



NOVEMBER 12, 2020

**HUD DATA ANALYSIS FOR
LATINOJUSTICE**

IN RE LATINOJUSTICE PRLDEF V. HUD

Prepared by Winston & Strawn LLP's Law and Empirical Analysis Group



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I. DATA SUMMARY

- The recently produced (more) detailed HUD data contains “snapshot” data for around 25,000 households during specific periods between 2017 and 2019. These snapshots do not account for households entering or exiting HUD housing programs. They are simply “snapshots” at one point in time. We believe this detailed data contains information only on “mixed” households (i.e., households with one ineligible member). This understanding is supported by HUD’s regulatory impact statement (<https://nlihc.org/sites/default/files/2019-05/Noncitizen-RIA-Final-April-15-2019.pdf>), which identified around 25,000 households that would be affected by the new proposed rule.
- Because mixed households by definition have one ineligible member under the new proposed rule, we cannot use the recently produced data to do any analyses of the number of mixed Hispanic households in HUD housing that would be affected by this new rule out of all Hispanic households in HUD housing programs. We would then want to compare that figure to the analogous figure for non-Hispanic households. Our inability to do this sort of analysis is because HUD failed to produce any detailed data on non-mixed households.
- In conclusion, we need to go back to HUD for additional data about all households. We will also likely want more detailed data from HUD on mixed households.

Please find in subsequent sections specific statistics across various categories.

II. HOUSEHOLDS

A. TOTAL HOUSEHOLDS

Description	DEC 2017	MAR 2018	JUN 2018	SEP 2018	DEC 2018	MAR 2019	JUN 2019
Total Number of Households	25,143	24,877	24,617	24,411	24,086	23,781	23,557

B. HISPANIC HOUSEHOLDS

Description	DEC 2017	MAR 2018	JUN 2018	SEP 2018	DEC 2018	MAR 2019	JUN 2019
Total Number of Hispanic households	22,203	21,853	21,495	21,175	20,758	20,564	20,535
Number of Hispanic households with ineligible members	22,189	21,839	21,482	21,159	20,742	20,550	20,517
Percentage of Hispanic households with ineligible members	99.9%	99.9%	99.9%	99.9%	99.9%	99.9%	99.9%
Average number of ineligible members in a Hispanic household	1.35	1.35	1.35	1.35	1.34	1.34	1.34

C. NON-HISPANIC HOUSEHOLDS

Description	DEC 2017	MAR 2018	JUN 2018	SEP 2018	DEC 2018	MAR 2019	JUN 2019
Total Number of Non-Hispanic Households	2,940	3,024	3,122	3,236	3,328	3,217	3,022
Number of Non-Hispanic households with ineligible members	2,924	3,009	3,106	3,219	3,308	3,198	3,000
Percentage of Non-Hispanic households with ineligible members	99.5%	99.5%	99.5%	99.5%	99.4%	99.4%	99.3%
Average number of ineligible members in a Non-Hispanic household	1.21	1.21	1.21	1.21	1.20	1.21	1.21

Table Notes:

- Hispanic household defined as households with at least one member classified as "Hispanic".
- Non-Hispanic household defined as all household members classified as "not Hispanic" or "unknown".
- Percentage of households with ineligible members defined as percentage of households with at least one ineligible member.
- Average number of ineligible members defined as average of the total number of ineligible members in each household.

III. INDIVIDUALS

A. TOTAL INDIVIDUALS

Description	DEC 2017	MAR 2018	JUN 2018	SEP 2018	DEC 2018	MAR 2019	JUN 2019
Total Number of Eligible Individuals	76,299	75,405	74,483	73,795	72,786	71,874	71,098
Total Number of Ineligible Individuals	31,935	31,559	31,216	30,828	30,322	29,883	29,551
Total Number of Other Individuals	147	178	176	163	142	120	119

B. HISPANIC INDIVIDUALS

Description	DEC 2017	MAR 2018	JUN 2018	SEP 2018	DEC 2018	MAR 2019	JUN 2019
Number of Hispanic Eligible Individuals	64,787	63,844	62,730	61,814	60,683	60,087	59,860
Percentage of Hispanic Eligible Individuals out of Total Eligible	84.9%	84.7%	84.2%	83.8%	83.4%	83.6%	84.2%
Number of Hispanic Ineligible Individuals	27,804	27,346	26,933	26,429	25,852	25,537	25,431
Percentage of Hispanic Ineligible Individuals out of Total Ineligible	87.1%	86.7%	86.3%	85.7%	85.3%	85.5%	86.1%
Number of Hispanic Other Individuals	51	46	43	37	33	35	37

C. NON-HISPANIC INDIVIDUALS

Description	DEC 2017	MAR 2018	JUN 2018	SEP 2018	DEC 2018	MAR 2019	JUN 2019
Number of Non-Hispanic Eligible Individuals	11,512	11,561	11,753	11,981	12,103	11,787	11,238
Number of Non-Hispanic Ineligible Individuals	4,131	4,213	4,283	4,399	4,470	4,346	4,120
Number of Non-Hispanic Other Individuals	96	132	133	126	109	85	82

Table Notes:

- Eligible individuals defined as members with citizenship codes: "EC=member is an eligible citizen" or "EN=member is an eligible noncitizen".
- Ineligible individuals defined as members with citizenship codes: "IC=ineligible child of a head of househo", "IP=Ineligible parent of a head of househ", or "IN=member is an ineligible noncitizen".
- Other individuals defined as members with citizenship codes: "Unknown", "PV=member eligibility status is pending", "XX=persons who are not counted under the".

IV. HEAD OF HOUSEHOLDS

A. HISPANIC HEAD OF HOUSEHOLDS

Description	DEC 2017	MAR 2018	JUN 2018	SEP 2018	DEC 2018	MAR 2019	JUN 2019
Total Number of Hispanic heads of households	21,379	21,041	20,695	20,381	19,994	19,826	19,795
Number of ineligible Hispanic heads of households	15,817	15,563	15,301	15,096	14,819	14,758	14,709
Percentage of ineligible Hispanic heads of households	74.0%	74.0%	73.9%	74.1%	74.1%	74.4%	74.3%

B. INELIGIBLE HEAD OF HOUSEHOLD AND ELIGIBLE CITIZEN MEMBER

Description	DEC 2017	MAR 2018	JUN 2018	SEP 2018	DEC 2018	MAR 2019	JUN 2019
Total Number of Households with Ineligible Head of Household and Eligible Citizen Member	17,580	17,363	17,161	17,002	16,781	16,627	16,479
Number of Hispanic Households with Ineligible Head of Household and Eligible Citizen Member	15,734	15,468	15,211	15,007	14,719	14,643	14,597
Percent of Hispanic Households with Ineligible Head of Household and Eligible Citizen Member	89.5%	89.1%	88.6%	88.3%	87.7%	88.1%	88.6%

C. HOUSEHOLDS WITH INELIGIBLE HEAD OF HOUSEHOLD

Description	DEC 2017	MAR 2018	JUN 2018	SEP 2018	DEC 2018	MAR 2019	JUN 2019
Total Number of Households with Ineligible Head of Household	17,688	17,482	17,276	17,117	16,910	16,770	16,618
Total Number of Ineligible Children of Heads of Households	103	100	97	93	83	87	86

Table Notes:

- Households with an eligible citizen member defined as households with at least one member classified as "EC=member is an eligible citizen".

V. APPENDIX: FULL DATA SUMMARY

Description	DEC 2017	MAR 2018	JUN 2018	SEP 2018	DEC 2018	MAR 2019	JUN 2019
Total Number of Households represented in the data	25,143	24,877	24,617	24,411	24,086	23,781	23,557
Total Number of Eligible Individuals	76,299	75,405	74,483	73,795	72,786	71,874	71,098
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Percentage of Hispanic Eligible Individuals	84.9%	84.7%	84.2%	83.8%	83.4%	83.6%	84.2%
Number of Non-Hispanic Eligible Individuals	11,512	11,561	11,753	11,981	12,103	11,787	11,238
Total Number of Ineligible Individuals	31,935	31,559	31,216	30,828	30,322	29,883	29,551
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Percentage of Hispanic Ineligible Individuals	87.1%	86.7%	86.3%	85.7%	85.3%	85.5%	86.1%
Number of Non-Hispanic Ineligible Individuals	4,131	4,213	4,283	4,399	4,470	4,346	4,120
Total Number of Other Individuals	147	178	176	163	142	120	119
Number of Hispanic Other Individuals	51	46	43	37	33	35	37
Number of Non-Hispanic Other Individuals	96	132	133	126	109	85	82
Total Number of Hispanic households	22,203	21,853	21,495	21,175	20,758	20,564	20,535
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