

Duval County HUD Housing and Code Enforcement Assessment

Public Opinion Research Laboratory
University of North Florida

A Report for Jacksonville Area Legal Aid



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UNF Public Opinion Research Laboratory

Summary:

The Public Opinion Research Laboratory at the University of North Florida, on behalf of the Jacksonville Area Legal Aid, Inc., conducted an analysis of the City of Jacksonville's Municipal Code Compliance Division (MCCD) current policy that prevents the MCCD from inspecting and enforcing violations in HUD properties. The U.S. Department of Housing and Urban Development (HUD) oversees a variety of housing related programs, but their Section 8 Project-Based Rental Assistance (PBRA) and public housing programs are the focus of this study.

This report uses United States Census Block level data to assess variation in the MCCD complaint data between areas with HUD housing, specifically PBRA and public housing, and areas without HUD housing. We provide evidence that shows PBRA and public housing is located in census blocks that are predominately populated with black residents and that those census blocks are significantly more likely to have residential municipal code complaints than census blocks without HUD housing. The MCCD has instituted a policy of non-enforcement of residential complaints and violations in HUD housing that has a disparate impact on black residents living in HUD housing in Jacksonville.

Introduction

The U.S. Department of Housing and Urban Development was formed in 1965, with a stated mission “to create strong, sustainable, inclusive communities and quality affordable homes for all” (U.S. Department of Housing and Development). HUD oversees a variety of housing related programs, but their PBRA program and public housing program are of primary interest in this report. The PBRA program “was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities” (U.S. Department of Housing and Development). HUD housing varies from single-family homes to multi-family apartment complexes (U.S. Department of Housing and Development). About 3,300 local housing agencies manage public housing units for around 1.2 million households nationally (U.S. Department of Housing and Development). In Jacksonville, the Jacksonville Housing Authority is responsible for public housing.

The PBRA program was designed to assist “low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market” (U.S. Department of Housing and Development), theoretically giving low-income individuals more choice about where to live. Through this program, a family pays a percentage of their monthly income toward rent and HUD provides a subsidy to the owner of the property to cover the difference. HUD provides funding to cover the cost of the subsidies as well as administrative components. For the purposes of this project, a ‘HUD’ property is a property that has a PBRA housing contract or public housing that is operated by the JHA. In this report, PBRA properties are identified by the type property: family, elderly, disabled or public housing operated by JHA.

Jacksonville's MCCD is responsible for enforcing residential violations in the municipal code, “the Municipal Code Compliance Division enforces property maintenance, safety, and zoning codes, which affect the quality of life in Jacksonville. These laws address property nuisance, unsafe structures, residential/commercial minimum building standards, zoning...” (City of Jacksonville Municipal Code Compliance Division 2017). However, current policy prevents the MCCD from inspecting and enforcing violations in HUD properties. Since neighborhoods and census blocks tend to be demographically homogenous and racially segregated, especially in southern cities (Gotham 2002), and the City of Jacksonville does not investigate complaints in HUD properties, this report uses census block data to assess the impact of residential violations in these neglected communities.

This report evaluates the racial composition, presence/absence of HUD housing, and presence/absence of municipal code compliance complaints in 10,720 Jacksonville, Florida census blocks between January 1 and June 30, 2016. This time frame includes 2,746 residential violation cases from the MCCD in

Jacksonville, Florida. Of these 10,720 blocks, 9,106 blocks did not have any recorded complaints in this time period, while 1,614 blocks had at least one recorded complaint. The number of complaints per block ranged from 0 to 18 complaints and averaged 0.23 complaints per census block for this six-month period.

The 10,720 census blocks averaged 81 people per block with a population that was 32.67% black, though this masks the reality of continued dramatic segregation in Jacksonville. The racial composition of blocks with and without identified HUD housing was significantly different, blocks with HUD properties skew toward a higher percentage of black residents. Blocks without identified HUD housing averaged 32.5% black, a proportion almost identical to the average black population for the 10,720 census blocks in general (32.7%). In blocks where a HUD property was present, an average of 59% of the population was black. In addition, while roughly 30% of census blocks had essentially 0% black residents, only a single block containing a Family HUD property was less than 28% black. More than 70% of blocks with a Family HUD or public housing property contained populations that were between 60-100% black.

Blocks with no identified HUD housing averaged 0.22 complaints per block over the six-month period while blocks with identified HUD housing averaged 0.93 complaints per block. Only 15% of blocks with no identified HUD housing had at least one complaint in this period, while 41% of blocks with identified HUD housing had at least one complaint. Overall, the data presented here demonstrates that HUD properties, specifically Family HUD, Disabled HUD and public housing properties, are in census blocks with a much higher proportion of black residents than average, and that these blocks are significantly more likely to have had at least one residential violation complaint in the six-month period, as well as a higher average number of complaints per census block. This remains true, even though the MCCD does not take complaints in HUD housing. Since census blocks tend to be relatively small, the fact that these areas still have a disproportionately high number of complaints, suggests that if the HUD housing complaints were included, the difference between HUD and non-HUD census blocks would be even greater.

U.S. Census Block Data

Census blocks are the “smallest geographical unit for which the Census Bureau tabulates 100-percent data” (United States Census Bureau). A given state is broken up into counties, which are then broken up into census tracts, which are divided into census block groups and then finally into individual census blocks (United States Census Bureau). Census blocks often, though not always, correspond to actual city blocks (United States Census Bureau). This project utilized census block data from 2010, the most recent census block data available. This project was inspired by a concern about whether the City of Jacksonville should be conducting code enforcement for HUD properties in Jacksonville, and thereby excludes the surrounding Beaches (Jacksonville, Neptune and Atlantic Beaches) and Baldwin areas. Additionally, unpopulated census blocks as of 2010 were also removed, leading to a total of 10,720 census blocks. In Table 1, these 10,720 census blocks had a mean population of 81 people and ranged in population from 1 person to 3,740 people. Although it is likely that the populations of these census blocks have shifted at least slightly since 2010, the above figures are the most recent data currently available.

Table 1. U.S. Census Block Population

Variable	Observed	Mean	Std. Deviation	Minimum	Maximum
Census Block	10,720	80.62	185.42	1	3,740

Census block data was used for this project in part because corresponding data on race is available. For the purposes of this project, the demographic categories ‘black’ and ‘white’ are most significant, largely due to the history of intentional and state-enforced segregation based on these demographic categories in the United States (see Rothstein 2014) and due to the continued prevalence of race-based housing segregation (Squires and Kubrin 2005). These patterns of segregation are evident in Jacksonville as well.

Jacksonville's black population had a dissimilarity statistic¹ of 53.9% in 2000 and 53.1% in 2010, meaning that in 2010 53.1% of the black population would have needed to move to another census tract for the black population to be as evenly distributed as non-Hispanic whites. By contrast, the Hispanic population had a dissimilarity score of 27.7% in 2010 and non-Hispanic Asian/Pacific Islanders had a dissimilarity score of 37.5%. "Isolation" is defined as the average proportion of neighbors that are a given race for the average neighborhood where individuals of that race live. In 2000, black isolation was 50.7%, decreasing only slightly to 47.0% in 2010. For comparison, Hispanics had an isolation score of 9.0% in 2010 and non-Hispanic Asian/Pacific Islanders had an isolation score of 6.7% in 2010. The only group with a higher isolation score than non-Hispanic blacks was non-Hispanic whites, with a score of 74.0% in 2010 (Institute for Child, Youth and Family Policy, 2017). The relative stability of segregation and isolation measures for the black population between 2000 and 2010 provides additional support for utilizing 2010 data in 2017.

Not only is housing still segregated, but also black Americans are still concentrated in high-poverty areas and disproportionately lack access to quality housing. Public housing typifies this type of housing segregation, and solutions to it are complicated and difficult to implement (Turner, Popkin and Rawlings 2009). Jacksonville, Florida is no different than the rest of the country. Specifically, 36.1% of the Non-Hispanic black population lived in high poverty neighborhoods in 2000, in contrast to 3.3% of non-Hispanic whites, 5.1% of Hispanics, and 2.3% of Non-Hispanic Asian/Pacific Islanders (Diversity Data 2017). In 2000, 6.3% of Non-Hispanic blacks lived in very high poverty neighborhoods, while less than 1% of Non-Hispanic whites, Hispanics, and non-Hispanic Asian/Pacific Islanders lived in very high poverty neighborhoods (Diversity Data 2017). Non-Hispanic blacks in Jacksonville also had the highest rates for exposure to neighborhoods with crowded housing, exposure to neighborhoods with households receiving public assistance income, exposure to neighborhood poverty, and exposure to neighborhood unemployment in 2000 (Institute for Child, Youth and Family Policy, 2017).

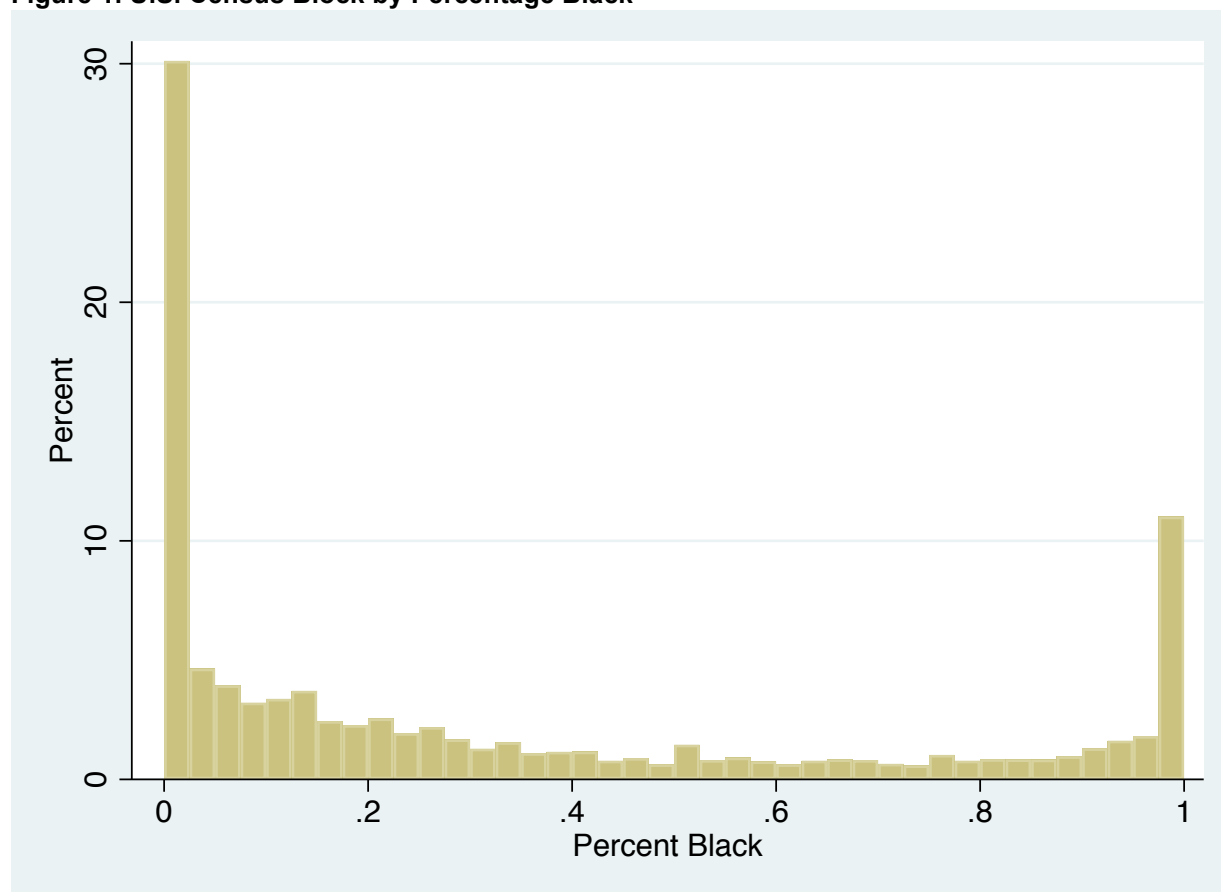
Table 2 and Figure 1 below demonstrate the racial makeup of the 2010 City of Jacksonville census blocks utilized here. Thirty percent of these blocks have a population that is 0% black, while over 10% of blocks have a population that is nearly 100% black. Much smaller percentages of census blocks have a population with a more moderate percentage of black residents. This demonstrates the enduring race-based segregation of census blocks in Jacksonville, Florida. While the average percentage of black residents for these census blocks is 32.7%, this statistic is less meaningful in light of such dramatic segregation.

Table 2. U.S. Census blocks Percentage Black

Variable	Observed	Mean	Std. Deviation	Minimum	Maximum
Census Block	10,720	0.33	0.37	0	1

¹ A 'dissimilarity index' is a measure of geographic association (see Duncan and Duncan 1955).

Figure 1. U.S. Census Block by Percentage Black



Complaint Data

For the purposes of this project, 'complaints' were used as a proxy for code violations. This choice was again based on data availability. The PORL put in a public records request to the MCCC in Jacksonville for case summaries of Residential Violation cases from January 1 to June 30, 2016. In this period, there were 2,746 cases. The specific details of each municipal code dealing with these complaints is available online via the City of Jacksonville, Florida (City of Jacksonville 2017).

It is worth emphasizing that potential complaints/violations from residents of HUD properties are not captured, as the City of Jacksonville does not currently enforce code violations at HUD properties. Potential complaints/violations from residents of JHA public housing are also not represented, as the City of Jacksonville does not conduct enforcement in those properties. As a result, in census blocks where HUD and/or JHA properties exist, complaints are very likely underestimating potential violations.

Tables 3 and 4 illustrate that, of the 10,720 census blocks, 9,106 blocks did not have any recorded complaints in this six-month period, while 1,614 blocks had at least one recorded complaint. The number of complaints per block ranged from 0 to 18 complaints. A total of 1,198 blocks had a single complaint, 244 blocks had two complaints, and 102 blocks had three complaints. Thirty blocks had four complaints and 13 had five complaints. Six blocks had six complaints, 5 blocks had seven complaints, and 5 blocks had nine complaints. Only four blocks had more than ten complaints. Census blocks averaged 0.23 complaints per block.

Table 3. Number of Complaints per U.S. Census Block

# of complaints	Frequency	Percent	Cumulative Percent
0	9,106	84.94	84.94
1	1,198	11.18	96.12
2	244	2.28	98.40
3	102	0.95	99.35
4	30	0.28	99.63
5	13	0.12	99.75
6	6	0.06	99.80
7	5	0.05	99.85
8	7	0.07	99.92
9	5	0.05	99.96
12	1	0.01	99.97
16	1	0.01	99.97
17	1	0.01	99.99
18	1	0.01	100.00
Total	10,720	100.00	100.00

Table 4. Mean Number of Complaints per U.S. Census Block

Mean Estimation	Mean	Std. Error	95% Confidence Interval	
Complaints	.225	.01	.21	.24

HUD Properties

HUD properties were identified in 71 of the 10,720 census blocks represented here. As can be seen in Table 5, 4 blocks contained Disabled HUD housing, 18 contained Elderly HUD housing, 32 contained Family HUD housing and 17 contained public housing (listed as JHA) for a total of 71 different census blocks with some form of HUD present. There were several census blocks that had multiple HUD properties within them. If a block had a combination of Elderly/Family HUD housing or Disabled/Family HUD housing, it was classed as Family HUD housing, and if a block had Disabled/Elderly housing it was classified as Disabled.

Table 5. Frequency of HUD and Other Types of Public Housing

Type of HUD Property within Census Block	Frequency	Percent	Cumulative
Disabled	4	7.04	7.04
Elderly	18	23.94	30.99
Family	32	45.07	76.06
JHA	17	23.94	100.00
Total	71	100.00	100.00

Demographics

Racial composition was assessed by looking at what percentage of a given census block's residents were black. As shown in Table 6, blocks where no HUD housing was identified, the average percent black was 32%, very similar to the average for Jacksonville census blocks overall (33%). In blocks where a HUD property was present, the average percent black was 59%. Based on the data analysis performed, it can be stated with 95% confidence that the percent black for a census block without HUD housing will be between 32% and 33%, while it can be stated with 95% confidence that a block with HUD housing will be

between 52% black and 66% black. The difference between these two estimates is statistically significant at the 95% confidence level.

Table 6. Average Percent Black by Property

Type of HUD Property within Census Block	Mean	Std. Error	95% Confidence Interval
All Census Blocks	0.33	0.00	0.32 – 0.33
No HUD Property	0.32	0.00	0.32 – 0.33
Any HUD Property	0.59	0.04	0.52 – 0.66
PBRA Property	0.58	0.04	0.50 – 0.67
JHA Property	0.62	0.07	0.47 – 0.76

Racial composition of blocks was evaluated in conjunction with the specific type of HUD housing present in Tables 7 and 8. The average percent black for a block with Disabled HUD housing was 59%, the average for blocks with Elderly HUD housing was 33% black, and the average for blocks with Family HUD housing was 72% black. Census blocks with public housing were 62% black on average. Based on the data analysis performed, it can be stated with 95% confidence that a block with Family HUD housing will have between 63% black residents and 80% black residents. It can be stated with 95% confidence that a block with Elderly HUD housing will be between 19% and 48% black. This difference is statistically significant at the 95% confidence level. As a result of the Elderly HUD housing varying so dramatically from Family HUD census blocks, the report will describe data analyses both including and excluding blocks with Elderly HUD housing. It can be stated with 95% confidence that a block with Disabled HUD housing will be between 39% and 78% black. The differences between blocks with Disabled HUD housing and blocks with Elderly HUD housing and Family HUD housing are not statistically significant. The larger confidence interval is due to a much smaller number of cases identified in this category. When Elderly HUD housing is excluded, the average percent black for all blocks where a HUD property has been identified rises to nearly 70%.

Table 7. Average Percent Black by Public Housing Type

Type of HUD Property within Census Block	Mean	Std. Error	95% Confidence Interval
Disabled	0.59	0.10	0.39 – 0.78
Elderly	0.33	0.07	0.19 – 0.48
Family	0.72	0.04	0.63 – 0.80
JHA	0.62	0.07	0.47 – 0.76

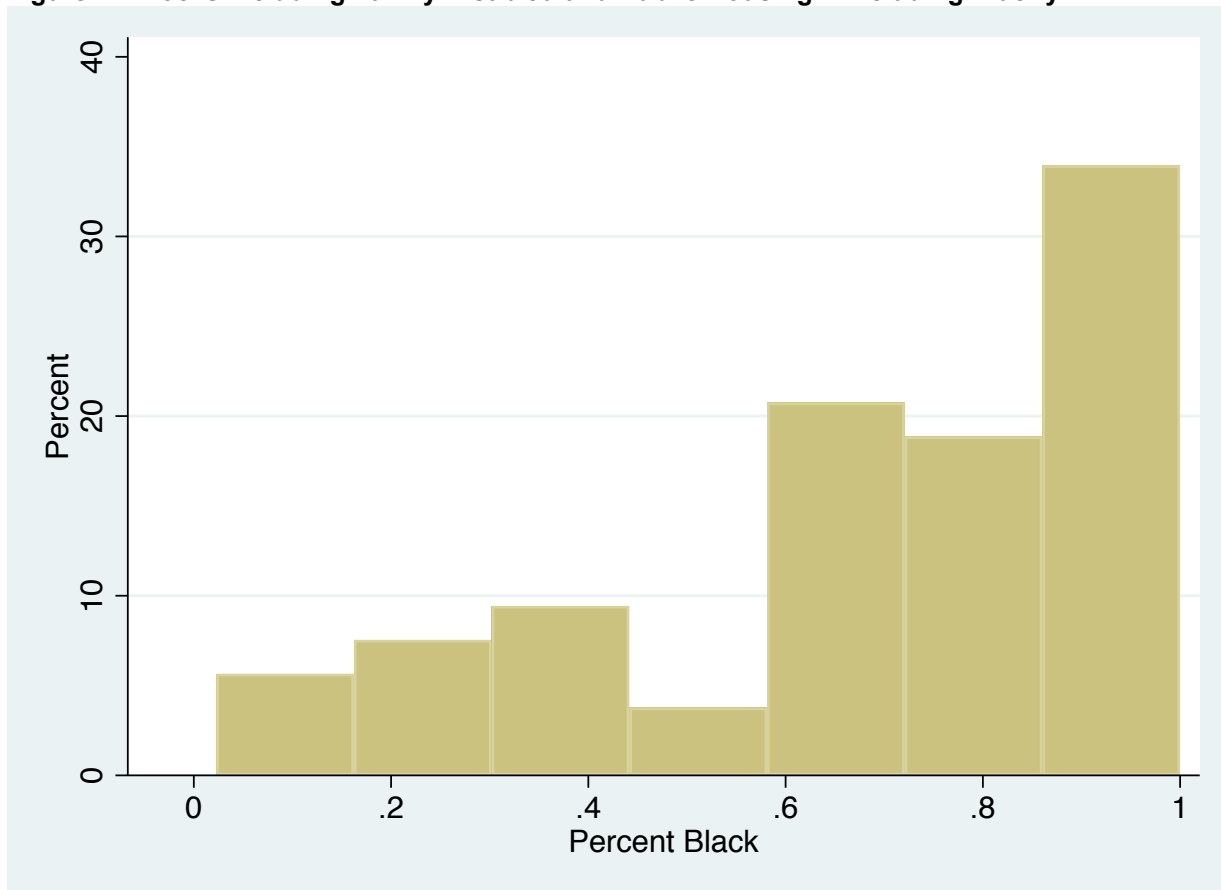
Table 8. Average Percent Black by Property Excluding Elderly Housing Type

Type of HUD Property within Census Block	Mean	Std. Error	95% Confidence Interval
All Census Blocks	0.33	0.00	0.32 – 0.33
No HUD Property	0.32	0.00	0.32 – 0.33
PBRA Property	0.70	0.04	0.62 – 0.78
JHA Property	0.62	0.07	0.47 – 0.76
Any HUD Property	0.68	0.04	0.60 – 0.75

*Excluding Elderly Housing

The distribution of blocks where HUD housing is present, excluding Elderly HUD housing, is presented below. As illustrated in Figure 2, more than half of the blocks where Family, Disabled or public housing is present are between 70% and 100% black. Unlike the initial histogram of Jacksonville census blocks in general, where 30% of blocks contained essentially no black residents, 0% of census blocks where Family or Disabled HUD housing exists have 0% black residents.

Figure 2. Blocks Including Family/Disabled and Public Housing - Excluding Elderly



Complaints in HUD Blocks

For blocks with no identified HUD housing, the average number of complaints during the 6-month period was 0.22, while census blocks with a HUD property averaged 1 complaint per block. Based on the data analysis performed, it can be stated with 95% confidence that a block without identified HUD housing will have between .21 and .23 complaints for this period, while for blocks with a HUD property present it can be stated with 95% confidence that a given block will have between .42 and 1.58 complaints for this period. This difference is statistically significant. When blocks with Elderly HUD housing were excluded, the average number of complaints for other blocks with HUD housing present increased to 1.09. Census blocks with JHA properties present average 1.24 complaints per block, however, with so few cases and a large variation in complaint numbers among those properties, the 95% confidence interval ranges from more than 3 complaints to a negative number – a non-possible outcome.

Table 9. Complaints by Property

Type of HUD Property within Census Block	Mean	Std. Error	95% Confidence Interval
No HUD Property	0.22	0.01	0.21 – 0.23
PRBA Property	0.93	0.27	0.40 – 1.45
JHA Property	1.24	0.93	-0.57 – 3.06
Any HUD Property	1.00	0.30	0.42 – 1.58

Data analysis was also performed to assess how likely complaints were to exist at all in HUD (including Elderly) vs non-HUD blocks. This provides a check to ensure that outliers (such as the few blocks with upwards of 10 complaints) are not skewing results. Based on this analysis, 15% of blocks with no HUD property had a recorded complaint, compared to 39% of blocks with a HUD property present as shown in Table 10. This difference is statistically significant.

Table 10. Complaints in Blocks by Property

Type of HUD Property within Census Block	Percentage of Census Blocks with a Complaints	Std. Error	95% Confidence Interval
No HUD Property	0.15	0.00	.014 – 0.16
PBRA Property	0.41	0.07	0.28 – 0.54
JHA Property	0.35	0.12	0.12 – 0.59
Any HUD Property	0.39	0.06	0.28 – 0.51

In Table 11, when blocks with Elderly HUD housing were excluded, 38% of blocks with other HUD housing had at least one recorded complaint. This difference is also statistically significant compared to the 15% of blocks with no HUD housing that had at least one complaint. The similarity here when including and excluding Elderly HUD housing is noteworthy because it demonstrates that the choice to include or exclude Elderly HUD housing does not substantially alter the pattern whereby blocks with HUD housing more often having complaints during this period.

Table 11. Complaints in Blocks by Property Excluding Elderly Housing*

Type of HUD Property within Census Block	Percentage of Census Blocks with a Complaints	Std. Error	95% Confidence Interval
No HUD Property	0.15	0.00	.014 – 0.16
PBRA Property	0.39	0.08	0.23 – 0.55
JHA Property	0.35	0.12	0.12 – 0.59
Any HUD Property	0.38	0.07	0.25 – 0.51

*Excluding Elderly HUD properties

The findings above consistently show that residential complaints are more likely to occur in census blocks that have HUD properties. This is striking, not only in the stark differences across the racial makeup of the census blocks with and without residential complaints, but also due to the City of Jacksonville's policy to not address municipal code complaints that originate from HUD properties. Since census blocks tend to be relatively small homogenous units (Myers 1954; Weiss, Ompad, Galea and Vlahov 2007) and the HUD property(ies) present in each census block are likely to take up a sizable portion of the population of a given Block, the estimates of complaints per census block are likely to dramatically underestimate the complaints and potential violations in a given block. Even though this research was unable to directly inspect HUD properties for residential violations of the municipal code, based on the available data and extant social science research, it is likely that these HUD properties are suffering from residential complaints and violations similar to those being reported within their census blocks. The residents of HUD housing in Jacksonville (whom are disproportionately black) are being overlooked by the MCCD.

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