

Regional Analysis of Impediments to Fair Housing Choice

For Davenport, Moline and Rock Island

July 2019



REGIONAL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

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PROJECT PARTNERS

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Prepared for the Cities of Davenport, Iowa; Moline, Illinois; and Rock Island, Illinois by Mosaic Community Planning, LLC



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CHAPTER I.

INTRODUCTION

FAIR HOUSING PLANNING

Equal access to housing choice is crucial to America’s commitment to equality and opportunity for all. Title VIII of the United States Civil Rights Act of 1968, more commonly known as the Fair Housing Act, provides housing opportunity protection by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability. The U.S. Department of Housing and Urban Development (HUD), specifically HUD’s Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

Provisions to affirmatively further fair housing (AFFH) are basic long-standing components of HUD’s housing and community development programs. The AFFH requirements are derived from Section 808(e) (5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department’s housing and urban development programs in a manner to affirmatively further fair housing.¹

Local communities, such as Davenport, Moline, and Rock Island, that receive grant funds from HUD through its entitlement process satisfy this obligation by performing an “Analysis of Impediments to Fair Housing Choice” (AI). In an AI, local communities that receive HUD entitlement grant funds evaluate barriers to fair housing choice and develop and implement strategies and actions to overcome any identified impediments based on their individual histories, circumstances, and experiences. Through this process, local entitlement communities promote fair housing choices for all persons, including classes protected under the Fair Housing Act, and provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities.

HUD will presume that the grantee is meeting its obligation and certification to affirmatively further fair housing by taking actions that address the impediments, including:

- Analyzing and eliminating housing discrimination within the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to all persons to include those persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

¹ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 13)*. March 1996.

Through its Community Planning and Development (CPD) programs, HUD’s goal is to expand mobility and widen a person’s freedom of choice. The Department also requires Community Development Block Grant (CDBG) program grantees to document AFFH actions in the annual performance reports that are submitted to HUD.

In 2015, HUD published a final rule on Affirmatively Furthering Fair Housing, which outlined procedures that jurisdictions and public housing authorities who participate in HUD programs must take to promote access to fair housing and equal opportunity. This rule stipulated that grantees and housing authorities take meaningful actions to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected class characteristics. Under HUD’s final rule, grantees must take actions to:

- Address disparities in housing need;
- Replace segregated living patterns with integrated and balanced living patterns;
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity; and
- Foster and maintain compliance with civil rights and fair housing laws.

To assist grantees and housing authorities affirmatively further fair housing, HUD provided publicly-available data, maps, and an assessment tool to use to evaluate the state of fair housing within their communities and set locally-determined priorities and goals. HUD’s final rule mandated that most grantees begin submitting to HUD an assessment developed using this tool in 2017; however, a 2018 HUD notice withdrew the requirement to prepare such assessments.² A subsequent notice further required that grantees instead prepare and keep on file a current Analysis of Impediments to Fair Housing Choice.³ HUD’s data and maps remain available for grantees to use in preparing their AIs. For further information, please see HUD’s notices appended to this report.

The Cities of Davenport, Iowa; Moline, Illinois; and Rock Island, Illinois partnered to develop this Analysis of Impediments to Fair Housing Choice, which covers all three geographies. Mosaic Community Planning assisted the Cities with the preparation of this report. It follows the requirements in HUD’s *Fair Housing Planning Guide*. In several chapters, it incorporates maps and data developed by HUD for use by grantees in developing local fair housing studies.

DEFINITIONS

Affirmatively Further Fair Housing – In keeping with the latest proposed guidance from HUD, to Affirmatively Further Fair Housing Choice (AFFH) is to comply with “the 1968 Fair Housing Act’s obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing

² See Notice “*Affirmatively Furthering Fair Housing: Withdrawal of the Assessment Tool for Local Governments*” in Appendix IV.

³ See Notice “*Affirmatively Furthering Fair Housing (AFFH): Responsibility To Conduct Analysis of Impediments*” in Appendix IV.

policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability or familial status.”⁴

Fair Housing Choice - This Analysis of Impediments to Fair Housing Choice uses the following definition of “Fair Housing Choice”:

- The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

Impediments to Fair Housing Choice - As adapted from the HUD *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include:⁵

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

Protected Classes – The following definition of federally protected classes is used in this document:

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

Affordable – Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD’s definition:

- HUD defines as "affordable" housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs. For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners insurance, and any homeowners’ association fees.

DATA SOURCES

Decennial Census Data – Data collected by the Decennial Census for 2010 and 2000 is used in this Assessment (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- [2010 and 2000 Census Summary File 1 \(SF 1\)](#) – This dataset contains what is known as “100% data,” meaning that it contains the data collected from every household that participated in the

⁴ U.S. Department of Housing and Urban Development. “HUD Publishes New Proposed Rule on Affirmatively Furthering Fair Housing Choice.” Press Release No. 13-110. July 19, 2013.

⁵ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

Census and is not based on a representative sample of the population. Though this dataset is very broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.

- 2000 Census Summary File 3 (SF 3) – Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the “long form” Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value. The SF 3 dataset was discontinued for the 2010 Census, but many of the variables from SF 3 are included in the American Community Survey.

American Community Survey (ACS) – The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census’s SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- ACS Multi-Year Estimates – More current than Census 2010 data, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 1-year estimates. The 2012-2016 ACS 5-year estimates are used most often in this assessment.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) – HUD’s AFFH Data and Mapping Tool provides a series of online, interactive maps and data tables to assist grantees in preparing fair housing analyses. Topics covered include demographics and demographic trends; racial and ethnic segregation; housing problems, affordability, and tenure; locations of subsidized housing and Housing Choice Voucher use; and access to educational, employment, and transportation opportunities. This report uses HUD’s latest data and maps, AFFHT0004, which was released in November 2017. HUD’s source data includes the American Community Survey (ACS), Decennial Census / Brown Longitudinal Tract Database (BLTD), Comprehensive Housing Affordability Strategy (CHAS), Longitudinal Employer-Household Dynamics (LEHD), HUD’s Inventory Management System (IMS) / Public and Indian Housing (PIH) Information Center (PIC), and others. For a complete list of data sources, please see HUD’s Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation within Appendix IV of this report or available online at <https://www.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-AFFHT0004-November-2017.pdf>.

CHAPTER 2.

COMMUNITY PARTICIPATION PROCESS

COMMUNITY ENGAGEMENT OVERVIEW

An important component of the research process for this Analysis of Impediments to Fair Housing Choice involved gathering input regarding fair and affordable housing conditions, perceptions, and needs in the Davenport, Moline, and Rock Island region. The project team used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders, including public meetings, focus groups, interviews, and a communitywide survey.

Public Meetings

Three meetings open to the general public were held to inform the public about and gather information for the Analysis of Impediments to Fair Housing Choice. Each meeting began with a short presentation providing an overview of the AI followed by an interactive discussion of fair housing, neighborhood conditions, and community resources in the region. Spanish interpretation was provided at the Esperanza Center meeting in Moline and sign language interpretation was provide at the Roosevelt Community Center meeting in Davenport. A total of 22 members of the public attended one of the three meetings. Meeting dates, times, and locations are shown below:

Public Meeting #1	Public Meeting #2	Public Meeting #3
Tuesday, September 18, 2018 6:30 PM	Wednesday, Sept. 19, 2018 6:30 PM	Thursday, September 20, 2018 6:30 PM
Greater Antioch Baptist Church 929 14 th Street, Rock Island, IL	Roosevelt Community Center 1220 Minnie Ave, Davenport, IA	Esperanza Center 335 5 th Street, Moline, IL

Focus Groups

In addition to the public meetings, five focus groups were held to collect input from groups of residents and professionals with specific backgrounds and unique perspectives on fair housing. As with the public meetings, these groups typically began with an explanation of the Analysis of Impediments to Fair Housing Choice. The focus group leader then facilitated a discussion of fair and affordable housing needs, neighborhood conditions, and community resources in the region. In most cases, the AI project team worked with local agencies and organizations to host and promote the focus groups to their respective members or clients, resulting in a total of 27 participants. A list of the focus groups with their sponsoring organizations is provided below.

- Rock Island/Old Chicago Residents – coordinated by the Martin Luther King Jr. Community Center
- Latino Residents – coordinated by Global Floreciente
- Providers Serving People with Disabilities – coordinated by the City of Rock Island
- Immigrants and Refugees – coordinated by World Relief
- Public Services Professionals – coordinated by the City of Rock Island

Stakeholder Interviews

During the week of September 17, 2018, individual and small group stakeholder interviews were held in a variety of locations in Davenport, Moline, and Rock Island. For people unable to attend an in-person interview, telephone interviews were offered. Stakeholders were identified by the local government staff and represented a variety of viewpoints including fair housing/legal advocacy, housing, affordable housing, community development and planning, education, employment, homelessness, people with disabilities, and others.

Interview invitations were made by email and/or phone to a list of stakeholders compiled by the project team with input from staff at the Cities of Davenport, Moline, and Rock Island. Twenty people participated in an interview, and many other invitees participated in other manners, such as by attending a public meeting, hosting a focus group, or taking the community survey. Organizations from which one or more representatives participated in the development of this AI include:

- Arc of the Quad Cities
- Blackhawk Bank & Trust
- City of Davenport
- City of Moline
- City of Rock Island
- Community Housing Services
- Davenport Civil Rights Commission
- DeLaCerde House, Inc.
- Family Resources
- Floreciente Association
- Global Floreciente
- Grass Roots Organizing Works
- Greater Antioch Baptist Church
- Habitat for Humanity Quad Cities
- Heart of Hope
- Hilltop Village
- IH Mississippi Valley Credit Union
- Martin Luther King, Jr. Center
- Moline Community Development Corporation
- Quad Cities Chamber of Commerce
- Quad City Builders
- Quad City Realtors
- Rock Island Community Caring Conference
- Rock Island County Health Department
- Rock Island Fire Department
- Rock Island Housing Authority
- Rock Island Human Rights Commission
- Rock Island Township
- Scott County Housing Trust Fund
- South Rock Island Township
- St. Ambrose University
- The House
- United Way of the Quad Cities
- Vera French Housing
- Western Illinois Area Agency on Aging
- World Relief

Community Survey

The fourth method for obtaining community input was a 26-question survey available to the general public, including people living or working in the region, and other stakeholders. The survey was available online and in hard copy, in English and Spanish, from September through December 2018. Paper copies were available at the public meetings and other related events held throughout the study area. A total of 170 survey responses were received.

Public Comment Period and Hearings

The Cities of Davenport, Moline, and Rock Island held a 30-day public comment period from May 29 to June 28, 2019 and held a total of five public hearings to receive feedback on the draft Analysis of Impediments. Hearing dates, times, and locations are shown below:

Public Hearing #1

Thursday, June 6, 2019

5:00 PM

Moline City Hall

619 16 Street, Moline, IL 61265

Public Hearing #4

Wednesday, June 19, 2019

5:30 PM

Davenport City Hall

226 W. 4th Street, Davenport, IA 52801

Public Hearing #2

Monday, June 10, 2019

6:45 PM

Rock Island City Hall

1528 Third Avenue, Rock Island, IL 61201

Public Hearing #5

Monday, June 24, 2019

6:45 PM

Rock Island City Hall

1528 Third Avenue, Rock Island, IL 61201

Public Hearing #3

Monday, June 17, 2019

10:00 AM

Moline City Hall

619 16 Street, Moline, IL 61265

The City received two public comments, both via the project website. All comments received are included in Appendix I.

Publicity for Community Engagement Activities

A variety of approaches were used to advertise the AI planning process and related participation opportunities to as broad an audience as possible. Notice was given to residents through English and Spanish public notices in the *Dispatch-Argus*, on the project website (www.quadcitiesfairhousing.com), through a press release to local news outlets, and through flyers placed in public places. Flyers were also emailed to all stakeholder organizations invited to participate in interviews. In all meeting advertisements, information for anyone needing special accommodations was provided, but none were requested.

COMMUNITY ENGAGEMENT RESULTS

For the community participation process, the consulting team developed a standard question set for use in public meetings, focus groups, and interviews. Listed below are the summarized comments from interview participants and meeting/focus group attendees, as well as a summary of survey results. All input was considered in the development of this AI, and no comments or surveys were not accepted. Note that these comments do not necessarily reflect the views of the Cities of Davenport, Moline, or Rock Island.

Public Meetings and Focus Groups

1. What are the greatest fair and affordable housing needs in the community? Are there parts of the region that are particularly affected?
 - Affordability outside of just a handful of neighborhoods – need more affordable options throughout the region.
 - Poor housing conditions are an issue in some neighborhoods. If housing is affordable, it's not in good condition.
 - Income-restricted (Section 8) apartments in Davenport are very hard to find. More units that accept Section 8 are needed.
 - There is a gap between the very affordable rental units (\$350-\$600) and the very expensive downtown apartments. Rentals in the \$700 range don't turn over and are almost never available for rent.
 - Apartment conversions where a large house is divided into apartments often result in unsafe conditions.
 - There aren't enough opportunities for low and moderate income households to become homeowners; the 30 to 70% AMI income range is a big market if downpayment assistance is available.
 - More subsidized housing that reaches the 30% AMI or less income range; LIHTC development doesn't serve the lowest income groups. There is a long wait list for units and it's a long process to get from homelessness to housing.
 - Bedbugs and pests are an issue in low-income housing, especially in the older complexes.
 - There are slumlords who do not take care of their properties but people are afraid to report them because they don't want to lose their housing and have no other housing options. There's not landlord accountability. City may do an inspection, but doesn't have resources to relocate a family if the unit is not suitable to stay in.
 - Housing for seniors is needed – small, one-story affordable homes would do well with seniors but aren't available.
 - Landlords take advantage of people who have language barriers and few housing options. People with the fewest choices have to go to places that will work with them and then are afraid of retribution if they report wrongdoing.

2. What parts of the region are generally seen as areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?
 - In Rock Island, the neighborhoods "above the hill" are considered high opportunity, yet people also choose to be south of 7th Avenue. This is where there are immigrant and refugee populations with strong sense of community or multi-generational family ties to a house or neighborhood.
 - Cityline Plaza is near a pharmacy, grocery store, clinic, and church with Spanish-language services.
 - In the Quad Cities, it's more about which of the cities you live in than your specific neighborhood. A Moline resident wouldn't likely aspire to move to a different neighborhood in Moline, but to Bettendorf.
 - For urban living, Davenport is the best option, but it's difficult to travel across the river. Public transportation is not well-timed.

- People moving to downtown Davenport are bringing in new restaurants and more things to do.
 - There was a perception of crime in Rock Island, but that is shifting; Rock Island has done a good job of concentrating its efforts to clean up its neighborhoods.
 - Overall, houses sell pretty quickly in the area; where people want to live depends on what they can afford.
 - Transportation can be a barrier; buses don't run past 9 pm so it can be a barrier to where you can live and be able to get to work.
 - People like their neighborhoods because it's their homes; want to represent their neighborhood well and see it grow.
 - People stay in their neighborhoods because of the sense of community and knowing their neighbors.
 - Places near grocery stores and parks are popular. Safety is also important.
3. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices?
- Communication barriers may limit housing choices for people who aren't fluent in English. It makes it difficult to establish relationships with bankers, realtors, and employers and to navigate complex and formal processes.
 - Access to buses and support networks may impact housing choices for people, especially those who do not have personal transportation or for immigrants who aren't fluent in English.
 - Rock Island's Broadway neighborhood is a good area and historic but is run by a group of people with NIMBY attitudes disguised as concern for traffic and historic preservation.
 - Some landlords are unwilling to rent to refugees because of the language barrier. These tend to be small-scale landlords.
 - Real estate agents influence where people look for housing; it is subtle.
 - There may be a bias against people with children; landlords may have biases about who they think seems like a more stable tenant.
 - They may have the same options but there are financial barriers and knowledge barriers about how to rent, buy, and care for a home. It's a generational issue related to resources and information.
 - People in different situations may be looking to be near different resources (ex: jobs, laundromat, kids activities, etc.) and that impacts what your options are.
 - Want to think that people would have the same range of options, but not sure it is the case.
 - Doubt that options would be the same because of preconceived notions about people.
 - There are physical barriers in the housing stock that limit options for some people with disabilities. More ground level units are needed.
 - Within the same neighborhood, yes, but citywide, no. People make presumptions based on your last name.
 - Criminal histories can be a barrier to obtaining housing.
 - Contract for deed and rent to own situations take advantage of vulnerable groups. Homes are not maintained.

- Refugees and other immigrants can be taken advantage of in the for-sale market as well. Are home prices fair relative to resale values/home values? Many refugees buy homes in Moline or East Moline because of the good resale values.
 - There is a definite need for more education about financial management, homeownership, and similar topics. However, it is difficult to get high attendance at these types of events; people may not have time to go or not know what the benefits would be.
4. Are you aware of any housing discrimination? What are some things that can be done to overcome discrimination?
- Immigrant and refugee populations are most affected by discrimination.
 - There is some bias among real estate agents and steering does occur.
 - Some landlords will refuse to show an apartment to a Latino family – it happens.
 - There is some discrimination that happens “between the colors.” An African American family may be unwelcome in a Latino neighborhood, and vice versa.
 - Not aware of it, but may still be happening.
 - Yes, this happens especially with rentals but is hidden. Landlords don’t explicitly say it. Particularly with respect to race and sexual orientation.

5. Are people in the area segregated in where they live? What causes this segregation to occur?
- Immigrants may initially settle (or be settled) in the same neighborhood. These may be areas with more affordable housing.
 - Racial segregation follows economic differences.
 - Rock Island is segregated by the hill. Above the hill are expensive neighborhoods with bigger yards and a grocery store. Below the hill neighborhoods consist of lower-quality houses priced under \$100,000.
 - The area has improved a lot and is not as segregated as it used to be.
 - Fair Housing Act has made improvements compared to levels of segregation that existed before.
 - Historically, redlining segregated people. Now segregation is related to affordability. Pockets of places with more affordable housing tend to have higher shares of households of color.
 - Some older neighborhoods have flourished and are somewhat gentrified (ex: Broadway). Others remain highly economically segregated.
 - People have a sense of what areas they should be living in based on their economics. There are also perceptions between the three cities (ex: that crime is higher in Rock Island) that are not necessarily true.
6. Is there an adequate supply of housing that is accessible to people with disabilities?
- No, there are not enough options, especially for people under 60. There are many resources for seniors, but far fewer for younger age groups.
 - The Arc of the Quad Cities operates group homes.
 - People with disabilities are expected to “bring their own modifications.” Due to their age, houses in Rock Island are usually multi-story or split level with tiny bathrooms. Accessible options just aren’t very available.
 - There were a few ramp-building programs, but most are no longer operating. Ramps are limited in their utility anyway – they solve the problem of getting into a house but not getting around inside it.
 - Most modifications like ramps are more practical and easier to do for owner-occupied housing.
 - There is no partnership between the housing authorities and the service providers to serve tenants with disabilities. Attempts to establish partnerships never materialize.
 - In some communities, covenants restricting the number of unrelated individuals who can live together are imposed to prevent group homes from locating there.
 - People with disabilities are frequently renters and have to get their landlord’s permission to make modifications. Sometimes landlords won’t permit them or take months to reach a decision.
 - On the Illinois side of the river, there are lots of old, two-story houses that would require elevators which is cost prohibitive. New construction is more likely to have open floor plans and accessibility features, but Davenport gets most new construction activity; there’s less happening in Moline and Rock Island.
 - Overall, the region’s housing stock tends to be pretty old and thus is not accessible.
 - People with disabilities often do not want to leave public housing or Section 8 housing because, working with the housing authorities, requested accommodations are easier to get and the ADA is more enforceable.

- There's a need for more group homes, supportive housing, and assistance for people who want to live independently.
7. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?
- Prairie State Legal Services can help with fair housing issues and is good at fielding and referring complaints.
 - People need to report to the Rock Island Human Rights Commission so it will be followed-up on, but many people do not. Complaints they receive are usually related to employment. Investigation and enforcement mechanism is limited.
 - Davenport Civil Rights Commission.
 - HUD office.
 - NAACP.
 - For discrimination affecting a resident without legal status, Project NOW may be helpful.
 - Community Development Department.
 - Housing authority if it occurs at a housing authority property.
 - Within social service provider circles, the organizations and activities are well-known, but not to the general public. Social service agencies are probably the best organizations to get this information out to their clients.
8. Are public resources (e.g., parks, schools, roads, police and fire services, etc.) available evenly throughout all neighborhoods?
- Moline's allocation of public resources is reasonable. They make a good attempt to keep things even.
 - Accessing resources is hardest in Rock Island. Things like the bank, grocery store, and interstate are all further away.
 - Parks, police, and fire are all evenly provided. Public transit is "evenly bad", especially cross-river.
 - Public sector resources are provided evenly; it's the retail and private-sector resources that are not.
 - Schools have a disparity in reputation across the region, but there are not big quality differences in actuality. Moline and Rock Island's older facilities perform as well as Davenport's newer schools.
 - Park system is robust.
 - Fire and police services are strategically placed to reach all residents.
 - Sometimes the question is not so much about availability of police services but about the tone of them. Policing is not the same at the top of the hill in Rock Island as it is at the bottom.
 - There is a difference in schools. You can see it just by going into them. Resources like textbooks and other supplies are not as good as they used to be.
 - You can see differences between various neighborhoods in Davenport but some of this is related to how well people can afford to keep up their property.
 - There aren't grocery stores in walking distance, although there may be some smaller mom and pop grocers in the neighborhoods, the larger shopping area is up the hill.
 - Some neighborhoods lack sidewalks.

9. Is there anything we haven't discussed that you feel is important to our research?

- Homelessness is a need and the cities should be working to address homelessness and housing affordability while the homeless count is relatively low.
- Rental inspection programs are good. Rock Island has one, but Moline's is not strong. Too many Moline aldermen are landlords and don't want the accountability. Moline has a good code but more money is needed for enforcement versus just responding to complaints.
- Investors buy homes cheaply and then try to flip them or don't improve them. Neighborhood residents meanwhile aren't able to purchase them.
- Rock Island and Moline have affordability, but poorer housing stock and few new housing starts. Davenport has a larger housing affordability issue.
- The \$150-\$200,000 price range is where the market is not meeting existing demand levels.
- Community Reinvestment Act (CRA) should encourage more real investments in communities (ex: financial literacy classes, loans to certain income level households, etc.) versus smaller actions. There isn't much enforcement for fair lending at the federal level.
- Public housing authority rules can be restrictive, harsh, and unforgiving. But too soft is a problem too. An eviction from a public housing property results in being "blacklisted" from all other public housing properties.
- There's a need to refresh or rehab areas that have been lagging in investment and upkeep.
- Transit systems linking across the river take a long time and inhibit mobility throughout the region.
- The Quad Cities is fortunate to have a good amount of affordable housing and available jobs, but the quality of both can be improved.
- There's a need to further cultivate the relationship between the City of Rock Island and the school district to support educational attainment and meet students' diverse needs (ex: grandparents raising grandchildren on fixed incomes, families doubling up).

Stakeholder Interviews

1. What are the greatest fair and affordable housing needs in the community? Are there parts of the region that are particularly affected?

- Waiting lists for public and subsidized housing are long; for Section 8, the lists are even longer – up to two years.
- Low income housing can be found that is affordable and in good repair, but sometimes roaches and bed bugs are a problem.
- People have different definitions of affordable housing and housing that is considered "affordable" often doesn't serve lowest income groups.
- Criminal backgrounds, credit problems, or past history of lease violations are all barriers to accessing housing.
- 3+ bedroom apartments that are affordable – both single family homes and townhomes for large families.
- Redlining against and within Rock Island is occurring based on perceptions by Realtors and financial institutions of the city as less desirable than the other Quad Cities communities due to its racial demographics.
- Improve the maintenance of existing housing stock.

- Affordable housing is in less-safe areas, and there's not enough of it.
 - The region is lacking single-family inventory for first time homebuyers now ready to move up to their second homes – roughly the \$125,000 to \$250,000 market.
 - Need greater housing choice throughout the region.
 - Lack of housing for people under 60% AMI – it's just not being built.
 - Cost burden. Many people – renters and homeowners – are paying more than 50% of their incomes for housing.
 - Landlord accountability – you can tell just by looking if a home is owned or rented by an absentee landlord.
 - IL side of the river typically lags behind IA in single-family development, but Moline has a large amount of multifamily construction and housing is being built in all areas of the city.
 - New construction is difficult given building costs versus sales prices. Prices are higher in Bettendorf due to higher land costs. Sprinkler code in Rock Island increases building cost.
 - The housing stock in Moline is good but tired. Deferred maintenance takes its toll and houses can end up going to flippers and returned to the market as overpriced rentals.
 - Newer housing is needed in Moline; the aging housing stock is a challenge but there is little room to expand the city.
 - Davenport has done a good job at renovation but homes are not as affordable as Moline or Rock Island.
 - The most recent LIHTC projects are several years old because for-profit developers have trouble making affordable housing projects work. Downtown Davenport is seeing investment but in other parts of the city, developers are only at the table if there are lots of incentives.
 - LIHTC properties do not qualify students (per federal law) which shuts out a big group of people who could use this program.
 - There needs to be a collaborative conversation between City, developers/businesses, social service organizations, and the community. These groups have to be at the table together before they end up each in their own corners.
 - Need for temporary assistance to keep people in housing when they face an emergency and transitional housing/rapid rehousing, especially for families who cannot go to a shelter.
 - Assistance to help families in public housing move to market rate units or buy a home as their incomes increase.
2. What parts of the region are generally seen as areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?
- Bettendorf, Pleasant Valley, the Village of East Davenport, and LeClaire offer new schools, sports facilities, and lots of retail and shopping establishments.
 - There are good, walkable neighborhoods in downtown areas, but if you can afford the house, you probably cannot afford the rehabilitation costs.
 - Downtown Davenport is becoming an area of opportunity. In Downtown, people want amenities.
 - Northeast Davenport (north of 53rd Street) and rural Scott County. There has been a lot of growth in the area north of 53rd Street, including new retailers.
 - Up the hill in Davenport has good housing opportunities but is not as well-connected to services as other areas.

- McClellan Heights has a low crime rate, good architecture, beautiful river views, good schools, and a mixture of big and small homes.
 - Moline is popular because it's close to a lot of retail.
 - The perception is that the IA side of the river is better on safety, schools, and cost, although this is not necessarily true. There are tax differences but also differences in services.
 - Generally, the suburbs of the Quad Cities are the areas with greatest opportunity. Barriers to these neighborhoods are their lack of affordable housing as a result of the cities' failure to pass zoning regulations requiring a percentage of all new development to be designated as affordable.
 - Homewood, Villa Park, and Wildwood all are mature and stable neighborhoods with good aesthetics and access to opportunities. Low turnover plus higher housing costs may prevent some people from accessing housing in these areas.
 - Areas that people think of as having opportunity area also the areas that discriminate against people of color.
 - People that are transit-dependent are encouraged to look at routes before looking for housing. Transit tries to serve all multifamily but may not be able to if a developer builds further out.
 - Empty nesters may be looking for areas that are walkable and have single-level housing.
 - Where you want to live depends heavily on your situation, your needs, and what type of housing you're looking for. Public perception of schools impacts people choices. Davenport has great schools but this often isn't the perception compared to suburban districts.
3. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices?
- Steering by real estate agents can impact options and be a barrier. Businesses' relocation departments may also influence where people move; often tied to school district.
 - The lack of new housing construction in Moline and Rock Island limits individuals' ability to choose to live in new or higher-priced houses in this portion of the region.
 - Yes, people generally have the same range of options.
 - No, people don't have the same range of options because they don't have the same opportunities.
 - Options may be the same but there is a need to communicate what those options are. There are language barriers and people tend to chose from what they are familiar with. May not know all the areas that would be options.
 - Allowing that economic inconsistencies exist in what households can afford, people do have the same range of choices. Their preferences may differ, but available choices are the same.
 - Discrimination in employment leads to people of color holding poorer jobs and earning less, narrowing their range of housing choices. Similarly, discriminatory lending practices can lead to disparities in choice for people of color and female-headed households.
 - The issue would be differences in credit scores or criminal history. Fairly, or sometimes not, these will limit housing options for some groups. It could also impact ability to get utilities in their name.
 - For immigrants, language barriers and immigration status can be issues in obtaining housing.
 - Would like to say yes, but there are probably barriers other than income.

4. Are you aware of any housing discrimination? What are some things that can be done to overcome discrimination?
- Have not heard anyone complain of discrimination or issues with accommodating a disability.
 - Not aware of any.
 - People wouldn't say there is discrimination happening, but when you look data it's apparent that there is at least economic segregation (ex: school districts with very high rates of students with free and reduced lunches). Race is probably the most common basis for discrimination but a single mom with children may face barriers renting as well.
 - Training is needed for the individual cities' Human/Civil Rights Commissions to perform fair housing testing to address potential red-lining or discrimination in the real estate and lending industries.
 - Housing advertisements occasionally include language specifying "no kids," which is an often-overlooked discriminatory practice.
 - NIMBYism is strong in Davenport. There is a high protest rate leading to a large number of hearings.
 - Rent-to-own situations that seek to get around city's rental inspections end up exploiting people.
 - Lots of decision makers in Davenport are White and may not have equity issues on their radars, particularly related to development. There is a sense that any development is good development, but there should be a better approach.
5. Are people in the area segregated in where they live? What causes this segregation to occur?
- Yes, people are segregated, but the segregation is due to income differences.
 - Refugees and immigrants tend to congregate in certain areas.
 - Immigrants, especially Burmese and Africans, tend to establish in Rock Island because they already have family or friends there. This community helps them learn the language, navigate schools, and find their way around.
 - Segregation does occur. It is because people migrate together.
 - Pockets may exist by national origin or religion, but these have a role of protecting vulnerable populations from discrimination.
 - Moline is very diverse and many different languages are spoken in schools. There may be some segregation by income.
 - Florencia has a large Latino population. This happens by choice, but also due to economic factors – it is a neighborhood of the housing that is affordable and that landlords will rent to Latinos.
 - Latinos may approach a realtor and ask for help finding a home specifically in Florencia.
 - Davenport is very segregated; Rock Island used to be but is becoming less so in last several years.
 - The poor live in centralized neighborhoods while the rich more often live in the suburbs. Other demographic characteristics such as race and sexuality may follow a similar pattern. The lack of affirmative public policy from local governments to address this issue (i.e., zoning, sufficiently funding affordable housing, taxing McMansions) allows this segregation to exist.

- By shoring up infrastructure and reinvesting in communities, we can reduce the flight out of them which helps preserve their diversity. People leave an area not because its racial characteristics are changing, it's because of a perceived decrease in safety.
- Segregation persists because of apathy. Solutions exist but require social engineering that people will resist.
- Segregation does occur because people want to live near people they know.
- McClellan Heights may carry a perception of not being very open to diversity; Norwood Park is very open and is becoming more diverse; South of Locust has more African American residents; and West End has a significant Vietnamese and Hispanic population.
- Not really, there are many neighborhoods that are pretty diverse. In Moline and East Moline the Floreciente neighborhood has a relatively higher Latino population share.
- Segregation levels have improved. You still see pockets of neighborhoods that are not diverse but overall the area and schools have become more diverse.

6. Is there an adequate supply of housing that is accessible to people with disabilities?

- Challenges for people with disabilities probably exist. The city is hilly and there are often steps from the road to a home's front door.
- Housing design standards apply to newer homes, but those may not be affordable.
- Landlords frequently deny assistance animals required by people with disabilities.
- Davenport's is some of the oldest housing stock in the nation. Many single family homes were constructed without thought to any accessibility features. Because of the ADA, newer multifamily housing contains accessible units, but the ADA standards also increase development costs.
- There are some group homes operated out of large old homes in the region, but these are only serving the needs of people who are ambulatory.
- Moline has group homes that mostly fly under the radar. People don't know or recognize them as group homes.
- Moline's zoning ordinance has provisions related to accommodations, retrofitting, and group homes. Its rental housing inspection program has helped reduce community blight.
- Habitat for Humanity, Project NOW, and Rebuilding Together both have programs to build ramps or make home modifications for people with disabilities.
- CAPS (Certified Aging in Place Specialist) helps aging adults who want to stay in their homes make adjustments. Homes can be remodeled but is an issue of budget.
- In Moline, 90% of existing homes would need modifications to be accessible to people with disabilities.
- Curb-to-curb transportation service can be scheduled for people with disabilities, and regular transit routes are also ADA accessible.

7. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?

- The cities and civil rights commissions do this work, but there is a void with respect to consistency and messaging. People have so many means of communication available and you have to get the word out through all of them. It's expensive and difficult.

- Davenport Civil Rights Commission takes the lead on fair housing. Legal Aid and Prairie State Legal Services also provide some services. These resources aren't generally well-known among the general public though.
- Moline Human Rights Commission and Moline Housing Authority.
- No one in the Iowa side of the region is doing any fair housing services. Or if they are, people don't know about them.
- The Rock Island County Health Department does some fair housing education through its caseworkers to include affordable/accessible housing lists and referrals.
- The Quad City Area Realtor Association provides fair housing information through its continuing education offerings and ethics training.
- Quad City Housing Cluster.
- Legal Aid has fair housing information available online.
- World Relief and Global Communities may be able to help people or tell them who to contact.
- Davenport's Human Rights Commission holds block parties and outreach focused on children as a strategy for introducing fair housing information to families.
- For housing industry professionals, fair housing law and practices are thoroughly drilled in by internal education programs.
- Broader education efforts about fair housing and available housing programs are needed. Should be through churches, in multiple languages, radio station PSAs.

8. Are public resources (e.g., parks, schools, roads, police and fire services, etc.) available evenly throughout all neighborhoods?

- Yes, resources are distributed evenly.
- The cities all do a good job with resource distribution.
- Resource distribution is based on needs. Older communities may get more than their share, but they also need more.
- Davenport's central city is left behind as the City spreads its resources across less needy suburban neighborhoods with large, expensive homes. The central city needs focused investment.
- No, Davenport closed schools south of Locust.
- In Davenport, some neighborhoods are left out and don't receive their share of resources. Spending \$700,000 in CDBG funds on three homes is not equitable.
- Davenport has done a good job – parks are good.
- In Rock Island, the housing authority does a lot of work in the downtown, but the city itself does not.
- Code enforcement is selective in where it acts in Rock Island.
- The newer part of Moline is lacking in park space, and this has been identified in the Comprehensive Plan. Schools and churches in the area do have open space.
- Some resources are necessarily targeted. For example CDBG, can only be spent in certain areas depending on income levels.
- Neighborhoods aren't invested evenly relative to road repairs, but schools are generally invested in better.
- Discrepancy in transportation, especially for second and third shift workers.

- There are differences in the availability of funding for transportation between Iowa and Illinois and that leads to different service levels and operating hours. There used to be a loop service that connected the downtowns but grant funding for that has ended.

9. Is there anything we haven't discussed that you feel is important to our research?

- Community dialogue is needed to begin addressing these issues.
- In private-market affordable housing, lead paint can be an issue; this is less often a concern in public housing units.
- Inclusiveness must be part of any revitalization planning in the Quad Cities' downtowns.
- There is no programming to help people of color become homeowners.
- There is a big need for rapid rehousing assistance.
- Discriminatory employment practices, such as screening for low credit scores or arrest records, are facially neutral but have a strong negative effect on the level of opportunity available to people of color.
- More home improvement loans are needed, along with targeted redevelopment versus a scattered approach.
- Humility of Mary and True North in Dubuque should be models for housing for the homeless, supportive housing, and housing redevelopment.
- Programs designed to help people need to be welcoming.
- Big Table is a encourage interaction among diverse group of residents. About 5,000 people participated in 500 locations.

Community Survey

The following includes a sample of questions and responses from the community survey. Complete results are provided as an appendix to this report.

Participant Demographics

- Of the 170 people who participated in the survey, the majority live in a Davenport zip code (60%). Nearly one-quarter live in a Rock Island zip codes (23%) and about 8% live in a Moline zip code. The remaining 9% live in other areas in the region.
- A little over half of survey takers (57%) are between the ages of 25 and 44. People age 45 to 61 make up nearly one-third of participants (31%) and seniors (age 62 and over) comprise 10%.
- Survey participants' incomes were fairly evenly distributed. About 22% of respondents have an annual household income under \$25,000 and 20% have incomes from \$25,000 to \$49,999. Another one-fifth of respondents have incomes between \$50,000 and \$74,999 and 15% have incomes from \$75,000 to \$99,999. The remaining 22% have incomes of \$100,000 or more.
- The majority of survey respondents are White (78%). Black participants make up 16% of survey takers, Latinos comprise 7%, and people of other or multiple races constitute 5%.
- Of the 170 participants, 15 (9%) regularly speak a language other than English at home. Spanish and French are the most common of these languages.

- About 28% of survey takers have a member of their household with a disability.
- A little more than half of respondents own their home (57%), while one-third are renters (33%). The remaining 11% live with a relative or friend or have other living situations. Eight respondents (or about 5%) live in public housing or receive Section 8 rental assistance.

Participants' Thoughts about their Neighborhoods

- When asked how satisfied they are with the neighborhood where they live, the vast majority are “very satisfied” (41%) or “somewhat satisfied” (47%). Twelve percent are either “not very satisfied” (10%) or “not at all satisfied” (2%).
- What survey takers like best about their neighborhoods is represented in the word cloud to the right. Many responses mentioned safety, quiet, friendly neighbors, proximity to parks and stores, and well-maintained homes.
- A little over half of respondents (56%) did not express an interest in moving to another area in the region. Of the 65 survey takers who would like to move (44%), the most common areas of interest are Bettendorf and rural areas or smaller towns outside of the cities. Downtown Davenport, Moline, and Rock Island were also mentioned frequently, as was East Davenport.



- Most participants reported having access to community resources including quality public schools, places to shop and bank, parks and trails, and housing they can afford. In contrast, reliable bus service and access to areas with jobs they could get are less available.
- When asked to select what types of housing are need in Davenport, Moline, and Rock Island, “housing that people with lower incomes can afford” and “first time homebuyer assistance” were the most common selections; about 58% of respondents think a lot more of this type of housing is needed. “Housing that accepts Section 8 vouchers” was also a popular selection. Respondents also commented on the need for improved housing condition and quality, particularly for rental units.
- The majority of respondents think services like fire and police protection, garbage collection, and parks and trails are provided evenly throughout Davenport, Moline, and Rock Island. Conversely, more than 50% of survey takers think grocery stores, property maintenance, roads and sidewalks, and schools are not evenly provided.

Participants' Thoughts about Fair Housing

- About one-half of survey participants (49%) report understanding their fair housing rights, and another 37% somewhat understand their fair housing rights. Most people know or somewhat know

here to file a fair housing complaint (59%). Only a small share of participants do not understand their fair housing rights (14%), but a more sizeable share do not know where to file a fair housing complaint (42%).

- Twenty-five respondents (17%) report that they experienced housing discrimination in Davenport, Moline, or Rock Island. About three-quarters of these respondents were discriminated against by a landlord or property manager and 28% were discriminated against by a real estate agent. Common bases for discrimination include race (60% of instances reported in this survey), familial status (39%), and disability (35%).
- Of the 25 respondents who experienced housing discrimination, the large majority (92%) did not file a report. Common reasons for not reporting include not knowing what good it would do (identified by 63% of respondents), not knowing where to file (38%), and fear of retaliation (33%).
- Survey participants were asked whether they think housing discrimination is an issue in Davenport, Moline, and Rock Island. Of the respondents who live in a Davenport zip code (85 respondents), 30% said housing discrimination is an issue, and just over one-third (35%) said it may be an issue. Nine percent (9%) said housing discrimination is not an issue, and the remaining 25% do not know whether it is.

Of the respondents who live in a Moline zip code (11 respondents), 36% said housing discrimination is an issue, 45% said it may be an issue, and the remaining 18% didn't know. Of the respondents who live in a Rock Island zip code (36 respondents), 39% said housing discrimination is an issue, 28% said it may be an issue, 11% said it is not an issue, and the remaining 22% didn't know.

- Asked to select any factors that are barriers to fair housing in Davenport, Moline, and Rock Island, survey participants most commonly identified the following impediments:

Respondents who live in a Davenport Zip Code (79 respondents)

- Neighborhoods that need revitalization and new investment (65%)
- Not enough affordable rental housing for large families (61%)
- Displacement of residents due to rising housing costs (54%)
- Discrimination by landlords or rental agents (53%)
- Not enough affordable rental housing for individuals (53%)

Respondents who live in a Moline Zip Code (11 respondents)

- Discrimination by landlords or rental agents (82%)
- Not enough affordable rental housing for individuals (73%)
- Community opposition to affordable housing (64%)
- Displacement of residents due to rising housing costs (64%)
- Lack of housing options for people with disabilities (64%)
- Limited access to good schools (64%)

Respondents who live in a Rock Island Zip Code (35 respondents)

- Neighborhoods that need revitalization and new investment (74%)
- Discrimination by landlords or rental agents (60%)
- Displacement of residents due to rising housing costs (60%)
- Not enough affordable rental housing for individuals (60%)
- Not enough affordable rental housing for small families (57%)

CHAPTER 3.

SOCIOECONOMIC PROFILE

DEMOGRAPHIC PROFILE

The three-city study area is home to an estimated 183,472 residents according to the 2013-2017 5-Year American Community Survey (ACS). The most populous of the three communities, Davenport accounts for 56% of that population, or 102,268 residents. Moline and Rock Island are somewhat similar in size, with populations of 42,644 and 38,560, respectively.

Since 2000, both Moline and Rock Island lost about 3% of their population. In contrast, Davenport added residents, growing by about 4%. Population in the Davenport-Moline-Rock Island Metropolitan Statistical Area (MSA), which includes Scott County in Iowa and Rock Island, Henry, and Mercer Counties in Illinois, grew by about 2% since 2000 to reach 383,141 residents per the most recent ACS estimate. This section more closely examines population characteristics and trends in Davenport, Moline, Rock Island, and the region using Census and ACS data provided in Tables 1 and 2.

Race/Ethnicity

About four-fifths of residents in the Davenport-Moline-Rock Island MSA are non-Hispanic White (81.9%). Black and Latino residents make up similar population shares at 6.6% and 7.6%, respectively. No other population segment comprises more than 2% of the population in the region. Davenport, Moline, and Rock Island, however, are somewhat more diverse than the region as a whole.

In Davenport, White residents make up three-quarters of the population (76.7%), Black residents comprise 10.5%, and Latinos constitute 7.3%. Moline has a similar White population share at 75.4%, but Hispanic residents make up the second largest population segment there at 15.6%, followed by Black residents at 4.8%. Of the three cities, Rock Island is most diverse. About two-thirds of its population is White (67.8%), 18.0% is Black, and 9.4% is Hispanic.

In all three cities, Asian, Native American, other races, and people of multiple races make up relatively small population shares. The Asian population share ranges from 1.8% in Rock Island to 2.3% in Moline; multiple race residents range from 1.7% of the population in Moline to 3.0% in Davenport. No other racial or ethnic groups comprises more than 0.3% of the population in any of the three cities.

From 1990 to 2010, all three cities and the region became more diverse. The MSA lost about 21,000 White residents during the 20-year period, and each city saw a decline in its White population, both numerically and as a share of the population. Declines in population share were 10.5 percentage points in Davenport, 10.6 percentage points in Rock Island, and 14.8 percentage points in Moline.

With the exception of non-Hispanic White residents, all other population segments saw an increase in population and population share from 1990 to 2010 in all three cities and the region. The number of Latino

residents more than doubled in each city; increases in population share were 3.9 percentage points in Davenport, 5.6 percentage points in Rock Island, and 8.8 percentage points in Moline.

African American population growth rates varied more by geography. Black residents make up a larger share of Rock Island's population (20%) compared to the other cities, but Rock Island's Black population also grew more slowly, at a modest 13% from 1990 to 2010. Davenport's Black population saw a more substantial increase at 70%, comprising 12.7% of the city's total resident by 2010. Moline's African American population grew more rapidly than that of the other cities between 1990 and 2010, increasing by 220% but, by 2010, making up just 5.9% of the city's population.

Although Asian and Native American populations more than doubled in each geography of these two decades, they remained low as overall shares of the population.

National Origin

Foreign-born residents make up a small but significant share (4.7%) of the Davenport-Moline-Rock Island MSA. Looking by city, shares vary considerably. In Moline, nearly one-in-ten residents is foreign-born (9.7%). This figure is slightly lower in Rock Island (6.2%) and lower still in Davenport (3.8%). While the number of foreign-born residents more than doubled from 1990 to 2010 in Moline and Rock Island, their population growth in Davenport was more modest at 80%.

In each city, the largest group of foreign-born residents were from Mexico (31.5% of all foreign-born residents in Davenport, 38.9% in Rock Island, and 57.1% in Moline). Indians also make up significant shares in each city. In Davenport, other common countries of origin include Vietnam, Germany, and the Philippines. In Moline, other western African countries, Korea, and Poland are common countries of origin, as are other south central Asian countries, Cuba, and Russia in Rock Island. A Rock Island representative indicates that they city also has a considerable Afrikaner population.

LEP

Population dynamics for people with limited English proficiency (LEP) often resemble those of foreign-born residents in a community. This is true for the MSA and its cities, where the LEP population in each area typically grew at similar although slightly lower rates than the foreign-born population.

Shares of residents with limited English proficiency are 2.4% in Davenport, 4.0% in Rock Island, and 6.2% in Moline. In all three cities, the most common language for the LEP population is Spanish. While the rank of other languages varies by city, African, Serbo-Croatian, Polish, French, Arabic, Vietnamese, Korean, Thai, and other Asian language are common in all three.

Disability

According to the most recent ACS, there are 45,219 people with a disability in the Davenport-Moline-Rock Island MSA (12.0% of total population). A similar share of Davenport and Moline residents have a disability (11.6% or 11,706 residents in Davenport and 12.2% or 5,173 residents in Moline). The rate is slightly higher in Rock Island, where 5,533 people with a disability comprise 14.6% of the city's population.

While precise shares of the population in each geography impacted varies by type of disability, general patterns are similar. In all three cities, the most common disability type was an ambulatory difficulty, which impacts 6.3% of residents in Davenport, 5.8% in Moline, and 7.9% in Rock Island. Cognitive difficulties were the second-most-common disability type in each area, affecting about 4% of residents in Davenport and Moline and 6.1% in Rock Island.

Hearing difficulties affect about 3-5% of the population in the cities, and vision difficulties impact 2-3%. Disabilities that require extensive assistance, such as difficulties with independent living or self-care, make up 4-5% and 2% of the population in each city, respectively.

Age

Population in the Davenport-Moline-Rock Island MSA and each city is relatively normally distributed regarding age. In each area, the largest segment of the population is between the ages of 18 and 64. This age group's population share is 60.7% in Moline, 62.4% in Rock Island, and 63.4% in Davenport. Youth (under age 18) comprise just under one-quarter of residents in each area, from 22.2% in Rock Island to 24.0% in Davenport. Seniors make up about 15-16% of the population in Moline, Rock Island, and the region, and a slightly lower share of the population in Davenport (12.6%).

Since 1990, the most notable change in age distribution is between the under 18 and 18 to 64 age brackets. In each geography, the share of residents under age 18 contracted slightly while the share between ages 18 and 64 grew. In Davenport and Moline, there was little change in the senior share of the population, while in Rock Island it fell by 2.2 percentage points.

Sex

In each geography, women make up slightly larger shares of the population than men (51-52% compared to 48-49%). These shares have not changed appreciably since 1990, when women comprised 52-53% of the population in each geography and men made up 47-48%.

Family Type

Regionally, about 43% of families have children. The shares of families with children in Rock Island and Moline are nearly identical to that of the region at 42.8% and 43.4%, respectively. In Davenport, the figure is slightly higher – 45.7% of families have children.

Since 1990, the number and share of families with children declined in all three cities and in the region. Shares fell by 5.4 percentage points in Davenport, 4.2 percentage points in Moline, and 2.4 percentage points in Rock Island. These figures indicate that families which children may be leaving the MSA and/or that families are not having children at the same rate as they did 20 years ago.

TABLE 1A. DEMOGRAPHIC OVERVIEW FOR THE CITY OF DAVENPORT AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Demographic Indicator	City of Davenport		Davenport-Moline-Rock Island MSA			
	#	%	#	%		
Race/Ethnicity						
Non-Hispanic						
White	76,414	76.7%	311,053	81.9%		
Black	10,462	10.5%	25,132	6.6%		
Asian or Pacific Islander	2,175	2.2%	6,023	1.6%		
Native American	270	0.3%	727	0.2%		
Two or More Races	2,983	3.0%	7,411	2.0%		
Other	128	0.1%	320	0.1%		
Hispanic	7,253	7.3%	29,024	7.6%		
National Origin						
#1 country of origin	Mexico	1,179	1.3%	Mexico	7,055	2.0%
#2 country of origin	Vietnam	838	0.9%	India	1,608	0.5%
#3 country of origin	India	126	0.1%	Vietnam	969	0.3%
#4 country of origin	Germany	107	0.1%	Other Western Africa	856	0.2%
#5 country of origin	Philippines	97	0.1%	Germany	463	0.1%
#6 country of origin	Korea	94	0.1%	Canada	432	0.1%
#7 country of origin	Thailand	84	0.1%	Philippines	421	0.1%
#8 country of origin	Sweden	83	0.1%	Korea	390	0.1%
#9 country of origin	Canada	75	0.1%	China excl. Hong Kong & Taiwan	324	0.1%
#10 country of origin	Other Eastern Africa	67	0.1%	Poland	323	0.1%
Limited English Proficiency (LEP) Language						
#1 LEP Language	Spanish	1,159	1.2%	Spanish	6,385	1.8%
#2 LEP Language	Vietnamese	724	0.8%	Vietnamese	783	0.2%
#3 LEP Language	Korean	74	0.1%	French	475	0.1%

Note: All % represent a share of the total population within the jurisdiction or region. The most populous places of birth and languages at the city and regional levels may not be the same, and are thus labeled separately.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

TABLE 1A. DEMOGRAPHIC OVERVIEW FOR THE CITY OF DAVENPORT AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA (CONTINUED)

Demographic Indicator	City of Davenport			Davenport-Moline-Rock Island MSA		
		#	%		#	%
Limited English Proficiency (LEP) Language (continued)						
#4 LEP Language	Serbo-Croatian	72	0.1%	Arabic	376	0.1%
#5 LEP Language	Thai	67	0.1%	Other Asian Language	361	0.1%
#6 LEP Language	Arabic	56	0.1%	African	310	0.1%
#7 LEP Language	Chinese	49	0.1%	Serbo-Croatian	302	0.1%
#8 LEP Language	African	47	0.1%	Other Indic Language	272	0.1%
#9 LEP Language	German	41	<0.1%	Polish	247	0.1%
#10 LEP Language	French	22	<0.1%	Chinese	219	0.1%
Disability Type						
Hearing difficulty		2,514	2.7%		13,480	3.8%
Vision difficulty		1,671	1.8%		6,867	2.0%
Cognitive difficulty		4,136	4.5%		15,116	4.3%
Ambulatory difficulty		5,766	6.3%		21,966	6.3%
Self-care difficulty		2,264	2.5%		8,224	2.3%
Independent living difficulty		4,149	4.5%		15,552	4.4%
Sex						
Male		48,553	48.7%		186,589	49.1%
Female		51,132	51.3%		193,101	50.9%
Age						
Under 18		23,946	24.0%		89,568	23.6%
18-64		63,216	63.4%		233,011	61.4%
65+		12,523	12.6%		57,111	15.0%
Family Type						
Families with children		11,185	45.7%		43,014	42.8%

Note: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. The most populous places of birth and languages at the city and regional levels may not be the same, and are thus labeled separately.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

TABLE 1B. DEMOGRAPHIC OVERVIEW FOR THE CITY OF MOLINE AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Demographic Indicator	City of Moline		Davenport-Moline-Rock Island MSA			
	#	%	#	%		
Race/Ethnicity						
Non-Hispanic						
White	32,797	75.4%	311,053	81.9%		
Black	2,105	4.8%	25,132	6.6%		
Asian or Pacific Islander	989	2.3%	6,023	1.6%		
Native American	70	0.2%	727	0.2%		
Two or More Races	739	1.7%	7,411	2.0%		
Other	22	0.1%	320	0.1%		
Hispanic	6,760	15.6%	29,024	7.6%		
National Origin						
#1 country of origin	Mexico	2,416	6.0%	Mexico	7,055	2.0%
#2 country of origin	Other Western Africa	387	1.0%	India	1,608	0.5%
#3 country of origin	India	260	0.6%	Vietnam	969	0.3%
#4 country of origin	Korea	108	0.3%	Other Western Africa	856	0.2%
#5 country of origin	Poland	104	0.3%	Germany	463	0.1%
#6 country of origin	Philippines	91	0.2%	Canada	432	0.1%
#7 country of origin	Germany	85	0.2%	Philippines	421	0.1%
#8 country of origin	Other UK	83	0.2%	Korea	390	0.1%
#9 country of origin	Bosnia & Herzegovina	60	0.2%	China excl. Hong Kong & Taiwan	324	0.1%
#10 country of origin	England	57	0.1%	Poland	323	0.1%
LEP Language						
#1 LEP Language	Spanish	1,929	4.8%	Spanish	6,385	1.8%
#2 LEP Language	French	185	0.5%	Vietnamese	783	0.2%
#3 LEP Language	Serbo-Croatian	111	0.3%	French	475	0.1%

Note: All % represent a share of the total population within the jurisdiction or region. The most populous places of birth and languages at the city and regional levels may not be the same, and are thus labeled separately.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

TABLE 1B. DEMOGRAPHIC OVERVIEW FOR THE CITY OF MOLINE AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA (CONTINUED)

Demographic Indicator	City of Moline		Davenport-Moline-Rock Island MSA			
	#	%	#	%		
#4 LEP Language	Arabic	94	0.2%	Arabic	376	0.1%
#5 LEP Language	African	92	0.2%	Other Asian Language	361	0.1%
#6 LEP Language	Polish	90	0.2%	African	310	0.1%
#7 LEP Language	Other Asian Language	53	0.1%	Serbo-Croatian	302	0.1%
#8 LEP Language	Thai	50	0.1%	Other Indic Language	272	0.1%
#9 LEP Language	Korean	36	0.1%	Polish	247	0.1%
#10 LEP Language	Japanese	24	0.1%	Chinese	219	0.1%
Disability Type						
Hearing difficulty		1,623	4.0%		13,480	3.8%
Vision difficulty		831	2.1%		6,867	2.0%
Cognitive difficulty		1,725	4.3%		15,116	4.3%
Ambulatory difficulty		2,341	5.8%		21,966	6.3%
Self-care difficulty		910	2.3%		8,224	2.3%
Independent living difficulty		1,686	4.2%		15,552	4.4%
Sex						
Male		20,962	48.2%		186,589	49.1%
Female		22,521	51.8%		193,101	50.9%
Age						
Under 18		9,903	22.8%		89,568	23.6%
18-64		26,386	60.7%		233,011	61.4%
65+		7,194	16.5%		57,111	15.0%
Family Type						
Families with children		4,902	43.4%		43,014	42.8%

Note: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. The most populous places of birth and languages at the city and regional levels may not be the same, and are thus labeled separately.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

TABLE 1C. DEMOGRAPHIC OVERVIEW FOR THE CITY OF ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Demographic Indicator	City of Rock Island		Davenport-Moline-Rock Island MSA			
	#	%	#	%		
Race/Ethnicity						
Non-Hispanic						
White	26,061	67.8%	311,053	81.9%		
Black	6,924	18.0%	25,132	6.6%		
Asian or Pacific Islander	685	1.8%	6,023	1.6%		
Native American	87	0.2%	727	0.2%		
Two or More Races	1,036	2.7%	7,411	2.0%		
Other	63	0.2%	320	0.1%		
Hispanic	3,601	9.4%	29,024	7.6%		
National Origin						
#1 country of origin	Mexico	933	2.6%	Mexico	7,055	2.0%
#2 country of origin	Other South Central Asia	170	0.5%	India	1,608	0.5%
#3 country of origin	India	123	0.3%	Vietnam	969	0.3%
#4 country of origin	Cuba	101	0.3%	Other Western Africa	856	0.2%
#5 country of origin	Russia	70	0.2%	Germany	463	0.1%
#6 country of origin	Uzbekistan	60	0.2%	Canada	432	0.1%
#7 country of origin	Other Eastern Africa	59	0.2%	Philippines	421	0.1%
#8 country of origin	Poland	58	0.2%	Korea	390	0.1%
#9 country of origin	Other Western Africa	53	0.2%	China excl. Hong Kong & Taiwan	324	0.1%
#10 country of origin	Vietnam	50	0.1%	Poland	323	0.1%
Limited English Proficiency (LEP) Language						
#1 LEP Language	Spanish	928	2.5%	Spanish	6,385	1.8%
#2 LEP Language	Other Indic Language	206	0.6%	Vietnamese	783	0.2%
#3 LEP Language	African	64	0.2%	French	475	0.1%

Note: All % represent a share of the total population within the jurisdiction or region. The most populous places of birth and languages at the city and regional levels may not be the same, and are thus labeled separately.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

TABLE 1C. DEMOGRAPHIC OVERVIEW FOR THE CITY OF ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA (CONTINUED)

Demographic Indicator	City of Rock Island		Davenport-Moline-Rock Island MSA			
	#	%	#	%		
Limited English Proficiency (LEP) Language (continued)						
#4 LEP Language	Other Asian Language	57	0.2%	Arabic	376	0.1%
#5 LEP Language	Serbo-Croatian	48	0.1%	Other Asian Language	361	0.1%
#6 LEP Language	Russian	45	0.1%	African	310	0.1%
#7 LEP Language	Polish	43	0.1%	Serbo-Croatian	302	0.1%
#8 LEP Language	Vietnamese	38	0.1%	Other Indic Language	272	0.1%
#9 LEP Language	French	32	0.1%	Polish	247	0.1%
#10 LEP Language	Arabic	17	0.1%	Chinese	219	0.1%
Disability Type						
Hearing difficulty		1,658	4.6%		13,480	3.8%
Vision difficulty		916	2.6%		6,867	2.0%
Cognitive difficulty		2,171	6.1%		15,116	4.3%
Ambulatory difficulty		2,833	7.9%		21,966	6.3%
Self-care difficulty		826	2.3%		8,224	2.3%
Independent living difficulty		1,915	5.3%		15,552	4.4%
Sex						
Male		18,487	48.1%		186,589	49.1%
Female		19,970	51.9%		193,101	50.9%
Age						
Under 18		8,551	22.2%		89,568	23.6%
18-64		23,991	62.4%		233,011	61.4%
65+		5,915	15.4%		57,111	15.0%
Family Type						
Families with children		3,867	42.8%		43,014	42.8%

Note: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. The most populous places of birth and languages at the city and regional levels may not be the same, and are thus labeled separately.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

TABLE 2. DEMOGRAPHIC TRENDS FOR THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Demographic Indicator	City of Davenport							
	1990		2000		2010		Current	
	#	%	#	%	#	%	#	%
Race/Ethnicity								
White, Non-Hispanic	83,627	87.2%	79,949	81.3%	76,414	76.7%	76,414	76.7%
Black, Non-Hispanic	7,411	7.7%	9,938	10.1%	12,626	12.7%	10,462	10.5%
Hispanic	3,293	3.4%	5,267	5.4%	7,253	7.3%	7,253	7.3%
Asian or Pacific Islander, Non-Hispanic	965	1.0%	2,247	2.3%	2,539	2.6%	2,175	2.2%
Native American, Non-Hispanic	330	0.3%	679	0.7%	697	0.7%	270	0.3%
National Origin								
Foreign-born	2,356	2.5%	3,671	3.7%	4,237	4.3%	3,743	3.8%
LEP								
Limited English proficiency	1,739	1.8%	2,705	2.8%	3,038	3.1%	2,422	2.4%
Sex								
Male	45,784	47.7%	47,773	48.6%	48,553	48.7%	48,553	48.7%
Female	50,123	52.3%	50,571	51.4%	51,132	51.3%	51,132	51.3%
Age								
Under 18	26,287	27.4%	26,229	26.7%	23,946	24.0%	23,946	24.0%
18-64	57,490	59.9%	59,999	61.0%	63,216	63.4%	63,216	63.4%
65+	12,130	12.7%	12,115	12.3%	12,523	12.6%	12,523	12.6%
Family Type								
Families with children	12,688	51.1%	12,427	50.1%	11,185	45.7%	11,185	45.7%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

TABLE 2. DEMOGRAPHIC TRENDS FOR THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA (CONTINUED)

Demographic Indicator	City of Moline							
	1990		2000		2010		Current	
	#	%	#	%	#	%	#	%
Race/Ethnicity								
White, Non-Hispanic	39,025	90.2%	35,667	82.4%	32,797	75.4%	32,797	75.4%
Black, Non-Hispanic	803	1.9%	1,479	3.4%	2,566	5.9%	2,105	4.8%
Hispanic	2,936	6.8%	5,189	12.0%	6,760	15.6%	6,760	15.6%
Asian or Pacific Islander, Non-Hispanic	333	0.8%	660	1.5%	1,137	2.6%	989	2.3%
Native American, Non-Hispanic	83	0.2%	170	0.4%	181	0.4%	70	0.2%
National Origin								
Foreign-born	1,534	3.5%	3,047	7.0%	4,062	9.3%	4,232	9.7%
LEP								
Limited English proficiency	1,011	2.3%	2,204	5.1%	2,822	6.5%	2,695	6.2%
Sex								
Male	20,440	47.2%	20,567	47.5%	20,962	48.2%	20,962	48.2%
Female	22,846	52.8%	22,742	52.5%	22,521	51.8%	22,521	51.8%
Age								
Under 18	10,814	25.0%	10,865	25.1%	9,903	22.8%	9,903	22.8%
18-64	25,510	58.9%	25,868	59.7%	26,386	60.7%	26,386	60.7%
65+	6,961	16.1%	6,576	15.2%	7,194	16.5%	7,194	16.5%
Family Type								
Families with children	5,692	47.6%	5,036	45.9%	4,902	43.4%	4,902	43.4%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

TABLE 2. DEMOGRAPHIC TRENDS FOR THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA (CONTINUED)

Demographic Indicator	City of Rock Island							
	1990		2000		2010		Current	
	#	%	#	%	#	%	#	%
Race/Ethnicity								
White, Non-Hispanic	31,560	78.4%	29,139	74.1%	26,061	67.8%	26,061	67.8%
Black, Non-Hispanic	6,813	16.9%	7,247	18.4%	7,672	20.0%	6,924	18.0%
Hispanic	1,530	3.8%	2,296	5.8%	3,601	9.4%	3,601	9.4%
Asian or Pacific Islander, Non-Hispanic	237	0.6%	384	1.0%	820	2.1%	685	1.8%
Native American, Non-Hispanic	78	0.2%	181	0.5%	230	0.6%	87	0.2%
National Origin								
Foreign-born	962	2.4%	1,267	3.2%	2,203	5.7%	2,399	6.2%
LEP								
Limited English proficiency	634	1.6%	803	2.0%	1,620	4.2%	1,552	4.0%
Sex								
Male	18,905	46.9%	18,776	47.7%	18,487	48.1%	18,487	48.1%
Female	21,385	53.1%	20,572	52.3%	19,970	51.9%	19,970	51.9%
Age								
Under 18	9,818	24.4%	9,250	23.5%	8,551	22.2%	8,551	22.2%
18-64	23,368	58.0%	23,666	60.2%	23,991	62.4%	23,991	62.4%
65+	7,104	17.6%	6,431	16.3%	5,915	15.4%	5,915	15.4%
Family Type								
Families with children	4,530	45.2%	3,791	45.7%	3,867	42.8%	3,867	42.8%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

TABLE 2. DEMOGRAPHIC TRENDS FOR THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA (CONTINUED)

Demographic Indicator	Davenport-Moline-Rock Island MSA							
	1990		2000		2010		Current	
	#	%	#	%	#	%	#	%
Race/Ethnicity								
White, Non-Hispanic	332,490	90.3%	324,058	86.2%	311,053	81.9%	311,053	81.9%
Black, Non-Hispanic	18,776	5.1%	23,551	6.3%	29,904	7.9%	25,132	6.6%
Hispanic	13,196	3.6%	20,914	5.6%	29,024	7.6%	29,024	7.6%
Asian or Pacific Islander, Non-Hispanic	2,407	0.7%	4,925	1.3%	7,179	1.9%	6,023	1.6%
Native American, Non-Hispanic	778	0.2%	1,869	0.5%	2,092	0.6%	727	0.2%
National Origin								
Foreign-born	7,577	2.1%	12,733	3.4%	16,133	4.3%	18,084	4.7%
LEP								
Limited English proficiency	5,758	1.6%	9,142	2.4%	10,982	2.9%	10,875	2.9%
Sex								
Male	177,861	48.3%	183,403	48.8%	186,589	49.1%	186,589	49.1%
Female	190,290	51.7%	192,616	51.2%	193,101	50.9%	193,101	50.9%
Age								
Under 18	98,550	26.8%	97,174	25.8%	89,568	23.6%	89,568	23.6%
18-64	218,889	59.5%	226,523	60.2%	233,011	61.4%	233,011	61.4%
65+	50,712	13.8%	52,322	13.9%	57,111	15.0%	57,111	15.0%
Family Type								
Families with children	49,083	49.1%	42,772	46.9%	43,014	42.8%	43,014	42.8%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

CHAPTER 4.

SEGREGATION AND INTEGRATION

Communities experience varying levels of segregation between different racial, ethnic, and socioeconomic groups. High levels of residential segregation often lead to conditions that exacerbate inequalities among population groups within a community. Increased concentrations of poverty and unequal access to jobs, education, and other services are some of the consequences of high residential segregation.⁶

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968 not only encouraged segregation, but mandated restrictions based on race in specific neighborhoods. The Fair Housing Act of 1968 outlawed discriminatory housing practices, but did little to address the existing segregation and inequalities. Other federal housing policies and programs, like Section 8 and HOPE VI, have been implemented in an effort to ameliorate the negative effects of residential segregation and reduce concentrations of poverty. Despite these efforts, the repercussions of the discriminatory policies and practices continue to have a significant impact on residential patterns today.

RACE AND ETHNICITY

The spatial distribution patterns of all racial and ethnic groups are relatively uniform and proportionate with population density throughout the city of Davenport. Figure 1 shows a slightly heavier concentration of racial and ethnic minority populations in the area south of Central Park Avenue between North Division Street and Bridge Avenue where population density is also highest. Neighborhoods immediately surrounding this core of greater density and diversity have a higher percentage of White residents compared to the rest of the city. Similarly, neighborhoods along the eastern border of the city are also more homogeneous with higher proportions of White residents.

The overall population distribution in the city of Davenport in 2010 is similar to residential patterns in 1990 shown in Figure 3. Since 1990, the population has become less centralized and spread evenly to neighborhoods throughout the city. Racial and ethnic minority groups were mostly concentrated in dense, central neighborhoods and the northwest quadrant of the city in 1990, but have since moved progressively outwards following the residential patterns of the overall population. In addition to an overall population increase of non-White residents, the city of Davenport also experienced a noticeable growth in diversity among racial and ethnic minority populations.

The population in the city of Moline is evenly distributed with no significant differences in density among neighborhoods throughout the city. The uniform spatial distribution of racial and ethnic minority populations indicates low levels of residential segregation. The northwest quadrant of the city is the most

⁶ Massey, D. (1990). American Apartheid: Segregation and the Making of the Underclass. *American Journal of Sociology*, 96(2), 329-357. Retrieved from <http://www.jstor.org/stable/2781105>

densely populated area and has the highest concentration of Hispanic residents compared to other neighborhoods in Moline. Spatial data shown in Figure 1 indicates the Hispanic population as the largest minority group in the city. There is also a noticeable concentration of Asian residents in the southeast quadrant despite the southern half of the city being less racially and ethnically diverse.

Since 1990, the city of Moline has only experienced minor changes in overall population distribution and residential density, however, the city of Moline has experienced a significant influx of non-White residents similar to other cities in the Davenport-Moline-Rock Island MSA. The residential patterns of racial and ethnic minority groups since 1990 show less geographic concentration and segregation of specific groups compared to the cities of Davenport and Rock Island.

Compared to the cities of Davenport and Moline, the spatial distribution of the population by race and ethnicity in the city of Rock Island indicates higher levels of residential segregation. Figure 1 shows some correlation between population density and racial composition of neighborhoods in Rock Island. The residential population in the northwest quadrant of the city is predominantly Black and most of the Hispanic population resides in the northern half of the city. The northern half of the city is more densely populated and racially and ethnically diverse compared to the southern half.

The city of Rock Island has experienced growth in total population and non-White residents since 1990, but residential patterns by race and ethnicity remain relatively unchanged. Racial and ethnic minority populations, primarily Black and Hispanic residents, have expanded to the northeast corner of the city, but still only represent a small percentage of the population in the southern block groups east of 11th Street.

According to Figure 4, the cities of Davenport, Moline, and Rock Island make up the most densely populated area of the MSA. The racial and ethnic minority populations reside in the most densely populated areas and have virtually no presence in less densely populated areas on the outskirts of the region.

FIGURE 1. POPULATION BY RACE AND ETHNICITY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND, 2010

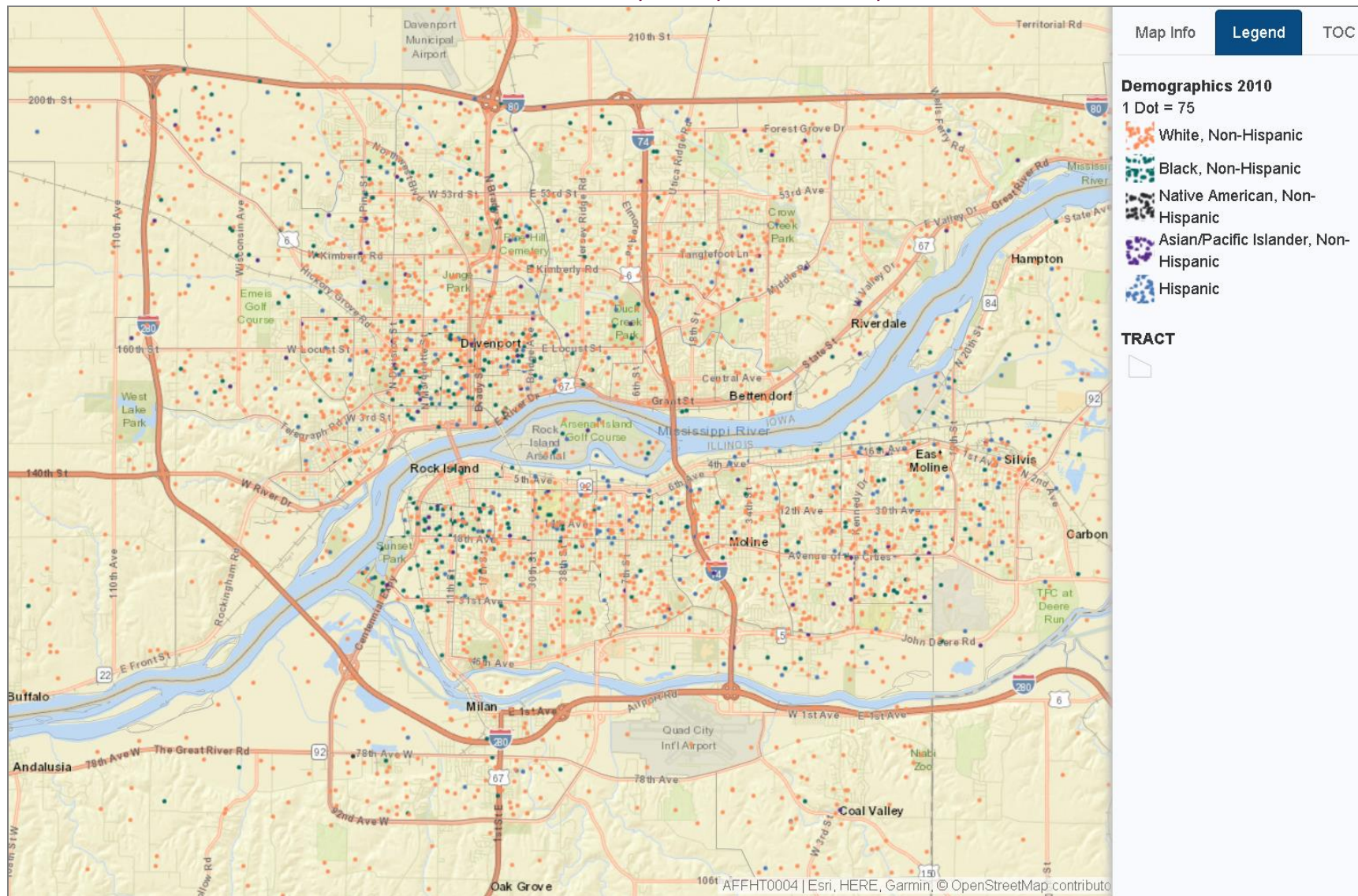
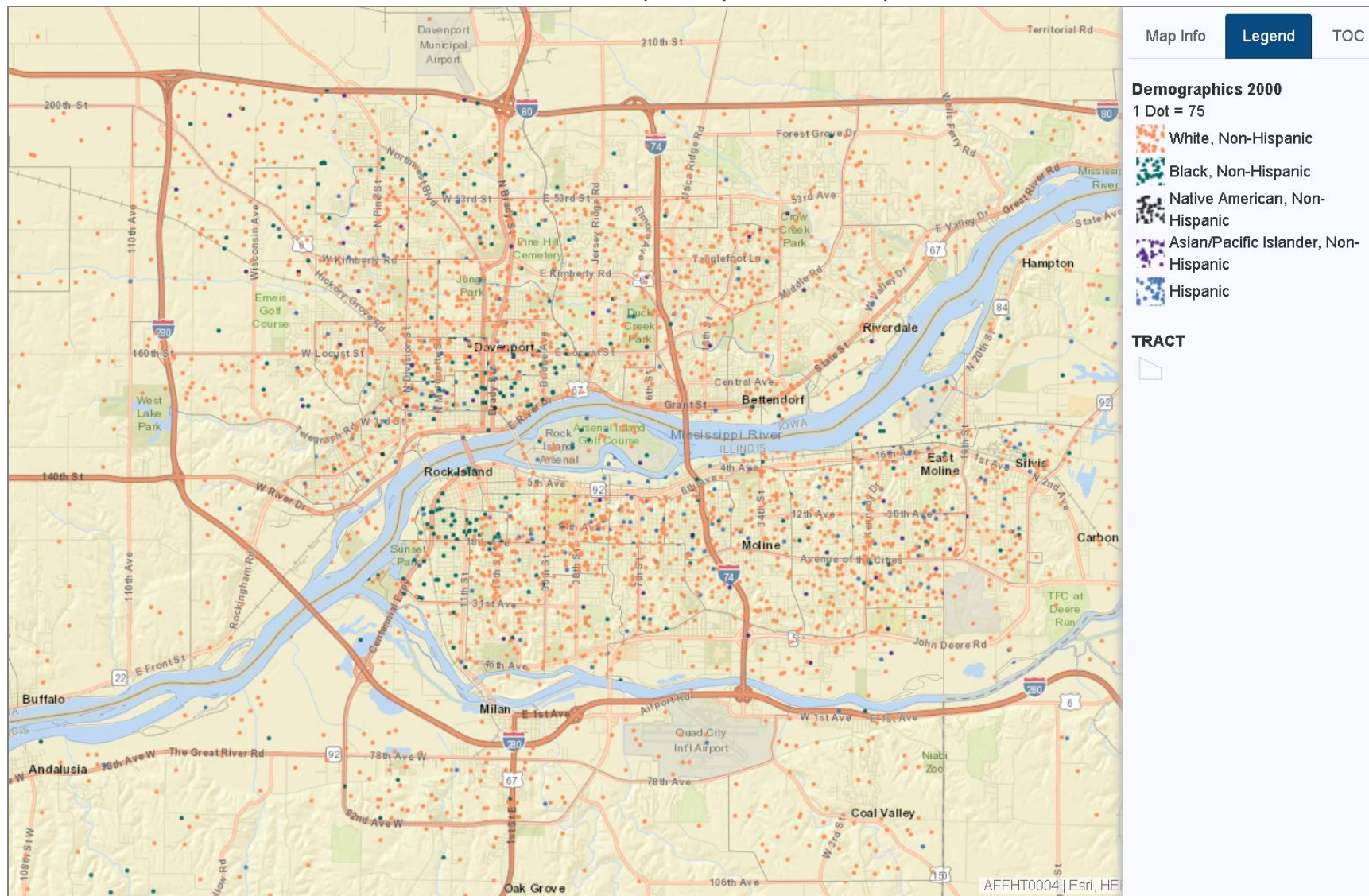
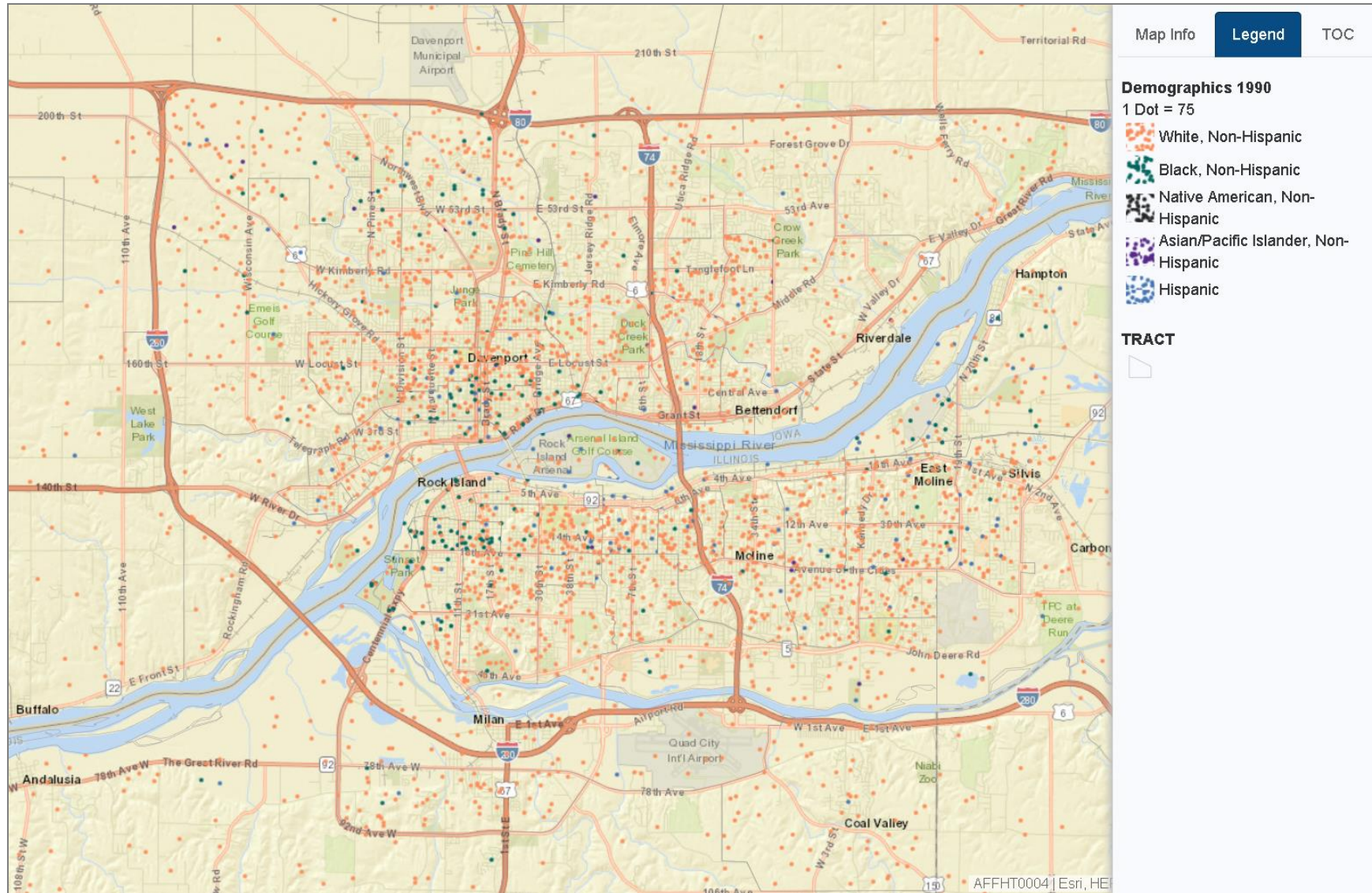


FIGURE 2. POPULATION BY RACE AND ETHNICITY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND, 2000



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 3. POPULATION BY RACE AND ETHNICITY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND, 1990



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

SEGREGATION LEVELS

In addition to visualizing racial and ethnic compositions of Davenport, Moline, and Rock Island with the preceding maps, this study also uses a statistical analysis – referred to as dissimilarity – to evaluate how residential patterns vary by race and ethnicity, and how these patterns have changed since 1990. The Dissimilarity Index (DI) indicates the degree to which a minority group is segregated from a majority group residing in the same area because the two groups are not evenly distributed geographically. The DI methodology uses a pair-wise calculation between the racial and ethnic groups in the region. Evenness, and the DI, are maximized and segregation minimized when all small areas have the same proportion of minority and majority members as the larger area in which they live. Evenness is not measured in an absolute sense, but is scaled relative to the other group. The DI ranges from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation.

The proportion of the minority population group can be small and still not segregated if evenly spread among tracts or block groups. Segregation is maximized when no minority and majority members occupy a common area. When calculated from population data broken down by race or ethnicity, the DI represents the proportion of minority members that would have to change their area of residence to match the distribution of the majority, or vice versa.

The table on the following page shares the dissimilarity indices for four pairings in the cities of Davenport, Moline, Rock Island, and the region. This table presents values for 1990, 2000, and 2010, all calculated using census tracts as the area of measurement. The “current” figure is calculated using block groups. Because block groups are typically smaller geographies, they measure segregation at a finer grain than analyses that use census tracts and, as a result, often indicate slightly higher levels of segregation than tract-level calculations.⁷ This assessment begins with a discussion of segregation at the tract-level from 1990 through 2010, and then examines the “current” figures calculated using block groups.

The 2010 dissimilarity indices calculated for each pairing in the city of Davenport show low levels of segregation. The highest DI value of 33.93 was for the Black/White pairing. The Hispanic/White pairing resulted in the lowest DI of 21.29. DI for all pairings declined from 1990, however, the Black/White pairing experienced the most significant decrease moving from moderate to low segregation. DI for Hispanic/White and Asian or Pacific Islander/White pairings have remained in low segregation levels since 1990.

⁷ Iceland, John and Erika Steinmetz. 2003. *The Effects of Using Block Groups Instead of Census Tracts When Examining Residential Housing Patterns*. U.S. Census Bureau, Washington DC: US. Accessed via https://www.census.gov/hhes/www/housing/resseg/pdf/unit_of_analysis.pdf.

This study of the effect of using census block groups instead of tracts to examine housing pattern in 331 metropolitan areas throughout the U.S. indicated that index scores were modestly higher when using block groups, by an average of 3.3 points for all metro area dissimilarity scores.

TABLE 3. DISSIMILARITY INDICES FOR THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Race/Ethnicity	Trends			Current (2010)
	1990	2000	2010	
City of Davenport				
Non-White/White	33.3	31.2	25.7	31.4
Black/White	42.6	39.3	33.9	40.9
Hispanic/White	26.3	26.0	21.3	25.0
Asian or Pacific Islander/White	27.7	26.8	21.6	34.2
City of Moline				
Non-White/White	28.7	29.3	23.7	28.3
Black/White	14.6	23.3	23.5	33.9
Hispanic/White	38.1	41.5	35.6	36.2
Asian or Pacific Islander/White	19.3	36.7	33.3	43.8
City of Rock Island				
Non-White/White	53.9	46.2	43.1	44.5
Black/White	60.8	54.8	51.1	53.6
Hispanic/White	35.4	31.4	31.6	35.3
Asian or Pacific Islander/White	23.4	14.8	34.4	46.6
Davenport-Moline-Rock Island MSA				
Non-White/White	44.1	40.4	37.5	41.4
Black/White	58.5	52.9	47.8	55.0
Hispanic/White	37.8	39.6	37.8	39.5
Asian or Pacific Islander/White	33.0	39.4	36.6	45.8

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

DI calculations in the city of Moline in 2010 also indicate low levels of segregation. However, DI for two pairings have increased since 1990. The Black/White pairing increased by nearly 9 points while the Asian or Pacific Islander/White pairing experienced the greatest of 14 points. The DI for the Hispanic/White decreased slightly from moderate to low segregation levels in 2000, but remained the highest of all groups in 2010. In contrast to DI calculations in Davenport and Rock Island, the Black/White pairing in Moline had the lowest DI of 23.53 in 2010.

The dissimilarity indices calculated for each pairing in the city of Rock Island show moderate segregation among Black and White populations. Although the DI for the Black/White pairing decreased by nearly 10 points since 1990, the DI is significantly higher than the Hispanic/White and Asian or Pacific Islander/White pairing. The DI of 43.06 for non-White/White pairing also indicates moderate segregation between the

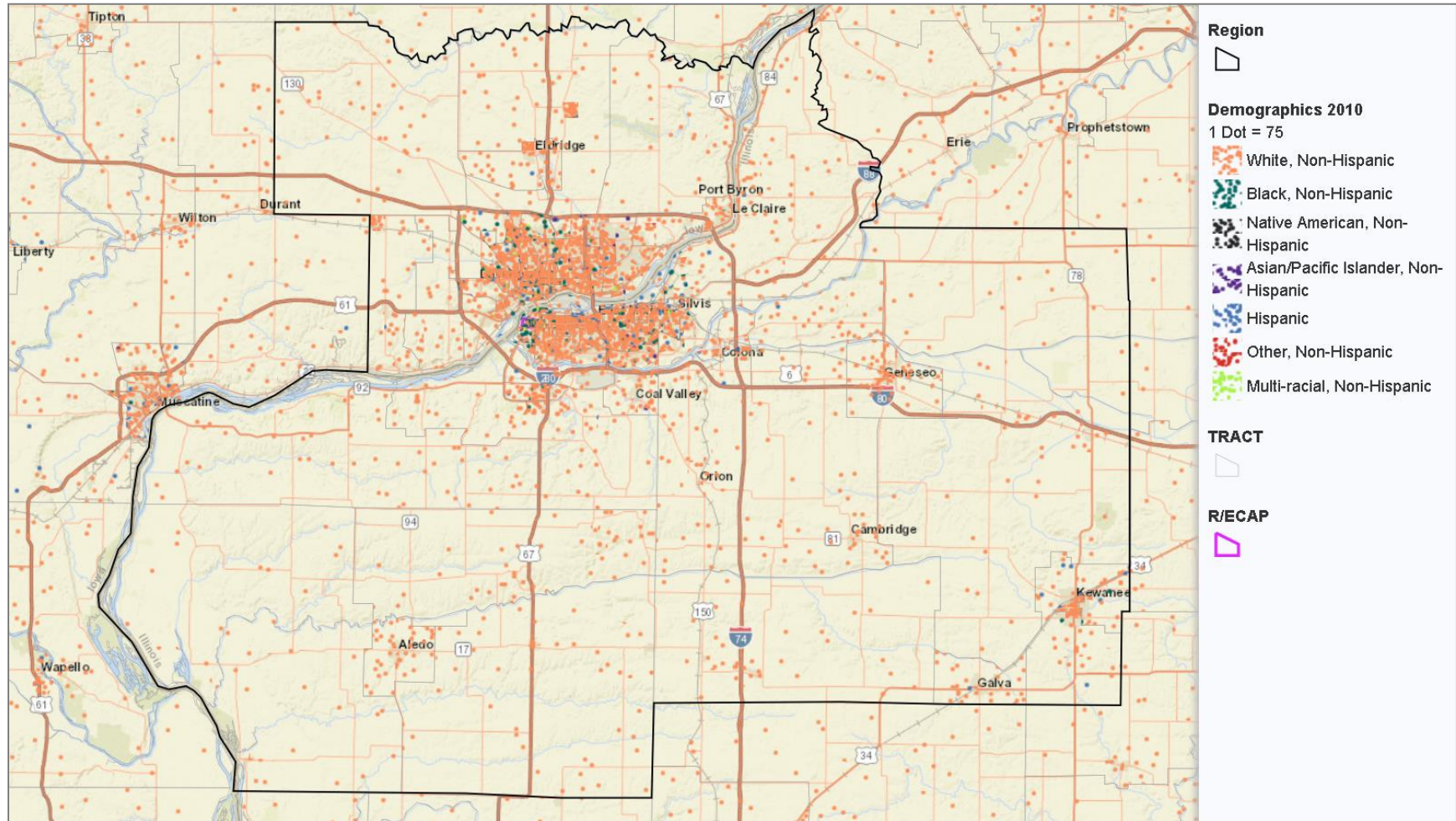
two populations. Contrary to the overall decreases in DI for other pairings, the Asian or Pacific Islander/White pairing yielded a DI of 34.41 in 2010, 11 points higher than the calculated DI in 1990.

The “current” figures for dissimilarity indices show slightly higher levels of segregation compared to tract-level data, however, most of the pairings in all three cities are at low segregation levels. The Black/White pairing has the highest DI (40.87) in the city of Davenport barely crossing the threshold of moderate segregation. The most significant difference in DI occurs with the Asian or Pacific Islander/White pairing where there is a 12-point discrepancy between “current” and 2010 figures.

“Current” figures in the city of Moline indicate moderate segregation among Asian or Pacific Islander and White populations. Block-level calculations for the Black/White pairing yielded a significantly higher DI of 33.92, but remained in low segregation levels. Non-White/White and Hispanic/White DI figures remained relatively stable regardless of unit of measurement.

Among the three cities, the city of Rock Island experiences the highest levels of segregation according to “current” DI figures. The highest DI value of 53.64 was for the Black/White pairing indicates moderate segregation, but is nearly at high segregation levels. The DI calculated for both the non-White/White and Asian or Pacific Islander/White pairings indicate moderate levels of segregation between these populations. Block-level DI calculations were similar to tract-level calculations for the Hispanic/White pairing, which indicates the only pairing with a low level of segregation in the city of Rock Island.

FIGURE 4. POPULATION BY RACE AND ETHNICITY IN THE DAVENPORT-MOLINE-ROCK ISLAND MSA, 2010



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

NATIONAL ORIGIN AND LIMITED ENGLISH PROFICIENCY POPULATION

Settlement patterns of immigrants significantly impact the composition and landscape of communities across the United States. Large central cities have the largest population of foreign-born residents, but suburban areas are experiencing rapid growth of foreign-born populations recently.⁸ Clusters of immigrants of the same ethnicity form for a variety of reasons. Social capital in the form of kinship ties, social network connections, and shared cultural experiences often draw new immigrants to existing communities. Settling in neighborhoods with an abundance of social capital is less financially burdensome for immigrants and provides opportunities to accumulate financial capital through employment and other resources that would otherwise be unattainable.⁹

Populations with limited English proficiency (LEP) are typically composed of foreign-born residents that originate from countries where English is not the primary language, however, a substantial portion (19%) of the national LEP population is born in the United States. Nationally, the LEP population has lower levels of education and is more likely to live in poverty compared to the English proficient population.¹⁰ Recent studies have also found that areas with high concentrations of LEP residents have lower rates of homeownership.¹¹

Communities of people sharing the same ethnicity and informal networks are able to provide some resources and opportunities, but numerous barriers and limited financial capital influence residential patterns of foreign-born and LEP populations.

Unlike the foreign-born populations in the cities of Moline and Rock Island, Figure 5 shows no significant concentrations of foreign-born residents in the city of Davenport. Residents originating from Mexico and Vietnam comprise the two largest groups among the foreign-born population and are relatively evenly distributed throughout the city. There is a slightly stronger residential pattern of Vietnamese residents as most of the population resides west of Brady Street with loose clusters along West Locust Street. Figure 5 also shows most residents from India reside in the eastern half of the city.

There are stronger residential patterns of foreign-born populations in the city of Moline. Residents from Mexico comprise the largest foreign-born population and reside throughout the northern half of the city, however there are heavy concentrations in the northwest corner of the city along 4th and 5th Avenue. The southeast corner of Moline south of the Avenue of the Cities contains a strong concentration of foreign-born residents from India. There are cluster of residents from West African countries immediately north of the Avenue of the Cities between 34th Street and Kennedy Drive.

⁸ James, F., Romine, J., & Zwanzig, P. (1998). The Effects of Immigration on Urban Communities. *Cityscape*, 3(3), 171-192.

⁹ Massey, D. (1999). Why Does Immigration Occur?: A Theoretical Synthesis. In Hirschman C., Kasinitz P., & DeWind J. (Eds.), *Handbook of International Migration, The: The American Experience* (pp. 34-52). Russell Sage Foundation.

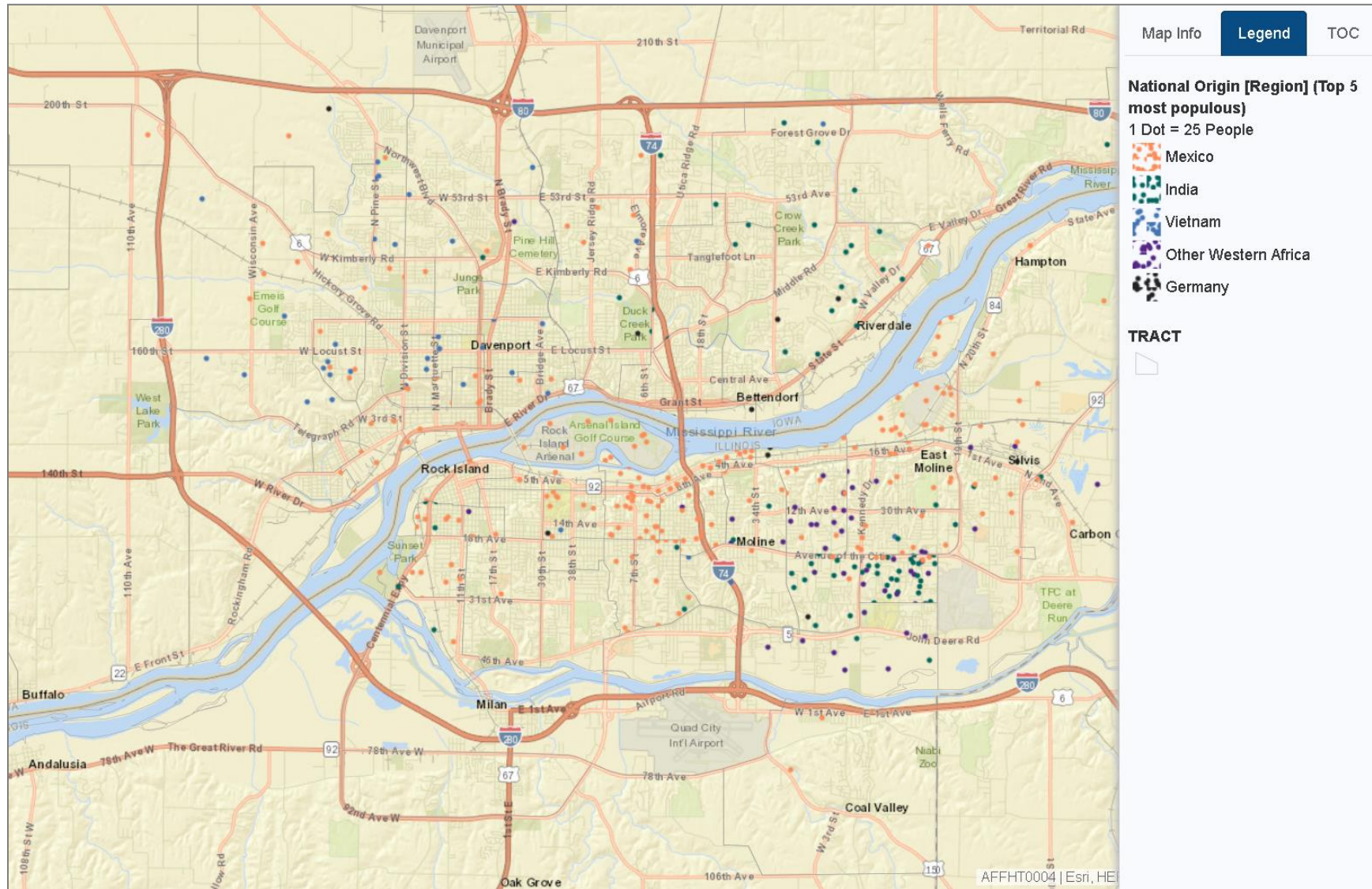
¹⁰ Zong, J. & Batalova, J. (2015). "The Limited English Proficient Population in the United States" *Migration Information Source*. Retrieved: <http://www.migrationpolicy.org/article/limited-english-proficient-population-united-states>

¹¹ Golding, E., Goodman, L., & Strohack, S. (2018). "Is Limited English Proficiency a Barrier to Homeownership." Urban Institute. Retrieved: <https://www.urban.org/research/publication/limited-english-proficiency-barrier-homeownership>

The city of Rock Island houses a smaller foreign-born population compared to Davenport and Moline. Foreign-born populations mostly reside in neighborhoods west of 17th Street and in the northeast corner of the city. The majority of the foreign-born population in Rock Island originate from Mexico.

The geographic distribution of residents with limited English proficiency (LEP) coincide with the locations of the foreign-born population in all three cities. The residential patterns of the Spanish-speaking and Vietnamese-speaking LEP populations closely mirror that of foreign-born residents originating from Mexico and Vietnam, respectively. LEP populations that speak French are concentrated in neighborhoods where residents from West African countries reside in the city of Moline. The lack of an LEP population that coincides with the concentrations of foreign-born residents from India is an indication of the population's proficiency with the English language.

FIGURE 5. FOREIGN-BORN POPULATION BY NATIONALITY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 6. POPULATION WITH LIMITED ENGLISH PROFICIENCY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

RACE, ETHNICITY, NATIONAL ORIGIN, AND POVERTY

This section looks at demographic and economic indicators to identify areas with elevated poverty rates (40% or higher) where people of color make up more than 50% of the population. Nationally, the racial and ethnic composition of higher-poverty neighborhoods is disproportionate relative to the U.S. population overall. According to the U.S. Department of Health and Human Services, Black and Hispanic populations comprise nearly 80% of the population living in areas of concentrated poverty in metropolitan areas, but only account for 42.6% of the total poverty population in the U.S.¹² Overrepresentation of these groups in areas of concentrated poverty can exacerbate disparities related to safety, employment, access to jobs and quality education, and conditions that lead to poor health.

Since 2000, the prevalence of concentrated poverty has expanded by nearly 75% in both population and number of neighborhoods. The majority of concentration of poverty is within the largest metro areas, but suburban regions have experienced the fastest growth rate.¹³

There is one census tract in Davenport, Moline, and Rock Island where the poverty rates is over 40% and less than one-half of the population is White. Tract 236 along Centennial Expressway on Rock Island's western edge is roughly bounded by 9th Avenue on the north, 11th Street on the east, 18th Avenue on the south, and Mill Street on the west. It includes the Douglas Park neighborhood and Douglas and Rauch Family Parks.

There are an estimated 2,074 residents living in that tract, of whom the majority are Black (62.3%). White residents make up 13.6% of the tract, followed by Asians (11.0%), and Hispanics (8.5%). These shares vary considerably from the city of Rock Island as a whole, where Black residents constitute 18.0% of the population and Asians make up 1.8%. Only the share of Hispanic residents is comparable at 9.4%.

Foreign-born residents are also overrepresented in Tract 236. More than 20% of residents were born in other countries, compared to 6.2% of the population citywide. Specifically, residents born in Mexico, India, Burma, Nepal, other countries in south central Asia, and other countries in eastern Africa are overrepresented.

Finally, there are a higher share of families with children in this tract than citywide (57.3% versus 42.8%).

Overall, several protected classes including people of color, foreign-born residents, and households with children live in the high-poverty tract at disproportionate rates relative to their population shares throughout the city.

¹² United States, Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. "Overview of Community Characteristics in Areas with Concentrated Poverty." ASPE Issue Brief, May 2014, https://aspe.hhs.gov/system/files/pdf/40651/rb_concentratedpoverty.pdf.

¹³ Kneebone, Elizabeth. "The Growth and Spread of Concentrated Poverty, 2000 to 2008-2012." *The Brookings Institution*, 29 July 2016, www.brookings.edu/interactives/the-growth-and-spread-of-concentrated-poverty-2000-to-2008-2012/.

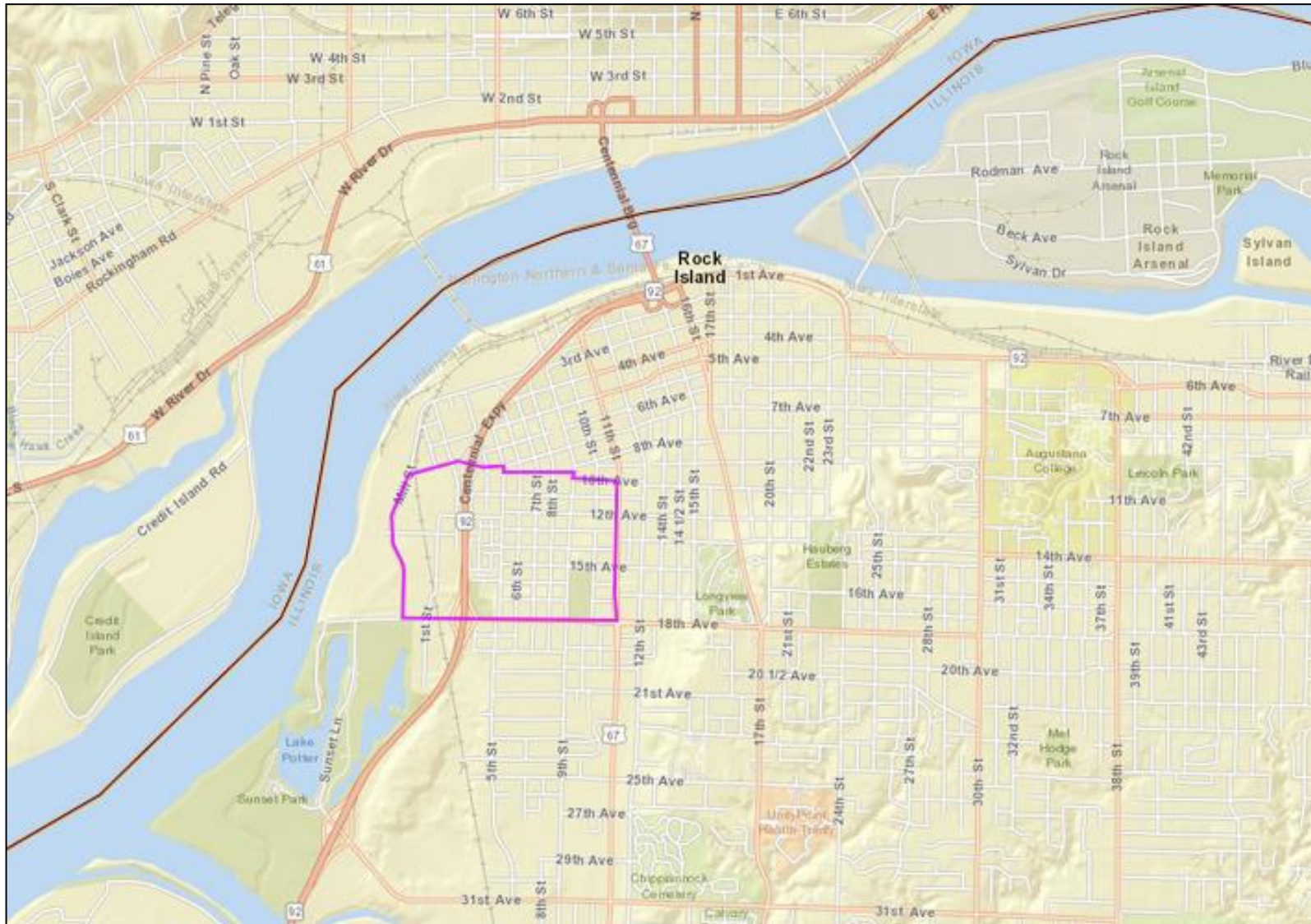
TABLE 4. DEMOGRAPHIC PROFILE OF ROCK ISLAND CENSUS TRACT 236

Demographic Indicator	Rock Island Census Tract 236	
	#	%
Race/Ethnicity		
Total Tract Population	2,074	
White, Non-Hispanic	282	13.6%
Black, Non-Hispanic	1,293	62.3%
Hispanic	176	8.5%
Asian or Pacific Islander, Non-Hispanic	227	11.0%
Native American, Non-Hispanic	8	0.4%
Other, Non-Hispanic	8	0.4%
National Origin		
Total Tract Population	2,074	
#1 country of origin	Mexico	149 7.2%
#2 country of origin	India	87 4.2%
#3 country of origin	Other South Central Asia	72 3.5%
#4 country of origin	Other Eastern Africa	51 2.5%
#5 country of origin	Burma	27 1.3%
#6 country of origin	Nepal	26 1.3%
#7 country of origin	Croatia	7 0.3%
#8 country of origin	Other Middle Africa	4 0.2%
#9 country of origin	Philippines	4 0.2%
Family Type		
Total Families in Tract	497	
Families with Children	285	57.3%

Note: All % represent a share of the total population within the tract, except family type, which is out of total families.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 7. CENSUS TRACT 236 IN ROCK ISLAND



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

CHAPTER 5.

ACCESS TO OPPORTUNITY

Housing discrimination and residential segregation have limited access to opportunity for specific population groups and communities. It is important to understand opportunity, as used in this context, as a subjective quality. Typically, it refers to access to resources like employment, quality education, healthcare, childcare, and other services that allow individuals and communities to achieve a high quality of life. However, researchers who interviewed residents of Baltimore, Maryland on this subject found perceptions of opportunity follow similar themes but are prioritized differently by different groups. Racial and ethnic minorities, low-income groups, and residents of distressed neighborhoods identified job access, employment, and training as important opportunities while White residents, higher income groups, and residents of wealthier neighborhoods more often identified sense of community, social connections among neighbors, freedom of choice, education, and retirement savings.¹⁴

Proximity is often used to indicate levels of access to opportunity, however, it would be remiss to consider proximity as the only factor in determining level of access. Access to opportunity is also influenced by social, economic, and cultural factors, thus making it difficult to accurately identify and measure. HUD conducted research regarding Moving to Opportunity for Fair Housing (MTO) to understand the impact of increased access to opportunity. Researchers found residents who moved to lower-poverty neighborhoods experienced safer neighborhoods and better health outcomes, but there was no significant change in educational outcomes, employment, or income.¹⁵ However, recent studies show the long-term effects of MTO on the educational attainment of children who were under the age of 13 are overwhelmingly positive with improved college attendance rates and higher incomes. On the other hand, children who were over the age of 13 show negative long-term impacts from MTO.¹⁶

The strategy to improve access to opportunities has been two-pronged with different housing and community development programs. Tenant-based housing vouchers allow mobility of recipients to locate in lower-poverty areas while programs like the Community Development Block Grant and Choice Neighborhoods Initiative provide funds to increase opportunities in disadvantaged neighborhoods.

¹⁴ Lung-Amam, Willow S., et al. "Opportunity for Whom? The Diverse Definitions of Neighborhood Opportunity in Baltimore." *City and Community*, vol. 17, no. 3, 27 Sept. 2018, pp. 636-657, doi:10.1111/cico.12318.

¹⁵ *Moving to Opportunity for Fair Housing Demonstration Program: Final Impacts Evaluation*. U.S. Department of Housing and Urban Development, Office of Policy Development and Research, www.huduser.gov/portal/publications/pdf/MTOFHD_fullreport_v2.pdf.

¹⁶ Chetty, Raj, Nathaniel Hendren, and Lawrence F. Katz. 2016. "The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment." *American Economic Review*, 106 (4): 855-902. https://scholar.harvard.edu/files/hendren/files/mto_paper.pdf

OVERVIEW OF HUD-DEFINED OPPORTUNITY FACTORS

Among the many factors that drive housing choice for individuals and families are neighborhood factors including access to quality schools, jobs, and transit. To measure economic and educational conditions at a neighborhood level, HUD developed a methodology to quantify the degree to which a neighborhood provides such opportunities. For each block group in the U.S., HUD provides a score on several “opportunity dimensions,” including school proficiency, poverty, labor market engagement, jobs proximity, transportation costs, transit trips, and environmental health. For each block group, a value is calculated for each index and results are then standardized on a scale of 0 to 100 based on relative ranking within the metro area, state, or nation. For each opportunity dimension, a higher index score indicates more favorable neighborhood characteristics.

Average index values by race and ethnicity for the city and region are provided in Table 5 for the total population and the population living below the federal poverty line. These values can be used to assess whether some population subgroups tend to live in higher opportunity areas than others, and will be discussed in more detail by opportunity dimension throughout the remainder of this chapter. The Opportunity Index Disparity measures the difference between the scores for the White non-Hispanic group and other groups. A negative score indicates that the particular subgroup has a lower score on that dimension than the White non-Hispanic group. A positive score indicates that the subgroup has a higher score than the White non-Hispanic Group.

Figures 8-18 map each of the opportunity dimensions along with demographic information such as race and ethnicity.

TABLE 5. DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic Population and Other Groups			
	Non-Hispanic				Hispanic	Black	Asian	Native American	Hispanic
	White	Black	Asian or Pacific Islander	Native American					
City of Davenport – Total Population									
School Proficiency Index	31.7	23.6	31.2	23.3	24.0	-8.1	-0.5	-8.4	-7.7
Jobs Proximity Index	54.5	54.4	52.1	55.3	52.4	-0.1	-2.4	0.8	-2.1
Labor Market Index	59.5	49.0	59.7	48.5	48.8	-10.5	0.2	-11.0	-10.7
Transit Index	47.6	50.8	47.6	51.4	52.1	3.2	0.0	3.8	4.5
Low Transportation Cost Index	50.1	55.0	50.9	52.3	53.1	4.9	0.8	2.2	3.0
Low Poverty Index	46.4	34.0	41.9	38.5	37.1	-12.4	-4.5	-7.9	-9.3
Environmental Health Index	61.8	59.3	63.4	60.1	59.2	-2.5	1.6	-1.7	-2.6
City of Davenport – Population below the Poverty Line									
School Proficiency Index	25.3	20.9	9.2	2.7	18.4	-4.4	-16.1	-22.6	-6.9
Jobs Proximity Index	54.1	50.7	59.8	48.0	49.1	-3.4	5.7	-6.1	-5.0
Labor Market Index	50.9	42.7	26.4	10.3	44.1	-8.2	-24.5	-40.6	-6.8
Transit Index	50.9	51.6	58.5	65.8	57.7	0.7	7.6	14.9	6.8
Low Transportation Cost Index	52.5	55.5	61.7	57.3	56.7	3.0	9.2	4.8	4.2
Low Poverty Index	38.0	27.1	22.2	11.0	29.1	-10.9	-15.8	-27.0	-8.9
Environmental Health Index	60.1	60.3	55.4	55.9	57.0	0.2	-4.7	-4.2	-3.1

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

TABLE 5. DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA (CONTINUED)

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic Population and Other Groups			
	Non-Hispanic				Hispanic	Black	Asian	Native American	Hispanic
	White	Black	Asian or Pacific Islander	Native American					
City of Moline - Total Population									
School Proficiency Index	33.3	30.8	28.8	30.5	22.8	-2.5	-4.5	-2.8	-10.5
Jobs Proximity Index	53.3	55.2	41.7	53.4	53.4	1.9	-11.6	0.1	0.1
Labor Market Index	62.4	59.3	72.6	59.4	48.3	-3.1	10.2	-3.0	-14.1
Transit Index	53.3	55.7	55.2	57.0	60.0	2.4	1.9	3.7	6.7
Low Transportation Cost Index	47.2	49.8	50.0	49.3	51.4	2.6	2.8	2.1	4.2
Low Poverty Index	64.7	57.6	67.5	57.6	52.4	-7.1	2.8	-7.1	-12.3
Environmental Health Index	67.1	65.3	68.0	65.1	63.6	-1.8	0.9	-2.0	-3.5
City of Moline - Population below the Poverty Line									
Low Poverty Index	55.2	50.7	75.0	51.0	51.2	-4.5	19.8	-4.2	-4.0
School Proficiency Index	26.5	26.3	23.7	27.9	28.5	-0.2	-2.8	1.4	2.0
Labor Market Index	53.1	53.3	91.0	64.0	49.3	0.2	37.9	10.9	-3.8
Transit Index	58.5	56.3	59.0	54.0	57.8	-2.2	0.5	-4.5	-0.7
Low Transportation Cost Index	49.8	51.0	56.0	50.0	50.4	1.2	6.2	0.2	0.6
Jobs Proximity Index	49.5	64.0	44.1	61.7	60.2	14.5	-5.4	12.2	10.7
Environmental Health Index	64.8	64.3	70.0	64.0	64.1	-0.5	5.2	-0.8	-0.7

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

TABLE 5. DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA (CONTINUED)

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic Population and Other Groups			
	Non-Hispanic				Hispanic	Black	Asian	Native American	Hispanic
	White	Black	Asian or Pacific Islander	Native American					
City of Rock Island – Total Population									
School Proficiency Index	30.1	25.0	26.6	28.5	25.4	-5.1	-3.5	-1.6	-4.7
Jobs Proximity Index	48.1	51.3	60.5	51.9	50.3	3.2	12.4	3.8	2.2
Labor Market Index	57.8	29.7	35.3	44.0	44.0	-28.1	-22.5	-13.8	-13.8
Transit Index	59.7	65.3	62.6	61.9	64.4	5.6	2.9	2.2	4.7
Low Transportation Cost Index	47.3	53.3	49.6	50.8	52.1	6.0	2.3	3.5	4.8
Low Poverty Index	49.3	22.0	30.9	36.8	32.9	-27.3	-18.4	-12.5	-16.4
Environmental Health Index	72.6	63.5	63.4	68.7	68.2	-9.1	-9.2	-3.9	-4.4
City of Rock Island – Population below the Poverty Line									
School Proficiency Index	26.9	24.0	N/A	N/A	23.9	-2.9	N/A	N/A	-3.0
Jobs Proximity Index	48.1	53.0	N/A	N/A	49.1	4.9	N/A	N/A	1.0
Labor Market Index	47.8	19.4	N/A	N/A	34.1	-28.4	N/A	N/A	-13.7
Transit Index	64.6	66.0	N/A	N/A	64.4	1.4	N/A	N/A	-0.2
Low Transportation Cost Index	52.8	54.7	N/A	N/A	51.0	1.9	N/A	N/A	-1.8
Low Poverty Index	30.4	15.8	N/A	N/A	27.1	-14.6	N/A	N/A	-3.3
Environmental Health Index	69.2	57.8	N/A	N/A	65.7	-11.4	N/A	N/A	-3.5

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

TABLE 5. DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA (CONTINUED)

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic Population and Other Groups			
	Non-Hispanic				Hispanic	Black	Asian	Native American	Hispanic
	White	Black	Asian or Pacific Islander	Native American					
Davenport-Moline-Rock Island MSA – Total Population									
School Proficiency Index	47.6	27.9	42.2	37.3	31.0	-19.7	-5.4	-10.3	-16.6
Jobs Proximity Index	52.3	53.1	50.7	53.9	51.2	0.8	-1.6	1.6	-1.1
Labor Market Index	62.6	43.8	63.4	53.9	48.5	-18.8	0.8	-8.7	-14.1
Transit Index	40.3	54.9	48.6	47.6	53.0	14.6	8.3	7.3	12.7
Low Transportation Cost Index	38.4	51.2	47.0	44.7	47.2	12.8	8.6	6.3	8.8
Low Poverty Index	59.6	35.3	53.9	49.5	46.2	-24.3	-5.7	-10.1	-13.4
Environmental Health Index	72.5	63.8	67.0	66.9	65.6	-8.7	-5.5	-5.6	-6.9
Davenport-Moline-Rock Island MSA – Population below the Poverty Line									
School Proficiency Index	36.8	25.6	16.1	25.7	26.3	-11.2	-20.7	-11.1	-10.5
Jobs Proximity Index	52.4	52.1	55.8	45.4	54.4	-0.3	3.4	-7.0	2.0
Labor Market Index	52.7	37.2	35.8	47.7	43.7	-15.5	-16.9	-5.0	-9.1
Transit Index	45.6	54.7	55.3	54.1	56.6	9.1	9.7	8.5	11.0
Low Transportation Cost Index	43.3	52.1	56.3	46.0	49.9	8.8	13.0	2.7	6.6
Low Poverty Index	46.6	27.6	33.6	45.2	38.5	-19.0	-13.0	-1.4	-8.1
Environmental Health Index	68.8	63.8	59.5	49.5	63.9	-5.0	-9.3	-19.3	-4.9

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

EDUCATION

School proficiency is an indication of the quality of education that is available to residents of an area. High quality education is a vital community resource that can lead to more opportunities and improve quality of life. HUD's school proficiency index is calculated based on the performance of 4th grade students on state reading and math exams. For each block group, the index is calculated using test results in up to the three closest schools within 1.5 miles. Results are then standardized on a scale of 0 to 100 based on relative ranking within the state. A higher index score indicates greater access to high-performing elementary schools.¹⁷

**SCHOOL PROFICIENCY INDEX:
BASED ON 4TH GRADE STUDENTS'
PERFORMANCE ON STATE
READING AND MATH TESTS AT
ELEMENTARY SCHOOLS IN OR
NEAR EACH BLOCK GROUP**

The map on the following page shows HUD-provided opportunity scores related to education for block groups within the cities of Davenport, Moline, and Rock Island, along with the demographic indicators of race and ethnicity. In each map, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

There are significant discrepancies in the levels of access to proficient schools among block groups in the city of Davenport. School proficiency index scores of most block groups within city boundaries fall within the range of 1 to 86, however, the majority of block groups have school proficiency index scores under 50. Block groups along the northern border of the city, where the majority of the block group is outside city limits, have the highest school proficiency index scores. School proficiency index scores are lowest in the most densely populated and racially and ethnically diverse block groups located south of Locust Street.

The spatial distribution of racial and ethnic groups and school proficiency index scores in the city of Davenport shown in Figure 8 indicate some correlation between race, ethnicity, and access to proficient schools. There is visual indication of the overrepresentation of racial and ethnic minority groups in the cluster of lowest scoring block groups south of Locust Street.

Table 5 shows the disparity in opportunities for each racial and ethnic group to access proficient schools in the city of Davenport. All minority groups have less access to proficient schools when compared to the White population. Black and Native American populations have the least access to proficient schools and experience the greatest disparity compared to other populations above the poverty line. The Asian population below the poverty line has the second lowest access to proficient schools, a significant discrepancy considering the Asian population above the poverty line had near equal access as the White population.

There is less variation in levels of access to proficient schools among most block groups in the city of Moline compared to the city of Davenport. School proficiency index scores among block groups in the city

¹⁷ HUD's data sources for its school proficiency index include attendance area zones from School Attendance Boundary Information System (SABINS) and Maponics, school proficiency data from Great Schools, and school addresses and attendance from Common Core of Data. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

of Moline range between 2 and 61. The lowest scoring block groups are located in the northwest corner for the city where there is a strong concentration of Hispanic residents. Most of the highest scoring block groups are located in the southern half of the city and have populations that are predominantly White. Residential distribution patterns and school proficiency index scores by block group shown in Figure 8 indicate disparities among racial and ethnic groups.

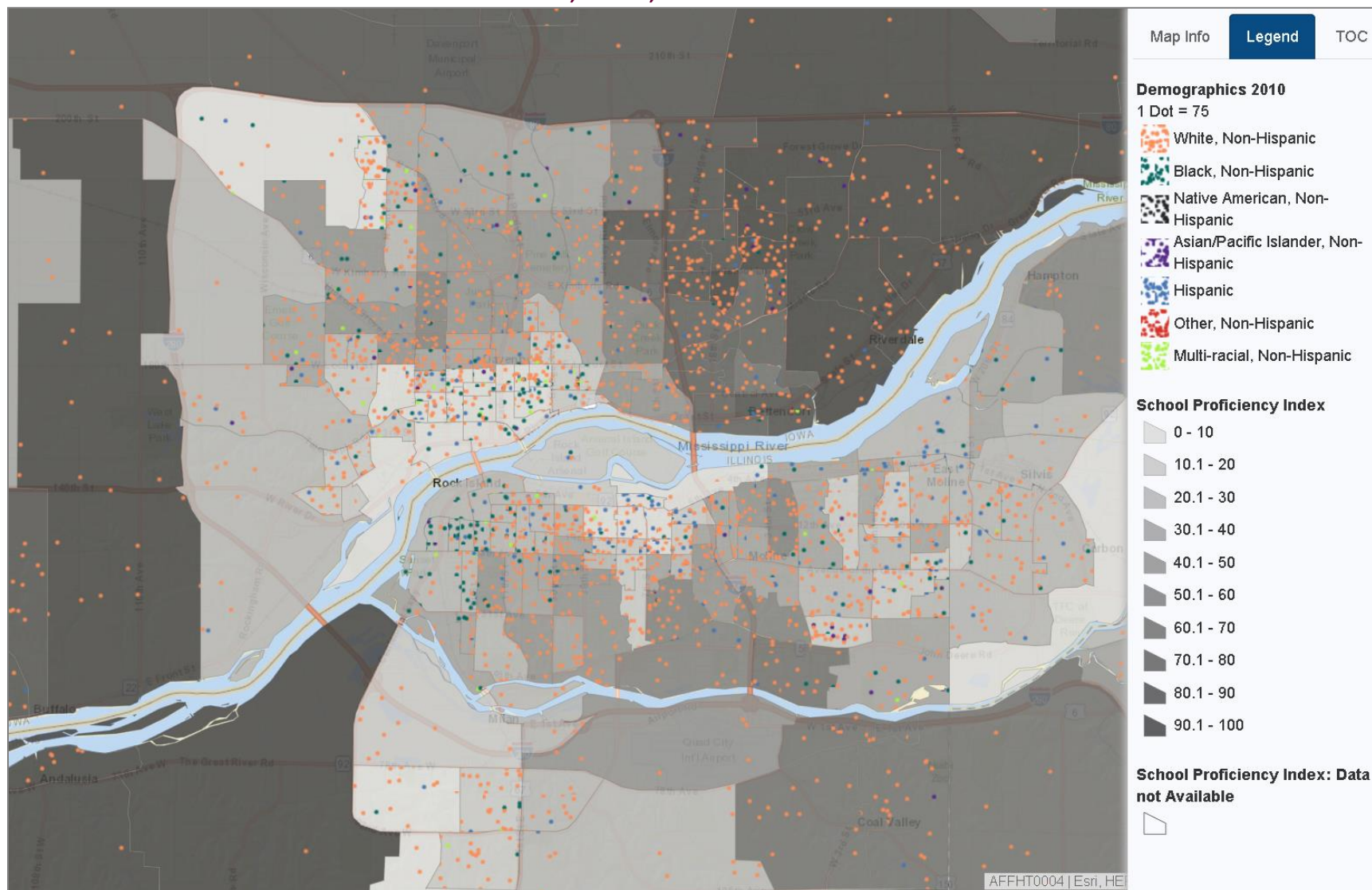
The opportunity dimension scores in Table 5 indicate lower levels of access to proficient schools for racial and ethnic minority groups in the city of Moline. The 11-point difference between White and Hispanic populations is more than double the disparity between White and Asian populations, the second lowest scoring group. Black and Native American populations have the best access to proficient schools among minority groups. Contrary to index scores of populations above the poverty line, the Hispanic population below the poverty line has the best access among all racial and ethnic groups. However, the disparities among racial and ethnic groups below the poverty line are less significant compared to populations above the poverty line.

The range of school proficiency index scores among block groups in the city of Rock Island is the smallest of all three cities. With the exception of one block group, school proficiency index scores range from 20 to 47. Most of the lowest scoring block groups are located in the northern half of the city, while the higher scoring block groups are primarily in the southeastern quadrant. Figure 8 shows disproportionate representation of racial and ethnic minorities residing in block groups that have low school proficiency index scores.

The disparities for each racial and ethnic group to access proficient schools in the city of Rock Island is not as great as in Davenport or Moline most likely due to the smaller range of scores among block groups. However, racial and ethnic minority groups have slightly less access to proficient schools compared to the White population in the city of Rock Island. Black and Hispanic populations scored the lowest in school proficiency index.

School proficiency index scores for all population groups in the region are generally higher than in the cities of Davenport, Moline, and Rock Island. Accordingly, disparities in access to proficient schools among racial and ethnic groups are greater in the MSA. White residents have significantly better access than all racial and ethnic minority groups. Asian populations below the poverty line are the lowest scoring group in the MSA despite the fact that Asians above the poverty line scored the second highest. Black and Hispanic populations also experience significant disparities in access to proficient schools in the Davenport-Moline-Rock Island MSA.

FIGURE 8. SCHOOL PROFICIENCY INDEX IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

EMPLOYMENT

Neighborhoods with jobs in close proximity are often assumed to have good access to jobs. However, distance alone does not capture any other factor such as transportation options, the type of jobs available in the area, or the education and training necessary to obtain them. There may be concentrations of jobs and low-income neighborhoods in urban centers, but many of the jobs are unattainable for residents of low-income neighborhoods. Therefore, this section analyzes both the labor market engagement and jobs proximity indices which, when considered together, offer a better indication of how accessible jobs are for residents of a specific area.




JOBS PROXIMITY INDEX: BASED ON DISTANCE TO REGIONAL EMPLOYMENT CENTERS AND THE LABOR SUPPLY SERVING THOSE CENTERS

The Jobs Proximity Index measures the physical distance between place of residence and job locations, with employment centers weighted more heavily. It also takes into account the local labor supply (i.e., competition for jobs) near such employment centers. Block group results are then standardized on a scale of 0 to 100 based on relative ranking within the metro area. A higher index score indicates greater access to job locations.¹⁸

The Jobs Proximity Index scores of block groups in the cities of Davenport, Moline, and Rock Island are mapped in Figure 9 along with the population distribution by race and ethnicity. There is no discernible pattern or concentration of block groups in relation to Jobs Proximity Index scores throughout any of the three cities. Block groups along the Mississippi River have high Jobs Proximity Index scores, but are not the only block with scores in the 90's. Due to the lack of any uniformity, it is difficult to determine any correlation between the spatial distribution of race, ethnicity, and access to jobs.

The Labor Market Engagement Index is based on unemployment rate, labor force participation rate, and the percent of the population age 25 and over with a bachelor's degree or higher. Block group results are standardized on a scale of 0 to 100 based on relative ranking nationally. A higher index score indicates greater labor market engagement.¹⁹ Figure 10 maps Labor Market Engagement Index scores for block groups in Davenport, Moline, and Rock Island. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.



LABOR MARKET ENGAGEMENT INDEX: BASED ON EMPLOYMENT LEVELS, LABOR FORCE PARTICIPATION RATES, AND EDUCATIONAL ATTAINMENT

¹⁸ HUD's data source for its jobs proximity index includes the Longitudinal Employer-Household Dynamics (LEHD) database. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

¹⁹ HUD's data source for its labor market engagement index is the American Community Survey. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

The spatial distribution of labor market engagement throughout the cities of Davenport, Moline, and Rock Island in Figure 10 does not show a noticeable pattern or correlation between race, ethnicity, and labor market engagement. However, the lowest scoring block groups are located along the Mississippi River in all three cities.

The Jobs Proximity Index scores by race and ethnicity listed in Table 5 indicate minor disparities among racial and ethnic groups above the poverty line in the city of Davenport. Native American populations have the best access to jobs while Asian populations have the lowest levels of access. Disparities in the levels of access to jobs among populations below the poverty line are slightly greater with a disparity of nearly 11 points between the highest and lowest scoring groups. The Asian population below the poverty line have the best access to jobs and the Native American population below the poverty line live the furthest from job locations.

Labor market engagement of racial and ethnic groups above the poverty line in the city of Davenport is relatively even. White and Asian populations have the highest level of engagement with the labor market among all groups. Black, Native American, and Hispanic populations share similar Labor Market Index scores that are approximately 11 points lower than White and Asian populations. Disparities between population groups below the poverty line is significantly more dramatic. Native Americans below the poverty line scored 49 and 41 points less than White residents above and below the poverty line, respectively. Asians below the poverty line are significantly less engaged with the labor market than other population groups.

Jobs Proximity Index scores in the city of Moline are virtually equal among racial and ethnic groups with the exception of the Asian population. Asians experience significantly less access to jobs compared to White, Black, Native American, and Hispanic populations. There are significant disparities in access to jobs among populations below the poverty line. Black populations below the poverty line have the best access to jobs of all groups in the city of Moline, followed by Native American and Hispanic populations. Asian populations below the poverty line also have better access to jobs compared to the same population above the poverty line.

Labor Market Engagement Index scores of population groups indicate an extreme disparity in the city of Moline. There is over a 40-point difference in labor market engagement between Asian and Hispanic populations both above and below the poverty line. The Asian population below the poverty line in Moline scored higher than all populations in all three cities by a significant margin. The disparities among White, Black, Native American, and Hispanic populations are significantly less in comparison.

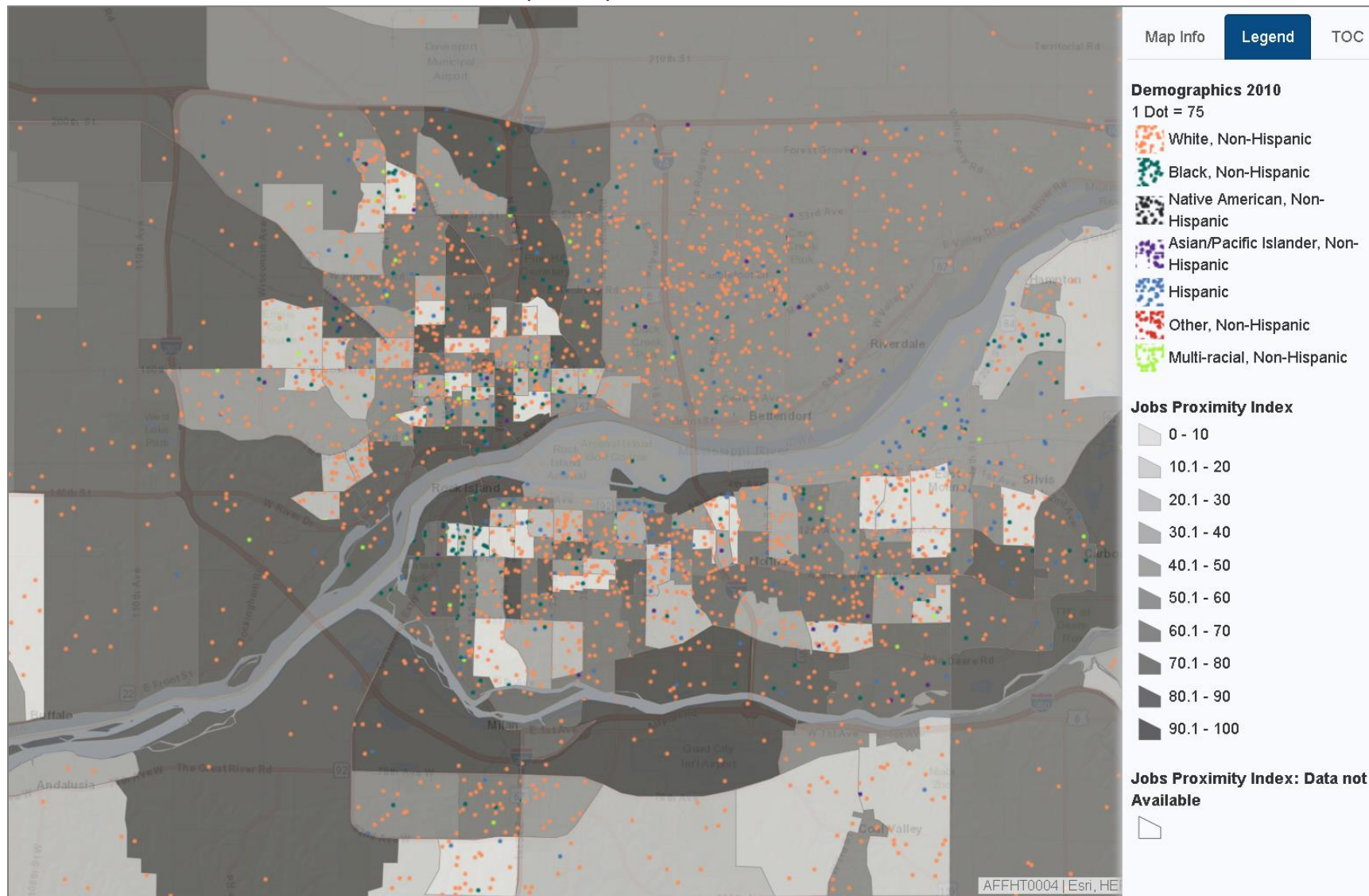
Population groups, with the exception of Asians, in the city of Rock Island have generally lower Jobs Proximity Index scores than the same groups in Davenport and Moline. The Asian population has significantly better access to jobs than other racial and ethnic groups scoring 12 points higher than all other groups. Contrary to other cities, the White population has the lowest access to jobs in the city of Rock Island.

Labor Market Index scores of population groups in the city of Rock Island indicate significant disparities among racial and ethnic groups above the poverty line. The greatest disparity in labor market engagement is between White and Black populations. The White population has the highest level of engagement with

the labor market among all groups. The Black population above the poverty line has the lowest labor market engagement among all populations followed by the Asian population. The average labor market engagement scores among racial and ethnic groups in the city of Rock Island are lowest compared to Davenport, Moline, and the Davenport-Moline-Rock Island MSA.

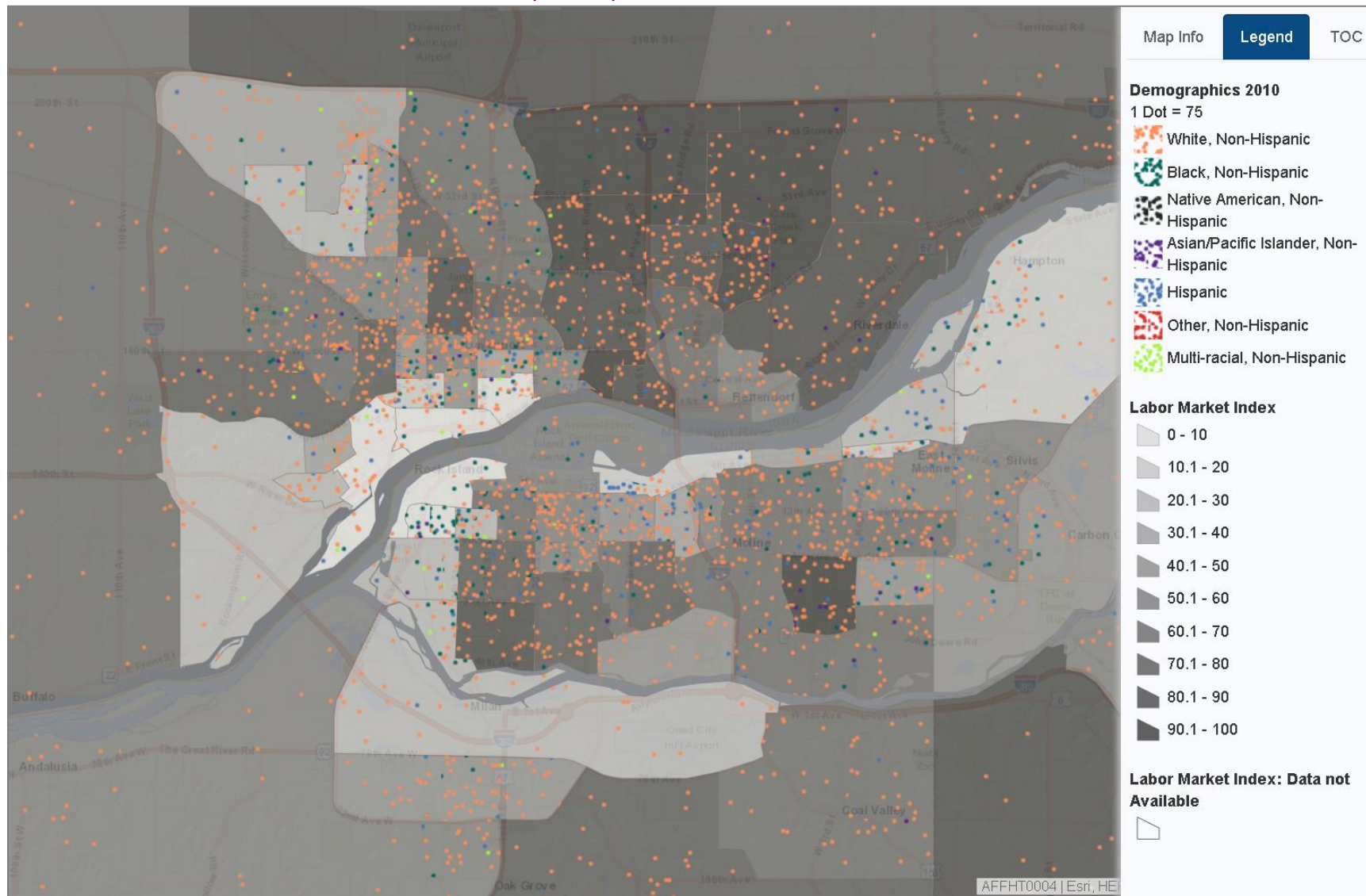
The MSA has overall lower disparities among racial and ethnic groups both above and below the poverty line in access to jobs. With the exception of the Native American population below the poverty line, Jobs Proximity Index scores of all groups are within a 4-point range. The Asian population below the poverty line has the best access to jobs while the Native American population below the poverty line has the lowest levels of access to jobs. Labor market engagement is also generally more even in the region compared to the cities of Davenport, Moline, and Rock Island.

FIGURE 9. JOBS PROXIMITY INDEX IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 10. LABOR MARKET INDEX IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

TRANSPORTATION

The Transit Trip Index measures how often low-income renter families in a neighborhood use public transit. Values are then standardized on a scale of 0 to 100 based on relative ranking nationally. The higher the index value, the more likely residents in that neighborhood use public transit.

The Low Transportation Cost Index is based on estimates of transportation costs as a percent of income for low-income renter families in a given neighborhood. Results are standardized on a scale of 0 to 100 based on relative ranking nationally. The higher the Low Transportation Cost Index, the lower the cost of transportation in that neighborhood.²⁰ Figures 11 and 12 map Transit Trip and Low Transportation Cost Index values for Davenport, Moline, and Rock Island. Lighter shading indicates areas of lower opportunity (i.e., less transit use and higher transportation costs) and darker shading indicates higher opportunity (i.e., higher transit use and lower transportation costs).

Figure 11 shows higher transit usage in block groups along the Mississippi River in all three cities. Transit Trip Index scores for population groups in the city of Davenport indicate similar levels of transit usage by racial and ethnic groups. Transit Trip Index scores show Hispanic, Native American, and Black families use public transportation more often. White and Asian families above the poverty line are less likely to use transit compared to other groups. Transit Trip Index scores are slightly higher for all populations below the poverty line and significant increases in usage by Asian and Native American families below the poverty line.

Figure 12 shows block groups with the highest Low Transportation Cost scores are located along the Mississippi River in the cities of Davenport and Rock Island. The spatial distribution of the lowest transportation does not align precisely with high transit usage. From the data provided in Figure 12, it is difficult to determine any correlation between race, ethnicity, population density, and transportation cost.

Low Transportation Cost Index scores provided in Table 5 indicate slightly lower transportation costs on average in the city of Davenport compared to the cities of Moline and Rock Island. Low Transportation Cost scores are relatively similar for all racial and ethnic groups in the city of Davenport. Asian populations below the poverty line have the lowest cost of transportation and live closest to public transportation.

TRANSIT TRIP INDEX: BASED ON ESTIMATED NUMBER OF TRANSIT TRIPS TAKEN BY FAMILIES WITH INCOMES AT 50% OF MEDIAN INCOME FOR RENTERS IN THE REGION

LOW TRANSPORTATION COST INDEX: BASED ON TRANSPORTATION COSTS AS A SHARE OF INCOME FOR FAMILIES WITH INCOMES AT 50% OF MEDIAN INCOME FOR RETNERS IN THE REGION

²⁰ HUD's data source for its transit trip and low transportation costs indices is Location Affordability Index (LAI) data. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

The white population above the poverty line experiences the highest transportation costs and live the furthest from public transportation.

All populations regardless of poverty status in the city of Moline also have similar transit usage. Hispanic families above the poverty line use public transportation the most while White families above the poverty line use public transportation the least.

Low Transportation Cost Index scores are slightly lower in the city of Moline compared to the city of Davenport. There are also less disparities among racial and ethnic groups below the poverty level regarding transportation costs and proximity to public transportation in the city of Moline. Asian populations below the poverty line score the highest and White populations above the poverty line score the lowest.

Transit Trip Index scores in the city of Rock Island are higher than the cities of Davenport and Moline. There are only minor disparities in usage of public transportation among all population groups. Black families both above and below the poverty line utilize public transportation most often. Similar to other cities, White families above the poverty line are also less likely to use public transportation compared to other populations in the city of Rock Island.

Low Transportation Cost Index scores of racial and ethnic groups in the city of Rock Island are very similar to those in the city of Moline. The Black population both above and below the poverty line have lower transportation costs and live closer to public transportation compared to the same populations in the city of Moline, but scores for all other groups are nearly identical.

All three cities have lower transportation costs and easier access to public transportation compared to the MSA. Disparities among racial and ethnic groups are also generally higher in the region than in the cities of Davenport, Moline, and Rock Island. Figures 11 and 12 also show block groups with darker shading are located within these three cities.

FIGURE 11. TRANSIT TRIPS INDEX IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND

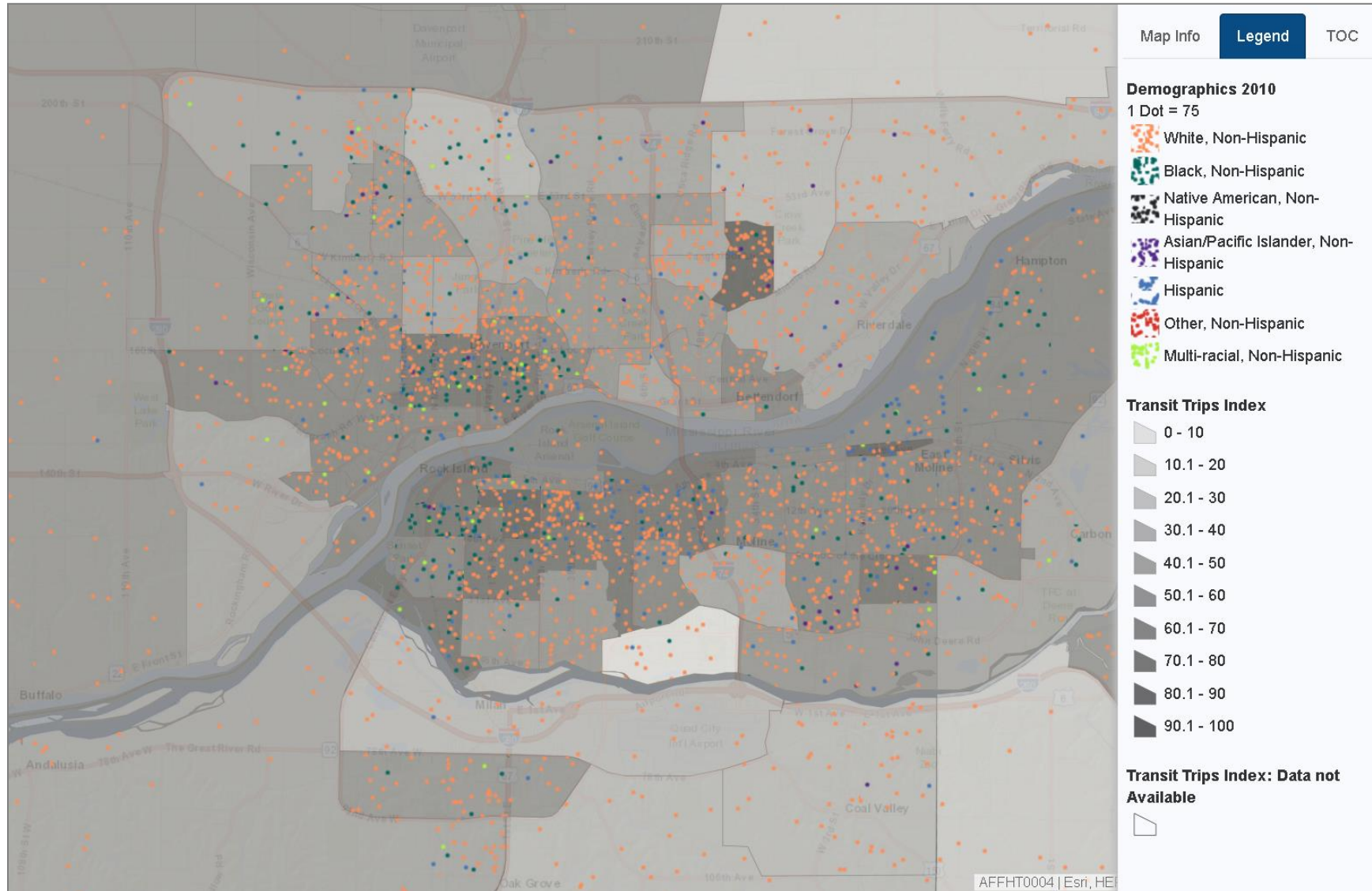
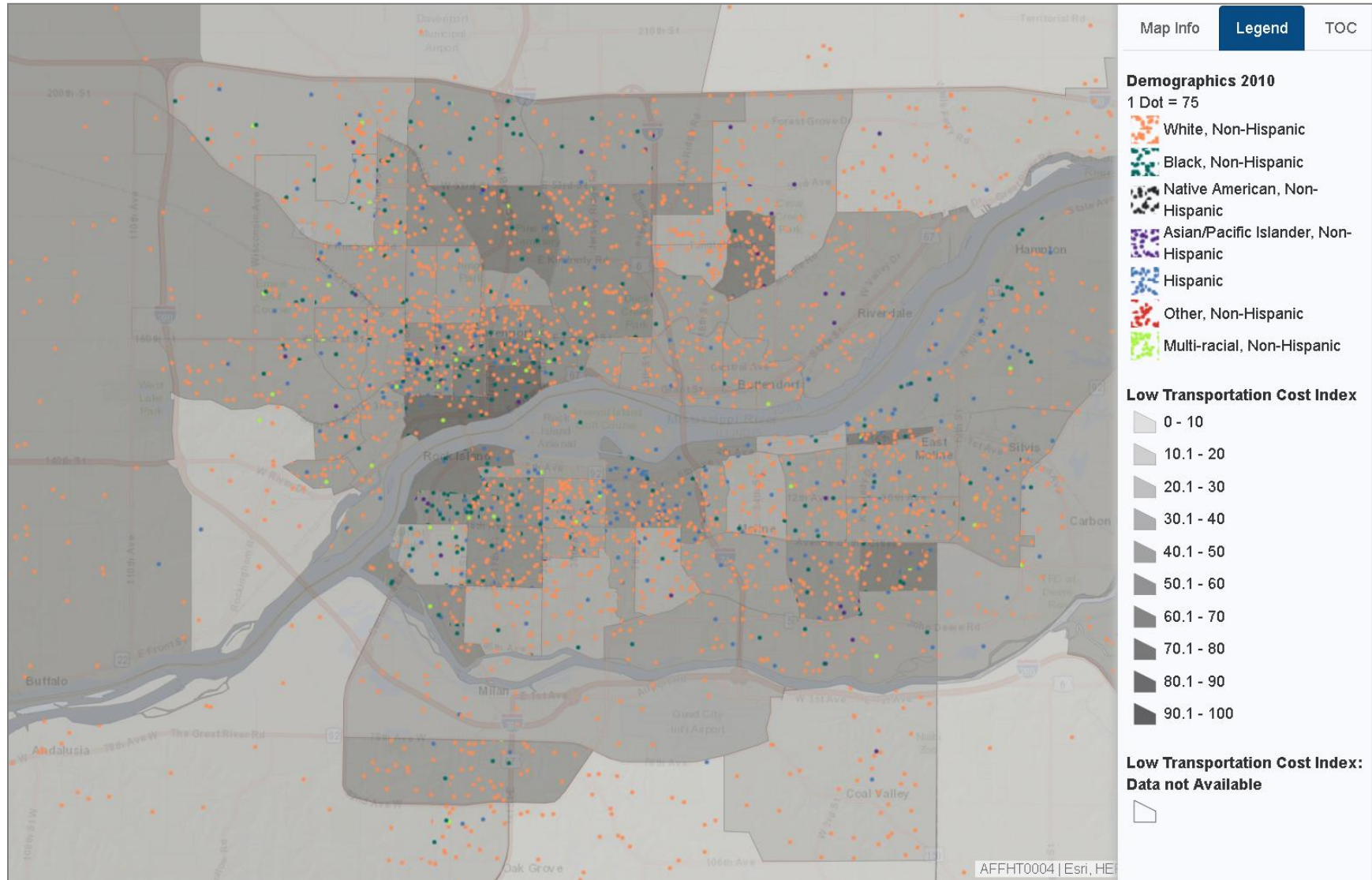


FIGURE 12. LOW TRANSPORTATION COST INDEX IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

Walk Score measures the walkability of any address by analyzing hundreds of walking routes to nearby amenities using population density and road metrics such as block length and intersection density. Data sources include Google, Education.com, Open Street Map, the U.S. Census, Localeze, and places added by the Walk Score user community.

Points are awarded based on the distance to amenities in several categories including grocery stores, parks, restaurants, schools, and shopping. Not only is the measure useful for showing walkability but also access in general to critical facilities. The most walkable neighborhoods in the city of Davenport are in or around Downtown. Major thoroughfares throughout the city are also shown as somewhat conducive to walking. The block groups in the most walkable areas are also the most densely populated.

The Walk Score Map for the city of Moline shows neighborhoods in the northwest corner of the city as the most walkable areas. Similar to walkable areas in the city of Davenport, the northwest corner is the most densely populated and home to a large Hispanic population.

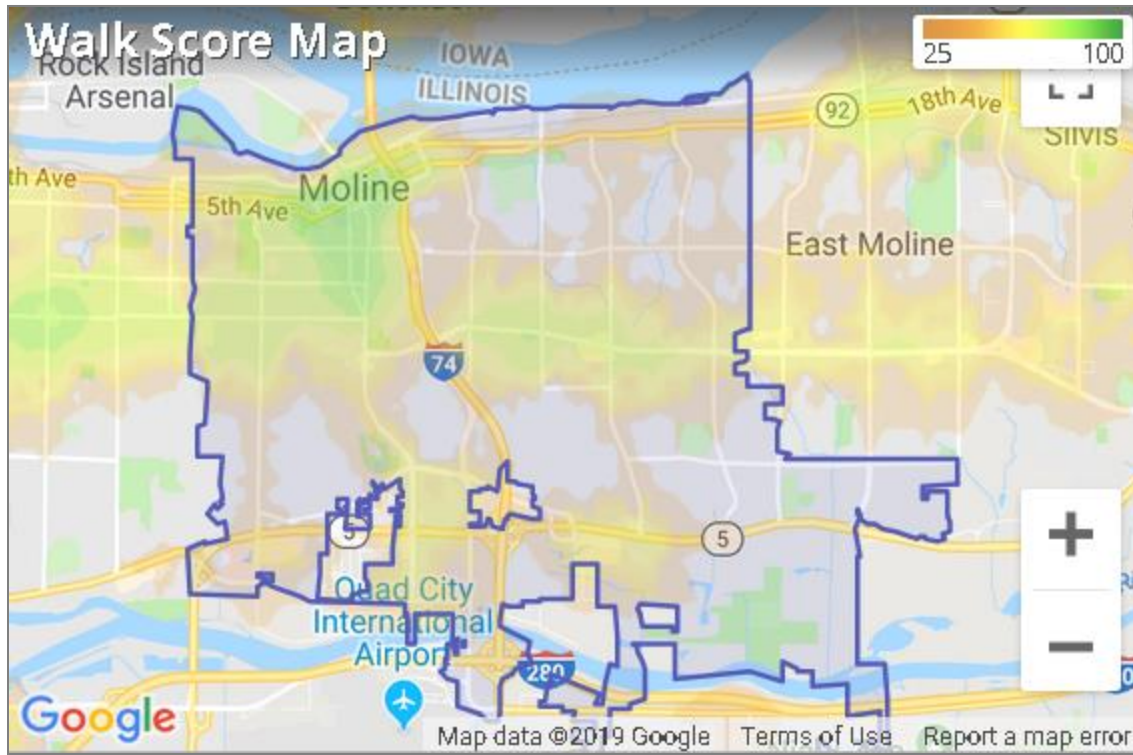
Walkable neighborhoods in the city of Rock Island are located along the Mississippi River between Centennial Bridge and 24th Street. Walk scores are also high in the areas surrounding the intersection of 18th Avenue and 30th Street.

FIGURE 13. WALKABILITY IN THE CITY OF DAVENPORT



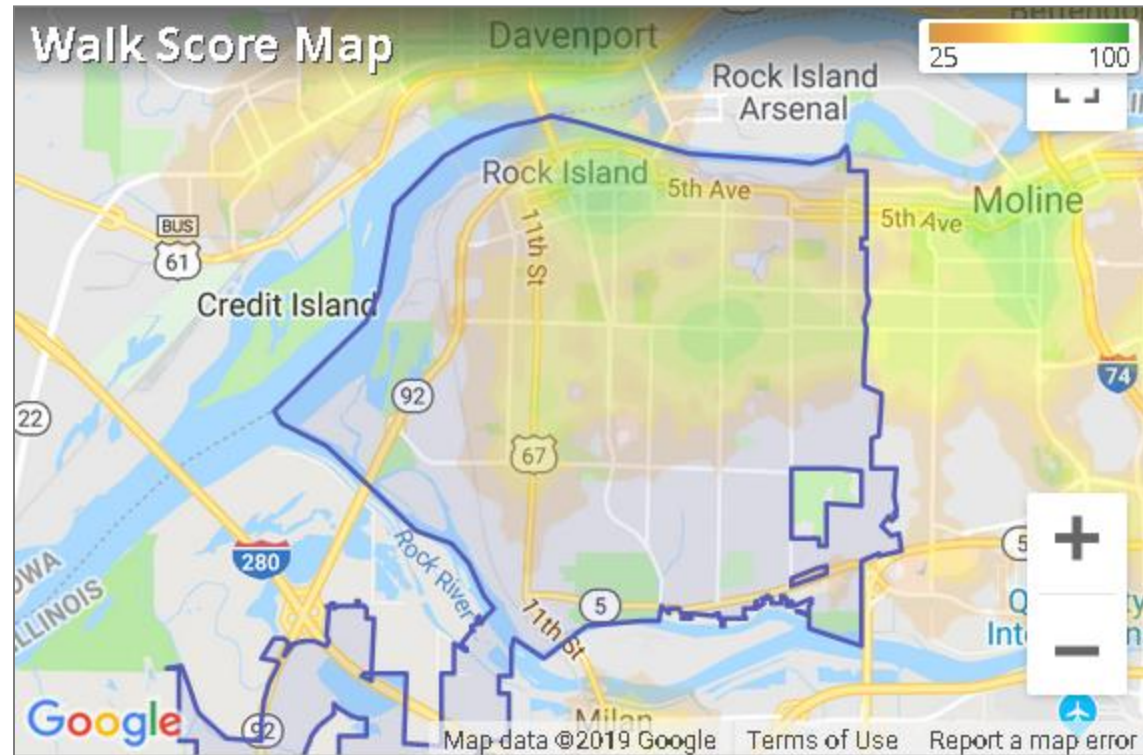
Map Source: Walkscore, Retrieved from: <https://www.walkscore.com/IA/Davenport>

FIGURE 14. WALKABILITY IN THE CITY OF MOLINE



Map Source: Walkscore, Retrieved from: <https://www.walkscore.com/IL/Moline>

FIGURE 15. WALKABILITY IN THE CITY OF ROCK ISLAND



Map Source: Walkscore, Retrieved from: <https://www.walkscore.com/IL/Rockisland>

POVERTY

Residents in high poverty areas tend to have lower levels of access to opportunity due to the absence of critical resources and disinvestment in their communities. As poverty increases, disparities in access to opportunities often increase among population groups and disadvantaged communities become even more isolated. HUD's Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure exposure to poverty by neighborhood. Values are standardized based on national ranking to produce scores ranging from 0 to 100 where a higher score indicates less exposure to poverty.²¹ Figure 14 maps Low Poverty Index scores for Davenport, Moline, and Rock Island. Lighter shading indicates areas of higher poverty and darker shading indicates lower levels of poverty.

LOW POVERTY INDEX: BASED ON NEIGHBORHOOD POVERTY RATES

Figure 14 shows the densely populated block groups along the Mississippi River in all three cities have more exposure to poverty compared to other parts of the cities. The city of Davenport is much larger in size, therefore, has the most block groups with high levels of exposure to poverty compared to Moline and Rock Island. According to Figure 14, the block groups that are exposed to more poverty seem to have a higher percentage of racial and ethnic minority residents. Block groups in the southern half of the Rock Island and Moline have the lowest exposure to poverty. The population of these block groups with low levels of poverty appear to be predominantly White.

Low Poverty Index scores in Table 5 show the levels of exposure to poverty for each population group in the cities of Davenport, Moline, and Rock Island. Racial and ethnic minority groups in the city of Davenport have more exposure to poverty than the White population. Disparities deepen with populations below the poverty level. Asian and Native American populations below the poverty line experience the greatest exposure to poverty by a significant margin.

Low Poverty Index scores of population groups in the city of Moline are the highest among all three cities. Disparities among most population groups are also the least drastic compared to the same populations in Davenport and Rock Island. However, the Asian population below the poverty line the city of Moline experiences the least exposure to poverty among all groups throughout the three cities.

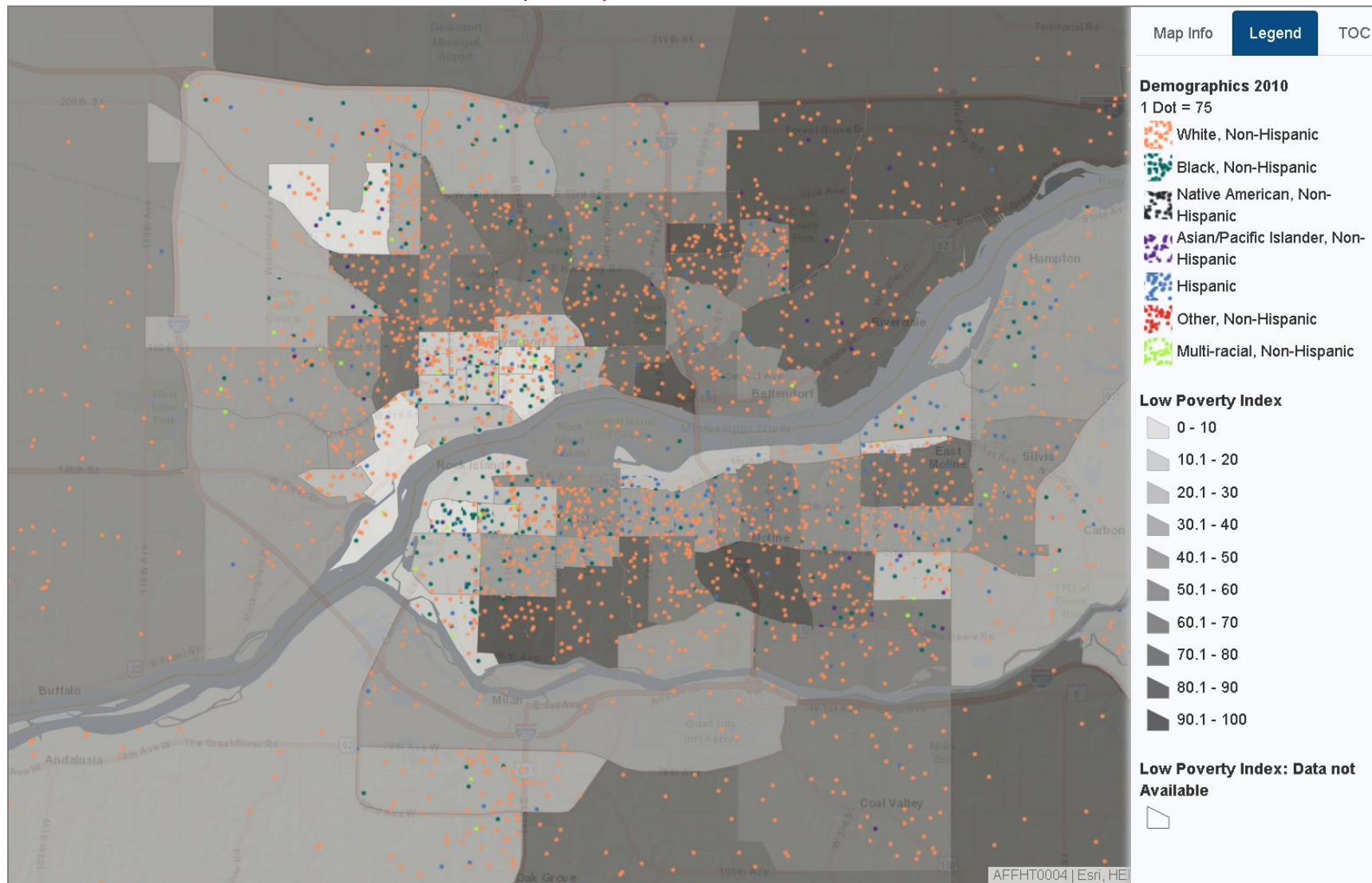
Table 5 shows the most significant disparities among racial and ethnic groups occur in the city of Rock Island. All racial and ethnic minority populations are exposed to significantly more poverty than the White population. The Black population below the poverty line experience the greatest exposure to poverty in the city of Rock Island. There is a 34-point differential between the scores of the Black population below the poverty line and the White population.

Low Poverty Index scores calculated for the Davenport-Moline-Rock Island MSA indicate similarly significant disparities among racial and ethnic population groups throughout the region. The White population above the poverty line is the least exposed to poverty in the MSA. Black populations both

²¹ HUD's data source for its low poverty index is the American Community Survey. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

above and below the poverty line experience the highest levels of exposure to poverty. The discrepancy in scores between the White and Black populations in the region is 32 points.


FIGURE 16. LOW POVERTY INDEX IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

ENVIRONMENTAL HEALTH

HUD's Environmental Health Index measures exposure based on EPA estimates of air quality (considering carcinogenic, respiratory, and neurological toxins) by neighborhood. The index only measures issues related to air quality and not other factors impacting environmental health. Values are standardized based on national ranking to produce scores ranging from 0 to 100 where a higher score indicates less exposure to environmental hazards.²² Figure 15 maps Environmental Health Index scores for Davenport, Moline, and Rock Island. Lighter shading indicates areas of higher potential exposure to hazards and darker shading indicates lower levels of environmental hazards.



ENVIRONMENTAL HEALTH INDEX: BASED ON STANDARDIZED EPA ESTIMATES OF AIR QUALITY HAZARDS

According to Figure 15, the city of Davenport has a disproportionate number of block groups with lower air quality compared to the rest of the region. There are no extreme disparities in the level of air quality among block groups in the cities of Davenport, Moline, and Rock Island. Figure 15 also shows the population distribution by race and ethnicity, but it is difficult to discern any correlation between the racial composition of block groups and air quality.

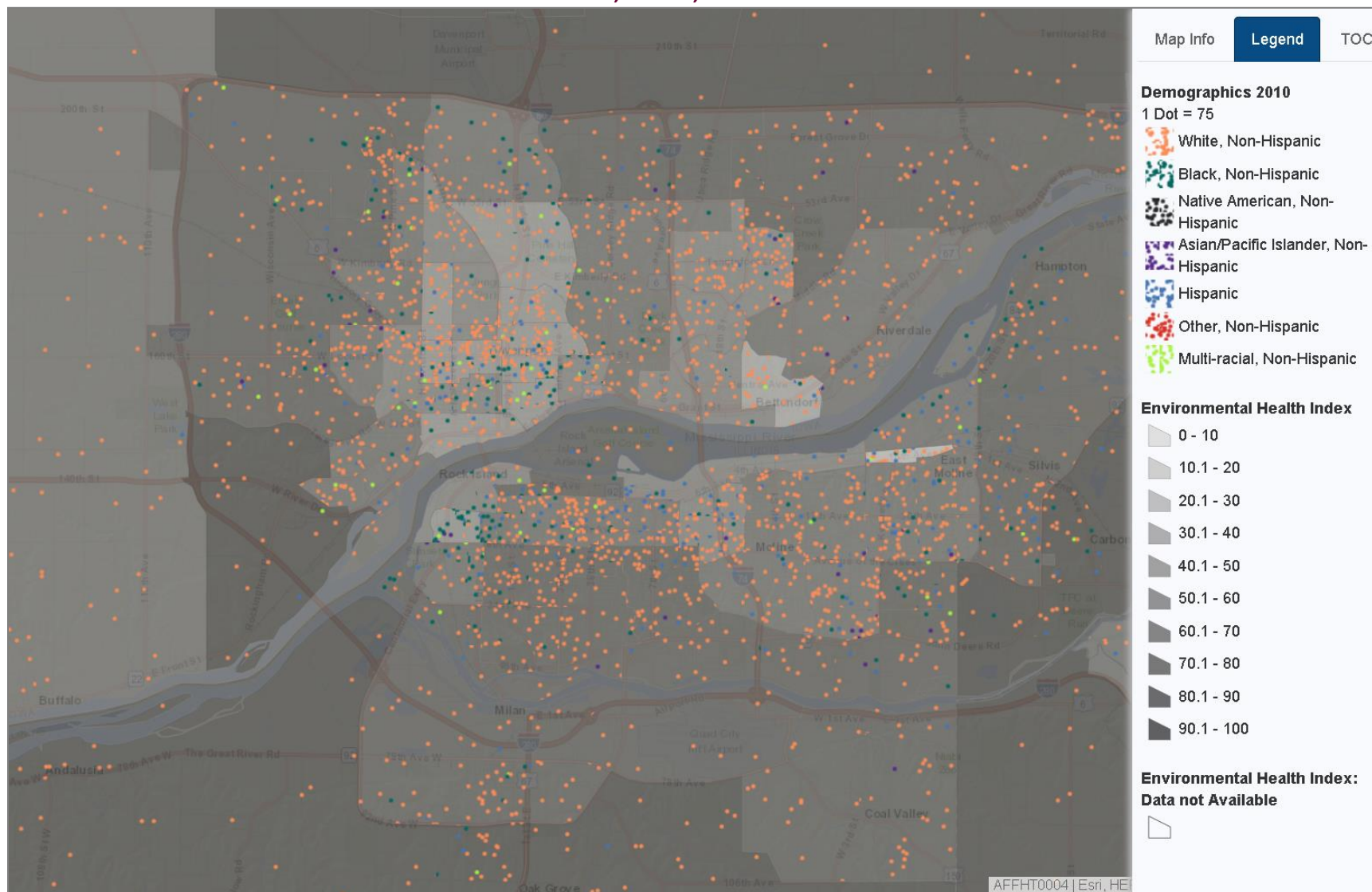
The Environmental Health Index scores in the city of Davenport suggest the similar levels of exposure to medium air quality among all racial and ethnic groups. The Asian and Native American populations below the poverty line in the city are exposed to slightly lower air quality compared to others. The Asian population above the poverty line is exposed to marginally higher air quality.

The air quality in the city of Moline is slightly better as evidenced by the higher scores. There are only minor disparities among population groups and air quality. The Asian population both above and below the poverty line are exposed to higher quality air compared to other population groups.

The Environmental Health Index scores among population groups in the city of Rock Island are similar to those found among population groups in the cities of Davenport and Moline. However, racial and ethnic minority groups experience greater disparities in air quality than in the other two cities. The White population both above and below the poverty line live in block groups that experience better air quality. The Black population below the poverty line scored the lowest with 57.8.

²² HUD's data source for its environmental health index is the EPA's National Air Toxins Assessment (NATA) data. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

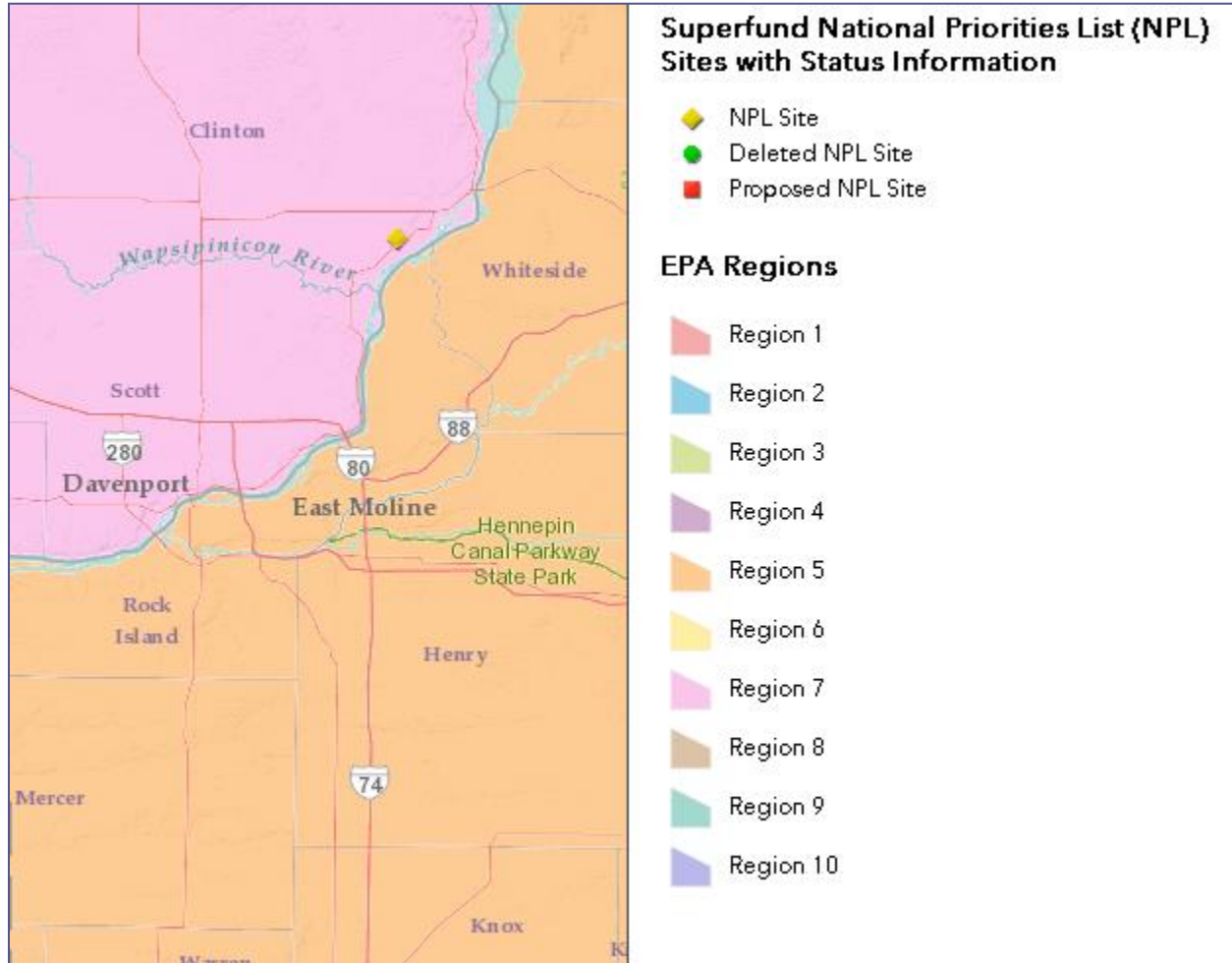
FIGURE 17. ENVIRONMENTAL HEALTH INDEX IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment. These sites are placed on the National Priorities List (NPL). There are no Superfund sites in Davenport, Moline, Rock Island, or the region.

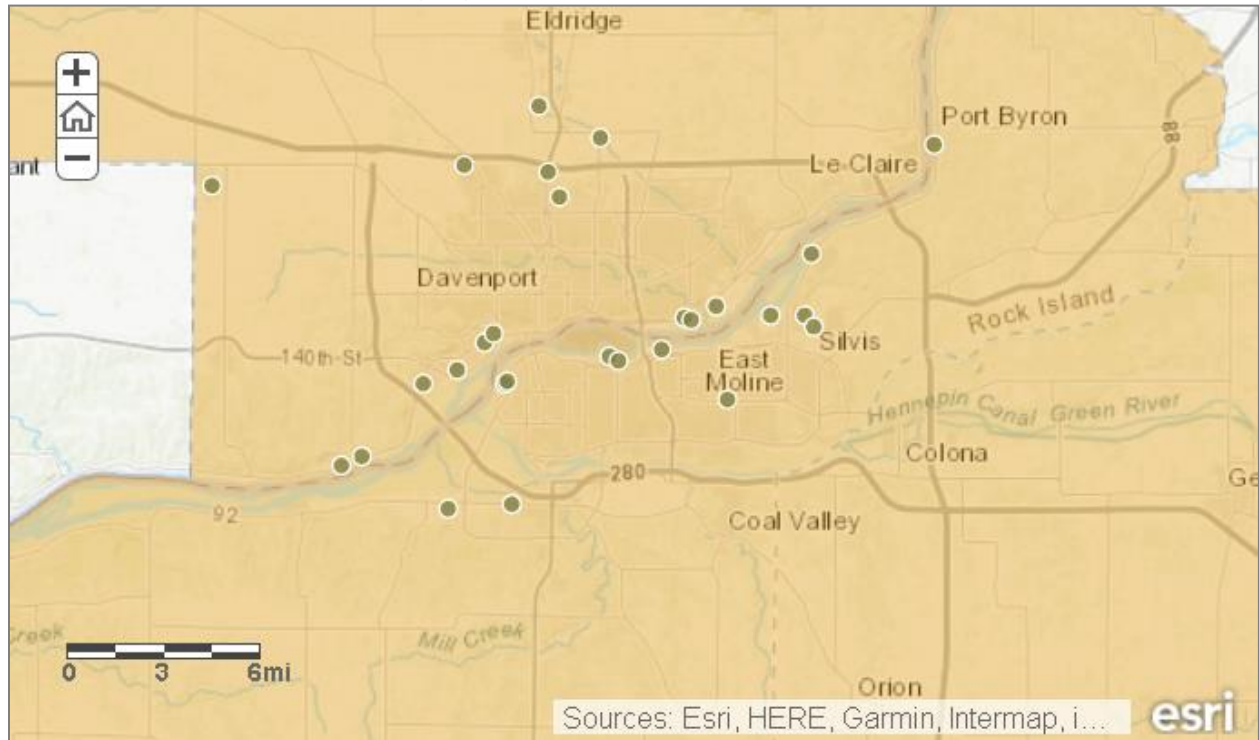
FIGURE 18. SUPERFUND NATIONAL PRIORITIES LIST (NPL) SITES IN THE DAVENPORT-MOLINE-ROCK ISLAND AREA



Map Source: Environmental Protection Agency GIS Data, Retrieved from: <https://www.epa.gov/superfund/search-superfund-sites-where-you-live>

The Toxics Release Inventory (TRI) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site. This information is collectively referred to as production-related waste managed. There are several sites located within the cities of Davenport, Moline, and Rock Island. Sites are primarily located along the Mississippi River with a couple of sites in the northern section of the city of Davenport. There are several more sites outside the cities of Davenport, Moline, and Rock Island that are within the region.

FIGURE 19. TOXIC RELEASE INVENTORY (TRI) IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Map Source: Environmental Protection Agency GIS Data, Retrieved from:
<https://iaspub.epa.gov/triexplorer/msa.html?pYear=2016&pParent=NAT&pLoc=218>

SUMMARY

Levels of access to schools, employment, jobs transit, and environmental health were compared among different racial and ethnic populations in the cities of Davenport, Moline, and Rock Island. Spatial distribution patterns of racial composition and index scores indicate unequal access to opportunities among different population groups throughout the three cities.

Spatial distribution patterns and index scores indicate disproportionate representation of racial and ethnic minorities residing in block groups that have low school proficiency index scores in all three cities. In addition, some of the highest scoring block groups have populations that are predominantly White. The opportunity dimension scores also indicate all minority groups in the cities of Davenport, Moline, and Rock Island have less access to proficient schools when compared to White populations

The Jobs Proximity Index scores of block groups in all three cities indicate minor disparities among most racial and ethnic groups in Davenport and Moline, however, more significant disparities to jobs access are found among populations below the poverty line. In contrast, Labor Market Engagement Index scores of population groups indicate significant disparities among most populations in all three cities. There is no discernible spatial pattern or concentration of block groups in relation to jobs proximity and labor market engagement throughout any of the three cities.

Transit Trip Index scores in the city of Rock Island are higher than the cities of Davenport and Moline where population groups share similar levels of transit usage. There are only minor disparities in usage of public transportation among population groups in all three cities. Low Transportation Cost Index scores provided in Table 5 indicate slightly lower transportation costs on average in the city of Davenport compared to the cities of Moline and Rock Island. Low Transportation Cost scores are also relatively similar for all racial and ethnic groups in all three cities.

Densely populated block groups along the Mississippi River in all three cities have more exposure to poverty. Block groups that are exposed to more poverty seem to have a higher percentage of racial and ethnic minority residents, while block groups with low levels of poverty appear to be predominantly White. The city of Rock Island has the highest exposure to poverty compared to Davenport and Moline. Racial and ethnic minority populations in the city of Rock Island are exposed to significantly more poverty than the White population.

The city of Davenport has a disproportionate number of block groups with lower air quality compared to the rest of the region, however, there are no extreme disparities in the level of air quality among block groups in the cities of Davenport, Moline, and Rock Island.

CHAPTER 6.

HOUSING PROFILE

The availability of quality affordable housing plays a vital role in ensuring housing opportunities are fairly accessible to all residents. On the surface, high housing costs in certain areas are exclusionary based solely on income. But the disproportionate representation of several protected class groups in low and middle income levels can lead to unequal access to housing options and neighborhood opportunity in high-cost housing markets. Black and Hispanic residents, immigrants, people with disabilities, and seniors often experience additional fair housing barriers when affordable housing is scarce.

Beyond providing fair housing options, the social, economic, and health benefits of providing quality affordable housing are well-documented. National studies have shown affordable housing encourages diverse, mixed-income communities, which result in many social benefits. Affordable housing also increases job accessibility for low and middle income populations and attracts a diverse labor force critical for industries that provide basic services for the community. Affordable housing is also linked to improvements in mental health, reduction of stress, and decreased cases of illnesses caused by poor-quality housing.²³ Developing affordable housing is also a strategy used to prevent displacement of existing residents when housing costs increase due to economic or migratory shifts.

Conversely, a lack of affordable housing eliminates many of these benefits and increases socioeconomic segregation. High housing costs are linked to displacement of low-income households and an increased risk of homelessness.²⁴ Often lacking the capital to relocate to better neighborhoods, displaced residents tend to move to socioeconomically disadvantaged neighborhoods where housing costs are most affordable.²⁵

This section discusses the existing supply of housing in the city of Davenport as well as the region. It also reviews housing costs, including affordability and other housing needs by householder income. Homeownership rates and access to lending for home purchases and mortgage refinancing are also assessed.

HOUSING SUPPLY SUMMARY

According to the most recent American Community Survey, there are 44,590 housing units in the city of Davenport, a 7.8% increase since 2000. Development activity has not been as strong in Moline, where total number of housing units increased by only 1.2% since 2000 to reach 19,723. Rock Island, meanwhile, saw a reduction in units. The 2012-2016 ACS estimate of 17,320 units represents a 1.3% decline since

²³ Maqbool, Nabihah, et al. "The Impacts of Affordable Housing on Health: A Research Summary." *Insights from Housing Policy Research*, Center for Housing Policy, www.rupco.org/wp-content/uploads/pdfs/The-Impacts-of-Affordable-Housing-on-Health-CenterforHousingPolicy-Maqbool.etal.pdf.

²⁴ "State of the Nation's Housing 2015." Joint Center for Housing Studies of Harvard University, <http://www.jchs.harvard.edu/sites/default/files/jchs-sonhr-2015-full.pdf>

²⁵ Deirdre Oakley & Keri Burchfield (2009) Out of the Projects, Still in the Hood: The Spatial Constraints on Public-Housing Residents' Relocation in Chicago." *Journal of Urban Affairs*, 31:5, 589-614.

2000. These figures reflect the development dynamic described by several stakeholders of limited housing starts and Davenport attracting more new housing than Moline or Rock Island.

The housing vacancy rate is similar in Davenport, Moline, and the Davenport-Moline-Rock Island MSA at about 8%. Vacancy is slightly higher in Rock Island at 10.7%. All three cities saw an increase in vacancy rate since 2000 and 2010. However, they remain below the national average of 12.2%. These rates, all calculated from ACS data, include housing that is available for sale or rent, housing that has been rented or sold but not yet occupied, seasonal housing, and other vacant units. Thus, the actual number of rental and for-sale units that are available for occupancy are likely lower than these figures indicate, supporting stakeholders' description of limited housing availability.

TABLE 6. HOUSING UNITS BY OCCUPANCY STATUS IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

	2000	2010	2012-2016	2000-2016 Change
City of Davenport				
Total Housing Units	41,350	44,087	44,590	7.8%
Occupied Housing Units	39,124	40,620	40,764	4.2%
Vacant Housing Units	2,226	3,467	3,826	71.9%
Vacancy Rate	5.4%	7.9%	8.6%	+ 3.2% points
City of Moline				
Total Housing Units	19,487	19,856	19,723	1.2%
Occupied Housing Units	18,492	18,573	18,126	-2.0%
Vacant Housing Units	995	1,283	1,597	60.5%
Vacancy Rate	5.1%	6.5%	8.1%	+3.0% points
City of Rock Island				
Total Housing Units	17,542	17,422	17,320	-1.3%
Occupied Housing Units	16,148	15,930	15,464	-4.2%
Vacant Housing Units	1,394	1,492	1,856	33.1%
Vacancy Rate	7.9%	8.6%	10.7%	+2.8% points
Davenport-Moline-Rock Island MSA				
Total Housing Units	N/A	167,110	168,328	N/A
Occupied Housing Units	N/A	155,175	154,336	N/A
Vacant Housing Units	N/A	11,935	13,992	N/A
Vacancy Rate	N/A	7.1%	8.3%	N/A

Data Sources: U.S. Census 2000 SF1 Table H003 and 2010 SF1 Table H3 and 2012-2016 5-Year American Community Survey Table B25002

Variety in terms of housing structure type is important in providing housing options suitable to meet the needs of all residents, including different members of protected classes. Multifamily housing, including rental apartments, are often more affordable than single-family homes for low- and moderate-income

households, who are disproportionately likely to be households of color. Multifamily units may also be the preference of some elderly and disabled householders who are unable or do not desire to maintain a single-family home.

The table that follows shows housing units by structure type in each geography. Overall, patterns are relatively similar in Davenport, Moline, and Rock Island. In each city, single-family detached homes make up the largest share of units at about two-thirds of the housing stock (65.0% in Davenport to 69.1% in Rock Island). Duplex, triplex, and quadraplex properties make up significant shares of units in each area, as do small multifamily properties with fewer than 20 units per structure. Collectively these housing types make up about one-fifth of units in each city (from 19.7% in Rock Island to 22.1% in Davenport). Larger multifamily buildings with 20 or more units make up about 7% of units in each city. Mobile home units constitute 1-3% of units.

TABLE 7. HOUSING UNITS BY STRUCTURE TYPE IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Units in Structure	City of Davenport		City of Moline		City of Rock Island		Davenport-Moline-Rock Island MSA	
	#	%	#	%	#	%	#	%
1, detached	29,001	65.0%	13,261	67.2%	11,960	69.1%	122,224	72.6%
1, attached	1,317	3.0%	905	4.6%	625	3.6%	5,592	3.3%
2-4	4,190	9.4%	1,742	8.8%	2,078	12.0%	11,664	6.9%
5-19	5,681	12.7%	2,160	11.0%	1,331	7.7%	14,334	8.5%
20-49	1,757	3.9%	393	2.0%	356	2.1%	3,821	2.3%
50 or more	1,478	3.3%	916	4.6%	798	4.6%	5,833	3.5%
Mobile home	1,158	2.6%	346	1.8%	172	1.0%	4,843	2.9%
Other (RV, boat, van, etc.)	8	0.0%	0	0.0%	0	0.0%	17	0.0%
Total	44,590	100.0%	19,723	100.0%	17,320	100.0%	168,328	100.0%

Note: All % represent a share of the total housing units within the jurisdiction or region.

Data Source: 2012-2016 5-Year American Community Survey Table B25024

Availability of housing in a variety of sizes is important to meet the needs of different demographic groups. Neighborhoods with multi-bedroom detached, single-family homes will typically attract larger families, whereas dense residential developments with smaller unit sizes and fewer bedrooms often accommodate single-person households or small families. But market forces and affordability impact housing choice and the ability to obtain housing of a suitable size, and markets that do not offer a variety of housing sizes at different price points can lead to barriers for some groups. Rising housing costs can, for example, lead to overcrowding as large households with lower incomes are unable to afford pricier, larger homes and are forced to reside in smaller units. On the other hand, people with disabilities or seniors with fixed incomes may not require large units but can be limited by higher housing costs in densely populated areas where most studio or one-bedroom units are located.

As the table below shows, three-bedroom units make up the largest share of housing in each city, constituting about 36-37% of housing. Two-bedroom units are the second most common, ranging from

30.3% of units in Davenport to 35.7% in Rock Island. Rock Island has the lowest shares of both studio/one bedroom housing and four plus bedroom housing, while Davenport has the most variety in terms of unit size.

TABLE 8. HOUSING UNITS BY NUMBER OF BEDROOMS IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Number of Bedrooms	City of Davenport		City of Moline		City of Rock Island		Davenport-Moline-Rock Island MSA	
	#	%	#	%	#	%	#	%
Studio or one	7,182	16.1%	2,908	14.7%	2,298	13.3%	20,790	12.4%
Two	13,527	30.3%	6,674	33.8%	6,177	35.7%	48,533	28.8%
Three	16,601	37.2%	7,089	35.9%	6,307	36.4%	66,653	39.6%
Four or more	7,280	16.3%	3,052	15.5%	2,538	14.7%	32,352	19.2%
Total	44,590	100.0%	19,723	100.0%	17,320	100.0%	168,328	100.0%

Note: All % represent a share of the total housing units within the jurisdiction or region.

Data Source: 2012-2016 5-Year American Community Survey Table B25041

Table 9 provides information for households living in publicly supported housing, including unit size and presence of children by housing program type. Assuming households with children would need two-bedroom or larger units, comparing the number of two- and three-plus bedroom units with the number of households with children does not immediately indicate overcrowding in assisted housing. For example, the 286 households with children who live in project-based Section 8 housing in Davenport could theoretically be housed in the 329 units with two or more bedrooms.

However, because data about households with children by household size is not available, precise conclusions regarding the suitability of the existing publicly supported housing stock cannot be drawn. There may be a mismatch between large family households and the availability of three bedroom or larger units, but such a situation is not discernible without information about household size. Additionally, smaller households may reside in units with more bedrooms (a 2-person households without children living in a 2-bedroom units, for example), reducing the availability of larger units for households with children.

Further, some housing types have a very close number of two plus bedroom units and households with children. In public housing in Davenport, for example, there are 37 households with children and 38 units with two or more bedrooms. Such close counts suggest the possibility that some households with children are living in one bedroom units. Public housing in Moline is a similar case – there are 121 households with children compared to 125 units with two or more bedrooms.

TABLE 9. PUBLICLY SUPPORTED HOUSING BY PROGRAM CATEGORY: UNITS BY NUMBER OF BEDROOMS AND PRESENCE OF CHILDREN IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND

Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Unit Bedrooms		Households with Children	
	#	%	#	%	#	%	#	%
City of Davenport								
Public Housing	0	0.0%	12	30.8%	26	66.7%	37	94.9%
Project-Based Section 8	339	50.2%	190	28.1%	139	20.6%	286	42.3%
Other Multifamily	77	88.5%	0	0.0%	0	0.0%	N/A	N/A
HCV Program	172	29.3%	207	35.3%	172	29.3%	299	50.9%
City of Moline								
Public Housing	348	73.3%	86	18.1%	39	8.2%	121	25.5%
Project-Based Section 8	132	62.6%	70	33.2%	2	1.0%	63	29.9%
Other Multifamily	0	0.0%	0	0.0%	0	0.0%	N/A	N/A
HCV Program	26	13.6%	74	38.7%	73	38.2%	110	57.6%
City of Rock Island								
Public Housing	337	83.8%	45	11.2%	10	2.5%	47	11.7%
Project-Based Section 8	317	41.1%	268	34.7%	183	23.7%	398	51.6%
Other Multifamily	74	100.0%	0	0.0%	0	0.0%	1	1.4%
HCV Program	43	16.9%	75	29.4%	121	47.5%	164	64.3%

Note: All % represent a share of the total households living in publicly supported housing units by program category within the jurisdiction.

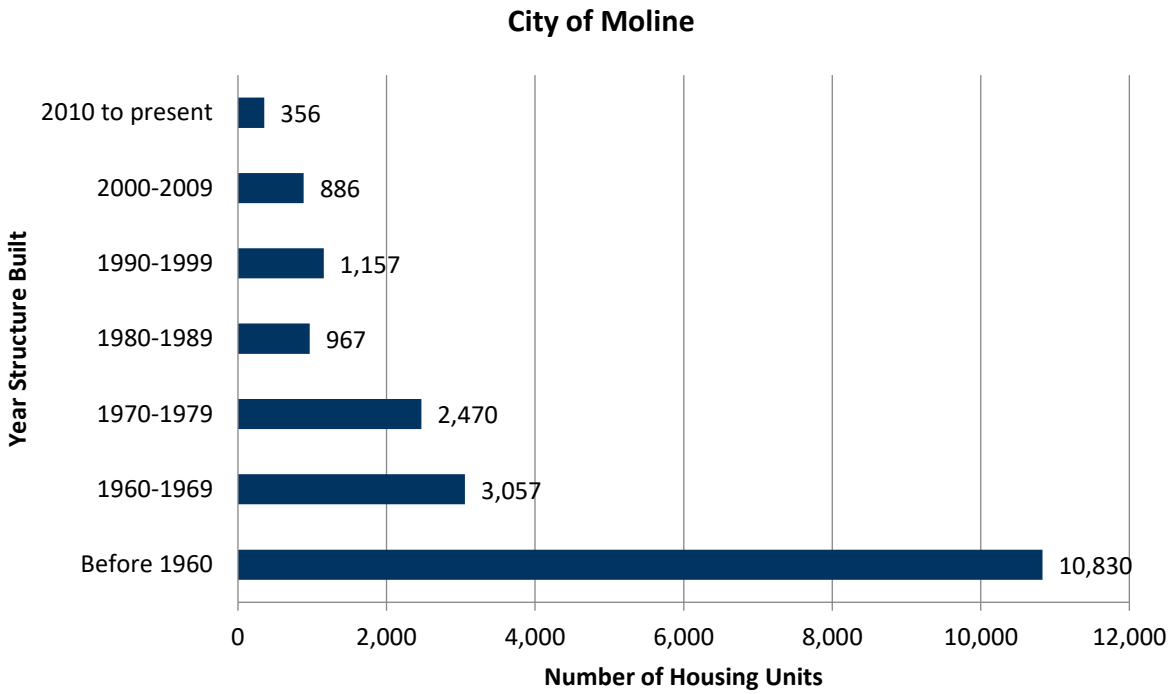
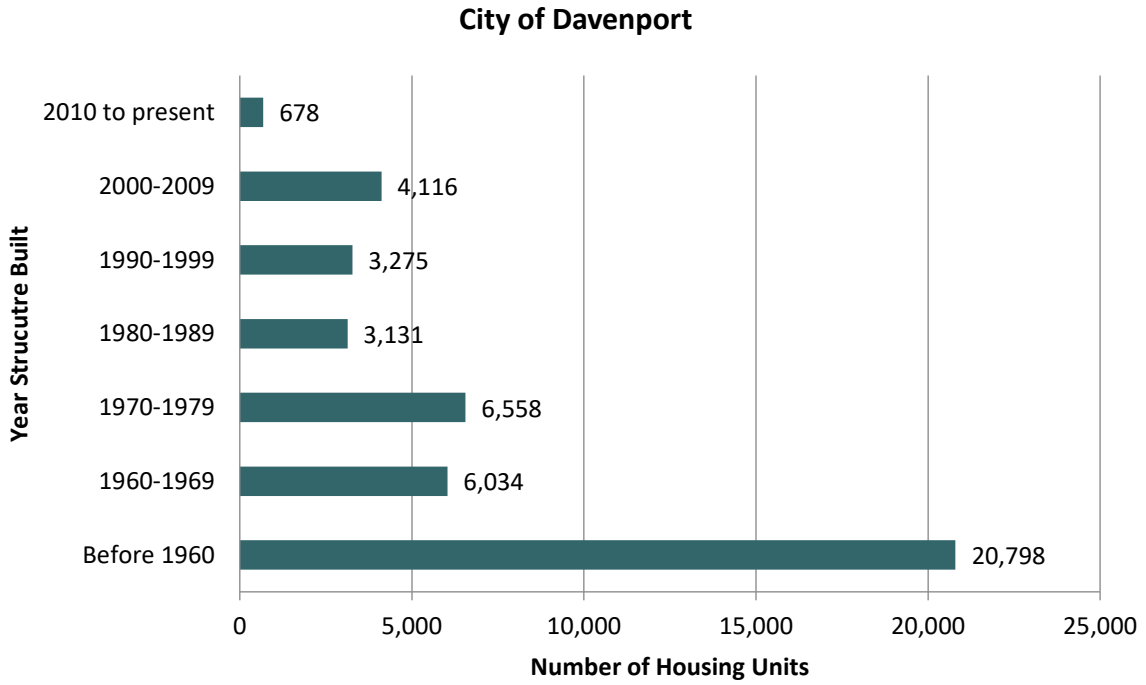
Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

Assessing housing conditions in an area can provide a basis for developing policies and programs to maintain and preserve the quality of the housing stock. The age of an area’s housing can have substantial impact on housing conditions and costs. As housing ages, maintenance costs rise, which can present significant affordability issues for low- and moderate-income homeowners. Aging rental stock can lead to rental rate increases to address physical issues or deteriorating conditions if building owners defer or ignore maintenance needs. Deteriorating housing can also depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. Additionally, homes built prior to 1978 present the potential for lead exposure risk due to lead-based paint.

Age of housing in Davenport, Moline, Rock Island and the region are shown on the next pages. In all areas, the largest share of homes were built over 50 years ago, prior to 1960. Housing is oldest in Rock Island, where 66.9% of units were built before 1960 versus 54.9% in Moline and 46.7% in Davenport.

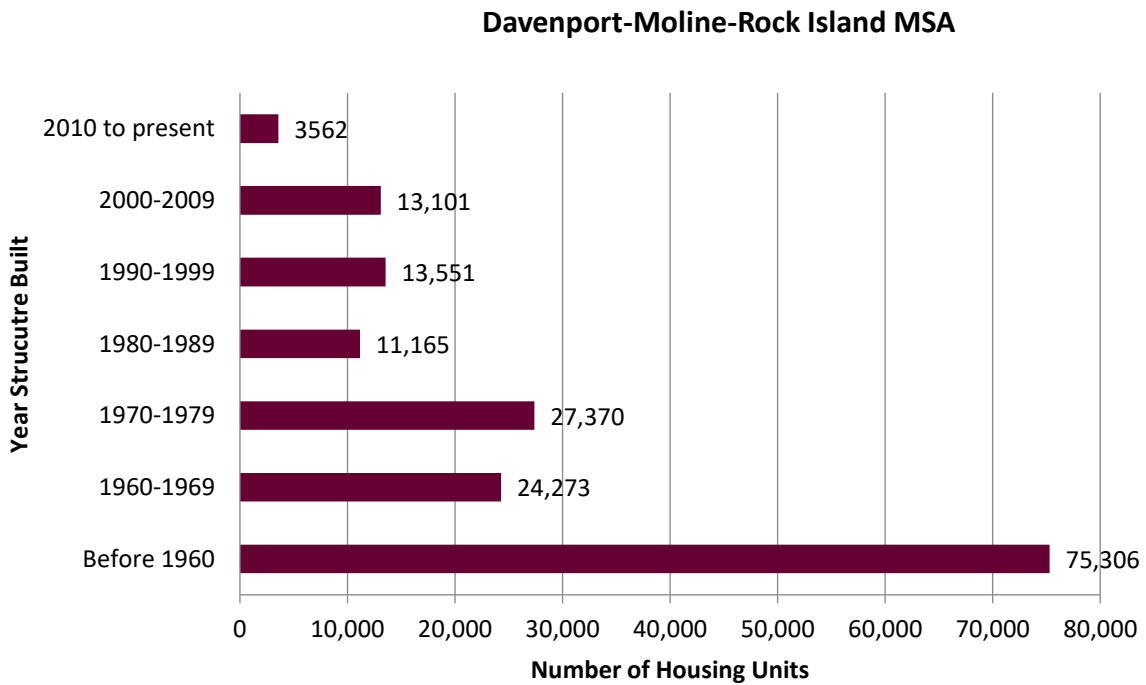
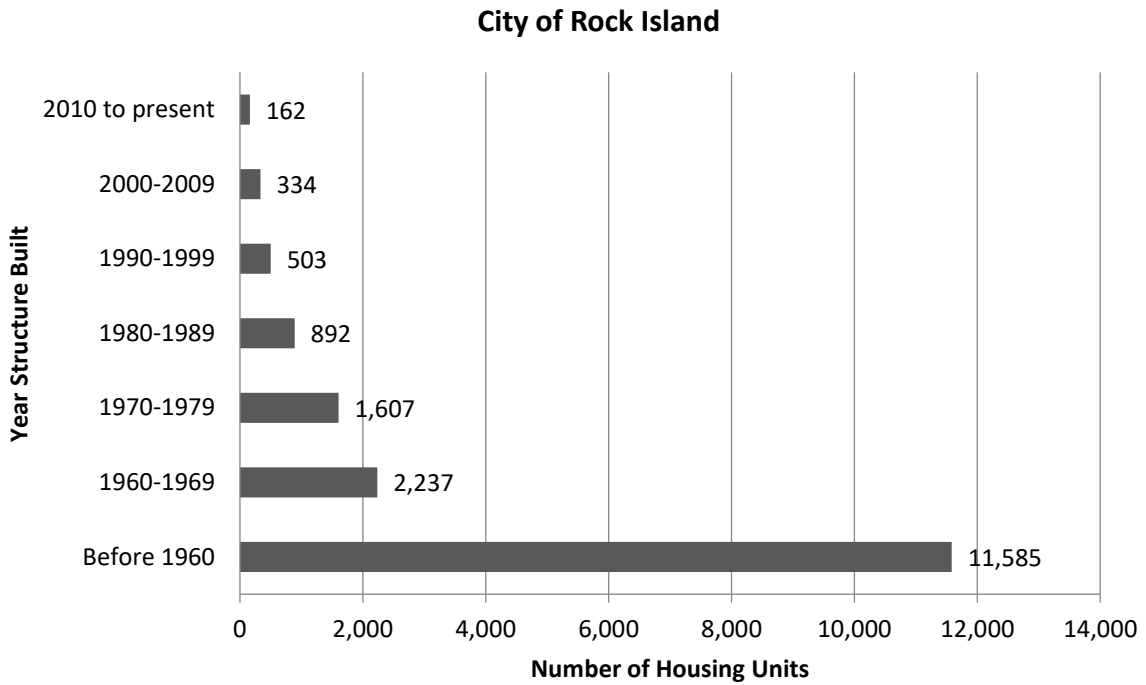
About one-tenth of units in Davenport were built since 2000, compared to 6.3% in Moline and 2.9% in Rock Island. These figures echo stakeholder comments related to housing age and condition, which noted that while units may be more affordable in Moline or Rock Island, they also tended to be older and may have more issues related to quality.

FIGURE 20. AGE OF HOUSING IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA



Data Source: 2012-2016 5-Year American Community Survey Table B25034

FIGURE 20. AGE OF HOUSING IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA (CONTINUED)



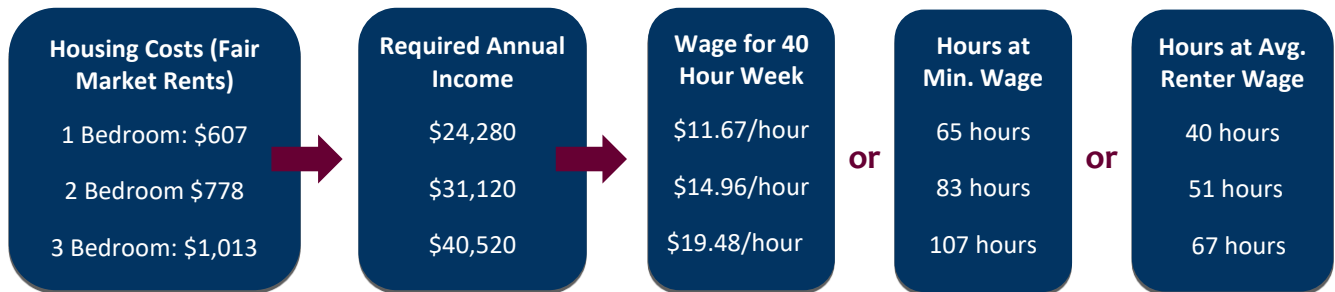
Data Source: 2012-2016 5-Year American Community Survey Table B25034

HOUSING COSTS AND AFFORDABILITY

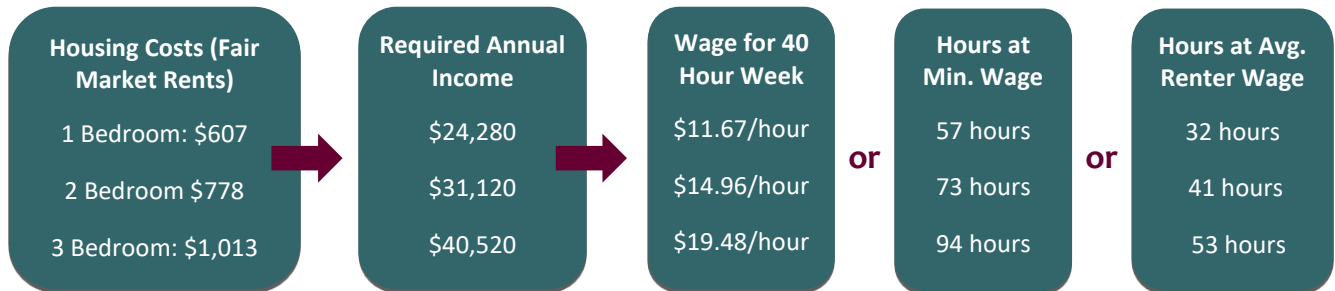
The availability of housing that is both affordable and in good condition was a common need identified by stakeholders, particularly for low- and moderate-income households. The National Low Income Housing Coalition’s annual *Out of Reach* report examines rental housing rates relative to income levels for counties throughout the U.S. The figure below shows annual household income and hourly wages needed to afford Fair Market Rents in Scott County, Iowa and Rock Island County, Illinois for one, two, and three bedroom rental units.

FIGURE 21. REQUIRED INCOME, WAGES, AND HOURS TO AFFORD FAIR MARKET RENTS BY COUNTY, 2018

Scott County



Rock Island County



Note: Required income is the annual income needed to afford Fair Market Rents without spending more than 30% of household income on rent. Minimum wage in Scott County is \$7.25 and Rock Island County is \$8.25. Average renter wages are \$12.50 in Scott County and \$16.78 in Rock Island County. Average renter wages are derived by the National Low Income Housing Coalition from Bureau of Labor Statistics’ Quarterly Census of Employment and Wages.

Source: National Low Income Housing Coalition *Out of Reach* 2018, Accessed from <http://nlihc.org/oor/iowa> and <http://nlihc.org/oor/illinois>.

Fair Market Rent (FMR) is a standard set by HUD at the county or regional level for use in administering its Section 8 rental voucher program. FMRs are typically the 40th percentile gross rent (i.e., rent plus utility costs) for typical, non-standard rental units in the local housing market. As Figure 21 shows, HUD’s FMRs in Scott and Rock Island Counties are identical given that they are in the same metropolitan area.

To afford a one-bedroom rental unit at the FMR of \$607 without being cost burdened (i.e., spending more than 30% of income on housing) would require an annual income of at least \$24,280. This amount translates to a 40-hour work week at an hourly wage of \$11.67. In Scott County, it would take a 65-hour work week at the minimum wage of \$7.25 or a 40-hour work week at the average renter wage of \$12.50

to afford the unit. With slightly higher wage levels in Rock Island County, it would take a 57-hour work week at the minimum wage of \$8.25 or a 32-hour work week at the average renter wage of \$16.78. Note that average renter wages for Scott and Rock Island Counties were derived by the National Low Income Housing Coalition from the Bureau of Labor Statistics' Quarterly Census of Employment and Wages data for the purpose of evaluating local housing affordability.

A household could afford the 2-bedroom FMR of \$778 with an annual income of \$31,120 or higher, or a 40-hour work week at an hourly wage of about \$15. A minimum wage employee would need to work 83 hours per week in Scott County or 73 hours in Rock Island County to afford the unit. Someone earning the average renter wage would have to work 51 hours in Scott County and 41 hours in Rock Island County.

Overall, this data indicates that higher minimum and average wages in Rock Island County mean that housing is more affordable for people there. While FMRs are set at the metropolitan level, there is variation in housing costs across the region, with stakeholder input indicating lower costs in Rock Island and Moline compared to Davenport. However, community input also suggested a greater prevalence of issues related to housing condition in the former cities. The next section looks in more detail at housing needs by city.

HOUSING NEEDS

Housing cost and condition are key components to housing choice. Housing barriers may exist in a jurisdiction when some protected class groups have greater difficulty accessing housing in good condition and that they can afford. To assess affordability and other types of housing needs, HUD defines four housing problems:

1. A household is *cost burdened* if monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
2. A household is *overcrowded* if there is more than 1.0 people per room, not including kitchen or bathrooms.
3. A housing unit *lacks complete kitchen facilities* if it lacks one or more of the following: cooking facilities, a refrigerator, or a sink with piped water.
4. A housing unit *lacks complete plumbing facilities* if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly housing income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (also as described above).

To assess housing need, HUD receives a special tabulation of data from the U. S. Census Bureau's American Community Survey that is largely not available through standard Census products. This data, known as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combination of HUD-specified criteria, such as housing needs by race and ethnicity. CHAS data for Davenport, Moline, Rock Island, and the region is provided in the tables that follow.

In Davenport, there are 12,135 households with at least one problem, making up 29.8% of households citywide. About one-in-seven Davenport households have a severe housing need (5,960 households or 14.6%). Looking at need by householder race and ethnicity shows that 25.9% of non-Latino White households have a housing need and 12.5% have a severe housing need. HUD defines a group as having a disproportionate need if its members experience housing needs at a rate that is ten percentage points or more above that of White households. In Davenport, all five racial and ethnic groups examined have a disproportionate rate of housing needs relative to White households. Shares with needs range from 44.2% for other race households to 62.8% for Native American households. Three groups have a disproportionate rate of severe needs: African Americans (25.8% with a severe housing need), Asians (31.1% with a severe need), and Native Americans (32.1% with a severe need).

In Moline, the overall incidence of housing problems and severe housing problems are slightly lower than in Davenport. About one-quarter of all households have a housing need (24.9%) and one-tenth have a severe housing need (11.2%). Disproportionate needs are also less prevalent there. Three groups have disproportionate rates of housing needs (Black households at 38.4%, Hispanic households at 35.0%, and other race households at 44.9%) relative to White households (22.7% with a housing need). For severe housing needs, only one group faces disproportionate rates – 21.5% of Black households in Moline have a severe housing need compared to 9.7% of White households.

Of the three cities, Rock Island has the highest rate of housing problems, with one-third of households (33.0%) facing a housing need and one-in-six facing a severe housing need (16.7%). As in Moline, three groups have a disproportionate rate of housing needs (Black households at 46.9%, Hispanic households at 40.1%, and Native American households at 87.1%) relative to White households (29.0% with a housing need). These same three groups face disproportionate severe needs (African Americans at 26.3%, Hispanics at 27.1%, and Native Americans at 71.0%) compared to 13.2% of White households.

Regional housing need levels are similar to those in Moline and lower than those in Davenport and Rock Island. About one-quarter of the region's households have a housing problem and about 12% have a severe housing problem.

Tables 10A through 10C also compare housing need rates for households by size and familial status. In all three cities, housing need rates are lowest for small family households (i.e., those with fewer than five people). These rates range from 19.1% in Moline to 24.6% in Rock Island. Large family and non-family households face somewhat similar rates of need as one another in each geography: about 36% each in Davenport, 28-32% in Moline, and 41-43% in Rock Island.

Tables 11A through 11C examine only one dimension of housing need – severe cost burdens (defined as spending more than 50% of income on housing). In Davenport and Rock Island about 14% of households have a severe cost burden, as do about 9% of households in Moline. No population subgroups in Moline have a disproportionate rate of severe cost burdens compared to White households. In both Davenport and Rock Island, two groups are disproportionately impacted. In Davenport, 24.7% of African Americans and 26.8% of Asians have a severe cost burden compared to 12.0% of White households. In Rock Island, 24.1% of Black households and 71.0% of Native American households have a severe cost burden compared to 11.2% of White households.

Looking at familial status shows that small family households have the lowest rates of severe cost burdens, which range from 5.2% in Moline to 10.5% in Rock Island. In all three cities, non-family households are most likely to spend more than one-half of their incomes on housing, with about 15% in Moline and about 19% in Davenport and Rock Island doing so.

Figure 22 maps the prevalence of housing needs by census tract, along with population by race and ethnicity. Tracts with the highest rate of housing problems are located in and near downtown Davenport and downtown Rock Island along the river. There are two tracts in Rock Island where 50% or more of households have a housing problem. In these tracts, people of color make up considerably higher population shares than they do citywide – more than 50% in one tract and more than 84% in the other, compared to about 32% throughout Rock Island. Similarly, Davenport tracts with the highest housing need rates generally have lower White population shares than the city overall. These patterns echo the findings in the data tables which show that households of color, particularly African American, Latino, and Native American households, are more likely to face housing needs.

TABLE 10A. DEMOGRAPHICS OF HOUSEHOLDS WITH HOUSING NEEDS IN THE CITY OF DAVENPORT AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Disproportionate Housing Needs	City of Davenport			Davenport-Moline-Rock Island MSA		
Households Experiencing any of the Four Housing Problems†	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race/Ethnicity						
White, Non-Hispanic	8,560	33,020	25.9%	30,745	133,765	23.0%
Black, Non-Hispanic	2,045	4,330	47.2%	4,371	9,417	46.4%
Hispanic	939	2,084	45.1%	2,903	7,659	37.9%
Asian or Pacific Islander, Non-Hispanic	289	653	44.3%	660	2,006	32.9%
Native American, Non-Hispanic	49	78	62.8%	164	256	64.1%
Other, Non-Hispanic	240	543	44.2%	637	1,488	42.8%
Total	12,135	40,740	29.8%	39,480	154,625	25.5%
Household Type and Size						
Family households, <5 People	4,985	20,810	24.0%	16,470	87,157	18.9%
Family households, 5+ People	1,145	3,210	35.7%	3,529	11,879	29.7%
Non-family households	6,005	16,725	35.9%	19,485	55,555	35.1%
Households Experiencing any of the Four Severe Housing Problems†	# with problems	# of households	% with Problems	# with problems	# of households	% with Problems
Race/Ethnicity						
White, Non-Hispanic	4,115	33,020	12.5%	14,149	133,765	10.6%
Black, Non-Hispanic	1,115	4,330	25.8%	2,412	9,417	25.6%
Hispanic	415	2,084	19.9%	1,410	7,659	18.4%
Asian or Pacific Islander, Non-Hispanic	203	653	31.1%	445	2,006	22.2%
Native American, Non-Hispanic	25	78	32.1%	100	256	39.1%
Other, Non-Hispanic	80	543	14.7%	273	1,488	18.4%
Total	5,960	40,740	14.6%	18,785	154,625	12.2%

Note: All % represent a share of households with housing problems by race, ethnicity, or household type.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

†The four Housing Problems and Severe Housing Problems are defined on p. 90.

TABLE 10B. DEMOGRAPHICS OF HOUSEHOLDS WITH HOUSING NEEDS IN THE CITY OF MOLINE AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Disproportionate Housing Needs	City of Moline			Davenport-Moline-Rock Island MSA		
Households Experiencing any of the Four Housing Problems†	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race/Ethnicity						
White, Non-Hispanic	3,375	14,865	22.7%	30,745	133,765	23.0%
Black, Non-Hispanic	295	769	38.4%	4,371	9,417	46.4%
Hispanic	700	2,003	35.0%	2,903	7,659	37.9%
Asian or Pacific Islander, Non-Hispanic	72	251	28.7%	660	2,006	32.9%
Native American, Non-Hispanic	0	19	0.0%	164	256	64.1%
Other, Non-Hispanic	35	78	44.9%	637	1,488	42.8%
Total	4,485	17,985	24.9%	39,480	154,625	25.5%
Household Type and Size						
Family households, <5 People	1,845	9,664	19.1%	16,470	87,157	18.9%
Family households, 5+ People	410	1,470	27.9%	3,529	11,879	29.7%
Non-family households	2,230	6,847	32.6%	19,485	55,555	35.1%
Households Experiencing any of the Four Severe Housing Problems†	# with problems	# of households	% with Problems	# with problems	# of households	% with Problems
Race/Ethnicity						
White, Non-Hispanic	1,439	14,865	9.7%	14,149	133,765	10.6%
Black, Non-Hispanic	165	769	21.5%	2,412	9,417	25.6%
Hispanic	343	2,003	17.1%	1,410	7,659	18.4%
Asian or Pacific Islander, Non-Hispanic	49	251	19.5%	445	2,006	22.2%
Native American, Non-Hispanic	0	19	0.0%	100	256	39.1%
Other, Non-Hispanic	15	78	19.2%	273	1,488	18.4%
Total	2,005	17,985	11.2%	18,785	154,625	12.2%

Note: All % represent a share of households with housing problems by race, ethnicity, or household type.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

†The four Housing Problems and Severe Housing Problems are defined on p. 90.

TABLE 10C. DEMOGRAPHICS OF HOUSEHOLDS WITH HOUSING NEEDS IN THE CITY OF ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Disproportionate Housing Needs	City of Rock Island			Davenport-Moline-Rock Island MSA		
Households Experiencing any of the Four Housing Problems†	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race/Ethnicity						
White, Non-Hispanic	3,343	11,518	29.0%	30,745	133,765	23.0%
Black, Non-Hispanic	1,235	2,635	46.9%	4,371	9,417	46.4%
Hispanic	354	882	40.1%	2,903	7,659	37.9%
Asian or Pacific Islander, Non-Hispanic	52	162	32.1%	660	2,006	32.9%
Native American, Non-Hispanic	54	62	87.1%	164	256	64.1%
Other, Non-Hispanic	78	284	27.5%	637	1,488	42.8%
Total	5,149	15,585	33.0%	39,480	154,625	25.5%
Household Type and Size						
Family households, <5 People	1,934	7,873	24.6%	16,470	87,157	18.9%
Family households, 5+ People	483	1,118	43.2%	3,529	11,879	29.7%
Non-family households	2,720	6,590	41.3%	19,485	55,555	35.1%
Households Experiencing any of the Four Severe Housing Problems†	# with problems	# of households	% with Problems	# with problems	# of households	% with Problems
Race/Ethnicity						
White, Non-Hispanic	1,523	11,518	13.2%	14,149	133,765	10.6%
Black, Non-Hispanic	693	2,635	26.3%	2,412	9,417	25.6%
Hispanic	239	882	27.1%	1,410	7,659	18.4%
Asian or Pacific Islander, Non-Hispanic	29	162	17.9%	445	2,006	22.2%
Native American, Non-Hispanic	44	62	71.0%	100	256	39.1%
Other, Non-Hispanic	54	284	19.0%	273	1,488	18.4%
Total	2,595	15,585	16.7%	18,785	154,625	12.2%

Note: All % represent a share of households with housing problems by race, ethnicity, or household type.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

†The four Housing Problems and Severe Housing Problems are defined on p. 90.

TABLE 11A. DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING COST BURDENS IN THE CITY OF DAVENPORT AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Households with Severe Cost Burdens	City of Davenport			Davenport-Moline-Rock Island MSA		
	# with problems	# of households	% with Problems	# with problems	# of households	% with problems
Race/Ethnicity						
White, Non-Hispanic	3,955	33,020	12.0%	12,480	133,765	9.3%
Black, Non-Hispanic	1,070	4,330	24.7%	2,194	9,417	23.3%
Hispanic	290	2,084	13.9%	940	7,659	12.3%
Asian or Pacific Islander, Non-Hispanic	175	653	26.8%	324	2,006	16.2%
Native American, Non-Hispanic	4	78	5.1%	79	256	30.9%
Other, Non-Hispanic	80	543	14.7%	229	1,488	15.4%
Total	5,574	40,740	13.7%	16,246	154,625	10.5%
Household Type and Size						
Family households, <5 People	1,955	20,810	9.4%	5,950	87,157	6.8%
Family households, 5+ People	415	3,210	12.9%	1,060	11,879	8.9%
Non-family households	3,229	16,725	19.3%	9,234	55,555	16.6%

Note: All % represent a share of households with severe housing cost burdens by race, ethnicity, or household type.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

TABLE 11B. DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING COST BURDENS IN THE CITY OF MOLINE AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Households with Severe Cost Burdens	City of Moline			Davenport-Moline-Rock Island MSA		
	# with problems	# of households	% with Problems	# with problems	# of households	% with problems
Race/Ethnicity						
White, Non-Hispanic	1,235	14,865	8.3%	12,480	133,765	9.3%
Black, Non-Hispanic	125	769	16.3%	2,194	9,417	23.3%
Hispanic	270	2,003	13.5%	940	7,659	12.3%
Asian or Pacific Islander, Non-Hispanic	25	251	10.0%	324	2,006	16.2%
Native American, Non-Hispanic	0	19	0.0%	79	256	30.9%
Other, Non-Hispanic	0	78	0.0%	229	1,488	15.4%
Total	1,655	17,985	9.2%	16,246	154,625	10.5%
Household Type and Size						
Family households, <5 People	504	9,664	5.2%	5,950	87,157	6.8%
Family households, 5+ People	119	1,470	8.1%	1,060	11,879	8.9%
Non-family households	1,027	6,847	15.0%	9,234	55,555	16.6%

Note: All % represent a share of households with severe housing cost burdens by race, ethnicity, or household type.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

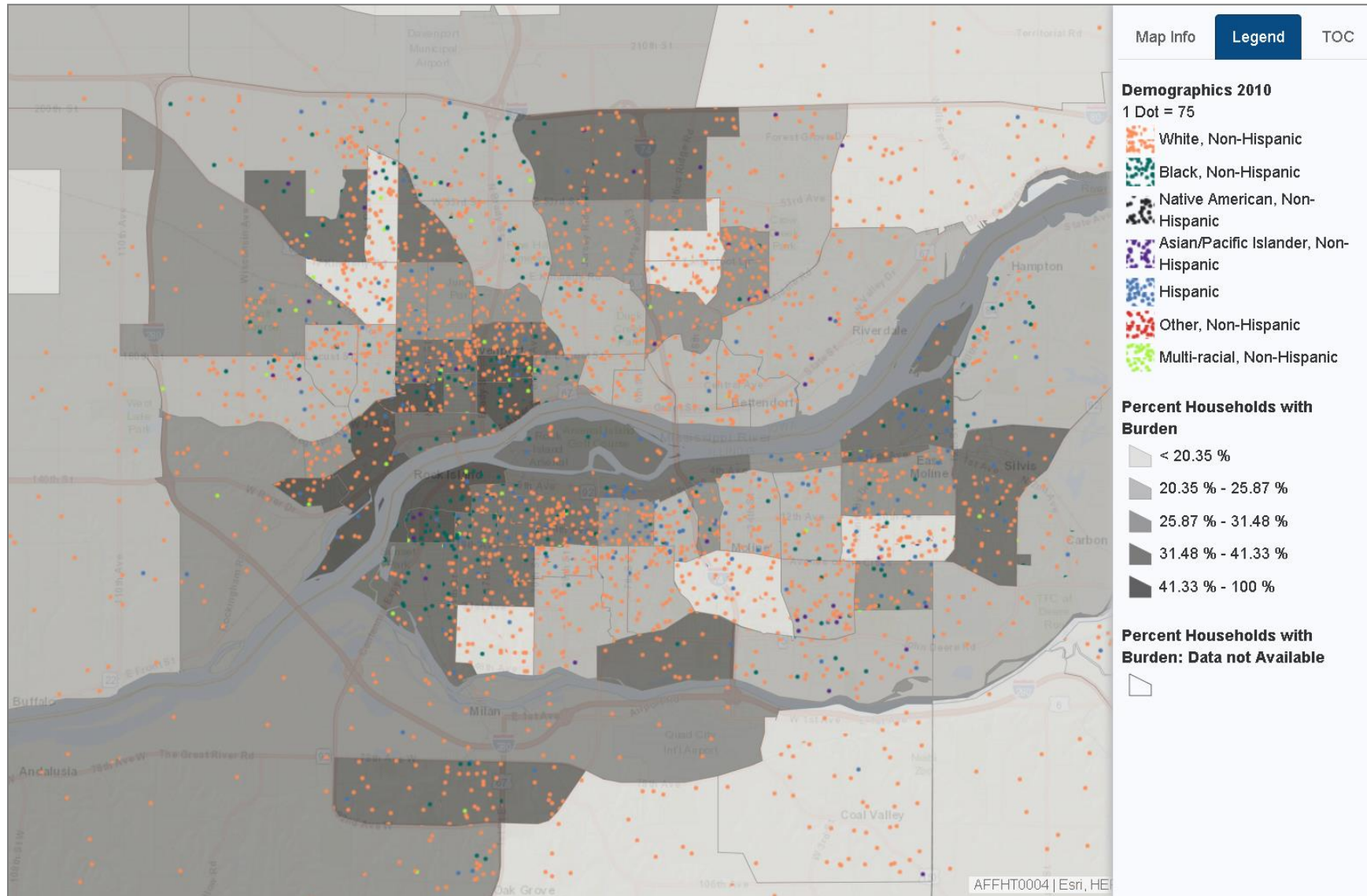
TABLE 11C. DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING COST BURDENS IN THE CITY OF ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Households with Severe Cost Burdens	City of Rock Island			Davenport-Moline-Rock Island MSA		
	# with problems	# of households	% with Problems	# with problems	# of households	% with problems
Race/Ethnicity						
White, Non-Hispanic	1,295	11,518	11.2%	12,480	133,765	9.3%
Black, Non-Hispanic	635	2,635	24.1%	2,194	9,417	23.3%
Hispanic	160	882	18.1%	940	7,659	12.3%
Asian or Pacific Islander, Non-Hispanic	25	162	15.4%	324	2,006	16.2%
Native American, Non-Hispanic	44	62	71.0%	79	256	30.9%
Other, Non-Hispanic	24	284	8.5%	229	1,488	15.4%
Total	2,183	15,585	14.0%	16,246	154,625	10.5%
Household Type and Size						
Family households, <5 People	830	7,873	10.5%	5,950	87,157	6.8%
Family households, 5+ People	149	1,118	13.3%	1,060	11,879	8.9%
Non-family households	1,219	6,590	18.5%	9,234	55,555	16.6%

Note: All % represent a share of households with severe housing cost burdens by race, ethnicity, or household type.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 22. HOUSING PROBLEMS AND RACE / ETHNICITY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

HOMEOWNERSHIP AND LENDING

Homeownership is vital to a community's economic well-being. It allows the opportunity to build wealth, is generally associated with higher levels of civic engagement,²⁶ and is correlated with positive cognitive and behavioral outcomes among children.²⁷

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968, along with continuing impediments to access, have had significant impacts on the homeownership rates of racial and ethnic minorities, particularly Black and Hispanic populations. The gap between the White and Black homeownership rate is the largest among racial and ethnic groups. In 2017, the U.S. Census Bureau reported a 21.6 percentage point gap in homeownership rate between White and Black households; just a 2.9 percentage point decrease since 1997.²⁸

Homeownership trends have changed in recent years because of significant events in the housing market and labor force. The homeownership rate for Millennials (the generation born between 1981 and 1997) is 8 percentage points lower than the two previous generations, controlling for age. This discrepancy can be attributed to a multitude of factors ranging from preference to urban areas, cost of education and associated debt, changes in marriage and childbearing patterns, rising housing costs, and the current supply of affordable houses.²⁹

The table that follows shows the number of owner and renter households, as well as the homeownership rate, by race and ethnicity for the cities of Davenport, Moline, and Rock Island. Overall, tenure data indicates that households of color are less likely than White households to own their homes. Homeownership gaps depend on race, ethnicity, and geography. In Davenport, African American households have the lowest homeownership rate (28.5%), which is less than half of the White homeownership rate of 67.6%. Asian households have a slightly higher homeownership rate than White households, the only case in any of the three cities in which a non-White group had a higher homeownership rate than White households did in their respective cities.

In Moline, both Black and other races had very low homeownership rates (26.0% and 21.1%, respectively), both less than half of the White homeownership rate of 71.9%. Hispanic households also had a notably lower homeownership rate a 43.8%.

²⁶ Manturuk K, Lindblad M, Quercia R. "Homeownership and civic engagement in low-income urban neighborhoods: a longitudinal analysis." *Urban Affairs Review*. 2012;48(5):731–60.

²⁷ Haurin, Donald R. et al. "The Impact of Homeownership on Child Outcomes." *Low-Income Homeownership Working Paper Series*. Joint Center for Housing Studies of Harvard University. October 2001, <http://www.jchs.harvard.edu/sites/default/files/liho01-14.pdf>.

²⁸ U.S. Census Bureau. Homeownership Rates by Race and Ethnicity of Householder: 1994 to 2017.

²⁹ Choi, Jung et al. "Millennial Homeownership: Why Is It So Low, and How Can We Increase It?" The Urban Institute. February 2000. https://www.urban.org/sites/default/files/publication/98729/millennial_homeownership_0.pdf

In Rock Island, other race households had the lowest homeownership rate (21.9%) but several other groups also show a considerable gap relative to the White homeownership rate of 73.8%. They include Black households (43.6%), Native Americans (41.6%), and Latinos (34.5%).

The maps that follow show the share of owners and renters by census tract in the city of Davenport, Moline, and Rock Island. Homeownership is lowest in the areas just north and south of the Mississippi river, which corresponds to the downtown core areas of each of the three cities. In Davenport, in the two tracts along the river with the lowest homeownership only one-in-five (80%) or less of residents own their homes. Another area of low home ownership is in north central Davenport in the area around Pine Hill Cemetery and Northpark Mall. Here, just over a third (36.2%) of residents own their homes. In Moline, only about a third (32%) of residents own their homes in the tract with the lowest homeownership, downtown. Homeownership is also fairly low in the Homewood neighborhood (41.1%). In Rock Island, the lowest homeownership rate is found in the portions of downtown and the Old Town Chicago neighborhoods that are closest to the river, where about one-in-four (22%) households are owned by their residents. Homeownership is also low in the Greenbush and Keystone neighborhoods along the river (32%) and in the Rock Riverfront neighborhood (39.1%). Generally, in the region, more urban and higher-density areas have higher shares of rental housing, while homeownership is most common in the rural parts of the counties.

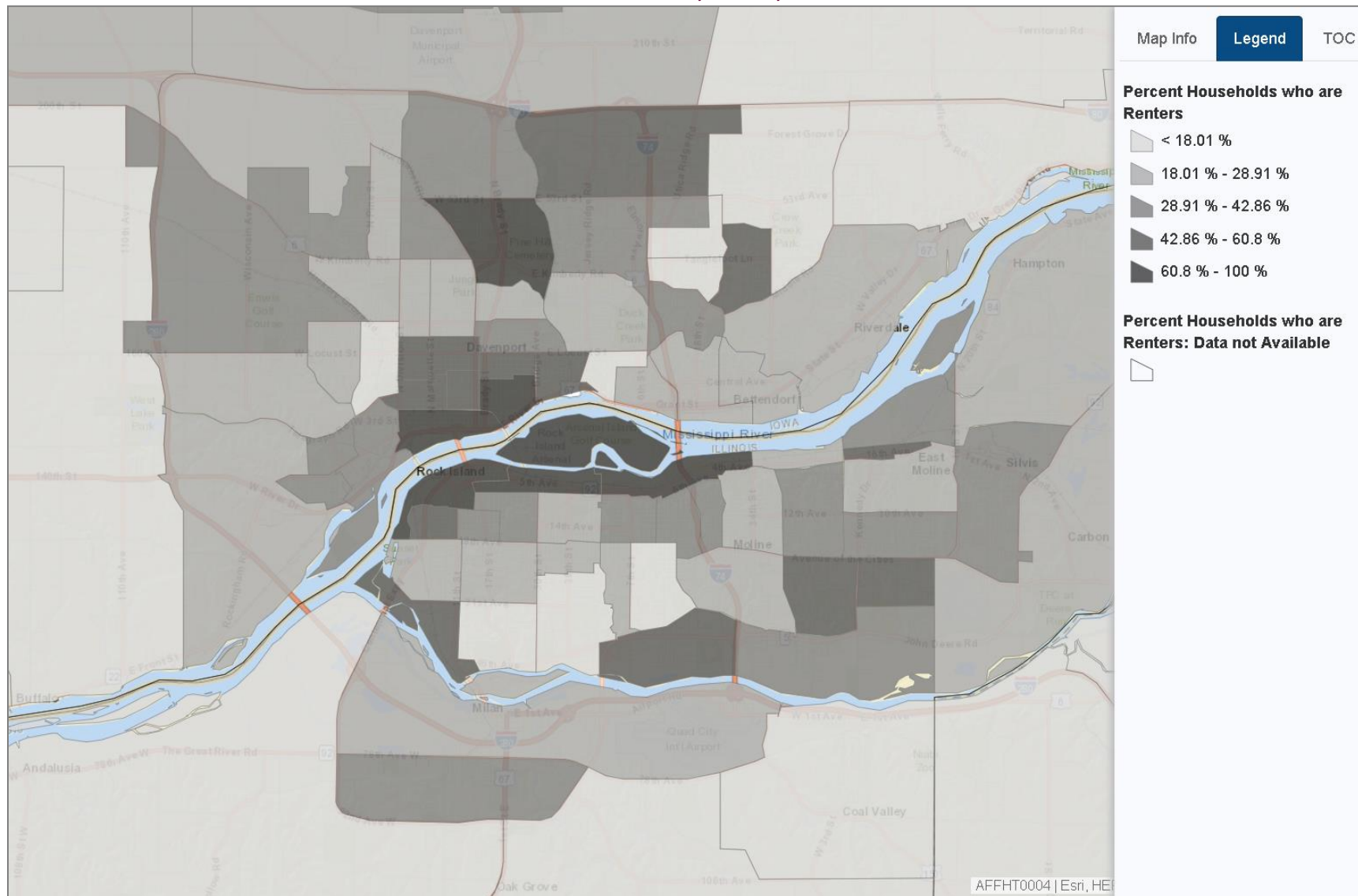
TABLE 12. HOMEOWNERSHIP AND RENTAL RATES BY RACE AND ETHNICITY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Race/Ethnicity	Owners		Renters		Homeownership Rate
	#	%	#	%	
City of Davenport					
White, Non-Hispanic	22,340	87.6%	10,690	70.2%	67.6%
Black, Non-Hispanic	1,235	4.8%	3,100	20.4%	28.5%
Hispanic	1,165	4.6%	920	6.0%	55.9%
Asian or Pacific Islander, Non-Hispanic	480	1.9%	185	1.2%	72.2%
Native American, Non-Hispanic	50	0.2%	30	0.2%	62.5%
Other, Non-Hispanic	240	0.9%	305	2.0%	44.0%
Total	25,515	100.0%	15,225	100.0%	62.6%
City of Moline					
White, Non-Hispanic	10,685	86.9%	4,180	73.5%	71.9%
Black, Non-Hispanic	200	1.6%	570	10.0%	26.0%
Hispanic	35	0.3%	45	0.8%	43.8%
Asian or Pacific Islander, Non-Hispanic	1,230	10.0%	775	13.6%	61.3%
Native American, Non-Hispanic	149	1.2%	110	1.9%	57.5%
Other, Non-Hispanic	4	0.0%	15	0.3%	21.1%
Total	12,300	100.0%	5,685	100.0%	68.4%
City of Rock Island					
White, Non-Hispanic	8,505	81.5%	3,025	58.8%	71.9%
Black, Non-Hispanic	1,150	11.0%	1,490	29.0%	26.0%
Hispanic	100	1.0%	190	3.7%	43.8%
Asian or Pacific Islander, Non-Hispanic	595	5.7%	300	5.8%	61.3%
Native American, Non-Hispanic	67	0.6%	94	1.8%	57.5%
Other, Non-Hispanic	14	0.1%	50	1.0%	21.1%
Total	10,440	100.0%	5,145	100.0%	68.4%
Davenport-Moline-Rock Island MSA					
White, Non-Hispanic	99,880	90.9%	33,870	75.8%	74.7%
Black, Non-Hispanic	3,294	3.0%	6,140	13.7%	34.9%
Hispanic	4,840	4.4%	2,830	6.3%	63.1%
Asian or Pacific Islander, Non-Hispanic	1,069	1.0%	944	2.1%	53.1%
Native American, Non-Hispanic	123	0.1%	135	0.3%	47.7%
Other, Non-Hispanic	695	0.6%	775	1.7%	47.3%
Total	109,915	100.0%	44,710	100.0%	71.1%

Note: Data presented are number of households, not individuals.

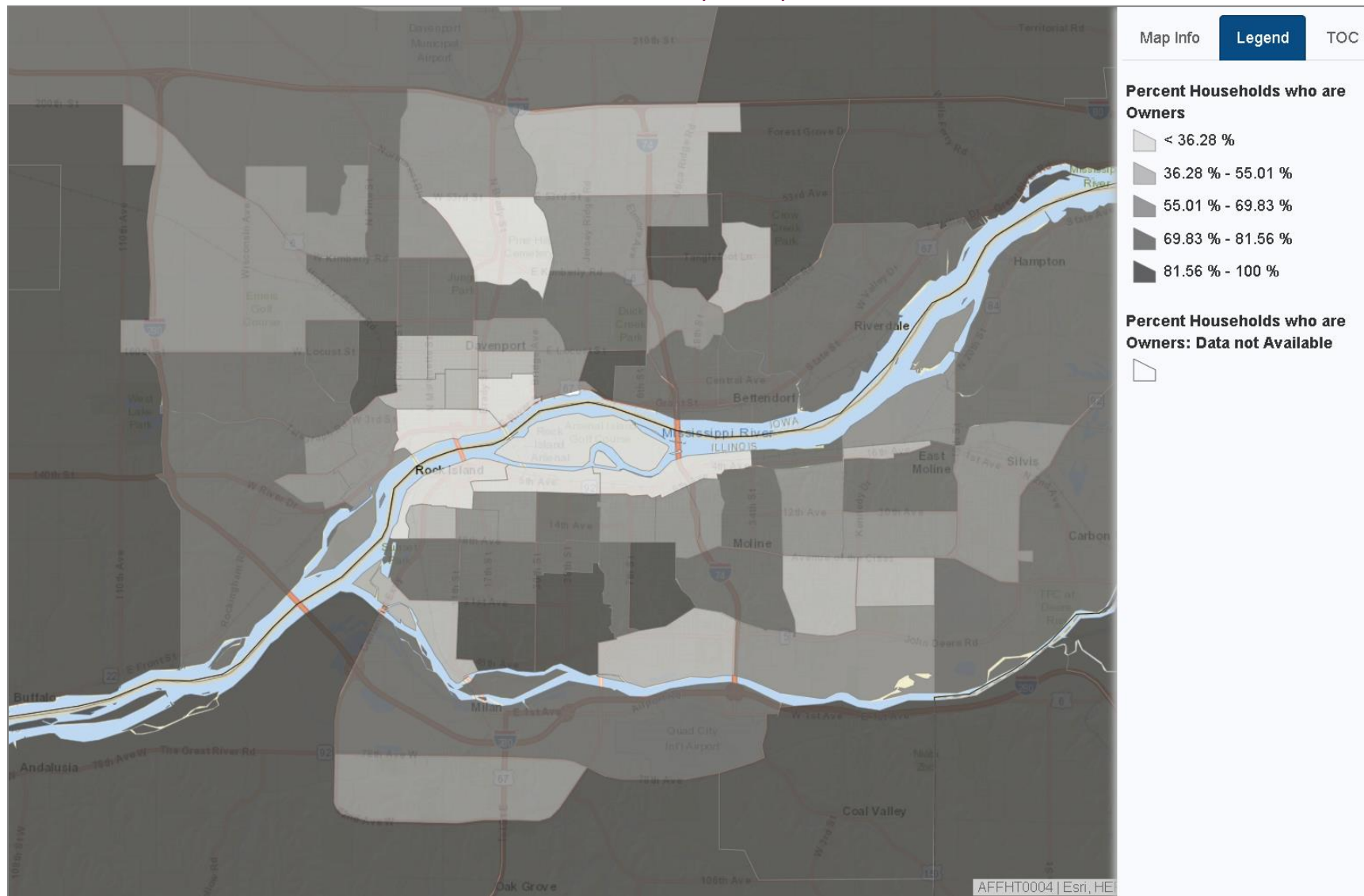
Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 23. SHARE OF HOUSEHOLDS THAT ARE RENTERS IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 24. SHARE OF HOUSEHOLDS THAT ARE OWNERS IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

Mortgage Lending

Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The proceeding data and analysis assesses the degree to which the housing needs of local residents are being met by home loan lenders. The cities of Davenport, Moline, and Rock Island do not regulate or control mortgage lending, which is a private market function. However, this analysis may point to private sector issues and opportunities related to lending patterns.

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market.

The national 2017 HMDA data consists of information for 12.1 million home loan applications reported by 5,852 home lenders, including banks, savings associations, credit unions, and mortgage companies.³⁰ HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and information about loan applicants such as sex, race, ethnicity, and income.

The source for this analysis is tract-level HMDA data for census tracts in Rock Island and Scott Counties (including the cities of Davenport, Moline, and Rock Island) for the years 2013 through 2017, which includes a total of 36,251 home purchase loan application records and 34,018 mortgage refinance application records.³¹ Within each record, some data variables are 100% reported: “Loan Type,” “Loan Amount,” and “Action Taken,” for example, but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, Internet, or phone in which the applicant declined to identify their sex, race and/or ethnicity. Missing race, ethnicity, and sex data are potentially problematic for an assessment of discrimination. If the missing data are non-random there may be adverse impacts on the accuracy of the analysis. Ideally, any missing data for a specific data variable would affect a small proportion of the total number of loan records and therefore would have only a minimal effect on the results.

Of these applications 13% were denied by the lending institution. There is no requirement for reporting reasons for a loan denial, and this information was not provided for about 33.4% of home purchase loan denials and 29.2% of refinance loan denials. Further, the HMDA data does not include a borrower’s total financial qualifications such as an actual credit score, property type and value, loan-to-value ratio, or loan product choices. Research has shown that differences in denial rates among racial or ethnic groups can

³⁰ Consumer Financial Protection Bureau. “FFIEC Announces Availability of 2017 Data on Mortgage Lending.” May 7, 2018. <https://www.consumerfinance.gov/about-us/newsroom/ffiec-announces-availability-2017-data-mortgage-lending/>

³¹ Includes applications for the purchase or refinance of one-to-four family dwellings in which the property is or will be occupied as the owner’s principal dwelling and in which the mortgage will be secured as first lien. Includes applications for conventional, FHA-insured, VA-guaranteed, and FSA/RHS-guaranteed loans.

arise from these credit-related factors not available in the HMDA data.³² Despite these limitations, the HMDA data play an important role in fair lending enforcement. Bank examiners frequently use HMDA data in conjunction with information from loan files to assess an institution's compliance with fair lending laws.

Complete information regarding applicant race, ethnicity, and income is available for 22,293 purchase loan applications, about 61.5% of all applications. Most applicants were White (87.6%); Asian households made up 2.2% of the applicant pool, Latino households made up 5.7%, and Black households comprised 3.5%. These shares are similar to the breakdown of households by race and ethnicity in the region overall, where 76.7% of householders are White, 2.2% are Asian, 7.3% are Latino, and 10.5% are Black, though Black and Latino rates of application are lower than their share of the total population and White applications are higher. The table below shows loan approval rates for completed loan applications by race and ethnicity at various income levels.³³ Not included in these figures are applications that were withdrawn or closed due to incompleteness such that no decision was made regarding approval or denial.

At each income level, households of color (except for Asian households) have higher purchase loan denial rates than White applicants. At low incomes, loan denial rates range from 8.5% for Asian households and 12.7% for White applicants to a rate of 22.8% for other races. At middle incomes, White applicants had the lowest denial rate (7.7%) followed by Latino households (9.6%), Black households (11.5%) and Asian households (12%). Other races had the highest denial rate (19%). At higher incomes, disparities were less pronounced. About 5% of White households were denied a home loan, while rates across all other groups were slightly higher, ranging from 6.1% for Asian households to 7.9% for Latino households. Overall, disregarding income, about 8.5% of White applicants were denied a home loan compared to 12.2% of applicants of color. African American and other race applicants had the greatest disparity in lending access, with overall home purchase loan denial rates of 13.6% and 16.5%, respectively.

The table also provides data for home refinance loan applications. Information regarding race, ethnicity, and income is available for 25,155 refinance applications, or 73.9% of the total refinance applications in the two counties. This data also shows some disparity in denial rates by race and ethnicity. Denial rates for White applicants range from about 13% to 31%, depending on income. As with purchase loans, at each income level, households of color (except for Asian households) overall have higher refinance loan denial rates than White applicants. Overall, applicants of color were denied refinance loans at a rate that was 75% higher than that of White applicants (34.5% versus 20.6%). Black and other race applicants had the highest overall denial rates, 41.6% and 45.2% respectively.

³² R. B. Avery, Bhutta N., Brevoort K.P., and Canne, G.B. 2012. "The Mortgage Market in 2011: Highlights from the Data Reported Under the Home Mortgage Disclosure Act." Board of Governors of the Federal Reserve System. Federal Reserve Bulletin, Vol. 98, No. 6.

³³ The low-income category includes applicants with a household income at or below 80% of area median family income (MFI). The middle income range includes applicants with household incomes from 81% to 120% MFI, and the upper income category consists of applicants with a household income above 120% MFI.

TABLE 13. LOAN APPROVAL RATES BY RACE AND ETHNICITY IN SCOTT AND ROCK ISLAND COUNTIES, 2013 – 2017

Applicant Income		Applicant Race and Ethnicity					All Applicants
		Non-Latino				Latino	
		White	Black	Asian	Other		
Home Purchase Loans							
Low Income	Completed Applications	7,950	455	295	57	798	9,555
	Denial Rate	12.7%	17.4%	8.5%	22.8%	16.4%	13.1%
Middle Income	Completed Applications	5,442	200	100	58	334	6,134
	Denial Rate	7.7%	11.5%	12.0%	19.0%	9.6%	8.1%
High Income	Completed Applications	8,251	201	279	55	303	9,089
	Denial Rate	5.0%	7.0%	6.1%	7.3%	7.9%	5.2%
All Applicants	Completed Applications	21,643	856	674	170	1,435	24,778
	Denial Rate	8.5%	13.6%	8.0%	16.5%	13.0%	9.0%
Home Refinance Loans							
Low Income	Completed Applications	6,266	340	106	26	637	7,375
	Denial Rate	30.5%	50.3%	43.4%	52.1%	36.1%	32.2%
Middle Income	Completed Applications	4,777	151	63	17	265	5,273
	Denial Rate	20.6%	35.1%	34.9%	34.6%	29.1%	21.7%
High Income	Completed Applications	7,852	191	146	30	240	8,459
	Denial Rate	12.7%	31.4%	12.3%	43.9%	22.5%	13.5%
All Applicants	Completed Applications	18,895	682	315	73	1,142	21,107
	Denial Rate	20.6%	41.6%	27.3%	45.2%	31.6%	22.1%

Note: “Completed applications” includes applications that were approved but not accepted, denied, and approved with a loan originated. It does not include applications withdrawn by the applicant or closed for incompleteness.

Data Source: FFIEC 2013-2017 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda

The table on the following page identifies reasons for denials by applicant race and ethnicity. A reason was provided in about 67% of home purchase loan denials and 55% of refinance loan denials. For purchase loans, credit history, which speaks to a household’s overall long-term ability to repay loans, was the most common denial reason for White, Black, and Latino applicants (triggering between 25% and 32% of denials in these groups). Debt to income ratio was the most common denial reason for Asians and other races. Collateral and insufficient cash, which both are related to the overall wealth of a household, were also common denial reasons for all of races and ethnicities. For refinance loans, credit history was again the most common reason for denial, at higher rates than for purchase loans. Debt to income ratio, incomplete credit applications, and collateral were also common reasons for denials regardless of applicant race and ethnicity.

TABLE 14. REASONS FOR LOAN DENIAL BY APPLICANT RACE AND ETHNICITY IN SCOTT AND ROCK ISLAND COUNTIES, 2013-2017

Reason for Denial	Applicant Race and Ethnicity					All Applicants
	Non-Latino				Latino	
	White	Black	Asian	Other		
Home Purchase Loans						
Denial reason provided	67.1%	58.1%	82.1%	57.1%	72.0%	67.3%
Collateral	8.8%	4.3%	5.4%	10.7%	4.8%	8.2%
Credit application incomplete	11.2%	6.8%	16.1%	7.1%	11.6%	11.1%
Credit history	24.5%	25.6%	8.9%	14.3%	31.7%	24.7%
Debt to income ratio	18.1%	18.8%	32.1%	25.0%	20.1%	18.8%
Employment history	3.7%	3.4%	8.9%	0.0%	6.9%	4.1%
Insufficient cash	8.4%	6.0%	5.4%	14.3%	14.8%	8.8%
Mortgage insurance denied	1.1%	0.0%	0.0%	3.6%	3.7%	1.3%
Other	6.3%	10.3%	8.9%	3.6%	10.1%	6.9%
Unverifiable information	3.6%	2.6%	14.3%	0.0%	6.3%	4.0%
Reason not provided	32.9%	41.9%	17.9%	42.9%	28.0%	32.7%
Total denials	1,853	117	56	28	189	2,243
Home Refinance Loans						
Denial reason provided	54.4%	51.2%	66.7%	47.1%	67.5%	55.3%
Collateral	20.4%	17.9%	16.7%	11.8%	6.6%	19.1%
Credit application incomplete	14.9%	13.0%	7.6%	9.8%	8.2%	14.1%
Credit history	44.4%	56.5%	43.9%	21.6%	32.5%	43.9%
Debt to income ratio	23.3%	22.7%	33.3%	11.8%	17.7%	22.8%
Employment history	2.6%	1.0%	3.0%	0.0%	4.5%	2.6%
Insufficient cash	6.8%	4.3%	13.6%	7.8%	9.1%	6.9%
Mortgage insurance denied	1.0%	0.0%	0.0%	0.0%	3.7%	1.1%
Other	10.5%	12.6%	9.1%	11.8%	14.0%	10.9%
Unverifiable information	4.1%	1.4%	7.6%	2.0%	4.9%	4.0%
Reason not provided	45.6%	48.8%	33.3%	52.9%	32.5%	44.7%
Total denials	2,769	207	66	51	243	3,336

Note: Some applications were denied for multiple reasons; thus, the total number of denial reasons reported are greater than the total number of loans denied.

Data Source: FFIEC 2013-2017 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda

ZONING, AFFORDABILITY, AND HOUSING CHOICE

Comprehensive land use planning is a critical process by which communities address a myriad of public policy issues such as housing, transportation, health, recreation, environmental protection, commercial and retail services, and land values, and address how the interconnection and complexity of these issues can ultimately impact the entire municipality. “The land use decisions made by a community shape its very character – what it’s like to walk through, what it’s like to drive through, who lives in it, what kinds of jobs and businesses exist in it, how well the natural environment survives, and whether the community is an attractive one or an ugly one.”³⁴ Likewise, decisions regarding land use and zoning have a direct and profound impact on affordable housing and fair housing choice, shaping a community or region’s potential diversity, growth, and opportunity for all. Zoning determines where housing can be built, the type of housing that is allowed, and the amount and density of housing that can be provided. Zoning also can directly or indirectly affect the cost of developing housing, making it harder or easier to accommodate affordable housing.

The following sections will explore (I) how Illinois and Iowa state law impacts local land use and zoning authority and decision-making and (II) how the zoning and land use codes of the Cities of Davenport, Moline, and Rock Island impact housing affordability and fair housing choice within those borders.

Intersection of Local Zoning with Federal and State Fair Housing Laws

One goal of zoning is to balance individual property rights with the power of government to promote and protect the health, safety, and general welfare of the overall community. Zoning codes regulate how a parcel of land in a community may be used and the density of development. Local governments may divide their jurisdiction into zoning districts by adopting a zoning map consistent with the comprehensive plan; define categories of permitted and special/conditional uses for those districts; and establish design or performance standards for those uses. Zoning may regulate the height, shape, and placement of structures and lot sizes or shapes. Jurisdictions also can expressly prohibit certain types of uses within zoning districts. In this way, local ordinances may define the type and density of housing resources available to residents, developers, and other organizations within certain areas, and as a result influence the availability and affordability of housing.

While local governments have the power to enact zoning and land use regulations, that power is limited by state and federal fair housing laws (e.g., the Illinois Human Rights Act, the Iowa Civil Rights Act, the federal FHAA, the Americans with Disabilities Act, constitutional due process and equal protection), which apply not only to private individuals but also to government actions. See H.R. Rep. No. 100–711, at 24 (1988), reprinted in 1988 U.S.C. C.A.N. 2173, 2185 (showing that Congress’ intent was that the amendments “would also apply to state or local land use and health and safety laws, regulations, practices or decisions which discriminate against individuals with handicaps”). In a recent landmark disparate impact case under the FHA, the Supreme Court affirmed that part of the FHA’s central purpose is to eradicate discriminatory housing practices, including specifically unlawful zoning laws and other housing

³⁴ John M. Levy. *Contemporary Urban Planning, Eighth Edition*. Upper Saddle River, NJ: Pearson Prentice Hall, 2009.

restrictions. *Tex. Dep't of Hous. & Cmty. Affairs v. Inclusive Cmty. Project, Inc.*, 135 S.Ct. 2507, 2521-2522 (2015) (citing multiple published court opinions involving challenges to local zoning and land use decisions and stating: "Suits targeting such practices reside at the heartland of disparate-impact liability.") Besides intentional discrimination and disparate treatment, discrimination under the FHA also includes

[A] refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling. FHA § 804(f)(3)(b).

This provision has been held to apply to zoning and land use decisions by local governments. *See, e.g., Howard v. City of Beavercreek*, 276 F.3d 802 (6th Cir. 2001) (finding Section 804(f)(3)(b) "creates an affirmative duty on municipalities . . . to afford its disabled citizens reasonable accommodations in its municipal zoning practices if necessary to afford such persons equal opportunity in the use and enjoyment of their property"); *Smith & Lee Assocs., Inc. v. City of Taylor*, 102 F.3d 781, 794-795 (6th Cir. 1996) (holding that city had violated the FHAA by failing to allow adult foster care homes to operate in areas zoned only for single-family neighborhoods).

In 1979 the Illinois legislature passed the state's own fair housing protection in the Illinois Human Rights Act. The IHRA protects against discrimination in housing/real estate transactions as well as employment, education, public accommodations and access to financial credit. The Act prohibits discrimination based on sex, age, race, color, religion, arrest record, marital status, sexual orientation, physical and mental disability, citizenship status (with regard to employment), national origin, ancestry, unfavorable military discharge, familial status (with respect to real estate transactions), military status, sexual harassment, and orders of protection.

Iowa passed its Civil Rights Act ("ICRA") in 1965, prohibiting discrimination in the sale, rental, and financing of dwellings, or to otherwise make housing unavailable, based on a person's sex, race, color, disability (physical and mental), religion, national origin, or familial status (families with children). In addition, Iowa protects persons based on creed, sexual orientation, and gender identity.

The City of Davenport also has adopted a local fair housing ordinance, which has been amended through the years to update protections for additional protected classes: in 2000, the ordinance was amended to include sexual orientation as a protected class, in 2005 to clarify provisions and add education as another area protected from discrimination; and in 2008 to bring the local ordinance into accord with the Iowa Civil Rights Act by adding gender identity and familial status to the list of protected classes. In addition to the protected classes under the FHAA and Iowa Civil Rights Act, the Davenport ordinance extends fair housing protections to persons on the basis of age and marital status.

Fair housing laws do not preempt local zoning laws but do apply to municipalities and local government units, and prohibit them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons. And even where a specific zoning decision does not violate a fair housing law, HUD entitlement communities must certify annually that they will set and implement standards and policies that protect and advance fair housing choice for all.

Cities of Davenport, Moline, and Rock Island Zoning Ordinance Reviews

Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. Examples of zoning provisions that most commonly result in barriers to fair housing choice include:

- Restrictive forms of land use that exclude any specific form of housing, particularly multi-family housing, or that require large lot sizes or low-density that deter affordable housing development by limiting its economic feasibility;
- Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit;
- Placing administrative and siting constraints on group homes for persons with disabilities;
- Restrictions making it difficult for residents with disabilities to locate housing in certain neighborhoods or to modify their housing;
- Restrictions on occupancy of alternative sources of affordable housing such as accessory dwellings, mobile homes, and mixed-use structures.

The cities' treatment of these types of issues are explored and evaluated in the tables and narrative below.

Because zoning codes present a crucial area of analysis for a study of impediments to fair housing choice, the latest available zoning ordinances of Davenport, Moline, and Rock Island were reviewed and evaluated against a list of ten common fair housing issues. Taken together, these issues give a picture of (1) the degree to which exclusionary zoning provisions may impact affordable housing opportunities within those jurisdictions and (2) the degree to which the zoning code may impact housing opportunities for persons with disabilities. The zoning ordinance was assigned a risk score of either 1, 2, or 3 for each of the ten issues and was then given an aggregate score calculated by averaging the individual scores, with the possible scores defined as follows:

1 = low risk – the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice;

2 = medium risk – the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread;

3 = high risk – the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

The following table lists the ten issues reviewed and the cities' scores for each issue. A complete report for each jurisdiction, including citations to relevant statutes, code sections, and explanatory comments, is included as an appendix to this document.

TABLE 15. ZONING CODE RISK SCORES

Issue	Risk Scores		
	Davenport	Moline	Rock Island
1a. Does the jurisdiction’s definition of “family” have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive?	1	2	2
1b. Does the definition of “family” discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?			
2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.?	1	2	2
2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?			
3a. Do the jurisdiction’s policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements?	2	1	2
3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?			
4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?	2	3	2
5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?	2	2	3
6a. Does the jurisdiction’s zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?	1	1	1

TABLE 15. ZONING CODE RISK SCORES (CONTINUED)

Issue	Risk Scores		
	Davenport	Moline	Rock Island
7. Does the zoning ordinance fail to provide residential districts where multi-family housing is permitted as of right? Are multifamily dwellings excluded from all single family dwelling districts?	1	1	1
7b. Do multi-family districts restrict development only to low-density housing types?			
8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?	2	2	2
9a. Are the jurisdiction’s design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act’s accessibility standards for design and construction?	1	1	1
9b. Is there any provision for monitoring compliance?			
10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?	2	1	2
Average Risk Score	1.5	1.6	1.8

Risk scores for the three communities are similar, (calculated by taking the average of the 10 individual issue scores) ranging from 1.5 to 1.8, indicating that overall there is low to moderate risk of the zoning regulations contributing to discriminatory housing treatment or impeding fair housing choice. In most cases, the zoning and other land use code sections are reasonably permissive and allow for flexibility as to the most common fair housing issues.

Davenport’s average risk score is 1.5. It received no “3” (high risk) scores but did received several “2” (medium risk) scores on certain issues where the zoning regulations have the potential to negatively impact fair and affordable housing.

Moline’s cumulative scores averaged to 1.6. It received a “3” (high risk) score on one issue (#4- spacing requirements) as well as several “2” (medium risk) scores.

Rock Island’s scores averaged to 1.8. It received one “3” (high risk) score (on issue #5 - treatment facility restrictions) and several “2” (medium risk) scores.

These medium and high risk scores could indicate the local governments may be vulnerable to fair housing complaints where the ordinance is applied in a way that impacts a protected class of persons. In such cases, improvements to the rules and policies could be made to more fully protect the fair housing rights of all the area’s residents and to better fulfill the mandate to affirmatively further fair housing.

Our research has shown that restricting housing choice for certain historically/socio-economically disadvantaged groups and protected classes can happen in any number of ways and should be viewed on a continuum. The zoning analysis matrix developed for this report and the narrative below are not designed to assert whether the cities' codes create a per se violation of the FHA or HUD regulations, but are meant as a tool to highlight significant areas where zoning and land use ordinances may otherwise jeopardize the spirit and intent of fair housing protections and HUD's AFFH standards for its entitlement communities.

The issues chosen for discussion show where zoning ordinances and policies could go further to protect fair housing choice for protected and disadvantaged classes, and yet still fulfill the zoning objective of protecting the public's health, safety, and general welfare. Specifically, the issues highlighted by the matrix inform, first, the degree to which the zoning ordinance may be overly restrictive and exclusionary to the point of artificially limiting the affordable housing inventory and directly contributing to higher housing and rental costs. And secondly, the matrix helps inform the impact the local regulations may have on housing opportunities for persons with disabilities, a protected class under state and federal fair housing law.

Impact of Zoning Provisions on Affordable Housing

Academic and market research have proven what also is intuitive: land use regulations can directly limit the supply of housing units within a given jurisdiction, and thus contribute to making housing more expensive, i.e. less affordable.³⁵ Zoning policies that impose barriers to housing development and artificially limit the supply of housing units in a given area by making developable land and construction costlier than they are inherently can take different forms and may include: high minimum lot sizes, low density allowances, wide street frontages, large setbacks, low floor area ratios, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, low maximum building heights, restrictions against infill development, restrictions on the types of housing that may be constructed in certain residential zones, arbitrary or antiquated historic preservation standards, minimum off-street parking requirements, restrictions against residential conversions to multi-unit buildings, lengthy permitting processes, development impact fees, and/or restrictions on accessory dwelling units. Where these zoning regulations are not congruent with the actual standards necessary to protect the health and safety of residents and prevent overcrowding, they may not be in express violation of fair housing laws but may nonetheless contribute to exclusionary zoning and have the effect of disproportionately reducing housing choice for moderate to low-income families, minorities, persons with disabilities on fixed incomes, families with children, and other protected classes by making the development of affordable housing cost prohibitive.

³⁵ See Gyourko, Joseph, Albert Saiz, and Anita A. Summers, *A New Measure of the Local Regulatory Environment for Housing Markets: The Wharton Residential Land Use Regulatory Index (2007)*, available at real.wharton.upenn.edu; Randal O'Toole, *The Planning Penalty: How Smart Growth Makes Housing Unaffordable (2006)*, available at independent.org/pdf/policy_reports/2006-04-03-housing.pdf; Edward L. Glaeser and Joseph Gyourko, *The Impact of Zoning on Housing Affordability (2002)*, available at law.yale.edu/system/files/documents/pdf/hier1948.pdf; The White House's *Housing Development Toolkit, 2016*, available at whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf.

None of the three cities' design standards, density allowances, and housing-type diversity appears facially exclusionary, and the cities all received "1" (low risk) score for Issue 6 and Issue 7 regarding exclusionary zoning regulations for single and multifamily housing types with one exception - Rock Island's relatively low limits on density and high minimum living area requirements resulted in a score of "2" (medium risk) for Issue 7. While the zoning ordinances may impact the feasibility of developing affordable housing in some cases, on the whole, the codes provide for lot sizes and densities that could accommodate affordable housing. But there are recommendations for how each city could use more flexible zoning and land use policy to support investment in its affordable housing stock.

Davenport's zoning code and map divide the City's residential districts into low density (R-1 and R-2), moderate density (R-3) dense (R-4), high density (R-MF), and mobile home park (R-7). Minimum single-family lot sizes range from 20,000 sq. ft. per unit in the R-1 district; 10,000 sq. ft. in the R-2 district; 7,500 sq. ft. in the R-3 district; and 6,000 sq. ft. in the R-4 and R-MF districts. Although the minimum lot sizes for R-1 and R-2 are large and may make the construction of affordable housing in these districts challenging, the zoning map shows that these districts are not widespread throughout the city. R-3, with a 7,500 minimum, is more common, though this is still a fairly large lot on which to provide affordable housing. Front setbacks are 20 feet or more in all zoning districts. Building height appears to be limited to approximately 3 stories in all districts except R-MF, which allow up to 70 feet. Two-family units are allowed in all these districts except R-1 and R-2 districts with somewhat larger minimum lot area for two-family developments and other requirements. There are no floor area ratio, minimum bedroom, or minimum livable floor area standards. Parking requirements are the same across all single-family zoning districts, a minimum of two spaces per dwelling unit.

Multifamily dwellings are allowed in the R-MF district. In addition, several commercial districts, C-T, C-1, C-2, C-3, C-D, C-V, and C-E allow multifamily dwellings. Single family lots in R-MF are required to be a minimum of 6,000 square feet, but for multifamily housing in the R-MF zoning district, a minimum of 1,500 square feet per unit is required. This equates to about 29 units per acre. Though the R-MF district allows building heights up to 70 feet, the minimum 1,500 square feet per acre maximum makes any development approaching the maximum height unlikely.

Moline's zoning code and map divide the City's residential districts into a single-family district, R-2, a one to six family district, R-4, a multifamily district, R-6, and a manufactured home district, R-7. The minimum lot size for R-2 is 6,000 square feet, and all other districts have a minimum of 5,000 square feet. R-4 requires 3,000 square feet per unit for multiple unit developments. Parking requirements are the same across all zoning districts, a minimum of three spaces per dwelling unit, which is fairly high. Front setbacks are 25 feet or more in all zoning districts. Height is limited to 2.5 stories in R-2 and R-4 and 12 stories in R-6 and R-7. Floor area ratio is limited but only for non-residential uses. There are no minimum bedroom or minimum livable floor area standards.

Multifamily dwellings are allowed in the R-4, R-6 and R-7 districts. In addition, several commercial districts, O-1, B-2, and B-3, and B-4, allow multifamily dwellings with a special use permit. The R-2, single-family district, allows twin houses by right and town houses and multiplexes by Special Use Permit.

Density is limited by a maximum number of units per acre of 14 for R-4 and 34 for R-6 and R-7. R-6 and R-7 also require a 1,250 square foot minimum area per unit. Height is restricted to 2.5 stories in R-4 and 12

stories in R-6 and R-7. Floor area ratio is limited but only for non-residential uses. The R-4 district is somewhat restrictive because of the height and maximum density requirements. The R-6 and R-7 districts allow for a fair amount of density, though the 34 units per acre maximum makes any development approaching the maximum 12 stories unlikely.

There are no minimum bedroom or minimum livable floor area standards. Parking minimums for multifamily are 2.5 spaces per 3 bedroom unit, 2 per 2 bedroom unit, and 1 per 1 bedroom or efficiency. The zoning map shows that the R-4, R-6, and R-7 districts are in use within the City.

Rock Island's zoning code and map divide the City's residential districts with minimum single-family lot sizes ranging from 5 acres minimum in the SE-1 district, to 1 acre minimum in the SE-2 district, 7,500 square feet for the R-1 district, and 6,000 square feet for the R-2 district. The R-3 district, which allows one and two family residences, requires a 5,000 square foot lot for a one-family residence, and for a duplex a 6,000 square foot lot with each of the two families having 3,000 square feet minimum. Front setbacks are 25 feet or more in all zoning districts. Height is limited to 2.5 stories in the SE-1, SE-2, and R-1 - R-4 districts. R-5 allows up to six stories, and R-6 allows up to 12.

Multifamily dwellings are allowed in the R-4, R-5, and R-6 districts. These districts require a minimum of 2,000 square feet of lot area per dwelling unit, which results in approximately 22 units allowed per acre. This allows for only moderate density, despite the allowances for buildings to be up to 6 or 12 stories. In addition, several office and commercial districts, O-1, B-1, and B-2, allow dwellings above the ground floor and do not contain density restrictions.

Across all zoning districts, dwelling units must meet both the International Building Code floor area standards and must be at least 900 square feet, with the length of the unit being no more than the width. There are no floor area ratio or minimum bedroom standards. Parking requirements are the same across all zoning districts, a minimum of two spaces per dwelling unit, and for six-plexes or greater, guest parking equal to 10% of the total dwelling units. The zoning map shows that the multifamily zoning districts are applied to a number of properties on the ground.

As for Issue 8 regarding alternative affordable housing types, Davenport's code defines "accessory dwelling unit" as an additional dwelling unit incidental to a principal single-family dwelling on the same lot with separate cooking and sanitary facilities, and with its own legal means of ingress and egress. These units are expressly allowed in the R-1, R-2, R-3, and R-4 zoning districts; Accessory dwelling units are not listed as an allowable use in any other zoning district. Manufactured homes are allowed only in the MHP zoning district, but within that district do not necessarily have to be located within a manufactured home park.

Moline allows for accessory dwellings in only two scenarios: within a Commercial Apartment where dwelling units may be above the ground floor of a building used for a commercial land use or a Caretaker's Residence for permanent housing for a caretaker of the property. Except for these two, "in no instance shall an accessory use, cellar, basement, tent or recreational trailer be used as a residence." This broad statement appears to prohibit garage and basement apartments and other small accessory dwellings. Manufactured Homes are permitted in the C-2, AG-2, R-2, R-4, R-6, and R-7 zoning districts. Manufactured home parks are permitted in the R-7 zoning district.

In Rock Island, accessory dwelling units are not expressly discussed in the zoning ordinance. In the AG-1 and AG-2 districts, a single farmhouse is allowed and no secondary dwellings of any type. In SE-1, SE-2 and R-1, under permitted accessory uses, living quarters are allowed but only for persons employed on the premises and subject to additional dimensional limitations such as a maximum size of 30% of the yard area. In the R-2 district, Dwelling Groups, which allow multiple units on a lot, may be allowed by the Board of Zoning Appeals. The other residential districts (R-3, R-4, R-5, and R-6) allow multiple dwelling units on a lot but do not contain provisions for accessory dwelling units. The R-7 district allows mobile home parks, and Modular Housing is permitted subject to the same standards as site-built homes if state and local criteria are met.

Exclusionary zoning can happen on a continuum and each of the jurisdictions could do more to ease their zoning and land use policies to further remove artificial barriers to development of and access to affordable housing across all residential zones. For example, all three cities could encourage more infill development in traditionally low-density neighborhoods by reducing minimum lot sizes, front setbacks, and parking requirements. To encourage more and a greater variety of multifamily, allowable densities in multifamily zones could be increased. To allow additional affordable housing options, accessory dwelling units could be allowed outside the specific and limited areas in the cities in which they are now.

All together, these zoning tools could potentially allow for more supply of housing, which helps put downward pressure on rental prices, so that moderate and low-income families have access to those neighborhoods and all the congruent benefits that come with higher opportunity areas such as access to jobs, better schools, access to transportation, and access to cultural amenities and public accommodations.

Moreover, the cities' land use regulations could go beyond just meeting the minimum FHA standards and affirmatively further and incentivize the development of affordable housing with inclusionary zoning policies (Issue 10). Currently, Davenport and Rock Island have not adopted specific development incentives like inclusionary zoning, reduced parking, design waivers, variances, or expedited permitting for the development of affordable or low-income housing or housing for protected classes. In Moline, within Planned Unit Developments, Council may allow deviation from default development standards for the provision of affordable housing for moderate, low and very low income households pursuant to HUD definitions for no less than 15 years.

CHAPTER 7.

PUBLICLY SUPPORTED HOUSING

Publicly supported housing encompasses several strategies and programs developed since the 1930s by the federal government to ameliorate housing hardships that exist in neighborhoods throughout the country. The introduction and mass implementation of slum clearance to construct public housing projects during the mid-1900s signified the beginning of publicly supported housing programs. Government-owned and managed public housing was an attempt to alleviate problems found in low-income neighborhoods such as overcrowding, substandard housing, and unsanitary conditions. Once thought of as a solution, the intense concentration of poverty in public housing projects often exacerbated negative conditions that would have lasting and profound impact on their communities.

Improving on public housing's model of high-density, fixed-site dwellings for very low-income households, publicly supported housing programs have since evolved into a more multi-faceted approach overseen by local housing agencies. The Housing and Community Development Act of 1974 created Section 8 rental assistance programs. Section 8, also referred to as the Housing Choice Voucher (HCV) program, provides two types of housing vouchers to subsidize rent for low-income households: project-based and tenant-based. Project-based vouchers can be applied to fixed housing units in scattered site locations while tenant-based vouchers allow recipients the opportunity to find and help pay for available rental housing on the private market.

The Tax Reform Act of 1986 created the Low-Income Housing Tax Credit (LIHTC) program to incentivize development of affordable, rental-housing development. Funds are distributed to state housing finance agencies that award tax credits to qualified projects to subsidize development costs. Other HUD Programs including Section 811 and Section 202 also provide funding to develop multifamily rental housing specifically for disabled and elderly populations.

The now-defunct HOPE VI program was introduced in the early 1990s to revitalize and rebuild dilapidated public housing projects and create mixed-income communities. Although HOPE VI achieved some important successes, the Choice Neighborhoods Initiative program was developed to improve on the lessons learned from HOPE VI. The scope of Choice Neighborhoods spans beyond housing and addresses employment access, education quality, public safety, health, and recreation.³⁶

Current publicly supported housing programs signify a general shift in ideology toward more comprehensive community investment and de-concentration of poverty. However, studies have shown a tendency for subsidized low-income housing developments and residents utilizing housing vouchers to continue to cluster in disadvantaged, low-income neighborhoods. Programmatic rules and the point allocation systems for LIHTC are thought to play a role in this clustering and recent years have seen many states revising their allocation formulas to discourage this pattern in new developments.³⁷ The reasons

³⁶ Department of Housing and Urban Development. *Evidence Matters: Transforming Knowledge Into Housing and Community Development Policy*. 2011. www.huduser.gov/portal/periodicals/em/EM-newsletter_FNL_web.pdf.

³⁷ Dawkins, Casey J. *Exploring the Spatial Distribution of Low Income Housing Tax Credit Properties*. US Department of Housing and Urban Development, www.huduser.gov/publications/pdf/dawkins_exploringliht_assistedhousingrcr04.pdf.

for clustering of HCVs is more complicated since factors in decision-making vary greatly by individual household. However, there are indications that proximity to social networks, difficulties searching for housing, and perceived or actual discrimination contribute to clustering.³⁸ This section will review the current supply and occupancy characteristics of publicly supported housing types and its geographic distribution within the study area.

SUPPLY AND OCCUPANCY

Moline, Rock Island, and Davenport each have a housing authority, which, when combined, provide approximately 945 public housing units throughout the region, housing families, the elderly, and people with disabilities. Together the three agencies administer about 1,200 Housing Choice Vouchers (HCVs), as shown below. Davenport’s Office of Assisted Housing (the city’s PHA) also serves as property manager and landlord for The Heritage, a 120-unit property with Project-Based Section 8 vouchers.

TABLE 16. HOUSING UNITS BY PROGRAM CATEGORY FOR DAVENPORT, MOLINE, AND ROCK ISLAND HOUSING AUTHORITIES

Housing Authority	Public Housing Units	Housing Choice Vouchers (HCV)	Project-Based Section 8 Units*
Davenport Office of Assisted Housing	42	724	120
Moline Housing Authority	486	210	
Rock Island Housing Authority	417	283	
Total	945	1,217	120

*Includes only units with project-based Section 8 vouchers that are in properties owned by the city; units with project-based Section 8 vouchers owned by private developers are included in Tables 17, 18, and 19.

Note: Data presented are number of housing units or vouchers owned and/or administered by each housing authority.

Data Sources: PHA 5-Year Plans; HUD’s A Picture of Subsidized Households, <https://www.huduser.gov/portal/datasets/assths.html>

In addition to public housing units and HCVs, there are other Project-Based Section 8 units in the region, as well as other multifamily properties subsidized by HUD programs designed to assist the elderly or people with disabilities. These properties may be owned and operated by publicly entities (such as cities and housing authorities) or by private developers. Comparing Tables 16 and 17, it is evident that not all of the publicly supported housing units in a jurisdiction are owned or managed by the city or the housing authority serving that jurisdiction. Due to voucher portability and other intricacies of these housing systems, there may be more units in an area than are provided by its respective housing authority.

Taken together, these publicly supported housing programs account for 3.7% of the housing units in Davenport, 5.1% of Moline’s housing units, and 9.6% of all housing units in Rock Island. However, because the programs are all rent-based, the share of rental units in the region supported in some form by a public

³⁸ Galvez, Martha M. *What Do We Know About Housing Choice Voucher Program Location Outcomes? A Review of Recent Literature*. What Works Collaborative, 2010. www.urban.org/sites/default/files/publication/29176/412218-What-Do-We-Know-About-Housing-Choice-Voucher-Program-Location-Outcomes-.PDF.

subsidy is considerably higher. Rock Island has the least population but the most Section 8 units, leading to a significant proportion of subsidized rental units in the city.

TABLE 17. HOUSING UNITS SUPPORTED THROUGH HUD FUNDING BY PROGRAM CATEGORY

Housing Units	City of Davenport		City of Moline		City of Rock Island	
	#	%	#	%	#	%
Total housing units	44,085	-	19,805	-	17,200	-
Public housing	42	0.1%	486	2.5%	417	2.4%
Project-based Section 8*	713	1.6%	221	1.1%	838	4.9%
Other multifamily**	87	0.2%	74	0.4%	N/A	N/A
HCV program	777	1.8%	225	1.1%	401	2.3%

*Includes units with project-based Section 8 vouchers in properties that may be owned by public agencies (such as cities or housing authorities), non-profit organizations, or private entities.

**Includes multifamily housing units developed under HUD’s Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities programs. These units may be in properties owned by public agencies (such as cities or housing authorities), non-profit organizations, or private entities.

Note: Data presented are number of housing units or vouchers. All % represent housing units within each housing program as a share of total housing units within that jurisdiction.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

In the City of Davenport, 81.1% of households identify as White, yet White households make up only 21.6% of public housing units and 34.4% of voucher holders in the city. They make up a greater share of Project-Based Section 8 households (57%). The representation of White families in other family units (91.2%) is slightly greater than their population share. Asian-Americans are also underrepresented in subsidized housing compared to their population share. Hispanic households are slightly over represented in Project-Based Section 8 units (6.6%) but underrepresented in public housing (2.7%), other family (4.1%), and the voucher program (3.1%). African-American households are overrepresented in public housing (75.7%), Project-Based Section 8 (34.2%), and the voucher program (61.2%), but underrepresented in other family housing (4.1%). An indication for a contributing factor to these disparities can be found by further analyzing the income data in the table, which shows that African-Americans’ share of the population in lower income groups is disproportionately higher than their share of the total population.

In Moline, the patterns are similar, particularly among White and African-American households. White households (67.3% of total households) are underrepresented in public housing (43.8%) and the voucher program (40.8%), but somewhat overrepresented in Project-Based Section 8 units (76.7%) and other multifamily properties (97.3%). Only two of the 74 total units are occupied by non-White households. Asian-Americans (0.6%) are roughly proportionally represented in public housing and the voucher program but not represented at all in Project-Based Section 8, though with their small share of the population, an addition or subtraction of one or two households would have a significant effect on the share. The number of Hispanic households (16.1%) is somewhat underrepresented in Project-Based Section 8 units (12.7%) but more significantly underrepresented in public housing (3.2%) and the voucher program (4.6%). African-American households (7.7%) are significantly overrepresented in public housing

(52.3%) and the voucher program (53.5%) and overrepresented to a lesser extent in Project-Based Section 8 units (10.7%).

In Rock Island, White households (58.6% of total households) are underrepresented in public housing (59.6%), Project-Based Section 8 (46.8%), and the voucher program (57.4%). African-American households (10.6%) are overrepresented in public housing (75.7%), Project-Based Section 8 (34.2%), and the voucher program. Hispanic households (7.5%) are significantly underrepresented in all three housing types (ranging from 2.3% to 3.7%), and Asian households (1.5%) are significantly overrepresented in Project-Based Section 8 (10.0%).

TABLE 18. RESIDENTS BY RACE AND ETHNICITY FOR HOUSING UNITS SUPPORTED THROUGH HUD FUNDING IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Housing Type	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
City of Davenport								
Public Housing	8	21.6%	28	75.7%	1	2.7%	0	0.0%
Project-Based Section 8*	380	57.0%	228	34.2%	44	6.6%	7	1.1%
Other Multifamily**	67	91.8%	3	4.1%	3	4.1%	0	0.0%
HCV Program	188	34.4%	335	61.2%	17	3.1%	4	0.7%
0-30% AMI	3,550	63.4%	1,335	23.8%	330	5.9%	194	3.5%
0-50% AMI	6,295	59.1%	1,970	18.5%	615	5.8%	223	2.1%
0-80% AMI	12,130	66.9%	2,955	16.3%	1,150	6.3%	323	1.8%
Total Households	33,020	81.1%	4,330	10.6%	2,084	5.1%	653	1.6%
City of Moline								
Public Housing	206	43.8%	246	52.3%	15	3.2%	3	0.6%
Project-Based Section 8*	151	76.7%	21	10.7%	25	12.7%	0	0.0%
Other Multifamily**	71	97.3%	1	1.4%	1	1.4%	0	0.0%
HCV Program	71	40.8%	93	53.5%	8	4.6%	1	0.6%

*Includes units with project-based Section 8 vouchers in properties that may be owned by public agencies (such as cities or housing authorities), non-profit organizations, or private entities.

**Includes multifamily housing units developed under HUD's Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities programs. These units may be in properties owned by public agencies (such as cities or housing authorities), non-profit organizations, or private entities.

Note: Data presented are number of households, not individuals. All % represent the share of households in each racial and ethnic group by housing program or income group. For example, 21.6% of households living in public housing in Davenport are White and 63.4% of households in the 0-30% AMI band in Davenport are White.

Data Sources: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>; HUD's A Picture of Subsidized Households, <https://www.huduser.gov/portal/datasets/assths.html>

TABLE 18. RESIDENTS BY RACE AND ETHNICITY FOR HOUSING UNITS SUPPORTED THROUGH HUD FUNDING IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA (CONTINUED)

Housing Type	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
City of Moline (continued)								
0-30% AMI	14,865	82.7%	769	4.3%	2,003	11.1%	251	1.4%
0-50% AMI	1,190	73.7%	125	7.7%	279	17.3%	19	1.2%
0-80% AMI	2,370	64.5%	250	6.8%	603	16.4%	39	1.1%
Total Households	4,765	69.3%	530	7.7%	1,108	16.1%	43	0.6%
City of Rock Island								
Public Housing	137	35.2%	232	59.6%	9	2.3%	8	2.1%
Project-Based Section 8*	356	46.8%	301	39.6%	27	3.6%	76	10.0%
Other Multifamily**	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HCV Program	66	27.4%	166	68.9%	9	3.7%	0	0.0%
0-30% AMI	11,518	73.9%	2,635	16.9%	882	5.7%	162	1.0%
0-50% AMI	1,270	56.4%	710	31.6%	135	6.0%	59	2.6%
0-80% AMI	2,245	51.0%	1,160	26.4%	280	6.4%	103	2.3%
Total Households	4,279	58.6%	1,710	23.4%	544	7.5%	107	1.5%
Davenport-Moline-Rock Island MSA								
Public Housing	351	39.2%	506	56.5%	25	2.8%	11	1.2%
Project-Based Section 8*	887	54.6%	550	33.9%	96	5.9%	83	5.1%
Other Multifamily**	138	94.5%	4	2.7%	4	2.7%	0	0.0%
HCV Program	670	40.1%	918	55.0%	73	4.4%	5	0.3%
0-30% AMI	11,630	72.0%	2,632	16.3%	1,098	6.8%	358	2.2%
0-50% AMI	21,600	65.5%	4,005	12.1%	2,187	6.6%	494	1.5%
0-80% AMI	43,270	73.2%	6,138	10.4%	4,122	7.0%	663	1.1%
Total Households	133,765	86.5%	9,417	6.1%	7,659	5.0%	2,006	1.3%

*Includes units with project-based Section 8 vouchers in properties that may be owned by public agencies (such as cities or housing authorities), non-profit organizations, or private entities.

**Includes multifamily housing units developed under HUD’s Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities programs. These units may be in properties owned by public agencies (such as cities or housing authorities), non-profit organizations, or private entities.

Note: Data presented are number of households, not individuals. All % represent the share of households in each racial and ethnic group by housing program or income group. For example, 21.6% of households living in public housing in Davenport are White and 63.4% of households in the 0-30% AMI band in Davenport are White.

Data Sources: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>; HUD’s A Picture of Subsidized Households, <https://www.huduser.gov/portal/datasets/assthsg.html>

A look at racial and ethnic composition of the population in subsidized housing shows a unique pattern within each city (Table 19). The information available for developments, many privately-owned but using public subsidies, within the City of Davenport indicates that most properties have populations of White residents lower than the overall White population share for the city. The exceptions are Spring Village, a Project-Based Section 8 property, and Luther Crest, an “other multifamily” property. Households of color reside at these properties at rates lower than their share of the general population of the city. The other subsidized housing developments contain shares of African-American residents that are well above their share of the population. Hispanic households range from being slightly underrepresented (Edgewater on Third and the Heritage), to roughly proportional (Luther Crest, Emeis Park, Brady Village, Spring Village), to over-represented (Castlewood, Fairmount pines, Westview Terrace). A number of properties have no Asian residents, however, with the City’s overall small Asian population, this is not necessarily due to anything other than chance.

In the complexes in Moline, public housing tends to have lower shares of White households than the total population and higher shares of African-American households. African-American households are overrepresented, and Hispanic households are underrepresented. In Project-Based Section 8 properties however, the share of White households is higher than that in the total population in three of the four complexes. In the other property, Highland Manor, African Americans are overrepresented. Hispanic households are overrepresented in Highland Manor and underrepresented in the other three properties. Only one property, Spring Brook/Spring Valley, housed any Asian households.

In Rock Island, White households are overrepresented in Heather Ridge, and overrepresented to a lesser extent in The Coventry and Watch Hill Tower. In other properties the White population is underrepresented. African-American Households, the share of which is larger than in Moline or Davenport, is significantly overrepresented in all properties except for Heather Ridge. Hispanic households are underrepresented in all properties, including Rock Island Manor, which has no Hispanic households. Asian households are significantly overrepresented in the Century Woods and Maple Ridge properties.

Along with the properties shown in Table 19, additional affordable housing units supported through other public or private subsidies may be available in the region. For example, DeLaCerde House owns and operates housing properties in Rock Island, including a group home and several apartments, for persons diagnosed with HIV/AIDS and their families using HUD Housing Opportunities for Persons with AIDS (HOPWA) grant funds.

TABLE 19. DEMOGRAPHICS OF HOUSING PROPERTIES SUPPORTED THROUGH HUD FUNDING BY PROGRAM CATEGORY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND

Development Name	# Units	% White	% Black	% Hispanic	% Asian	% Households with Children
City of Davenport						
Public Housing						
Davenport	42	23%	74%	3%	N/A	95%
Total	42	23%	74%	3%	N/A	95%
Project-Based Section 8*						
Spring Village	120	87%	6%	6%	N/A	N/A
The Heritage	120	66%	29%	3%	1%	1%
Westview Terrace	56	33%	56%	8%	4%	85%
Brady Village	44	42%	53%	5%	N/A	88%
Castlewood	96	33%	55%	13%	N/A	89%
Emeis Park	67	73%	21%	6%	N/A	67%
Fairmount Pines	110	24%	55%	13%	4%	83%
Edgewater On Third	100	74%	22%	2%	N/A	N/A
Total	713	57%	34%	7%	1%	N/A
Other Multifamily Projects**						
Vera French Commons	10	N/A	N/A	N/A	N/A	N/A
Luther Crest	77	88%	5%	5%	1%	N/A
Total	87	92%	4%	4%	0%	N/A
City of Moline						
Public Housing						
Hillside Heights	120	49%	46%	5%	N/A	4%
Spring Brook/Spring Valley	366	42%	54%	3%	1%	33%
Total	486	44%	52%	3%	1%	N/A

*Includes units with project-based Section 8 vouchers in properties that may be owned by public agencies (such as cities or housing authorities), non-profit organizations, or private entities.

**Includes multifamily housing units developed under HUD's Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities programs. These units are not publicly owned.

Note: Percentages represent the share of households in each racial and ethnic group and the share of households with children by property. Percentages may not add to 100 due to rounding error.

Data Sources: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>; HUD's A Picture of Subsidized Households, <https://www.huduser.gov/portal/datasets/asstshg.html>

TABLE 19. DEMOGRAPHICS OF HOUSING PROPERTIES SUPPORTED THROUGH HUD FUNDING BY PROGRAM CATEGORY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND (CONTINUED)

Development Name	# Units	% White	% Black	% Hispanic	% Asian	% Households with Children
City of Moline (continued)						
Project-Based Section 8*						
Fiesta Manor	6	N/A	N/A	N/A	N/A	N/A
Highland Manor Apartments	78	55%	20%	24%	N/A	86%
Sanders Apts.	40	79%	9%	12%	N/A	N/A
Westwood Terrace Apartments	97	87%	6%	6%	N/A	1%
Total	221	77%	11%	13%	N/A	N/A
Other Multifamily Projects**						
Morning Star Senior Housing	74	97%	1%	1%	N/A	N/A
Total	74	97%	1%	1%	N/A	N/A
City of Rock Island						
Public Housing						
Lincoln Homes	37	11%	86%	0%	3%	78%
Sunset Heights	141	30%	58%	5%	6%	11%
Spencer Towers	199	45%	53%	2%	N/A	3%
3 rd and 11 th Townhomes	7	N/A	N/A	N/A	N/A	N/A
Cascade Garden	33	19%	81%	0%	N/A	3%
Total	417	35%	60%	2%	2%	N/A
Project-Based Section 8*						
Heather Ridge Apartments	169	74%	20%	5%	1%	90%
Century Woods Apartments	230	18%	58%	4%	20%	77%
The Coventry	147	66%	30%	3%	N/A	N/A
Maple Ridge Apartments	152	21%	52%	4%	23%	74%
Watch Hill Tower	140	67%	28%	3%	2%	N/A
Total	838	47%	40%	4%	10%	N/A

*Includes units with project-based Section 8 vouchers in properties that may be owned by public agencies (such as cities or housing authorities), non-profit organizations, or private entities.

**Includes multifamily housing units developed under HUD's Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities programs. These units may be in properties owned by public agencies (such as cities or housing authorities), non-profit organizations, or private entities.

Note: Percentages represent the share of households in each racial and ethnic group and the share of households with children by property. Percentages may not add to 100 due to rounding error.

Data Sources: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>; HUD's A Picture of Subsidized Households, <https://www.huduser.gov/portal/datasets/asstshg.html>

GEOGRAPHY OF SUPPORTED HOUSING

In the map that follows, the locations of publicly supported housing developments are represented along with levels of Housing Choice Voucher use in the city of Davenport. The map is overlaid with dots representing racial/ethnic demographics.

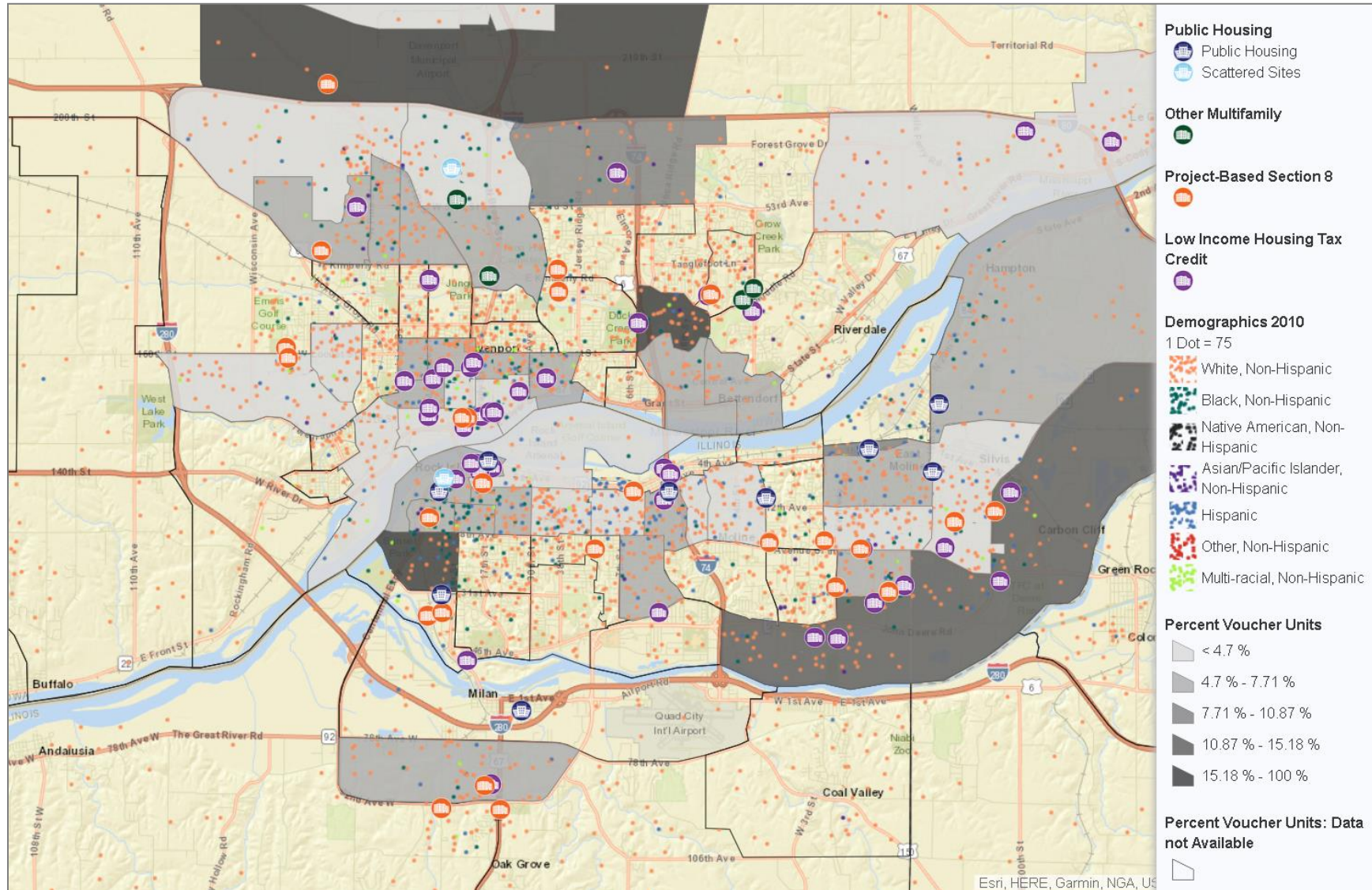
The blue markers on the maps indicate the locations of public housing. Only scattered sites are located in Davenport, two are located in Moline, and four in Rock Island. The two in central Rock Island are located in areas that differ from the overall population of Moline in that they are majority non-White and have higher percentages of African-American population. For the two in Moline, the area around Hillside Heights contains a larger share of Hispanic residents than the city overall, and the area around Spring Brook/Spring Valley is similar in racial/ethnic composition to the city overall.

The orange markers on the maps indicate that the locations of Project Based Section 8 units. In Davenport, there are pairs of properties in central Davenport, and the eastern and western parts of town. The area in central Davenport is more racially and ethnically diverse than the city overall, with all non-White population groups present in greater proportions than in the city overall. The areas around the other Section 8 locations more closely match the city's overall demographics. In Moline, the two Project-Based Section 8 properties are located in areas with above average Hispanic population. In Rock Island, the Project-Based Section 8 properties are located in areas with above average African-American population, particularly those in central Rock Island.

Finally, the maps also depict the locations of Low Income Housing Tax Credit developments with purple markers. The Low Income Housing Tax Credit (LIHTC) program is the primary source of subsidy for development of affordable housing by the private market. Created by the Federal Tax Reform Act of 1986, the LIHTC program makes available an indirect federal subsidy for investors in affordable rental housing. The value of the tax credits awarded to a project may be syndicated by the recipient to generate equity investment, offsetting a portion of the development cost. The LIHTC developments depicted are all privately owned, but as a condition of the LIHTC subsidy received, the resulting housing must meet certain affordability conditions. The majority of these are located in Davenport, and in all three cities the LIHTC properties are clustered in the core of the city.

The rates at which Housing Choice Vouchers (HCVs) are used are represented by the shading on the maps. HCVs are issued to households and may be used at a rental unit of the tenant's choosing to reduce the tenant's share of rent payments to an affordable level. Therefore, unlike the publicly supported developments marked on the map, HCVs are portable and their distribution throughout the city is subject to fluctuate over time. The current maps show that voucher usage is highest in the area south of the Douglas Park neighborhood in Rock Island. Voucher use is also prevalent in the less-populated section of north Davenport north of Interstate 80. Each of the cities' central city area also contained noticeable voucher use.

FIGURE 25. PUBLICLY SUPPORTED HOUSING AND RACE / ETHNICITY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

CHAPTER 8.

HOUSING FOR PEOPLE WITH DISABILITIES

According to the U.S. Census Bureau, 19% of the population reported having a disability in 2010. Research has found an inadequate supply of housing that meets the needs of people with disabilities and allows for independent living. The U.S. Department of Housing and Urban Development identified that approximately one third of the nation's housing stock can be modified to accommodate people with disabilities, but less than 1% is currently accessible by wheelchair users.³⁹

Identifying and quantifying existing accessible housing for all disabilities is a difficult task because of varying needs associated with each disability type. People with hearing difficulty require modifications to auditory notifications like fire alarms and telecommunication systems while visually impaired individuals require tactile components in design and elimination of trip hazards. Housing for people that have difficulty with cognitive functions, self-care, and independent living often require assisted living facilities, services, and staff to be accessible.

Modifications and assisted living arrangements tend to pose significant costs for the disabled population, which already experiences higher poverty rates compared to populations with no disability. Studies have found that 55% of renter households that have a member with a disability have housing cost burdens, compared with 45% of those with no disabilities.⁴⁰

RESIDENTIAL PATTERNS

In the City of Davenport, an estimated 10,550 persons 5-years-old or older have a disability, representing 11.5% of the total population. People aged 18-64 have the highest disability rate (6.5%), and the rate for those over 65 is 4.4%. In contrast, less than 1% of children between the ages of 5 and 17 are disabled. In Moline, an estimated 4,179 persons 5-years-old or older have a disability, representing 10.4% of the total population. Though this overall share of the population is similar to Davenport's, the age distribution is quite different. People over 65 have the highest disability rate (4.3%), followed by children between 5 and 17 (4.0%), and those aged 18-64 (2.1%). In Rock Island, as in Davenport, those aged 18-64 had the highest rates of disability (7.2%), followed by those over 65 (6.5%), and people under 5 (1.6%).

Ambulatory disabilities are the most common type in all three jurisdictions affecting 6.3% of Davenport, 5.8% of Moline, and 6.3% of Rock Island. Independent living and cognitive disabilities are the two next most common across all jurisdictions. The three least common in all cities are hearing, self-care, and vision. The map that follows shows the geographic distribution of persons with disabilities throughout the area. Rock Island has the highest concentration of people with disabilities in the central city and just south. The higher percentage of those under 5 with disabilities in Moline is noticeable by the orange dots.

³⁹ Chan, S., Boshier, L., Ellen, I., Karfunkel, B., & Liao, H. . L. (2015). Accessibility of America's Housing Stock: Analysis of the 2011 American Housing Survey. U.S. Department of Housing and Urban Development: Office of Policy Development and Research.

⁴⁰ America's Rental Housing 2017. (2017). Joint Center for Housing Studies of Harvard University.

Generally, people with disabilities are dispersed throughout the cities in a pattern similar to the population overall.

TABLE 20. DISABILITY BY TYPE IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Disability Type	City of Davenport		City of Moline		City of Rock Island		Davenport-Moline-Rock Island MSA	
	#	%	#	%	#	%	#	%
Hearing difficulty	2,514	2.7%	1,623	4.0%	1,658	4.6%	13,480	3.8%
Vision difficulty	1,671	1.8%	831	2.1%	916	2.6%	6,867	2.0%
Cognitive difficulty	4,136	4.5%	1,725	4.3%	2,171	6.1%	15,116	4.3%
Ambulatory difficulty	5,766	6.3%	2,341	5.8%	2,833	7.9%	21,966	6.3%
Self-care difficulty	2,264	2.5%	910	2.3%	826	2.3%	8,224	2.3%
Independent living difficulty	4,149	4.5%	1,686	4.2%	1,915	5.3%	15,552	4.4%

Note: All % represent a share of the total population within the jurisdiction or region.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

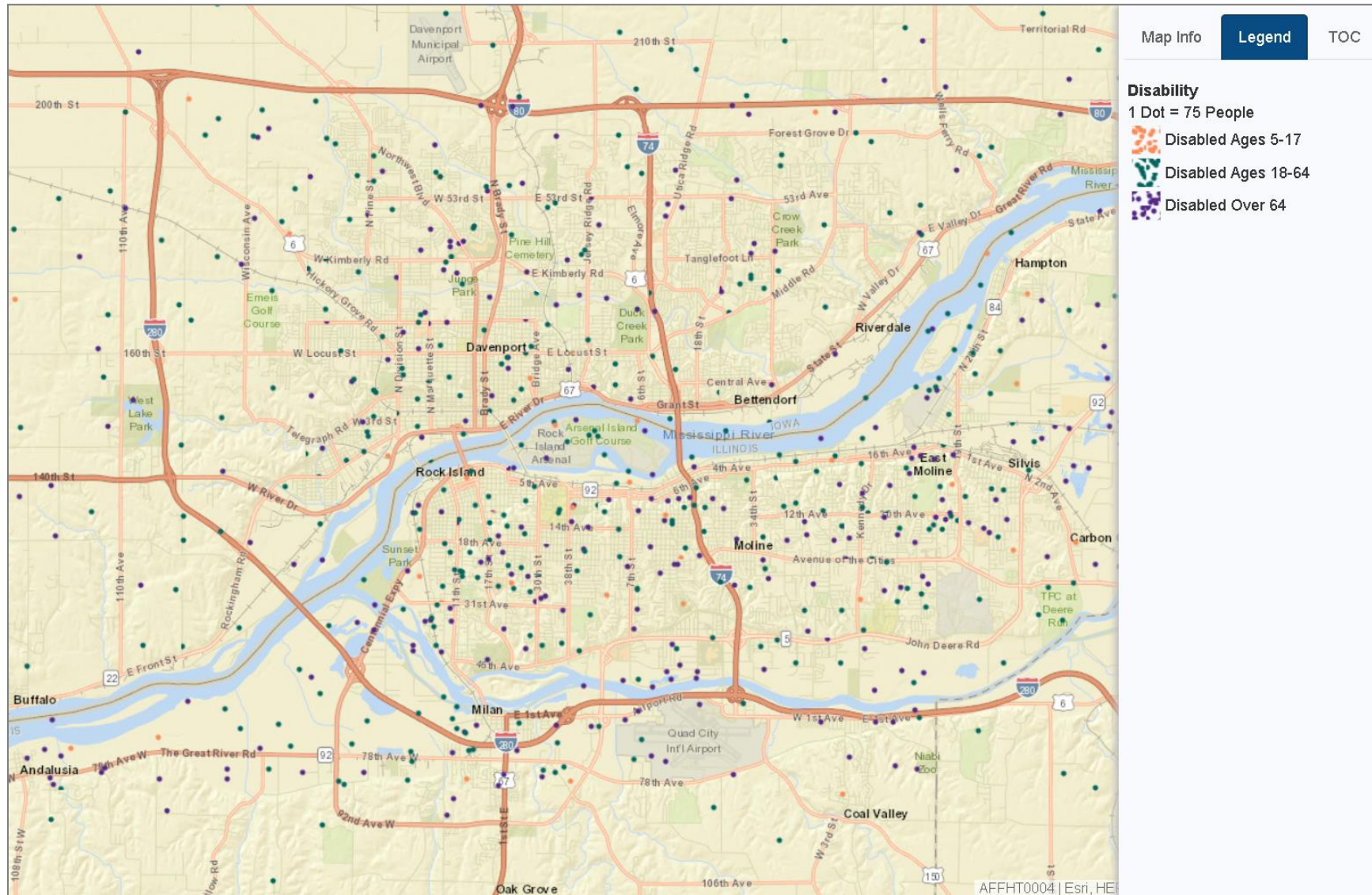
TABLE 21. DISABILITY BY AGE GROUP IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Age of People with Disabilities	City of Davenport		City of Moline		City of Rock Island		Davenport-Moline-Rock Island MSA	
	#	%	#	%	#	%	#	%
Age 5-17 with disabilities	583	0.6%	1,623	4.0%	574	1.6%	2,983	0.9%
Age 18-64 with disabilities	5,962	6.5%	831	2.1%	2,583	7.2%	20,965	6.0%
Age 65+ with disabilities	4,005	4.4%	1,725	4.3%	2,335	6.5%	18,758	5.3%

Note: All % represent a share of the total population within the jurisdiction or region.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

FIGURE 26. PEOPLE WITH A DISABILITY BY AGE IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Map Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

ACCESSIBLE HOUSING SUPPLY AND AFFORDABILITY

A search using HUD’s Affordable Apartment Search Tool was conducted to identify affordable rental properties in the cities of Davenport, Moline, and Rock Island designed to serve people with disabilities. The search for Davenport returned eleven results; two properties specifically designated for people with disabilities, four listed as being for elderly households, and five serving family households. The search for Moline returned four results, all listed as being for families. The search for Rock Island returned seven results, two designated as serving the elderly, three serving families, and two undesignated.

A similar point-in-time search on socialserve.com for affordable apartments currently for rent in the city of Davenport returned 77 results, 66 of which had some accessible features. Of the 77, 45 had waiting lists. In Moline, 31 properties were found, all with accessible features, but most of them (26 of the 31 properties) had waiting lists. In Rock Island, 57 properties were found, 55 with accessible features. Of the 57 listed properties, 50 had waiting lists.

Based on a standard Supplemental Security Income (SSI) payment of \$750 per month (equating to an affordable rent of \$250 or less), it is highly likely that people with disabilities who are unable to work and rely on SSI as their sole source of income, face substantial cost burdens and difficulty locating affordable housing. Publicly supported housing is often a key source of accessible and affordable housing for people with disabilities, and in the study area, these subsidized housing options are much more likely to contain households with at least one member with a disability than the housing stock in general. The table below shows that persons with disabilities are able to access all types of publicly-supported housing, except for other multifamily in the city of Moline.

TABLE 22. DISABILITY BY HOUSING PROGRAM CATEGORY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Housing Type	People with a Disability							
	City of Davenport		City of Moline		City of Rock Island		Davenport-Moline-Rock Island MSA	
	#	%	#	%	#	%	#	%
Public Housing	3	7.7%	66	13.9%	180	44.8%	249	27.2%
Project-Based Section 8*	158	23.4%	28	13.3%	171	22.2%	357	21.5%
Other Multifamily Housing**	10	11.5%	12	16.2%	N/A	N/A	22	13.7%
HCV Program	111	18.9%	29	15.2%	25	9.8%	264	15.0%

*Includes units with project-based Section 8 vouchers in properties that may be owned by public agencies (such as cities or housing authorities), non-profit organizations, or private entities.

**Includes multifamily housing units developed under HUD’s Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities programs. These units may be in properties owned by public agencies (such as cities or housing authorities), non-profit organizations, or private entities.

Note: All % represent the share of total housing units of each housing type occupied by a person with a disability. The definition of “disability” used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

Supportive housing, a typically subsidized long-term housing option combined with a program of wrap-around services designed to support the needs of people with disabilities, is another important source of housing for this population. Unique housing requirements for people with an ambulatory difficulty may include accessibility improvements such as ramps, widened hallways and doorways, and installation of grab bars, along with access to community services such as transit. For low- and moderate-income households, the costs of these types of home modifications can be prohibitive, and renters may face particular hardships as they could be required to pay the costs not just of the modifications, but also the costs of removing or reversing the modifications if they later choose to move.

ZONING AND ACCESSIBILITY

From a regulatory standpoint, local government measures to control land use typically rely upon zoning codes, subdivision codes, and housing and building codes, in concurrence with comprehensive plans. Local zoning authority is directed by the state enabling laws as part of the local government's police power but limited by superseding state laws related to specific land use, for example the regulation of public property, flood plains, utilities, natural resources, airports, housing regulated by a state licensing authority for persons with disabilities, higher education institutions, etc.

Definition of “Family” and Group Housing for Persons with Disabilities

Often one of the most scrutinized provisions of a municipality's zoning code is its definition of “family.” Local governments use this provision to limit the number of unrelated persons who may live together in a single dwelling. Unreasonably restrictive definitions may have the unintended or intended (depending on the motivations behind the drafting of the jurisdiction's definition) consequence of limiting housing for nontraditional families and for persons with disabilities who reside together in congregate living situations.

The City of Davenport recently amended its ordinance to completely remove a “family” definition, so as to make no distinction or limitation on the number of people, related or unrelated, who may live together in a dwelling unit.

Moline defines “family” to include one or more persons related by blood, marriage or adoption (including foster children), and in addition, any domestic servants and up to one gratuitous guest thereof, or a group of not more than three persons who need not be so related, and in addition domestic servants or gratuitous guests thereof, who are living together in a single dwelling unit and maintaining a common household.

Rock Island defines “family” to include one or more persons related by blood, marriage or adoption (including foster children), and in addition, any domestic servants and up to one gratuitous guest thereof, or a group of not more than three persons who need not be so related, and in addition domestic servants or gratuitous guests thereof, who are living together in a single dwelling unit and maintaining a common household. An additional definition, “Unrelated Group Family” allows a group of no more than five unrelated adults living together as a common household by doing their own cooking and living together, as distinguished from a group occupying a boarding house, lodging house, club, fraternity, sorority, or

hotel. Unrelated group families are permitted with administrative approval, provided that they submit an application, pay an application fee, comply with certain standards such as a spacing requirement, and pay for and pass bi-annual inspections.

Though the mechanics of each is different, both Moline and Rock Island define family based on the relationship and number of the residents. Limiting single family to no more than 5 unrelated individuals is neither the most permissive nor most restrictive under case precedent, but does fail to treat nontraditional, but functionally equivalent, household relationships equal with those related by blood or marriage, and may violate fair housing, privacy, and due process protections. More permissive and neutral definitions of family do not distinguish between related and unrelated occupants as long as the residents live together as a functionally or factually equivalent family or common household sharing common space, meals, and household responsibilities, and/or leaves maximum occupancy per dwelling as a matter of safety under occupancy standards rather than the zoning regulations. While the Supreme Court has recognized a local government's right to limit the number of unrelated individuals who may live together as constitutionally permissible, the restriction must be reasonable and not exclude a household which in every sense but a biological one is a single family. An unreasonably, or arbitrarily, restrictive definition could violate state due process and/or the federal FHAA as it may have a disproportionate impact on people with disabilities, minorities, and families with children. Another option is to amend the ordinances to add an administrative process for rebutting the presumption that a group exceeding the permitted maximum number of unrelated persons is not otherwise residing together as a single housekeeping unit and functional family. Accordingly, Moline and Rock Island each received a "2" moderate risk score on Issue 1 of the matrix; Davenport received a "1" low risk score on this issue.

None of the cities' "Family" definitions distinguish between or treat persons with disabilities differently *because of* their disability. However, each contains additional requirements and location restrictions on certain types of housing for people with disabilities. In Davenport, group homes allowed by right in nearly all residential zoning districts provided that, when a group home is located within an existing residential structure, the location, design, and operation of such facility must not alter the residential character of the structure. Treatment facilities for drug and alcohol addiction, however, always require a special use permit and then can only be sited in commercial and industrial districts. Because of its permissive group home siting regulations, Davenport was scored a "1" low risk on Issue #2 from the zoning review.

In Moline, Group and Institutional uses such as care homes are subject to location and capacity requirements and require a Special Use Permit in some districts. In Rock Island, none of the care home facilities are allowed in the SE residential districts. Group houses and Large Care Homes are subject to an additional discretionary approval from the Board of Zoning Appeals that other multifamily uses are not subject to. For these various reasons, Moline and Rock Island each received a "2" medium risk score on Issue #2. None of the cities ban or functionally ban housing for people with disabilities, but regulations should be amended to make clear that housing for persons with disabilities may be sited equally with other single-family housing for unrelated persons.

Reasonable Accommodations

Adopting a reasonable accommodation ordinance is one specific way to address land use regulations' impact on housing for persons with disabilities. Federal and state fair housing laws require that

municipalities provide individuals with disabilities or developers of housing for people with disabilities flexibility in the application of land use and zoning and building regulations, practices, and procedures or even waive certain requirements, when it is reasonable and necessary to eliminate barriers to housing opportunities, or “to afford persons with a disability the equal opportunity to use and enjoy a dwelling.” (The requirements for reasonable accommodation under the Americans with Disabilities Act (ADA) are the same as those under the FHA. 42 U.S.C. 12131(2).) However, the FHA does not set forth a specific process that must be used to request, review, and decide a reasonable accommodation.

Neither Davenport or Rock Island have adopted a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. Rather both jurisdictions rely on the variance process for such matters. In Davenport, this is through the Board of Adjustments, and in Rock Island, it is the Board of Zoning Appeals. This is required for any applicant seeking a variance and is not limited to housing for persons with disabilities. The purpose of a variance is not congruent with the purpose of requesting a reasonable accommodation, as a variance requires a showing of special circumstances or conditions applying to the land. In contrast, a reasonable accommodation is to allow individuals with disabilities to have equal access to use and enjoy housing. The jurisdiction does not comply with its duty to provide reasonable accommodation if it applies a standard based on the physical characteristics of the property rather than considering the need for modification based on the disabilities of the residents. Accordingly, both jurisdictions received a “2” on Issue #3. Moline has adopted a process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. Notification of surrounding property owners is required, and the Plan Commission may receive citizen input at their discretion, but Moline was assessed a “1” low risk score for this issue. However, the accommodation is at the discretion of the Plan Commission, and as is true of the variance process in Davenport and Rock Island, subjecting the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities and unfounded speculations about the impact on neighborhoods or threats to safety may impact the outcome.

Supportive Housing for Persons Recovering from Alcohol or Substance Addiction

Under federal law (e.g. FHA, ADA, Rehabilitation Act), it is discriminatory to deny an individual or entity the right to site a residential treatment program in a residential zone because it will serve individuals with alcohol or other drug problems or mental health disabilities.

In Davenport, residential drug or alcohol treatment facilities, halfway houses for people who have exited a correctional setting, and homeless shelters all require a special use permit to be located anywhere, and then must be sited in a commercial or industrial zoning district. These facilities must be spaced a minimum of 1,000 feet apart from one another and at least 300 feet from any residential area. Domestic violence shelters and residential care facilities are allowed as of right in multifamily residential, commercial, and industrial zoning districts. In Moline Halfway Houses and Group Homes are included along with other Group/Institutional Land Uses. Presumably treatment facilities would be defined as community based residential facilities though this is not explicit in the code. Small care facilities as defined by the City require a Special Use Permit in R-1, though they are allowed by right in the other residential districts, and large care facilities require a Special Use Permit in any residential zoning district. In Rock Island, “Halfway House/Group Homes” are allowed only in the R-4, R-5, and R-6 zoning districts and only when authorized

by the Board of Zoning Appeals, so they are not allowed by right in any zoning districts and are effectively prohibited in single-family districts.

While housing for persons with disabilities may be subject to state and local regulations related to health and safety, they cannot be excluded from residential districts altogether, and such regulations must not be based on stereotypes or presumptions about specific types of disabilities. Accordingly, for treatment facilities which house three or fewer unrelated persons (consistent with the City's family definition) recovering from drug or alcohol addiction, this disparate treatment may violate the FHA, and Rock Island received a "3" high risk score on Issue #5. Davenport and Moline do not prohibit these facilities but do enforce additional restrictions that are not applicable to other similar uses, so they each received a "2" medium risk score.

CHAPTER 9.

FAIR HOUSING ACTIVITIES

FAIR HOUSING RESOURCES

The federal Fair Housing Act—Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 *et seq.* (the “FHAA”)—paved the way for states to update or adopt their own statewide civil rights protections. As the federal Act was amended and expanded—e.g. to include, in addition to race, color, religion and national origin as protected classes, sex in 1974 and familial status and disability as protected classes in 1988—many state legislatures followed Congress’ lead. Currently, the FHAA protects persons from unlawful discrimination motivated by race, color, national origin, religion, sex, disability, or familial status. Under the Iowa and Illinois state anti-discrimination laws and the local code of ordinances for Davenport, additional classes of persons residing in Davenport, Moline and Rock Island also are protected from discriminatory housing practices that would limit access to fair housing.

Iowa’s Civil Rights Act

In 2015, Iowa celebrated the fiftieth anniversary of the passage of its landmark Civil Rights Act of 1965, which has been amended throughout the decades following its enactment to more closely parallel the federal FHAA in its protections and enforcement mechanisms. The Fair Housing Amendment was added in 1967 and protections based on sex/gender were included in a 1970 amendment. The enforcement provisions were strengthened in 1978 to improve the effectiveness of the state’s Civil Rights Commission and to provide an alternative civil remedy in the courts. Most recently, protections based on gender identity and sexual orientation were included in a 2007 update to the Act.

Both the FHAA and Iowa Civil Rights Act (“ICRA”) prohibit discrimination in the sale, rental, and financing of dwellings, or to otherwise make housing unavailable, based on a person’s sex, race, color, disability (physical and mental), religion, national origin, or familial status (families with children). In addition, Iowa protects persons based on creed, sexual orientation, and gender identity. Iowa Code § 216.8 *et seq.*

The fair housing provisions of Iowa’s Civil Rights Act have been certified by HUD as “substantially equivalent” to the “rights, procedures, remedies, and the availability of judicial review” provided in the FHAA. (See 24 C.F.R. § 115.201 *et seq.*) Substantial equivalence certification allows the state fair housing enforcement agency to apply for federal funding under HUD’s Fair Housing Assistance Program (FHAP). The Iowa Civil Rights Commission, created by the legislature to administer and enforce the state’s antidiscrimination laws, partners with HUD and receives funding through the FHAP to receive, investigate, and enforce charges of housing discrimination.

The Commission’s authority is derived from Iowa Code Chapter 216 and Iowa Administrative Code Chapter 161.9.1 *et seq.* The Commission has the power and duty to receive, investigate, mediate, and finally determine the merits of complaints alleging unfair or discriminatory practices in the areas of employment, housing, public accommodations, credit, and educational institutions. Moreover, the

Commission has the duty to investigate and study the existence, character, causes, and extent of discrimination in these areas.

If an individual has evidence that his/her rights under the FHAA or state fair housing law have been violated, including in a final land use or zoning decision, the aggrieved person may file a complaint with the Iowa Civil Rights Commission within 300 days of the last alleged discriminatory incident or with HUD within one year of the last alleged discriminatory incident, or file a lawsuit directly in state or federal court within the statute of limitations period. (HUD refers matters involving the legality of state or local zoning or other land use law or ordinance to the Department of Justice for further enforcement. See 42 U.S.C. 3610(g)(2)(C)).

The City of Davenport also has adopted a local fair housing ordinance, 2000 Davenport Municipal Code § 2.58.300 et seq. In 1974, the local Human Relations Ordinance was repealed and replaced to create the Davenport Civil Rights Commission. It was amended in 1999 to grant the Commission subpoena powers to investigate and to enact a fair housing section in line with the FHAA. The ordinance has gone through several other amendments to update protections for additional protected classes: in 2000, the ordinance was amended to include sexual orientation as a protected class, in 2005 to clarify provisions and add education as another area protected from discrimination; and in 2008 to bring the local ordinance into accord with the Iowa Civil Rights Act by adding gender identity and familial status to the list of protected classes. In addition to the protected classes under the FHAA and Iowa Civil Rights Act, the Davenport ordinance extends fair housing protections to persons on the basis of age and marital status. Davenport's local anti-discrimination ordinance also has been certified by HUD as substantially equivalent to the FHAA and qualifies the City to receive FHAP funding for fair housing discrimination investigation, enforcement, and education activities.

Illinois' Human Rights Act

Comprehensive anti-discrimination legislation was enacted in Illinois on December 6, 1979, with passage of the Illinois Human Rights Act, 775 ILCS 5/1-101 et seq. (IHRA). The IHRA protects against discrimination in housing/real estate transactions as well as employment, education, public accommodations and access to financial credit. The Act prohibits discrimination based on sex, age, race, color, religion, arrest record, marital status, sexual orientation, physical and mental disability, citizenship status (with regard to employment), national origin, ancestry, unfavorable military discharge, familial status (with respect to real estate transactions), military status, sexual harassment, and orders of protection.

The IHRA bifurcates enforcement between the Department of Human Rights—which investigates charges of discrimination, seeks conciliation between the parties, and makes findings and recommendations—and the Human Rights Commission, a separate state agency, which adjudicates complaints of civil rights violations. If after investigation the Department dismisses the charge, the complainant may file a Request for Review with the HRC or file a civil complaint in the circuit court within 90 days of the Department's dismissal. Either the Department or the complainant may file a Complaint of Civil Rights Violation with the Commission. Where complaints proceed to an administrative law judge (ALJ) hearing, the judge may recommend monetary and non-monetary relief, civil penalties, and attorneys' fees and cost. If either party objects to the ALJ's recommended order and decision, the Commission may adopt, reverse, or modify the

ALJ's recommendations. If the Commission adopts the order, it becomes a final order which may be appealed to the Illinois Appellate Court.

In 2018, Governor Bruce Rauner signed Executive Order 2018-08 requiring the Commission to eliminate the Request for Review backlog in 18 months. Governor Rauner also signed into law Public Act (100-1066), legislation that upgrades the position of the Human Rights Commissioners from part time to full-time appointments along with other procedural changes to the Illinois Human Rights Act.

HUD has certified the Illinois Department of Human Rights as a participating FHAP agency because the Illinois Human Rights Act meets the substantial equivalence test.

Under its Fair Housing Initiatives Program (FHIP), HUD awards grant money to local fair housing advocacy organizations who assist persons believed to have been harmed by discriminatory housing practices; to help people identify government agencies that handle complaints of housing discrimination; to conduct preliminary investigation of claims; to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices; and to educate the public and housing providers about equal opportunity in housing and compliance with the fair housing laws.

For FY 2017, HUD awarded FHIP dollars to two Illinois nonprofits that serve Moline and Rock Island: HOPE Fair Housing Center and Prairie State Legal Services, Inc.

HOPE Fair Housing Center has pledged to use its \$300,000 multi-year PEI grant (private enforcement initiative) for intake, testing/investigation, enforcement referral or action, public policy advocacy, and education and outreach in the suburban counties of DuPage, Kane, McHenry, Northwestern and Western Cook County, 26 rural counties in Northern Illinois, and large cities including Naperville, Peoria, Aurora, Elgin, Bloomington, Moline, and Rock Island.

Prairie State Legal Services, Inc. (PSLS), which also serves Moline and Rock Island, has pledged to use its \$300,000 PEI multi-year grant to offer a full range of fair housing enforcement services from intake to investigation to litigation. PSLS plans to expand testing services to grow a tester pool and include homeowner's insurance testing in the second half of the grant term. The organization also will make efforts to partner with universities or other community-based organizations to educate the public about opportunities, through the fair housing planning process, to identify and provide input about local barriers to fair housing choice, and continue to fight housing discrimination by offering legal services that include complaint intake, legal advice and representation, complaint filing, conciliation/mediation, settlement negotiation and referrals. PSLS will continue to offer complaint-based and audit testing and systemic work by initiating new fair housing investigations in rental, sales, lending, and insurance markets. The organization will refer all meritorious claims to HUD or DOJ. In addition, the organization will conduct fair housing trainings/workshops for potential victims of discrimination, housing consumers, housing providers, and local officials or staff of entitlement jurisdictions, and develop educational materials in the form of brochures translated into two new languages, a best practices sheet about affirmatively furthering fair housing, and financial literacy informational sheets in Spanish. Finally, PSLS will host fair housing month events and continue to maintain a social media presence focused on fair housing issues, cases, and education.

FAIR HOUSING COMPLAINTS

An individual in Davenport who believes he or she has been the victim of an illegal housing practice under the FHAA or Iowa Civil Rights Act may seek assistance from the Iowa Civil Rights Commission within 300 days of the last discriminatory incident or file a complaint with the Davenport Civil Rights Commission. A complainant in Moline or Rock Island may seek assistance from the Illinois Department of Human Rights. Or in either state, complainants may contact the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of when the discriminatory practice occurred. Typically, once certified, HUD will refer complaints of housing discrimination that it receives back to the state or local FHAP agency for investigation, conciliation and enforcement activities. HUD policy favors having fair housing professionals based locally where the alleged discrimination occurred because it has found that a state or local agency's closer proximity to the site of the alleged discrimination provides greater familiarity with local housing stock and trends and may lead to greater efficiency in case processing. Because the Iowa Civil Rights Commission, Davenport Civil Rights Commission, and Illinois Department of Human Rights are certified FHAP agencies, most complaints filed with the HUD FHEO office will be referred back to one of these agencies for investigation and enforcement.

The aggrieved party also may file a lawsuit in federal district court within two years of the discriminatory act (or in the case of multiple, factually-related discriminatory acts, within two years of the last incident). The complainant may file an action directly in district court regardless of whether an administrative complaint already has been filed or if filed, where it is in the process. Where an administrative action has been filed with HUD, the two-year statute of limitations is tolled during the period when HUD is evaluating the complaint.

After the FHEO, ICRC, DCRC, or IDHR receives a complaint and verifies that it has been timely filed and that the agency has jurisdiction, it will notify the alleged discriminator (respondent) and begin an investigation. During the investigation period, the agency will attempt through mediation to reach conciliation between the parties. Under FHEO rules, if no conciliation agreement can be reached, HUD must prepare a final "Determination" report finding either that there is "reasonable cause" to believe that a discriminatory act has occurred or that there is no reasonable cause. If the agency finds "reasonable cause," HUD must issue a "Charge of Discrimination" and a hearing/trial will be scheduled before an administrative law judge (ALJ). If the investigator determines that there is no "reasonable cause," the case is dismissed.

Under Iowa state rules, the ICRC investigator recommends to the administrative law judge whether probable cause or no probable cause exists to believe that discrimination occurred. If the ALJ finds no probable cause, the complaint is closed. If the ALJ finds probable cause, the parties are given 20 days to decide whether to proceed in district court or continue with the administrative complaint process. If the parties choose the Commission, the case is assigned to another ALJ, set for public hearing, and adjudged based on a preponderance of evidence standard. The ALJ may award the aggrieved party injunctive relief, actual damages, and attorney costs; but unlike federal district court, the ALJ may not impose punitive damages. Under Davenport's fair housing ordinance, the DCRC director will issue a determination of either "Probable Cause" or "No Probable Cause." If the director issues a determination of "No Probable Cause,"

the complainant may request the DCRC to reconsider its determination or may request the Iowa Civil Rights Commission to conduct a review of the DCRC finding. If the director finds probable cause, the Commission will again seek conciliation before setting a public hearing date. The Commission can adopt, modify, or reject the hearing officer's recommended decision or remand the case to the hearing officer for additional evidence. The DCRC may order injunctive relief, actual and punitive damages, reasonable attorney fees, and any other relief appropriate.

Similarly, after investigation, the IDHR will send the parties a copy of the investigative report with recommended findings dismissing the case or indicating that IDHR found substantial evidence of a violation of the Human Rights Act. The parties may enter a private settlement agreement, though these are not enforceable by IDHR or the Illinois Human Rights Commission (IHRC). If the Department mediates a settlement, it will submit a Terms of Settlement to the Commission for approval. The IHRC then enters an order dismissing the charge pursuant to compliance with the approved TSA. A party who alleges that an approved TSA has been breached may seek to have IDHR enforce the agreement in state court (where the Illinois Attorney General represents IDHR), or may file an enforcement action in the circuit court. If substantial evidence of discrimination is found and conciliation fails, IDHR files a complaint with the Illinois Human Rights Commission. The case will proceed to a public hearing before an ALJ or the parties can elect to have their claims decided in circuit court. IDHR will be a party to the administrative hearing, and seek appropriate relief for the Complainant and protection of the public interest. The judge can order appropriate remedies to make the complainant "whole."

The advantages of seeking redress through the administrative complaint process are that administrative proceedings are generally more expedited than the federal court trial process, and the enforcement agency takes on the duty, time, and cost of investigating the matter and conciliation may result in a binding settlement. However, the complainant also gives up control of the investigation and ultimate findings.

Housing discrimination claims may be brought against local governments and zoning authorities and against private housing providers, mortgage lenders, or real estate brokers.

Complaints Filed with HUD

Region Five of the Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the FHAA for cities and counties throughout Illinois, including Moline and Rock Island (as well as Ohio, Indiana, Michigan, Minnesota, and Wisconsin). The FHEO Region Seven office receives complaints for cities and counties throughout Iowa, including Davenport (as well as Kansas, Missouri, and Nebraska). To achieve its mission of protecting individuals from discrimination, promoting economic opportunity, and achieving diverse, inclusive communities, the FHEO receives and investigates complaints of housing discrimination, and leads in the administration, development, and public education of federal fair housing laws and policies.

A request was made to HUD for complaints received regarding housing units in the City of Davenport, City of Moline, and City of Rock Island for the previous five-year period. The Regional Office of FHEO maintains data reflecting the number of complaints of housing discrimination received by HUD, the status of all such complaints, and the basis/bases of all such complaints.

From January 1, 2014 through December 1, 2018, HUD opened or closed 98 formal complaints of alleged housing discrimination occurring within the jurisdiction of the City of Davenport and 18 complaints within Rock Island County jurisdictions (including the cities of Moline and Rock Island).

TABLE 23. HUD FAIR HOUSING COMPLAINTS IN DAVENPORT

Closure Date	Basis/Bases	Issues	Closure Reason	Compensation Amount
01/02/14	Race, Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	
01/03/14	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/ settlement successful	\$150
04/17/14	Sex	Discriminatory acts under Section 818 (coercion, etc.)	Conciliation/settlement successful	\$445
04/24/14	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$500
05/08/14	Race, Sex, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	
05/15/14	Religion	Discrimination in terms/conditions/privileges relating to rental	No cause determination	
06/16/14	Disability	Failure to make reasonable accommodation	No cause determination	
06/18/14	Disability	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	
06/30/14	Race, Color	Discrimination in the making of loans	No cause determination	
09/16/14	Disability	Discriminatory refusal to rent	Conciliation/settlement successful	\$1,000
09/26/14	Race	Discriminatory acts under Section 818 (coercion, etc.)	No cause determination	
10/24/14	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$450
10/31/14	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	\$700
10/31/14	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	
10/31/14	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	
11/14/14	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	
12/22/14	National Origin, Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$800
12/26/14	Race, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, etc.)	No cause determination	
01/27/15	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	

Data Source: FOIA Request to HUD Region VII Office of Fair Housing and Equal Opportunity

TABLE 23. HUD FAIR HOUSING COMPLAINTS IN DAVENPORT (CONTINUED)

Closure Date	Basis/Bases	Issues	Closure Reason	Compensation Amount
01/29/15	Race, Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$5,000
02/20/15	Race, Color	Discrimination in terms/conditions/privileges relating to rental	No cause determination	
03/11/15	Race, Retaliation	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$1,000
03/12/15	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	\$1,650
03/25/15	Race, Color	Discriminatory refusal to rent and negotiate for rental	No cause determination	
05/01/15	Sex	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, etc.)	No cause determination	
05/05/15	National Origin, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, etc.)	No cause determination	
05/14/15	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	\$500
06/18/15	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	
06/30/15	Sex	Discrimination in terms/conditions/privileges relating to rental	No cause determination	
09/10/15	Sex	Discriminatory acts under Section 818 (coercion, etc.)	Conciliation/settlement successful	\$1,060
10/06/15	Sex, Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, etc.)	Conciliation/settlement successful	\$5,262
10/23/15	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	\$275
12/14/15	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	\$0
12/31/15	Disability	Discrimination in services and facilities relating to rental; Failure to permit reasonable modification	Conciliation/settlement successful	\$2,807
02/02/16	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$500
02/02/16	Disability	Steering; Failure to make reasonable accommodation	Conciliation/settlement successful	\$0

Data Source: FOIA Request to HUD Region VII Office of Fair Housing and Equal Opportunity

TABLE 23. HUD FAIR HOUSING COMPLAINTS IN DAVENPORT (CONTINUED)

Closure Date	Basis/Bases	Issues	Closure Reason	Compensation Amount
02/11/16	Race	Discriminatory terms, conditions, privileges, or services and facilities; Steering	Conciliation/settlement successful	\$1,118
02/12/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	\$0
03/18/16	Retaliation	Discriminatory acts under Section 818 (coercion, etc.)	Conciliation/settlement successful	\$225
04/04/16	Race	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	\$1,200
04/05/16	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$1,125
06/03/16	Sex, Familial Status	Discriminatory refusal to rent	No cause determination	
06/13/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	\$600
06/30/16	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	
06/30/16	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	
09/15/16	Race, Sex	Discriminatory refusal to rent	Conciliation/settlement successful	\$0
09/30/16	Race	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant without resolution	
10/13/16	Race	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	\$0
11/03/16	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	
12/07/16	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	
12/08/16	Race, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Complainant failed to cooperate	
12/23/16	National Origin	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	
01/05/17	Sex	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	\$1,000
01/17/17	Race	Discriminatory refusal to rent	No cause determination	

Data Source: FOIA Request to HUD Region VII Office of Fair Housing and Equal Opportunity

TABLE 23. HUD FAIR HOUSING COMPLAINTS IN DAVENPORT (CONTINUED)

Closure Date	Basis/Bases	Issues	Closure Reason	Compensation Amount
01/19/17	Race	Discrimination in terms/conditions/privileges relating to rental	Dismissed for lack of jurisdiction	
01/26/17	Retaliation	Otherwise deny or make housing unavailable	Conciliation/settlement successful	\$2,000
02/06/17	Race	Discriminatory refusal to rent	No cause determination	
02/10/17	Race	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	\$0
02/14/17	Race	Discriminatory refusal to rent	Conciliation/settlement successful	\$500
03/17/17	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	
03/27/17	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	
05/25/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	\$125
06/05/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, etc.)	No cause determination	
06/13/17	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, etc.)	Conciliation/settlement successful	\$5,000
06/20/17	Disability	Discrimination in services and facilities relating to rental; Failure to provide accessible and usable public and common user areas	Conciliation/settlement successful	\$3,500
06/22/17	Sex	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, etc.)	Conciliation/settlement successful	\$0
06/27/17	Disability	Discriminatory refusal to rent	No cause determination	
06/29/17	Disability	Failure to make reasonable accommodation	No cause determination	
06/30/17	Disability	Failure to make reasonable accommodation	No cause determination	
06/30/17	Race	Discriminatory refusal to rent and negotiate for rental	No cause determination	
06/30/17	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	
06/30/17	Race	Discriminatory acts under Section 818 (coercion, etc.)	Conciliation/settlement successful	\$4,345
08/16/17	Race	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	\$100

Data Source: FOIA Request to HUD Region VII Office of Fair Housing and Equal Opportunity

TABLE 23. HUD FAIR HOUSING COMPLAINTS IN DAVENPORT (CONTINUED)

Closure Date	Basis/Bases	Issues	Closure Reason	Compensation Amount
09/01/17	Race	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	\$0
09/25/17	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	
11/14/17	National Origin, Sex, Disability	Discrimination in terms/conditions/privileges relating to rental; Steering; Failure to make reasonable accommodation	Conciliation/settlement successful	\$540
01/11/18	Race	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	\$750
02/02/18	Race, Familial Status	Discrimination in terms/conditions/privileges relating to rental	No cause determination	
06/05/18	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	\$3,093
06/06/18	Race	Discriminatory refusal to rent; Otherwise deny or make housing unavailable	No cause determination	
06/07/18	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	
06/18/18	Sex	Discrimination in terms/conditions/privileges relating to rental	No cause determination	
06/20/18	Race, Sex	Discrimination in terms/conditions/privileges relating to rental	No cause determination	
06/29/18	Disability	Failure to permit reasonable modification	No cause determination	
07/31/18	Race, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	\$1,520
08/03/18	Race, Retaliation	Discrimination in terms/conditions/privileges relating to rental	No cause determination	
08/24/18	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Non-compliance with design and construction requirements (handicap); Failure to make reasonable accommodation	Conciliation/settlement successful	\$5,000
09/05/18	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	
10/02/18	Race	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$750

Data Source: FOIA Request to HUD Region VII Office of Fair Housing and Equal Opportunity

TABLE 23. HUD FAIR HOUSING COMPLAINTS IN DAVENPORT (CONTINUED)

Closure Date	Basis/Bases	Issues	Closure Reason	Compensation Amount
10/30/18	National Origin, Sex, Disability	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	\$0
	Familial Status	Discriminatory advertising, statements and notices	Pending	
	Race	Opened 06/06/18		
	Sex, Disability	Opened 07/05/18		
	Disability	Opened 08/08/18		
	Sex	Opened 08/16/18		
	Sex	Opened 08/17/18		
	Race	Opened 09/11/18		
	Race, Disability	Opened 10/16/18		

Data Source: FOIA Request to HUD Region VII Office of Fair Housing and Equal Opportunity

TABLE 24. HUD FAIR HOUSING COMPLAINTS IN ROCK ISLAND COUNTY

Jurisdiction	Closure Date	Basis/Bases	Issues	Closure Reason	Compensation Amount
East Moline	08/28/14	Race, Religion, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	
East Moline	11/15/17	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	
Milan	10/27/14	Race	Discriminatory refusal to rent	Complainant failed to cooperate	
Milan	07/06/17	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	
Milan	Open	Disability	Failure to make reasonable accommodation		

Data Source: FOIA Request to HUD Region V Office of Fair Housing and Equal Opportunity

TABLE 24. HUD FAIR HOUSING COMPLAINTS IN ROCK ISLAND COUNTY (CONTINUED)

Jurisdiction	Closure Date	Basis/Bases	Issues	Closure Reason	Compensation Amount
Mokena	07/26/18	Race	Discriminatory refusal to rent; False denial or representation of availability - rental	No cause determination	
Moline	01/15/15	Religion	Discriminatory refusal to rent	No cause determination	
Moline	01/24/17	Race, Sex	Discrimination in terms/conditions/privileges relating to rental	No cause determination	
Moline	04/23/18	Sex	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation / settlement successful	
Moline	08/27/18	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	
Rock Island	01/27/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	
Rock Island	05/03/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	
Rock Island	07/11/17	Race	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	
Rock Island	04/20/18	Sex, Religion	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	
Rock Island	Open	Race, Sex, Disability			
Rock Island	Open	Race, Disability			
Rock Island	Open	Race			
Silvis	02/09/16	Race, Disability	Discrimination in services and facilities relating to rental	No cause determination	

Data Source: FOIA Request to HUD Region V Office of Fair Housing and Equal Opportunity

The number of complaints broken down by basis of discrimination are shown for Davenport and Rock Island County jurisdictions in the tables below.

TABLE 25. DAVENPORT COMPLAINTS BY BASIS

Basis	2014	2015	2016	2017	2018	Total
Color	1	2	0	0	0	3
Disability	12	6	5	8	7	38
Familial Status	0	1	1	0	2	4
National Origin	1	1	1	1	1	5
Race	6	9	10	14	13	52
Religion	1	0	0	0	0	1
Retaliation	1	1	2	1	3	8
Sex	2	4	2	3	6	17

Data Source: FOIA Request to HUD Region VII Office of Fair Housing and Equal Opportunity

TABLE 26. ROCK ISLAND COUNTY COMPLAINTS BY BASIS

Basis	2014	2015	2016	2017	2018	Total
Color	0	0	0	0	0	0
Disability	1	0	1	4	4	10
Familial Status	0	0	0	0	0	0
National Origin	0	0	0	0	0	0
Race	2	0	1	2	4	9
Religion	1	1	0	0	1	3
Retaliation	0	0	0	0	0	0
Sex	0	0	0	1	3	4

Data Source: FOIA Request to HUD Region V Office of Fair Housing and Equal Opportunity

More than one basis of discrimination may be cited in a single complaint. Regarding Davenport, for the survey period, race was cited in 52 complaints as the basis of discrimination, followed by disability in 38 cases, sex in 17 cases, retaliation in 8 cases, national origin in 5 cases, familial status in 4 cases, color in 3 cases, and religion in 1 case. For the Rock Island County jurisdictions, the numbers show disability was cited in 10 complaints as the basis of discrimination, followed by race in 9 cases, sex in 4 cases, and religion in 3 cases.

Also, more than one discriminatory act or practice, recorded as the discriminatory issue, may be cited in a single complaint. For the reported cases the discriminatory issues identified included failure to make a

reasonable accommodation or modification; discrimination in terms/conditions/privileges relating to rental; discriminatory refusal to rent and negotiate for rental; discriminatory terms, conditions, privileges, or services and facilities; discrimination in the terms/conditions for making loans; discriminatory acts under Section 818 (coercion, etc.); steering; failure to provide accessible and usable public and common user areas; discriminatory advertising, statements and notices; false denial or representation of availability – rental; non-compliance with design and construction requirements (handicap); using ordinances to discriminate in zoning and land use; and otherwise deny or make housing unavailable.

At the time of response, eight Davenport cases were open / pending and 90 cases had been closed. Of the closed cases, 44 were successfully resolved by conciliation; 42 were closed after investigation and a no cause determination; one was withdrawn by the complainant after resolution; one was withdrawn by complainant without resolution; one was administratively closed because the complainant failed to cooperate in the process; and one was closed for lack of jurisdiction. At the time of response, four Rock Island County cases were open / pending and 14 cases had been closed. Of the closed cases, six were closed after investigation and a no cause determination; six were withdrawn by the complainant after resolution; one was successfully resolved by conciliation; and one was administratively closed because the complainant failed to cooperate in the process. In the cases resolved by settlement / conciliation, the respondents did not necessarily admit liability, but may have settled to avoid further expense, time, and the uncertainty of litigation. Monetary damages totaling \$54,590 were reported for the cases resolved by settlement or conciliation in Davenport and \$857 in Rock Island County, though not all settled cases ended in monetary damages being awarded.

Complaints Filed with the Iowa Civil Rights Commission

A request also was made to the Iowa Civil Rights Commission for data reflecting the number of housing discrimination related complaints received by the Commission regarding housing units in the City of Davenport. The Commission provided the following data for 18 cases it processed between January 1, 2014 and December 31, 2018.

TABLE 27. IOWA CIVIL RIGHTS COMMISSION HOUSING COMPLAINTS IN DAVENPORT

Status / Closing Date	Basis/Bases	Issues	Closure Type	Settlement Amount
Closed – 4/3/2014	Disability	Failure to waive pet deposit for an assistance animal; Refusal to rent; Terms and conditions.	Satisfactory Adjustment	\$0.00; Fair housing training; Change of policy
Closed – 8/11/2014	Disability	Refusal to rent; Terms and conditions; Failure to make a reasonable accommodation.	No Probable Cause	
Closed – 11/4/2014	Disability	Failure to waive “no pets” policy for an assistance animal; Terms and conditions.	Satisfactory Adjustment	\$0.00; Fair housing training; Change of policy
Closed – 5/15/2015	National Origin (Hispanic); Familial Status	Harassment; Terms and conditions; Eviction.	No Probable Cause	
Closed – 6/30/2016	Gender (Male); Familial Status	Refusal to rent.	No Probable Cause	
Closed – 8/15/2016	Race (Black)	Terms and conditions; Eviction.	No Probable Cause	
Closed – 10/17/2016	Race (Black)	Failure to make timely repairs; attempted eviction.	Satisfactory Adjustment	\$0.00; Remove eviction from Complainant’s tenant file; Allow Complainant to renew lease; Fair housing poster
Closed – 12/1/2016	Race (Black)	Terms and conditions.	No Probable Cause	
Closed – 1/6/2017	National Origin (Hispanic)	Terms and conditions.	No Probable Cause	
Closed – 1/3/2017	Race (Black)	Terms and conditions.	No Probable Cause	
Closed – 1/6/2017	Gender (Female)	Evicted for wearing confederate flag baseball cap; Terms and conditions.	Satisfactory Adjustment	\$1,000; Fair housing poster
Closed – 3/2/2017	Race (Black)	Refusal to rent.	No Probable Cause	
Closed – 2/15/2017	Race (Black)	Refusal to rent.	No Probable Cause	
Closed – 12/9/2016	Race (Black); Retaliation	Terms and conditions; Eviction.	Administrative Closure	
Closed – 4/14/2017	Race (Black)	Terms and conditions.	Administrative Closure	
Closed – 06/25/2018	Race (Black)	Terms and conditions; Eviction.	No Probable Cause	
Closed – 9/24/2018	Race (American Indian)	Terms and conditions.	No Probable Cause	
Closed – 6/20/2018	Race (Black)	Refusal to rent.	No Probable Cause	

Data Source: Iowa Civil Rights Commission

More than one basis of discrimination may be cited in a single complaint. For the survey period, race was cited in 11 cases as the basis of discrimination, followed by disability in three cases, national origin in two cases, familial status in two cases, gender in two cases, and retaliation in one case. More than one issue also may be cited in a single complaint. For the reported cases, discriminatory terms and conditions were cited in 13 cases; discriminatory eviction in seven cases; discriminatory refusal to rent in six cases; discrimination regarding an assistance animal in two cases; failure to make a reasonable accommodation in one case; and harassment in one case.

At the time of response, all 18 reported cases had been closed: 12 cases were closed after investigation and a no probable cause determination; four cases were closed after satisfactory adjustment/settlement; 24 were withdrawn by the complainant after resolution; and two were closed administratively. Mediation and conciliation can lead to individualized settlement terms depending on the facts and needs of the parties on a case-by-case basis. Here, the Commission helped negotiate a monetary settlement to complainant (\$1,000) in one of the reported cases. In two cases, the respondent agreed to Fair Housing training and a change of policy. In another case, the eviction was removed from the complainant’s file and complainant was permitted to renew the lease.

Complaints Received by the Illinois Department of Human Rights

The Fair Housing Division of the Illinois Department of Human Rights receives and investigates charges of housing discrimination filed within one year of the alleged unlawful activity. A FOIA response from the Department reveals that between January 1, 2013, through December 14, 2018, the Department docketed and investigated 13 charges of discrimination related to properties located in Moline and Rock Island.

Disability was cited six times as the basis of discrimination; race in three cases; religion in two cases; and sex in one case. Four of the cases were closed following investigation for lack of substantial evidence. One case was settled through the Department’s conciliation process with the respondent agreeing to complete Fair Housing training. The charge was not settled for a dollar amount.

TABLE 28. ILLINOIS DEPARTMENT OF HUMAN RIGHTS HOUSING COMPLAINTS IN ROCK ISLAND COUNTY

Jurisdiction	Open and Closure Date	Basis/Bases	Issues	Closure Reason
Moline	05/03/13 - 06/20/14	Disability	Failure to accommodate	Lack of substantial evidence
Moline	09/19/13 - open		Lending standards	Lack of substantial evidence
Moline	08/18/14 - 07/07/15	Religion	Discriminatory terms	Lack of substantial evidence
Moline	01/30/17 - 08/14/18	Disability	Failure to accommodate	Substantial evidence
Moline	01/25/18 -	Sex	Terms	Adjusted terms (of settlement)
Moline	06/21/18 -	Disability	Additional civil rights	Adjusted and withdrawn
Rock Island	03/21/13 - 10/30/13	Race	Statements	Lack of substantial evidence
Rock Island	06/13/16 - 07/11/17	Disability	Failure to accommodate	Lack of substantial evidence

Source: Illinois Department of Human Rights

TABLE 28. ILLINOIS DEPARTMENT OF HUMAN RIGHTS HOUSING COMPLAINTS IN ROCK ISLAND COUNTY (CONTINUED)

Jurisdiction	Open and Closure Date	Basis/Bases	Issues	Closure Reason
Rock Island	02/15/17 - 05/05/17	Disability	Additional civil rights	Adjusted and withdrawn
Rock Island	05/09/17 - 11/02/17	Race	Additional civil rights	Adjusted and withdrawn
Rock Island	09/18/17 - pending	Religion	Terms	Failure to proceed
Rock Island	09/18/18 - pending	Disability	Additional civil rights	
Rock Island	10/22/18 - pending	Race	Terms	

Source: Illinois Department of Human Rights

Complaints received by the Davenport Civil Rights Commission

Housing discrimination related complaints must be filed with the Commission within one year of the alleged discriminatory incident. The Commission reports data reflecting complaints it receives, investigates, and processes in each calendar year’s Annual Report. As of the writing of this report, data for 2018 had not yet been published.

TABLE 29. DAVENPORT CIVIL RIGHTS COMMISSION HOUSING COMPLAINTS

Year	# of Housing Complaints Filed	Housing as Percentage of Total Complaints Received by Commission	# of Housing Complaints Closed	# of Housing Cases Referred to HUD
2013	29	21% (of 139 total)	28	2
2014	26	24% (of 110 total)	29	2
2015	24	18% (of 130 total)	15	7
2016	16	15% (of 108 total)	12	3
2017	16	14% (of 115 total)	24	1

Source: Davenport Civil Rights Commission

The Commission receives complaints regarding alleged discrimination not only in the arena of housing, but also employment, public accommodation, education, credit and transit. Its Annual Reports provide data regarding the basis of discrimination (i.e. race, disability, sex, etc.) and the disposition of cases (i.e. settlement, no probable cause finding, probable cause, etc.), but the numbers are not broken down by individual arenas. For example, in 2013, of the 139 total complaints that were filed with the Commission, race was cited 63 times as a basis of discrimination, but the report does not indicate how many of those were housing cases versus employment, public accommodation, education, credit or transit cases. Annual Reports are available on the Commission’s website.

FAIR HOUSING LAWSUITS AND LITIGATION

An aggrieved party may bypass the administrative processes described above and seek redress of housing discrimination in state or federal court. Over the recent five-year period—January 1, 2014 through

December 31, 2018—there have been at least four state or federal lawsuits filed or litigated concerning properties, lenders, and/or housing providers in the City of Davenport and Rock Island County areas. The following is a summary of those cases, which illustrate possible impediments to fair housing choice in the region.

- Hunter v. Rock Island Housing Authority, Civil Action No. 4:13-cv-401 (S.D. Ill) (complaint filed March 5, 2013) (case dismissed April 21, 2015).

RIHA provides low income housing to the residents of Rock Island County and surrounding communities. Hunter was a resident of one of RIHA's housing projects, a high-rise known as Spencer Towers. After Hunter twice urinated in Spencer Towers common area, RIHA served him with a 30-day notice to vacate for violating the terms of his lease. Hunter filed state court proceedings to oppose his eviction. The circuit court entered judgment in favor of RIHA and granted RIHA possession of the premises. Hunter did not raise racial discrimination as a defense during these state court proceedings, but in his federal district court complaint, Hunter, who is White, alleged that he was made to leave Spencer Towers when other similarly situated African-American tenants were not. The court, however, found these claims were unsupported by the facts and the law, and granted RIHA's motion for summary judgment and dismissed all of plaintiff's claims.

- National Fair Housing Alliance, Inc. v. Ryan Companies US, Inc., Civil Action No. 1:14-cv-03197 (N.D. Ill) (complaint filed May 1, 2014; consent decree approved and case dismissed Nov. 5, 2015).

After performing testing of various affordable multi-family senior apartment complexes in Illinois and Iowa including in Rock Island, Plaintiff fair housing advocates alleged that the subject properties designed, constructed and managed by the Defendants failed to meet the FHAA's design and construction accessibility requirements for persons with disabilities. Plaintiffs documented units lacking accessible kitchens, bathrooms and accessible routes, among other violations. Defendants denied they were in violation of the FHAA but agreed to resolve the claims by consent decree without further time and expense of litigation. The FHAA requires that covered multifamily dwellings must include certain features to make the dwellings accessible to, or adaptable for use by, a person who has or develops a disability. The parties' settlement included a confidential Retrofit Plan Agreement, giving the Defendants 30 months to complete the items needed for each property to bring it into compliance. Defendants also agreed to compensate Plaintiffs for damages and attorneys fees, diversion of resources, and frustration of mission, in a total amount of \$985,000 and for reimbursement and certifications of the respective properties as set forth in the Confidential Retrofit Plan Agreement.

- Davis v. City of Davenport, Civil Action No. 3:16-cv-00090 (S.D. Iowa) (complaint filed Sept. 9, 2016) (settled and dismissed Dec. 28, 2017).

Plaintiff, identified as African-American, brought this action against the City and the administrator of the Office of Assisted Housing after he was evicted from Heritage Highrise Apartments, a public housing project for persons sixty-two years of age or older and persons who have a physical or mental disability. Plaintiff claimed the City violated his civil rights under 42 U.S.C. § 1981 and the Fair Housing Act by terminating his lease and evicting him on the basis of race. The City disputed liability and asserted that the Plaintiff had been given notice of at least seven lease violations which justified termination. On motion

for summary judgment, the court found there was evidence that White tenants were allowed to violate some of these same rules without similar consequences and that a reasonable trier of fact could conclude a discriminatory reason “more likely” motivated the City’s administrator than his legitimate, nondiscriminatory reasons for terminating the lease. The court found in favor of the City on some issues and in favor of Plaintiff on others. The parties settled the claims for an undisclosed amount, and the matter was dismissed on Dec. 28, 2017.

- Seeberger v. Davenport Civil Rights Commission, No. 16-1534 (Ct. App. Iowa 2018).

Seeberger owned a three-bedroom residential property in Davenport, which she eventually rented to tenants though she kept her cats, clothing, and some furniture in the home. A mother and teenage daughter who were tenants filed a housing discrimination complaint with the local Civil Rights Commission after the teenage daughter became pregnant and Seeberger terminated their tenancy. The complaint, citing violations of Davenport Municipal Code section 2.58.305(C) and Section 804(c) of the FHA, alleged Seeberger discriminated on the basis of her familial status by making discriminatory statements. Following its investigation, the Commission issued a probable cause finding of discrimination. The Commission, and then a district court on appeal, approved the ALJ's decision in favor of the tenants and awarded \$17,500 in costs and attorneys fees. The appeals court affirmed the agency’s and district court’s findings of liability.

PAST FAIR HOUSING GOALS AND RELATED ACTIVITIES

Davenport, Moline, and Rock Island last completed an Analysis of Impediments to Fair Housing Choice in 2013. That AI identified several impediments for each geography and the region and recommended remedial actions to address each. The impediments and recommended activities from the 2013 AI are shown in the table that follows, along with progress made toward addressing them over the last five years.

TABLE 30. ACTIONS TAKEN TO ADDRESS IMPEDIMENTS IDENTIFIED IN 2013 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Impediment	Goals	Actions Taken since 2013
City of Davenport		
1. Lack of affirmative marketing policy and site selection policy for HOME program	Create HUD-compliant documents	<ul style="list-style-type: none"> • Revised Affirmative Marketing requirements for HOME-assisted projects • Continued to require HOME-assisted projects with more than 5 units to submit Affirmative Marketing plan • Underwent HUD monitoring, which showed no issues with the City’s site selection policies
2. Inadequate supply of affordable accessible rental units	Increase the supply of affordable accessible units	<ul style="list-style-type: none"> • Continued to evaluate plans for new construction and significant rehab projects to ensure accessibility features meet applicable laws • Met accessibility requirements in newly-constructed, HOME-assisted rental projects • Remodeled existing assisted units to improve accessibility
3. Lack of housing and land use strategies in local plans to further fair housing	Increased consideration of fair housing choice in comprehensive planning efforts	<ul style="list-style-type: none"> • Adopted new land use element to the Comprehensive Plan • Continued to follow HUD site and neighborhood standards • To increase land available for multi-family development, conducted an analysis of lot size and occupancy data and rezoned 166 parcels from single and two-family to multifamily zoning, adding 728 acres of multifamily-zoned land, an increase of 82%.
4. Minimal amount of land zones and available for multi-family housing	Increase supply of land zoned and available for multi-family development	<ul style="list-style-type: none"> • Re-designated “Residential Limited” zoning category to “Residential General,” which allows opportunities for higher-density dwellings • Developed new zoning ordinance and map
5. Restrictive zoning definitions of “family”	Adopt a more inclusive zoning ordinance definition of “family”	<ul style="list-style-type: none"> • Amended the City’s zoning ordinance and completely removed any definition of "family" so as to make no distinction or limitation on the number of people, related or unrelated, who may live together in a dwelling unit
6. Overly restrictive regulations for group homes for persons with disabilities	Increase accommodations for group homes	<ul style="list-style-type: none"> • City's amended zoning ordinance permits group homes in all residential districts, provided that, when a group home is located within an existing residential structure, the location, design, and operation of such facility must not alter the residential character of the structure

TABLE 30. ACTIONS TAKEN TO ADDRESS IMPEDIMENTS IDENTIFIED IN 2013 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (CONTINUED)

Impediment	Goals	Actions Taken since 2013
City of Davenport (continued)		
7. Inadequate HUD-required documents	Create HUD-compliant documents	<ul style="list-style-type: none"> • Amended the Section 8 Administrative Plan to reduce Subsidy and Payment Standards to assist more families • Implemented local preferences for Section 8 vouchers; Updated and sorted waiting lists • Submitted revised admissions and management plans to HUD

TABLE 30. ACTIONS TAKEN TO ADDRESS IMPEDIMENTS IDENTIFIED IN 2013 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (CONTINUED)

Impediment	Goals	Actions Taken since 2013
City of Moline		
1. Failure to identify affirmatively furthering fair housing choice as a project requirement and evaluation consideration in CDBG application packet	Increased consideration of affirmatively furthering fair housing choice when making CDBG funding decisions	<ul style="list-style-type: none"> • The City modified its CDBG application forms to include consideration for fair housing-based activities
2. Lack of housing and land use strategies in local plans to further fair housing	Increased consideration of fair housing choice in comprehensive planning efforts	<ul style="list-style-type: none"> • Comprehensive planning efforts have given consideration for multi-family development
3. Minimal amount of land zoned and available for multi-family housing	Increased supply of land zoned and available for multi-family development	<ul style="list-style-type: none"> • Evaluated and reduced application fee for certain zoning related actions to increase housing affordability • Reduced permit fees for non-profit affordable housing developers and examined development fees to identify ways to reduce them where possible
4. Restrictive zoning definitions of “family”	Adopt a more inclusive zoning ordinance definition of “family”	<ul style="list-style-type: none"> • City zoning staff are evaluating changes to the definition of “family.”
5. Overly restrictive regulations for group homes for persons with disabilities	Increase accommodations for group homes	<ul style="list-style-type: none"> • City zoning staff are evaluating changes to the regulation of small group homes.
6. Lack of knowledge about fair housing laws and landlord/tenant rights and responsibilities	Increase knowledge about fair housing laws and landlord/tenant rights and responsibilities	<ul style="list-style-type: none"> • Allocated CDBG and General Fund resources to address complaints received through the Code Enforcement and Neighborhood Abatement programs • Continue to inform clients about lead-based paint hazards and to partner with Rock Island County Health Department to provide community education and outreach regarding lead hazards • City staff attended training sessions on AFFH
7. Lack of local fair housing ordinance	Adopt a fair housing ordinance	<ul style="list-style-type: none"> • The City Council adopted a fair housing resolution
8. Ineffectual fair housing organization	Reorganize and reenergize the City’s Human Rights Commission	<ul style="list-style-type: none"> • The City evaluated reorganization options for the Human Rights Commission
9. Questionable access to public services and programs for persons with limited English proficiency	Determine the need for a Language Access Plan (LAP)	<ul style="list-style-type: none"> • The City evaluated the 4-Factor Analysis and compiled base-level information for the LAP

TABLE 30. ACTIONS TAKEN TO ADDRESS IMPEDIMENTS IDENTIFIED IN 2013 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (CONTINUED)

Impediment	Goals	Actions Taken since 2013
City of Rock Island		
1. Failure to identify affirmatively furthering fair housing choice as a project requirement and evaluation consideration in the CDBG application packet	Increased consideration of affirmatively furthering fair housing choice when making CDBG funding decisions	<ul style="list-style-type: none"> • Provides program information in Spanish, Swahili, and Kinyarwanda, including program brochures, program applications, policy and procedure materials; Material is distributed through the Code Enforcement program, community fairs and organizational gatherings
2. Lack of housing and land use strategies in local plans to further fair housing	Increased consideration of affirmatively furthering fair housing choice in comprehensive planning efforts	<ul style="list-style-type: none"> • Implemented AFFH policies in the City’s Comprehensive Plan adopted in 2014 • Allocated \$4,000 annually toward implementation of neighborhood plans
3. Minimal amount of land zoned and available for multi-family housing	Increased supply of land zoned and available for multi-family development	<ul style="list-style-type: none"> • Proposed changes to the zoning ordinances condense residential zones in such a way where there are now more zones that will allow higher density residential uses
4. Restrictive zoning definitions of “family”	Adopt a more inclusive zoning ordinance definition of “family”	<ul style="list-style-type: none"> • Closer review of the zoning code determined that some of the “other” living arrangements defined therein (Care Home, Small Residential and Unrelated Group Home) provide alternative definitions of family that address previous concerns regarding fair housing options for vulnerable populations
5. Lack of knowledge about fair housing laws and landlord/tenant rights and responsibilities	Increase knowledge about fair housing laws and landlord/tenant rights and responsibilities	<ul style="list-style-type: none"> • City staff attended training sessions on AFFH provided by the Illinois Department of Human Rights (IDHR) • Adopted a rental housing ordinance requiring landlord registration, annual inspections, and recourse for tenant complaints regarding housing code violations
6. Inadequate fair housing ordinance	Adopt a fair housing ordinance	
7. Ineffectual fair housing organization	Reorganize and reenergize the City’s Human Rights Commission	<ul style="list-style-type: none"> • Human Rights Commission receives all Fair Housing complaints and acts in an advisory/ mediation capacity for housing, employment, or discrimination disputes

TABLE 30. ACTIONS TAKEN TO ADDRESS IMPEDIMENTS IDENTIFIED IN 2013 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (CONTINUED)

Impediment	Goals	Actions Taken since 2013
Regional		
1. Lack of decent affordable housing	Increase the supply of affordable housing	<p><u>Davenport</u></p> <ul style="list-style-type: none"> • Continued balancing housing investments between revitalizing older areas and developing new affordable housing in areas where it was not traditionally available • Adhered to lead-based paint regulations in all housing rehabilitation programs offered by the City • Maintained Housing Quality Standards (HQS) on all assisted housing • Adopted new zoning ordinance that addresses and increase for affordable housing <p><u>Moline</u></p> <ul style="list-style-type: none"> • Supported new and existing affordable housing developments for low-to-moderate income households • Provided printed material advertising housing opportunities • Maintained a waiting list for applicants for City-administered housing programs • Provided down payment and closing cost assistance through the IHDA Homebuyers Program • Partnered with neighboring cities to apply for HUD and IHDA grants for affordable housing programs • Evaluated and reduced application fee for certain zoning related actions to increase housing affordability • Reduced permit fees for non-profit affordable housing developers and examined development fees to identify ways to reduce them where possible

TABLE 30. ACTIONS TAKEN TO ADDRESS IMPEDIMENTS IDENTIFIED IN 2013 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (CONTINUED)

Impediment	Goals	Actions Taken since 2013
Regional (continued)		
1. Lack of decent affordable housing (continued)	Increase the supply of affordable housing (continued)	<p><u>Moline (continued)</u></p> <ul style="list-style-type: none"> • Secured a Lead Hazard Control grant for 2013-2016 to address lead hazards, with priority given to households with children under 6 who have elevated blood lead levels • Worked with a state agency and affordable housing developer on a project that will provide affordable senior housing <p><u>Rock Island</u></p> <ul style="list-style-type: none"> • Partnered with Moline on a 2018 Lead Hazard Control grant application; funding was not awarded but the cities will reapply • Provides non-CDBG funding to Rock Island Economic Growth Corporation to provide affordable housing through development and down payment assistance • Created two Tax Increment Finance Districts (Heather Ridge and Century Woods) to assist Millenia Housing Management in the redevelopment of low mod rental housing at these locations
2. Failure to identify affirmatively furthering fair housing choice as a project requirement in the CDBG application packet	Increased consideration of affirmatively furthering fair housing when making CDBG funding decisions	<p><u>Rock Island</u></p> <ul style="list-style-type: none"> • All program applications include fair housing language • A fair housing brochure is distributed through Code Enforcement and Neighborhood Housing information and at community fairs and functions
3. Lack of affirmative marketing policy	Create HUD-compliant documents	<p><u>Davenport</u></p> <ul style="list-style-type: none"> • Revised Affirmative Marketing requirements for HOME-assisted projects • Continued to require HOME-assisted projects with more than 5 units to submit Affirmative Marketing plan • Underwent HUD monitoring, which showed no issues with the City's site selection policies

TABLE 30. ACTIONS TAKEN TO ADDRESS IMPEDIMENTS IDENTIFIED IN 2013 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (CONTINUED)

Impediment	Goals	Actions Taken since 2013
Regional (continued)		
4. Inadequate representation of protected classes on local housing-related appointed boards and commissions	Increase the number of members of protected classes on appointed boards and commissions	<p><u>Regionwide</u></p> <ul style="list-style-type: none"> • The cities of Moline, Davenport, and Rock Island make available and encourage all residents to apply to housing boards and civil rights commissions. Applications are available either on the government websites or through city offices. The application is public and the selection process is an impartial appointment made by the mayor and approved by city councils.
5. Inadequate supply of affordable accessible residential units	Increase the supply of affordable accessible units	<p><u>Davenport</u></p> <ul style="list-style-type: none"> • Continued to evaluate plans for new construction and significant rehab projects to ensure accessibility features meet applicable laws • Met accessibility requirements in newly-constructed, HOME-assisted rental projects • Remodeled existing assisted units to improve accessibility • Approved Cascade Gardens, a 70-unit multi-family complex for residents with mental health challenges
6. Questionable access to public services and programs for persons with limited English proficiency	Determine the need for a Language Access Plan (LAP)	<p><u>Rock Island</u></p> <ul style="list-style-type: none"> • Rock Island-Milan School District and Spring Forward Learning Center provide ESL classes to all non-English speaking families in the district; classes are attended by all family members
7. Lack of or inadequate public transit	Increase the frequency and extend the hours of public transit options	<p><u>Regionwide</u></p> <ul style="list-style-type: none"> • Public transit runs throughout the region with thirteen MetroLink (Moline and Rock Island) routes and ten Davenport Citibus routes. Transit is accessible 7 days a week, buses begin service as early as 4:45 am and run as late as 9:45 pm. All buses are equipped to accommodate riders with disabilities. The region has 24/7 access to taxi service and Uber drivers as well.

TABLE 30. ACTIONS TAKEN TO ADDRESS IMPEDIMENTS IDENTIFIED IN 2013 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (CONTINUED)

Impediment	Goals	Actions Taken since 2013
Regional (continued)		
8. Lack of knowledge about fair housing laws and landlord/tenant rights and responsibilities	Increase knowledge about fair housing laws and landlord/tenant rights and responsibilities	<p><u>Moline</u></p> <ul style="list-style-type: none"> • Allocated CDBG and General Fund resources to address complaints received through the Code Enforcement and Neighborhood Abatement programs • Continue to inform clients about lead-based paint hazards and to partner with Rock Island County Health Department to provide community education and outreach regarding lead hazards • City staff attended training sessions on AFFH <p><u>Rock Island</u></p> <ul style="list-style-type: none"> • City staff attended training sessions on AFFH provided by the Illinois Department of Human Rights (IDHR) • Adopted a rental housing ordinance requiring landlord registration, annual inspections, and recourse for tenant complaints regarding housing code violations
9. Lack of employment opportunities for minority and low- and moderate-income households	Increase jobs for minorities and low/moderate income households	<p><u>Regionwide</u></p> <p>The cities include and utilize Section 3 requirements as appropriate and work with local PHAs for employment opportunities</p>
10. Lack of employment opportunities for minority and low- and moderate-income households	Increase jobs for minorities and low/moderate income households	<p><u>Davenport</u></p> <ul style="list-style-type: none"> • Funded economic development activities that create or retain jobs for low-to-moderate income workers and/or business owners <p><u>Moline</u></p> <ul style="list-style-type: none"> • Assisted in the development of the Quad Cities Western Illinois University Riverfront Campus and other economic development projects to enhance educational attainment and employment readiness <p><u>Rock Island</u></p> <ul style="list-style-type: none"> • Approved “Initiatives and Actions” which identified strategies to grow a vibrant and diverse economy, including a Commercial/Retail Strategy Study for several corridors and neighborhoods

TABLE 30. ACTIONS TAKEN TO ADDRESS IMPEDIMENTS IDENTIFIED IN 2013 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (CONTINUED)

Impediment	Goals	Actions Taken since 2013
Regional (continued)		
11. Cultural and language barriers for minority groups, including refugees and immigrants	Assimilation of minority groups into the community	<u>Rock Island</u> <ul style="list-style-type: none"> • Leases 22 vacant, city-owned parcels as community garden spaces; majority of lease holders are immigrant residents; all written information is translated into Swahili and Kinyarwanda • Periodically conducts Rock Island University informational “How To” sessions hosted by department directors, City Manager, and Mayor; Sessions are held in locations with a concentrated population of non-English speaking residents
12. Perception that some local governments are unfriendly toward minorities and cannot be trusted to protect minorities’ best interests	Improve relations between local governments and minorities	<u>Rock Island</u> <ul style="list-style-type: none"> • Uses non-CDBG funding to assist Community Caring Conference with public outreach throughout the community; the majority of CCC’s outreach efforts are in minority populated neighborhoods.

TABLE 30. ACTIONS TAKEN TO ADDRESS IMPEDIMENTS IDENTIFIED IN 2013 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (CONTINUED)

Impediment	Goals	Actions Taken since 2013
Regional (continued)		
13. Concentrations of multi-family housing in impacted areas	Increase the supply of multi-family housing in non-impacted areas	<p><u>Davenport</u></p> <ul style="list-style-type: none"> • Re-designated “Residential Limited” zoning category to “Residential General,” which allows opportunities for higher-density dwellings • Continued balancing housing investments between revitalizing older areas and developing new affordable housing in areas where it was not traditionally available <p><u>Moline</u></p> <ul style="list-style-type: none"> • Supported new and existing affordable housing developments for low-to-moderate income households Evaluated and reduced application fee for certain zoning related actions to increase housing affordability • Reduced permit fees for non-profit affordable housing developers and examined development fees to identify ways to reduce them where possible <p><u>Rock Island</u></p> <ul style="list-style-type: none"> • Created two Tax Increment Finance Districts (Heather Ridge and Century Woods) to assist Millenia Housing Management in the redevelopment of low mod rental housing at these locations
14. Members of the protected classes are usually overrepresented in public housing and Section 8 housing	Increase supply of decent affordable private sector housing	<p><u>Rock Island</u></p> <ul style="list-style-type: none"> • Used Neighborhood Stabilization Program (NSP) funds to demolish blighted properties; acquire vacant, foreclosed, or abandoned properties; and provide affordable homeownerships opportunities • Provides non-CDBG funding to Rock Island Economic Growth Corporation to provide affordable housing through development and down payment assistance
15. Disproportionate impact of mortgage loan denial and high cost lending on protected classes	Eliminate discriminatory mortgage lending practices against minorities	<p><u>Davenport</u></p> <ul style="list-style-type: none"> • Continues to sustain homebuyer assistance program after the closure of United Neighbors, which requires counseling and helps pay for it

TABLE 30. ACTIONS TAKEN TO ADDRESS IMPEDIMENTS IDENTIFIED IN 2013 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (CONTINUED)

Impediment	Goals	Actions Taken since 2013
Regional (continued)		
15. Disproportionate impact of mortgage loan denial and high cost lending on protected classes (continued)	Eliminate discriminatory mortgage lending practices against minorities (continued)	<p><u>Moline</u></p> <ul style="list-style-type: none"> • Participated in a homebuying counseling class • Maintained information on homebuyer assistance and homeowner counseling available from partner agencies • Provided referrals to local institutions providing down payment and homebuyer assistance to income-qualified households <p><u>Rock Island</u></p> <ul style="list-style-type: none"> • Developed a curriculum to bring financial education to the workplace • Sponsored a foreclosure workshop • Promoted savings and asset building in the community • Continued New/Old Chicago initiative to enhance private investment and revitalization, including lending and foreclosure prevention assistance services
16. Discriminatory practices in real estate, mortgage lending, and homeowner insurance policies	Eliminate discriminatory real estate, mortgage lending, and homeowner insurance practices	<p><u>Regionwide</u></p> <ul style="list-style-type: none"> • Davenport, Moline, and Rock Island staff provide information and referrals to program clients and the public in regards to avoiding discriminatory real estate practices
17. Inadequate minority representation in the membership of the Quad City Area REALTORS® Association	Increase minority membership in the Quad City Area REALTORS® Association	<p><u>Regionwide</u></p> <ul style="list-style-type: none"> • The cities of Moline, Rock Island, and Davenport do not have authority over the membership of private organizations such as the Quad City Area REALTORS® Association
18. Discriminatory language in real estate advertisements in local newspapers and other real estate publications	Eliminate discriminatory language in real estate advertisements	<p><u>Regionwide</u></p> <ul style="list-style-type: none"> • The cities of Moline, Rock Island, and Davenport generally do not have authority over private real estate management firms or newspapers. When properties are funded with federal dollars and are subject to oversight during monitoring, their advertisements and publications are reviewed to ensure they remain in compliance with federal fair housing requirements attached to the funding sources for each property.

CHAPTER 10.

IDENTIFICATION OF IMPEDIMENTS

Described below are the fair housing impediments identified in this Analysis of Impediments, along with associated contributing factors. Contributing factors are issues leading to an impediment that are likely to limit or deny fair housing choice or access to opportunity. Recommended activities to address the contributing factors are contained within a table in this section. As local government entities, there are limitations in what the cities are able to do to actually correct the names impediments. In some cases, and particularly when a private-sector actor (such as a developer or landlord or mortgage lender) is involved the cities' roles may be primarily in the realm of advocacy and convening, yet in other cases (such as zoning code amendments or investment decisions regarding public funds), the cities are able to take significant and direct action themselves.

Impediment 1: Continued Need for an Increased Supply of Decent Affordable Housing

The most common issue identified by stakeholders in public meetings, focus groups, and interviews was the need for decent, safe, affordable housing in Davenport, Moline, and Rock Island. Participants repeatedly described a housing market where units that are most affordable to low- and moderate-income households are also most likely to have serious issues related to housing quality, deferred maintenance, and code violations. While many stakeholders noted that Moline and Rock Island have more affordable housing costs, issues related to housing condition are also more common there. Rental inspections programs attempt to ensure upkeep of properties by landlords but often fall short of adequately protecting tenants. Further, tenants may not report code enforcement or other violations to the cities for fear of retribution by their landlord or of displacement in cases where a unit is considered by inspectors to be unsuitable for habitation.

Data about housing problems presented in Chapter 6 of this report (see pages 90 through 99) shows that, in each city, affordability issues are more acute for households of color than for White households. In Davenport, households of color have housing problems at a rate that is 1.8 times that of White households (about 26% of White households have a housing problem compared to 46% of households of color). In Moline, 23% of White households have a housing problem compared to 28% of Black and 35% of Hispanic households. In Rock Island, 29% of White households have a housing problem versus 47% of Black and 40% of Hispanic households. Together with input regarding housing condition, these rates show a continued need to expand the supply of affordable housing available in all three cities, along with improving and/or maintaining existing affordable housing. This may include development and preservation of affordable for-sale and rental product. Further, several stakeholders note the specific need for housing assistance directed toward lowest income groups (households with incomes under 30% of area median income) and people experiencing or at risk for homelessness.

Impediment 2: Lack of Geographic Diversity in Affordable Housing Choices

Affordable and publicly subsidized housing options in the region tend to be clustered in certain neighborhoods, limiting the ability of low-income households to relocate within the region to areas with

different opportunity factors. While no household should be encouraged to move if it does not wish to, those that are open to relocating in order to take advantage of a different mix of opportunity features in another part of the region should be able to do so. Currently, one of the best programs supporting mobility of households is the Housing Choice Voucher program. Waiting lists can be years long, but even for those families able to obtain a voucher, options are limited by landlords who refuse to accept an HCV as payment. Rates of voucher usage are mapped in Chapter 7 (see page 127) and show vouchers being most concentrated in the area south Douglas Park in Rock Island and in Davenport north of Interstate 80. There are significant areas in all three cities where no vouchers are in use, typically in more desirable neighborhoods but where, presumably, landlords are more reluctant to accept vouchers.

Areas where fixed-site publicly supported housing is located tend to have lower shares of White residents and some racial and ethnic disparities among the residents of specific publicly supported housing developments exist. For example, Rock Island's Heather Ridge apartments are 74% White, however, at Century Woods, the White population is just 18%. Developments in each of the three cities, primarily those supported by Project-Based vouchers, exhibit similar patterns. These demographic patterns may well be the product of legitimate personal choices and preferences of the properties' residents, but the disparities bear further exploration to rule out any other cause. A review of the properties' marketing materials and strategies should be conducted to ensure that available units are marketed to the widest and most diverse group of potential residents possible.

Impediment 3: Accessible Housing for People with Disabilities is in Short Supply

In the fair housing survey conducted as part of this analysis, 51.9% of respondents named lack of housing options for people with disabilities as a barrier to fair housing in the region. Nearly three-quarters of respondents agreed that either "some more" or "a lot more" housing for people with disabilities is needed in the region. Searches for accessible rental housing using various internet search tools revealed that many properties with accessible units to serve this population have waiting lists for those units. Compounding this lack of units are provisions of local zoning codes that have the effect of making the siting of new housing for this population more challenging. The cities of Moline and Rock Island have various opportunities to clear up ambiguities in their codes related to group home regulation and all three cities, including Davenport, could reconsider the degree of special permitting required for treatment and recovery facilities. Additionally, Davenport and Rock Island lack a reasonable accommodation provision within their zoning ordinances. Such a provision creates a separate administrative process for someone to request accommodation of a disability without the undue burden of following a typical variance process, which is designed for handling special conditions associated with a lot or property rather than for ensuring equal access to housing.

The age and design of much of the region's housing stock is not conducive to accessibility for people with disabilities and the costs to retrofit existing units with modifications is very high. Furthermore, a significant lawsuit filed by the National Fair Housing Alliance in 2014 alleged that a large multifamily housing developer working in the region had failed to meet accessibility standards in its new construction. Local building inspectors should carefully monitor compliance in all future development projects and developers constructing new housing units should be educated and encouraged to consider universal design principles that could result in greater numbers of accessible housing being built.

Impediment 4: Community Development Planning Lacks an Equity Focus

Planning for community development, whether for what improvements are needed or where those improvements ought to go, can greatly benefit from an equity lens applied to decision making processes. In this sense, an equity-informed decision making process would lead to an even distribution of costs and benefits across all populations and groups within a community, ensuring fairer, more comparable outcomes that are guided by true community input. Understandably, community development decisions can be complex, with many worthy but competing alternatives under consideration, often resulting in a compromise solution. Current HUD regulations require, and the cities follow, specific site and neighborhood standards that discourage new assisted housing development in areas of minority concentrations. By adding an equity consideration to the process above and beyond these HUD standards, development goals and policy outcomes can be steered toward actions that work toward greater fairness. For example, in neighborhood revitalization projects, decisionmakers must straddle a line between making focused investments in a single community for greater impact and the possibility that needs in other communities may go unfunded as a result. An intentional focus on equitable outcomes may require reconsideration of certain policies and processes.

Additionally, stakeholder input suggests a need for training and community education focused on overcoming racism. Meeting participants cited several examples of prejudicial and “Not In My Backyard” or NIMBY attitudes among people in positions of local leadership as well as among some members of the public at large. A broad-based and respected local convening organization could consider a periodic anti-racism training aimed first at community leaders as a starting point to help disseminate the message more widely to other groups. Participation would be voluntary, but by attracting high-level community representatives, the trainings would take on a reputation of prestige in the community.

Impediment 5: Protected Classes Face Barriers to Fairly Accessing Housing

This report identifies several ways that different protected class members face barriers in accessing for-sale and rental housing. Housing discrimination complaint data from HUD, the Iowa Civil Rights Commission, and the Davenport Civil Rights Commission reveals a substantial number of housing complaints filed in the city of Davenport over the last five years. The City’s Civil Rights Commission received 111 complaints, the Iowa Civil Rights Commission received 18, and HUD received 98. Of those received by HUD, race was the most common basis for discrimination, present in 52 out of the 98 cases (or 53%). Disability followed and was the basis for discrimination in 38 cases (or 39% of the total). While the high number of housing complaints suggests that public awareness of fair housing rights and resources, it also indicates a potentially high degree of discrimination within Davenport, particularly based on race and disability. Continued fair housing education, outreach, and enforcement is needed to continue to raise awareness about fair housing rights and responsibilities, legal resources available, and avenues for recourse.

In addition to the housing complaint data, stakeholders frequently commented that steering by real estate agents is common in the area. Several stakeholders related specific instances in which they were looking to purchase homes in a certain neighborhood or city and were told by real estate agents that they should

look elsewhere. To proactively address steering by real estate agents, the cities could consider collaboratively conducting fair housing testing, along with continued education and outreach efforts to housing industry professionals and the general public.

Input from community members identified another barrier to accessing housing particularly likely to impact low- and moderate-income households, specifically including those who are immigrants and/or have limited English proficiency. Stakeholders noted instances in which landlords offer prospective tenants who do not speak English fluently or are otherwise vulnerable unfair leases that differ from those offered other tenants, often pressuring them to sign without having read or understood the terms. Sellers/landlords in contract-for-deed sales and rent-to-own situations also have the potential to take advantage of buyers/tenants who do not fully understand the terms of the agreement and often end up losing their housing. The cities could consider ways to enhance the legal services available to low- and moderate-income households and translation and interpretation services available to people with limited English proficiency so as to promote an understanding of their rights in the rental and purchase process and provide assistance with leases or other real estate contracts.

Finally, Home Mortgage Disclosure Act data showed a substantial gap in access to mortgage refinance loans by race and ethnicity, even when controlling for income level. About 21% of mortgage refinance applications by white homeowners were denied, compared to 42% of those by Black homeowners and 32% by Latino homeowners. While Black applicants were more likely to be denied on the basis of credit history than white applicants, Latino applicants were much less likely than white applicants to be denied on these grounds, yet their overall denial rates remained higher. To address these disparities, the cities should consider looking for ways to work with both consumers and lenders to improve loan refinance application outcomes for applicants of color.

Impediment 6: Community Perceptions Influence Housing Choice

Community input gathered for this report indicates that in many ways housing choices, affordable housing development, and the ability to sustain mixed-income communities in the Quad Cities are influenced by public perception. Many stakeholders emphasized that lack of knowledge of or accurate information about cities and neighborhoods in the region impedes people from considering their full range of options as they make housing decisions. As a specific example, several participants identified negative and inaccurate perceptions about Rock Island as a barrier and noted that these perceptions may be promulgated by real estate agents who dissuade clients from looking for housing there. The cities should explore collaborative avenues for increasing residents' exposure to and appreciation for different parts of the region. The Quad Cities Big Table event in April of 2018, where more than 5,000 community members came together for conversation in various locations over two days is one example of such an event. Others may include cultural activities focus on food or music that encourage people of different backgrounds or perspectives to come together.

Additionally, while Impediment 4 identified "Not In My Back Yard" (NIMBY) attitudes among community leaders as a potential fair housing barrier, this sentiment among the general public can also impact affordable housing construction and development of mixed-income neighborhoods. To the extent that the development process includes approvals subject to public hearings, community opposition to

affordable housing can impede projects and increase their costs. The cities should consider ways to increase community understanding of affordable housing and its necessary role in the region.

TABLE 31. FAIR HOUSING GOALS AND ACTIVITIES

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #1: Continued Need for an Increased Supply of Decent Affordable Housing		
Limited new rental housing construction or rental rehabilitation in the region	<ul style="list-style-type: none"> Continue using CDBG and HOME funds to increase and maintain the availability of high-quality, affordable rental and for-sale housing through new construction and rehabilitation. (Ongoing, beginning Q2 2019) Review the Qualified Allocation Plans issued by the Illinois Housing Development Authority and Iowa Finance Authority (as appropriate) under their respective Low Income Housing Tax Credit (LIHTC) programs to identify local government policies or actions that may positively impact the competitiveness of developers' applications. For developers proposing LIHTC projects in areas with access to key community resources/opportunity factors or areas experiencing a loss of affordable rental units, work with them to increase the competitiveness of their applications through letters of support, provision of data and information, gap financing, and other assistance. (Ongoing, beginning Q1 2020) 	City of Davenport City of Moline City of Rock Island
Limited supply of affordable housing disproportionately impacts households of color	<ul style="list-style-type: none"> In the routine monitoring of subrecipient organizations and CHDOs, ensure that affirmative marketing plans are in place, are adhered to, and are effective in promoting affordable housing opportunities to diverse groups of residents, including people of color. (Ongoing, beginning Q3 2019) 	City of Davenport City of Moline City of Rock Island
Landlords are reluctant to maintain and improve rental properties	<ul style="list-style-type: none"> The cities of Davenport, Moline, and Rock Island all operate rental inspection programs to periodically assess the condition of the rental properties within their jurisdictions. The cities should assess their respective registration and inspection programs for opportunities to close loopholes and make them more effective, including consideration of increased staffing and resource allocations. (Q1, 2020) Organize a networking meeting between local government inspection staff and nonprofit housing assistance organizations to develop a referral protocol for situations where a tenant household may have to be displaced due to substandard housing conditions discovered in the course of an inspection. (Ongoing, beginning Q2, 2020) 	City of Davenport City of Moline City of Rock Island

TABLE 31. FAIR HOUSING GOALS AND ACTIVITIES (CONTINUED)

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #2: Lack of Geographic Diversity in Affordable Housing Choices		
Affordable housing is limited, particularly in desirable areas where neighborhoods offer enhanced access to some types of opportunity	<ul style="list-style-type: none"> • Regular, ongoing campaigns to reach and recruit new landlords into the HCV program should be implemented by the region’s housing authorities. (Ongoing, beginning Q2, 2019) • New affordable housing development, whether by the cities with CDBG or HOME funds, the local housing authorities, or private-sector LIHTC developers should be given priority consideration when it will be located in an area that increases access to new types of opportunity not generally available in neighborhoods where existing affordable housing is located. (Ongoing, beginning Q2, 2019) 	<p>City of Davenport City of Moline City of Rock Island</p> <p>Partners: Moline Housing Authority Rock Island Housing Authority</p>
Racial disparities exist in the occupancy of some publicly supported housing developments	<ul style="list-style-type: none"> • The local public housing authorities and the private property managers of properties containing Project-Based Section 8 units should review their Affirmative Marketing Plans and consider new and creative marketing techniques to reach applicants of a wide variety of backgrounds. (Q4, 2019) • Request that property managers at publicly supported housing developments conduct a periodic self-review of their practices and procedures, to include the racial and ethnic composition of resident-facing staff, the holidays celebrated at the property, and the content of flyers, newsletters, and wall posters to ensure inclusiveness and cultural sensitivity. (Ongoing, beginning Q1, 2020) 	<p>City of Davenport City of Moline City of Rock Island</p> <p>Partners: Moline Housing Authority Rock Island Housing Authority</p>
Impediment #3: Accessible Housing for People with Disabilities is in Short Supply		
Insufficient accessible housing exists to serve the needs of people with disabilities	<ul style="list-style-type: none"> • Consider opportunities to encourage or incentivize the construction of new accessible housing units for people with disabilities. <ol style="list-style-type: none"> a. When new accessible housing is proposed by a developer, organization, or agency, express support (through letters of support and/or certifications of consistency with the Consolidated Plan) wherever possible. (Ongoing, beginning Q2, 2019) b. Review local funding mechanisms and federal grant sources for opportunities to incentivize development of new accessible housing units. (Q4, 2020) c. Meet with local providers of accessible housing and permanent supportive housing to discuss resources available and potential for collaboration on future proposed housing developments. (Q4, 2020) 	<p>City of Davenport City of Moline City of Rock Island</p>

TABLE 31. FAIR HOUSING GOALS AND ACTIVITIES (CONTINUED)

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #3: Accessible Housing for People with Disabilities is in Short Supply (continued)		
<p>Insufficient accessible housing exists to serve the needs of people with disabilities (continued)</p>	<ul style="list-style-type: none"> • Consider establishing a pool of local funds to be used to hold vacated accessible and ground-floor apartments available for people with disabilities. <ul style="list-style-type: none"> a. Meet with local stakeholders to include people with disabilities, their advocates, property managers, and philanthropic organizations to evaluate the possibilities and structure of such a program. (Q4, 2020) b. Develop, capitalize, and implement program as appropriate. (Q2, 2021) 	<p>City of Davenport City of Moline City of Rock Island</p>
<p>The Cities of Davenport and Rock Island do not have a clear and objective process by which persons with disabilities may request a reasonable accommodation</p>	<ul style="list-style-type: none"> • Consider, draft, and adopt local code amendments that would provide an administrative alternative to a variance application for people requesting accommodation or modification related to a disability. (Q2, 2020) 	<p>City of Davenport City of Rock Island</p>
<p>Ambiguous or inconsistent zoning/land use code provisions raise questions about allowable siting and occupancy for housing for people with disabilities</p>	<ul style="list-style-type: none"> • Moline and Rock Island should review family definitions to consider the elimination of relationship by “blood or marriage” as a basis determining whether a household qualifies as a family and/or whether caps on the number of unrelated individuals who may live together are warranted at all. • Moline and Rock Island’s regulations relating to the siting of group homes should be clarified, with clear siting options available in residential districts and the group home definitions aligned with the codes’ respective family definitions to ensure that the treatment of people living in group homes is consistent with that of the non-disabled population. • All three cities should review and clarify the permitted locations of housing serving people recovering from alcohol or substance abuse to include residential districts. 	<p>City of Davenport City of Moline City of Rock Island</p>
<p>Lawsuit filings suggest weak enforcement of accessibility requirements in multifamily housing development</p>	<ul style="list-style-type: none"> • Ensure local government building inspectors are regularly and adequately trained to recognize and enforce accessibility standards in covered multifamily housing developments. (Ongoing, beginning Q2, 2019) • As a component of general fair housing education offered within the community, consider a specialized workshop for multifamily developers that provides education on fair housing, the ADA, and also highlights the concept and benefits of universal design. (Ongoing, beginning Q1, 2020) 	<p>City of Davenport City of Moline City of Rock Island</p>

TABLE 31. FAIR HOUSING GOALS AND ACTIVITIES (CONTINUED)

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #4: Community Development Planning Lacks an Equity Focus		
Equity issues are not routinely and consistently considered on a regional basis in planning and policymaking for affordable housing	<ul style="list-style-type: none"> • The cities should each explore the creation of an evaluation tool that could be used to review development and policy decisions to maximize equitable outcomes (e.g. the King County Housing Development Consortium’s Racial Equity Impact Tool). (Q2, 2020) • The cities should annually review and provide comment on the Annual Action Plans and annual PHA Plans of their neighboring municipalities to ensure they are furthering affordable housing opportunities in high-opportunity areas. (Ongoing, beginning Q1, 2020) • New affordable housing development, whether by the cities with CDBG or HOME funds, the local housing authorities, or private-sector LIHTC developers should be given priority consideration when it will be located in an area that increases access to new types of opportunity not generally available in neighborhoods where existing affordable housing is located. (Ongoing, beginning Q2, 2019) • As the cities’ comprehensive plans are routinely updated, staff in the respective CDBG program offices should review the proposed housing element updates and comment to planning staff on any concerns related to equity of planning policies or development plans. (Ongoing, beginning Q2, 2019) 	City of Davenport City of Moline City of Rock Island
Stakeholder input suggested that racism and NIMBY attitudes have been expressed by some community members in positions of leadership	<ul style="list-style-type: none"> • A broad-based and trusted local convening institution (e.g. the Quad Cities Community Foundation, United Way of the Quad Cities, Quad Cities Chamber, Augustana College, etc.) should be enlisted to create and offer a periodic anti-racism training aimed at local community leaders. <ul style="list-style-type: none"> a. The cities should meet together to consider potential partnering organizations, methods of approach, and any available funding to support such an initiative. (Q3, 2020) b. Finalize parameters with selected partner and refine the details of the training program. (Q4, 2020) c. Deliver first community-wide training. (Q1, 2021) d. Consider feedback and success of training; evaluate need for ongoing periodic training program. (Q4, 2021) 	City of Davenport City of Moline City of Rock Island

TABLE 31. FAIR HOUSING GOALS AND ACTIVITIES (CONTINUED)

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #5: Protected Classes Face Barriers to Fairly Accessing Housing		
Data on housing discrimination complaint filings indicates that more fair housing education is needed for members of the general public	<ul style="list-style-type: none"> • Either using in-house staff or through a contracted provider, the cities should annually design and/or update and coordinate delivery of a regional fair housing education program that reaches the public with information about fair housing rights and responsibilities, how to recognize discrimination, and how and where to file a complaint. (Ongoing, beginning Q1, 2020) 	<p>City of Davenport City of Moline City of Rock Island</p>
Housing complaint data and stakeholder input suggests that steering by real estate agents may be prevalent	<ul style="list-style-type: none"> • Identify an appropriate partner organization and coordinate a fair housing testing program directed at potential issues of steering. (Q1, 2020) • Communicate results of fair housing testing to local officials and stakeholders; plan and implement remedial actions as may be necessary (Q3, 2020) 	<p>City of Davenport City of Moline City of Rock Island</p>
Immigrants, refugees, and people with limited English proficiency are at heightened risk of housing discrimination	<ul style="list-style-type: none"> • Provide fair housing enforcement and education in culturally-appropriate ways, particularly to non-English speaking communities. <ul style="list-style-type: none"> a. If not conducted by city staff, issue an RFP to local organizations for funding supporting fair housing education in culturally-appropriate ways, particularly to non-English speaking communities. (Annually, beginning Q1, 2020) 	<p>City of Davenport City of Moline City of Rock Island</p>
Reduced access to mortgage refinancing for households of color	<ul style="list-style-type: none"> • Fund agencies that provide homeownership education and financial counseling for moderate-income and first time homebuyers. Work with local organizations to market these services to communities of color. (Ongoing, beginning Q2, 2019) • Develop partnerships with credit counseling agencies to reach communities of color and build a pipeline of potential homebuyers. (Ongoing, beginning Q3, 2019) • Meet with lenders and/or appraisers to inform them of goals for furthering fair housing and discuss lending barriers related to homeownership and community reinvestment in low-income neighborhoods. (Q4, 2019) 	<p>City of Davenport City of Moline City of Rock Island</p>

TABLE 31. FAIR HOUSING GOALS AND ACTIVITIES (CONTINUED)

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #6: Community Perceptions Influence Housing Choice		
Incorrect and prejudiced assumptions within the community limit the public’s exposure to some parts of the region	<ul style="list-style-type: none"> • Explore options for a communitywide event or events, such as the Quad Cities Big Table in 2018, that encourage interaction among diverse participants in neighborhoods throughout the region. Other events centered around food, music, and cultural exchange can also be supported and promoted to highlight underestimated neighborhoods within the Quad Cities. (Ongoing, beginning Q2, 2019) 	<p>City of Davenport City of Moline City of Rock Island</p>
NIMBYism threatens otherwise viable affordable and mixed-income housing opportunities for protected classes	<ul style="list-style-type: none"> • Develop and deliver community education around the concept of affordable housing and its cultural and economic value to the community. <ul style="list-style-type: none"> a. Develop an adaptable slide deck and presentation on the subject of the value of affordable housing, including qualitative and quantitative arguments. (Q4, 2019) b. Establish a small “speakers bureau” of designated city staff or other community partners to deliver the presentation to local groups. (Q1, 2020) c. Market the presentation and available speakers to community groups such as neighborhood/homeowners’ associations, Rotary and other similar clubs, and associations of Realtors, homebuilders, and lenders. (Ongoing, beginning Q2, 2020) 	<p>City of Davenport City of Moline City of Rock Island</p>

APPENDIX I

CITIZEN PARTICIPATION RECORD

PUBLIC NOTICES, FLYERS, AND SIGN-IN SHEETS

PUBLIC NOTICE
COMMUNITY MEETINGS FOR FAIR HOUSING STUDY

The Cities of Davenport, Moline, and Rock Island are jointly preparing a regional fair housing study known formally as an Analysis of Impediments to Fair Housing Choice. This study will discuss patterns of race, housing, and poverty; access to opportunity; and housing barriers in the region. It will also outline strategies the cities may take to improve housing choices for their residents. The study is required by the U.S. Department of Housing and Urban Development for jurisdictions that receive certain community development and affordable housing grant funds.

The opinions and perceptions of local residents are an important part of this study. To provide input, all residents are invited to attend one of three public meetings and participate in a survey. Meetings will be held at the following dates, times, and locations, and are open to the general public. Refreshments will be served and children are welcome.

Tuesday, Sept. 18

6:30 - 7:30 p.m.

Greater Antioch Baptist Church
929 14th St
Rock Island, IL

Wednesday, Sept. 19

6:30 - 7:30 p.m.

Roosevelt Community Center
(in the gym)
1220 Minnie Ave.
Davenport, IA

Thursday, Sept. 20

6:30 - 7:30 p.m.

With Spanish Interpretation
Esperanza Center
335 5th Ave
Moline, IL 61265

The survey and additional information about the project are available online at www.quadcitiesfairhousing.com. Project updates will be posted to the website, and a draft of the study will be available in early 2019.

Other Information

Any person with disabilities who wishes to attend a meeting and who requires a special accommodation, or any other person requiring a special accommodation in attending the meetings, should notify K.J. Whitley, City of Moline Community Development Manager, at (309) 524-2044 or Meghan Overton, City of Davenport Neighborhood Development Coordinator, at (563) 888-3204 at least 24 hours prior to meeting time.

NOTICIA PÚBLICA

REUNIONES COMUNITARIAS PARA ESTUDIO DE VIVIENDA JUSTA

Las ciudades de Davenport, Moline y Rock Island están preparando conjuntamente un estudio regional de viviendas justas conocido formalmente como un Análisis de impedimentos para la elección de vivienda justa. Este estudio discutirá patrones de raza, vivienda y pobreza; acceso a la oportunidad; y barreras de vivienda en la región. También describirá las estrategias que las ciudades pueden tomar para mejorar las opciones de vivienda para sus residentes. El Departamento de Vivienda y Desarrollo Urbano de los EE. UU. Exige el estudio para las jurisdicciones que reciben ciertos fondos de desarrollo comunitario y de viviendas asequibles.

Las opiniones y percepciones de los residentes locales son una parte importante de este estudio. Para proporcionar información, todos los residentes están invitados a asistir a una de tres reuniones públicas y participar en una encuesta. Las reuniones se llevarán a cabo en las siguientes fechas, horarios y lugares, y están abiertas al público en general. Se servirán refrescos y los niños son bienvenidos.

Martes, 18 de septiembre

6:30 - 7:30 p.m.

Gran Iglesia Bautista de Antioquía

929 Calle 14

Rock Island, IL

Miércoles, 19 de septiembre

6:30 - 7:30 p.m.

Centro Comunitario Roosevelt

(en el gimnasio)

1220 Minnie Avenida

Davenport, IA

Jueves, 20 de septiembre

6:30 - 7:30 p.m.

* Con interpretación en español *

Esperanza Center

335 5 Avenida

Moline, IL 61265

La encuesta y la información adicional sobre el proyecto están disponibles en línea en www.quadcitiesfairhousing.com. Las actualizaciones del proyecto se publicarán en el sitio web, y un borrador del estudio estará disponible a principios de 2019.

Otra información

Cualquier persona con discapacidad que desee asistir a una reunión y que requiera un alojamiento especial, o cualquier otra persona que requiera un alojamiento especial para asistir a las reuniones, debe notificar a K.J. Whitley, Gerente de Desarrollo Comunitario de la Ciudad de Moline, al (309) 524-2044 o Meghan Overton, Coordinadora de Desarrollo del Vecindario de la Ciudad de Davenport, al (563) 888-3204 al menos 24 horas antes de la hora de la reunión.

Customer Ad Proof

60002954 MOLINE CITY/PLANNING - LEGALS

Order Nbr 12475

Publication	Dispatch Argus		
Contact	MOLINE CITY/PLANNING - LEGALS	PO Number	
Address 1	619 16TH STREET	Rate	Legal - Email
Address 2		Order Price	197.04
City St Zip	MOLINE IL 61265	Amount Paid	0.00
Phone	3095242035	Amount Due	197.04
Fax			
Section	Legals	Start/End Dates	09/14/2018 - 09/14/2018
SubSection		Insertions	1
Category	2627 Miscellaneous Notices	Size	147
Ad Key	12475-1	Salesperson(s)	Unassigned Account
Keywords	COMMUNITY MEETINGS FOR FAIR HOUSING	Taken By	Molly Cox
Notes			

Ad Proof

NOTICE
PUBLIC NOTICE
COMMUNITY MEETINGS FOR FAIR
HOUSING STUDY

The Cities of Davenport, Moline, and Rock Island are jointly preparing a regional fair housing study known formally as an Analysis of Impediments to Fair Housing Choice. This study will discuss patterns of race, housing, and poverty; access to opportunity; and housing barriers in the region. It will also outline strategies the cities may take to improve housing choices for their residents. The study is required by the U.S. Department of Housing and Urban Development for jurisdictions that receive certain community development and affordable housing grant funds.

The opinions and perceptions of local residents are an important part of this study. To provide input, all residents are invited to attend one of three public meetings and participate in a survey. Meetings will be held at the following dates, times, and locations, and are open to the general public. Refreshments will be served and children are welcome.

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6:30 - 7:30 p.m.
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6:30 - 7:30 p.m.
With Spanish Interpretation
Esperanza Center
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Moline, IL 61265

The survey and additional information about the project are available online at www.quadcitiesfairhousing.com. Project updates will be posted to the website, and a draft of the study will be available in early 2019.

Other Information
Any person with disabilities who

wishes to attend a meeting and who requires a special accommodation, or any other person requiring a special accommodation in attending the meetings, should notify K.J. Whitley, City of Moline Community Development Manager, at (309) 524-2044 or Meghan Overton, City of Davenport Neighborhood Development Coordinator, at (563) 888-3204 at least 24 hours prior to meeting time.

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REUNIONES COMUNITARIAS
PARA ESTUDIO DE VIVIENDA
JUSTA

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Las opiniones y percepciones de los residentes locales son una parte importante de este estudio. Para proporcionar información, todos los residentes están invitados a asistir a una de tres reuniones públicas y participar en una encuesta. Las reuniones se llevarán a cabo en las siguientes fechas, horarios y lugares, y están abiertas al público en general. Se servirán refrescos y los niños son bienvenidos.

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Moline, IL 61265

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Cualquier persona con discapacidad que desee asistir a una reunión y que requiera un alojamiento especial, o cualquier otra persona que requiera un alojamiento especial para asistir a las reuniones, debe notificar a K.J. Whitley, Gerente de Desarrollo Comunitario de la Ciudad de Moline, al (309) 524-2044 o Meghan Overton, Coordinadora de Desarrollo del Vecindario de la Ciudad de Davenport, al (563) 888-3204 al menos 24 horas antes de la hora de la reunión.

FAIR HOUSING MEETINGS

Please join us for a conversation about fair housing in the Quad Cities. As an active resident, we need to hear from you!

- What types of housing are available in your community?
- Does your neighborhood have access to good schools, jobs, transportation, healthcare, and grocery stores?
- What barriers limit the range of housing option available to you?
- Do you know what to do if you feel you have experienced housing discrimination?



MEETING SCHEDULE

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With Spanish Interpretation

Esperanza Center

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Moline, IL 61265



Refreshments will be provided and children are welcome.

Learn more about the Assessment and how you can get involved by visiting the website:

www.quadcitiesfairhousing.com

You may also contribute to the process by taking the survey on the website.

The Cities of Davenport, Moline, and Rock Island are working together on a plan to expand fair access to housing and neighborhood opportunity in the city and region. Please help us by sharing your thoughts and experiences at the public meetings or by taking the survey. The community's opinions and perceptions are an important part, and everyone is invited to give input. For more information about the project, please contact Mosaic Community Planning, at 404-831-1395 or info@mosaiccommunityplanning.com.



**DAVENPORT, MOLINE & ROCK ISLAND UNDERTAKING FAIR HOUSING STUDY
HUD-Required Analysis Will Guide Progress Toward
Equal Housing Opportunity**

The Cities of Davenport, Moline, and Rock Island are jointly preparing a regional fair housing study known formally as an Analysis of Impediments to Fair Housing Choice. This study will discuss patterns of race, housing, and poverty; access to opportunity; and housing barriers in the region. It will also outline strategies the cities may take to improve housing choices for their residents. The study is required by the U.S. Department of Housing and Urban Development for jurisdictions that receive certain community development and affordable housing grant funds.

The assessment process is heavily influenced by the views and recommendations of local residents, whose input is solicited both through public meetings and an online survey. Meetings will be held at the following dates, times, and locations, and are open to the general public. Refreshments will be served and children are welcome.

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*With Spanish
Interpretation*
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335 5th Ave
Moline, IL 61265

The survey and additional information about the project are available online at www.quadcitiesfairhousing.com. Project updates will be posted to the website, and a draft of the study will be available in early 2019.

###

Davenport, Moline, Rock Island prepare a regional fair housing study



By Sarah Beth Coleman | Posted: Wed 10:46 PM, Sep 12, 2018

QUAD CITIES (KWQC) – The Cities of Davenport, Moline, and Rock Island are jointly preparing a regional fair housing study known formally as an Analysis of Impediments to Fair Housing Choice. This study will discuss patterns of race, housing, and poverty; access to opportunity; and housing barriers in the region.

The study is required by the U.S. Department of Housing and Urban Development for jurisdictions that receive certain community development and affordable housing grant funds and also outline strategies the cities may take to improve housing choices for their residents.

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*With Spanish
Interpretation*

Esperanza Center
335 5th Ave
Moline, IL 61265

The survey and additional information about the project are available online at www.quadcitiesfairhousing.com.
Project updates will be posted to the website, and a draft of the study will be available in early 2019.

Get the latest updates from kwqc.com delivered to your browser

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Quad Cities want your help to improve housing opportunities

POSTED 12:49 PM, SEPTEMBER 12, 2018, BY WQAD DIGITAL TEAM



This is an archived article and the information in the article may be outdated. Please look at the time stamp on the story to see when it was updated.

MOLINE, Illinois — The cities of Moline, Rock Island and Davenport are teaming up to provide better housing opportunities for Quad City residents, and they need your help.

According to a statement from the Moline Planning and Development Department, the cities are preparing for a regional study called an Analysis of Impediments to Fair Housing Choice. The goal of the study is to create strategies for improved housing choices by discussing race, housing, poverty, access to opportunity and regional housing barriers.



The statement says this study relies heavily on input from residents through public meetings and online feedback. Here are the times and locations of each meeting.

Tuesday, Sept. 18; 6:30 – 7:30 p.m. at Greater Antioch Baptist church, 929 14th St., Rock Island.

Wednesday, Sept. 19; 6:30 – 7:30 p.m. at Roosevelt Community Center in the gym, 1220 Minnie Ave., Davenport.

Thursday, Sept. 20; 6:30 – 7:30 p.m. at the Esperanza Center (with Spanish interpretation), 335 5th Ave., Moline.

Free refreshments are provided at the meetings, and children are welcome.

Click here to access the online survey.



MOSAIC
COMMUNITY PLANNING

Public Meeting Sign-In Sheet

Date: 9-20-18
Location: Esperanza Center

Name	Organization (if Applicable)	Phone	Email	Address
KJ Whitlow	City of Moline	524-2044	Kwhitlow@moline.il.us	619 Westwood, Moline, IL
MERSA Dikeye	Family Resources	563-293-1837	FDKette@familyres.org	
Teresa Cruz	Elorecente	30929190133	Tcruz@immigrants.org	134 Railroad Ave Moline
Jose Escamilla		3093146766	JEscamilla@immigrants.org	15 St. A Moline
Annisa weaver	getspaid.com			
Colleen Spald-Johnson	City of PEI	733-2904	cspald@peil.org	
Anita Vega	Transitions			
Jill Anderson	City of Moline	524-2038	janderson@moline.il.us	619 16th St, Moline, IL

PUBLIC NOTICE

HEARING AND COMMENT PERIOD FOR FAIR HOUSING REPORT

The Cities of Davenport, Moline, and Rock Island have jointly prepared a draft regional fair housing study known as an Analysis of Impediments to Fair Housing Choice and now invite members of the public to review and offer comments on the report.

Background

The Cities of Davenport, Moline, and Rock Island, as recipients of federal grant funds from the U.S. Department of Housing and Urban Development, must periodically conduct a fair housing study known as an Analysis of Impediments to Fair Housing Choice (AI). The AI studies patterns of integration and segregation; racially and ethnically concentrated areas of poverty; disparities in access to opportunity; and disproportionate housing needs. Based on the findings of this research, the report proposes fair and affordable housing strategies to overcome the identified fair housing issues.

Public Review Period

The fair housing report will be available for public review and comment from May 29 to June 28, 2019. The document may be downloaded from the project website (www.quadcitiesfairhousing.com) or may be viewed in any of the following physical office locations:

- City of Davenport Community Planning and Economic Development Department, 226 West 4th Street, Davenport, IA 52801
- City of Moline Community Development Division, 619 16th Street, Moline, IL 61265
- City of Rock Island Community and Economic Development, 1528 Third Avenue, Rock Island, IL 61201

Public Hearings

Public Hearings will be held at which the cities will present information on the report and receive comments from the public regarding the draft. The Hearings will be held as follows:

- Thursday, June 6, 2019, 5pm – 6pm, City of Moline City Hall, 619 16 Street, 2nd Floor, Committee-of-Whole Conference Room, Moline, IL 61265
- Monday, June 10, 2019, 6:45pm, Rock Island City Council Chambers, Rock Island City Hall, 1528 Third Avenue, Rock Island, IL 61201
- Wednesday, June 19, 2019, 5:30pm, Davenport City Hall, 226 W. 4th Street, 1st Floor, City Council Chambers, Davenport, IA 52801
- Monday, June 17, 2019, 10am–11am, City of Moline City Hall, 619 16 Street, 2nd Floor, Committee-of-Whole Conference Room, Moline, IL 61265
- Monday, June 24, 2019, 6:45pm, Rock Island City Council Chambers, Rock Island City Hall, 1528 Third Avenue, Rock Island, IL 61201

To Make Comments

Written comments will be received until 5:00pm local time on Friday, June 28, 2019. Comments regarding the report may be submitted online via the project website at www.quadcitiesfairhousing.com/contact-us or may be mailed or physically delivered to any of the following three locations

- City of Davenport Community Planning and Economic Development Department, Attn: Meghan Overton, 226 West 4th Street, Davenport, IA 52801
- City of Moline Community Development Division, 619 16th Street, Moline, IL 61265
- City of Rock Island Community and Economic Development, 1528 Third Avenue, Rock Island, IL 61201

Alternatively, comments may be made orally at the Public Hearings described above.

Accessibility and Accommodation

Any person with disabilities who wishes to attend a hearing and who requires a special accommodation, or any other person requiring a special accommodation in attending a hearing or accessing the draft report, should notify one of the following contacts at least 24 hours in advance. City of Davenport: Meghan Overton, Neighborhood Development Coordinator, (563) 888-3204; City of Moline: K.J. Whitley, Community Development Manager, kwhitley@moline.il.us or (309)524-2044; City of Rock Island: Colleen Small-Vollman, (309) 732-2900.

+++++

NOTICIA PÚBLICA

PERIODO DE AUDIENCIA Y COMENTARIOS PARA EL INFORME DE VIVIENDA JUSTA

Las ciudades de Davenport, Moline y Rock Island están preparando conjuntamente un estudio regional de viviendas justas conosido formalmente como un Análisis de impedimentos para la elección de vivienda justa y ahora invitan a miembros del público a revisar y ofreser comentarios en el informe.

Fondo

Las ciudades de Davenport, Moline and Rock Island, como recipientes de una beca Federal del Department de Vivienda y Desarrollo Urbano de los Estados Unidos, deben periódicamente realizar un estudio de vivienda justa consido como Análisis de impedimentos para la elección de vivienda justa (AI). Los patrones de estudio en caso de integración y segregación; racialmente y éticamente en áreas concentradas de pobreza.; disparidades en el acceso a la oportunidad; y necesidades de vivienda desproporcionadas. Basado en el hallazgo de esta investigación, el informe propone estrategias de vivienda justa para superar los problemas identificados de vivienda justa.

Revisión de registros públicos

El informe de vivienda justa estará disponible para revision y comentatios del 29 de Mayo al 28 de Junio del 2019. El documento se puede descargar desde el sitio web del poyecto (www.quadcitiesfairhousing.com) o puede verse en culaquiera de las siguientes ubicaciones de oficinas físicas.

- Ciudad de Davenport, Departamento de Planificación y Desarrollo Económico Comunitario, 226 West 4th Calle, Davenport, IA 52801
- Ciudad de Moline, Division de Desarrollo Comunitario, 619 16th Calle, Moline, IL 61265
- Ciudad de Rock Island Desarrollo Comunitario y Económico, 1528 Tercera Avenida, Rock Island, IL 61201

Informe de audiencias públicas

Se celebrarán audiencias públicas en las que las ciudades presentarán información sobre el informe y recibirán comentarios del público sobre el borrador. Las audiencias se realizarán de la siguiente manera:

- Jueves, 6 de Junio del 2019. De las 5pm-6pm, Palacio Municipal de la Ciudad de Moline, 619 16 Calle, segunda planta, Sala de Conferencias Comité de Todas, Moline, IL 61265
- Lunes, 10 de Junio del 2019. A las 6:45pm Ciudad de Rock Island Cámaras del Consejo, Palacio Municipal de la Ciudad de Rock Island, 1528 Tercera Avenida, Rock island, IL 61201
- Miércoles, 19 de Junio del 2019, 5:30pm, Palacio Municipal de Davenport, 226 W. 4th Calle, primera planta, Cámaras del Consejo, Davenport, IA 52801
- Lunes, 17 de Junio del 2019. De las 10am-11am, Palacio Municipal de la Ciudad de Moline, 619 16 Calle, segunda planta, Sala de Conferencias Comité de Todas, Moline, IL 61265
- Lunes, 24 de Junio del 2019, de las 6:45pm, Ciudad de Rock Island, Palacio Municipal de la Ciudad de Rock Island, 1528 Tercera Avenida, Rock island, IL 61201

Para hacer comentarios

Comentarios escritos seran recibidos hasta las 5:00 de la tarde tiempo local el Viernes 28 de Junio, del 2019. Los comentarios sobre el informe pueden enviarse en línea a través del sitio web del proyecto www.quadcitiesfairhousing.com/contact-us o puede ser enviado por correo o entregado físicamente en cualquiera de las siguiente tres localidades.

- Ciudad de Davenport Departamento de Planificación y Desarrollo Económico Comunitario, attentamente: Meghan Overton, 226 West 4th Calle, Davenport, IA 52801
- Ciudad de Moline Division de Desarrollo Comunitario, 619 16th Calle, Moline, IL 61265
- Ciudad de Rock Island Desarrollo Comunitario y Económico, 1528 Tercera Avenida, Rock Island, IL 61201

Alternativamente, se pueden hacer comentarios en la audiencia pública descrita anteriormente.

Accesibilidad y alojamiento

Cualquier persona con discapacidad que desee asistir a una audiencia y que requiera un alojamiento especial, o cualquier persona que requiera un alojamiento especial para asistir a una audiencia o acceder al informe preliminar, debe notificar a uno de los siguientes contactos con al menos 24 horas de anticipación. Ciudad de Davenport: Meghan Overton, Coordinadora de Desarrollo del Vecindario, al (563) 888-3204; Ciudad de Moline: K.J. Whitley, Gerente de Desarrollo Comunitario de la Ciudad de Moline, al (309)524-2044; Ciudad de Rock Island: Colleen Small-Volman, al (309)732-2900.

*** Proof of Publication ***

STATE OF IOWA
SCOTT COUNTY, } ss.

The undersigned, being first duly sworn, on oath does say that he/she is an authorized employee of THE QUAD-CITY TIMES, morning edition, a daily newspaper printed and published by Lee Enterprises, Incorporated, in the City of Davenport, Scott County, Iowa, and that a notice, a printed copy of which is made a part of this affidavit, was published in said THE QUAD-CITY TIMES, on the dates listed below.

CITY OF DAVENPORT - LEGALS

Sharon Langel
226 W 4TH ST
DAVENPORT, IA 52801

ORDER NUMBER 41069

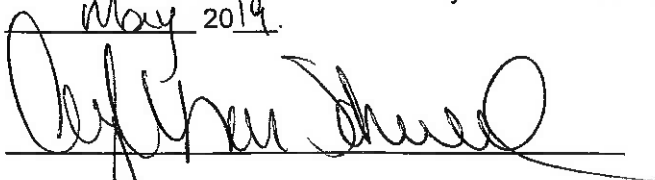
The affiant further deposes and says that all of the facts set forth in the foregoing affidavit are true as he/she verily believes.



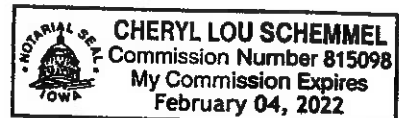
Section: Notices & Legals
Category: 2520 Miscellaneous Notice
PUBLISHED ON: 05/29/2019

TOTAL AD COST: 123.32
FILED ON: 5/29/2019

Subscribed and sworn to before me by said affiant this 29 day of May 2019.



Notary Public in and for Scott County, Iowa



Accesibilidad y alojamiento
Cualquier persona con discapacidad que desee asistir a una audiencia y que requiera un alojamiento especial, o cualquier persona que requiera un alojamiento especial para asistir a una audiencia o acceder al informe preliminar, debe notificar a uno de los siguientes contactos con al menos 24 horas de anticipación. Ciudad de Davenport: Meghan Overton, Coordinadora de Desarrollo del Vecindario, al (563) 888-3204; Ciudad de Moline: K.J. Whitley, Gerente de Desarrollo Comunitario de la Ciudad de Moline, al (309)524-2044; Ciudad de Rock Island: Colleen Small-Vollman, al (309)732-2900.

**PUBLIC NOTICE
HEARING AND COMMENT
PERIOD FOR FAIR HOUSING
REPORT**

The Cities of Davenport, Moline, and Rock Island have jointly prepared a draft regional fair housing study known as an Analysis of Impediments to Fair Housing Choice and now invite members of the public to review and offer comments on the report.

Background
The Cities of Davenport, Moline, and Rock Island, as recipients of federal grant funds from the U.S. Department of Housing and Urban Development, must periodically conduct a fair housing study known as an Analysis of Impediments to Fair Housing Choice (AI). The AI studies patterns of integration and segregation; racially and ethnically concentrated areas of poverty; disparities in access to opportunity; and disproportionate housing needs. Based on the findings of this research, the report proposes fair and affordable housing strategies to overcome the identified fair housing issues.

Public Review Period
The fair housing report will be available for public review and comment from May 29 to June 28, 2019. The document may be downloaded from the project website (www.quadcitiesfairhousing.com) or may be viewed in any of the following physical office locations:

1. City of Davenport Community Planning and Economic Development Department, 226 West 4th Street, Davenport, IA 52801
2. City of Moline Community Development Division, 619 16th Street, Moline, IL 61265
3. City of Rock Island Community and Economic Development, 1528 Third Avenue, Rock Island, IL 61201

Public Hearings
Public Hearings will be held at which the cities will present information on the report and receive comments from the public regarding the draft. The Hearings will be held as follows:

1. Thursday, June 6, 2019, 5pm - 6pm, City of Moline City Hall, 619 16 Street, 2nd Floor, Committee-of-Whole Conference Room, Moline, IL 61265
2. Monday, June 10, 2019, 6:45pm, Rock Island City Council Chambers, Rock Island City Hall, 1528 Third Avenue, Rock Island, IL 61201
3. Wednesday, June 19, 2019, 5:30pm, Davenport City Hall, 226 W. 4th Street, 1st Floor, City Council Chambers, Davenport, IA 52801
4. Monday, June 17, 2019, 10am-11am, City of Moline City Hall, 619 16 Street, 2nd Floor, Committee-of-Whole Conference Room, Moline, IL 61265
5. Monday, June 24, 2019, 6:45pm, Rock Island City Council Chambers, Rock Island City Hall, 1528 Third Avenue, Rock Island, IL 61201

To Make Comments
Written comments will be received until 5:00pm local time on Friday, June 28, 2019. Comments regarding the report may be submitted online via the project website at www.quadcitiesfairhousing.com/contact-us or may be mailed or physically delivered to any of the following three locations:

1. City of Davenport Community Planning and Economic Development Department, Attn: Meghan Overton, 226 West 4th Street, Davenport, IA 52801
2. City of Moline Community Development Division, 619 16th Street, Moline, IL 61265
3. City of Rock Island Community and Economic Development, 1528 Third Avenue, Rock Island, IL 61201

Alternatively, comments may be made orally at the Public Hearings described above.

Accessibility and Accommodation
Any person with disabilities who wishes to attend a hearing and who requires a special accommodation, or any other person requiring a special accommodation in attending a hearing or accessing the draft report, should notify one of the following contacts at least 24 hours in advance. City of Davenport: Meghan Overton, Neighborhood Development Coordinator, (563) 888-3204; City of Moline:

**NOTICIA PÚBLICA
PERIODO DE AUDIENCIA Y
COMENTARIOS PARA EL
INFORME DE VIVIENDA JUSTA**

Las ciudades de Davenport, Moline y Rock Island están preparando conjuntamente un estudio regional de viviendas justas conocido formalmente como un Análisis de impedimentos para la elección de vivienda justa y ahora invitan a miembros del público a revisar y ofrecer comentarios en el informe.

Fondo
Las ciudades de Davenport, Moline and Rock Island, como recipientes de una beca Federal del Department de Vivienda y Desarrollo Urbano de los Estados Unidos, deben periódicamente realizar un estudio de vivienda justa conocido como Análisis de impedimentos para la elección de vivienda justa (AI). Los patrones de estudio en caso de integración y segregación; racialmente y éticamente en áreas concentradas de pobreza; disparidades en el acceso a la oportunidad; y necesidades de vivienda desproporcionadas. Basado en el hallazgo de esta investigación, el informe propone estrategias de vivienda justa para superar los problemas identificados de vivienda justa.

Revisión de registros públicos
El informe de vivienda justa estará disponible para revisión y comentarios del 29 de Mayo al 28 de Junio del 2019. El documento se puede descargar desde el sitio web del proyecto (www.quadcitiesfairhousing.com) o puede verse en cualquiera de las siguientes ubicaciones de oficinas físicas:

1. Ciudad de Davenport, Departamento de Planificación y Desarrollo Económico Comunitario, 226 West 4th Calle, Davenport, IA 52801
2. Ciudad de Moline, Division de Desarrollo Comunitario, 619 16th Calle, Moline, IL 61265
3. Ciudad de Rock Island Desarrollo Comunitario y Económico, 1528 Tercera Avenida, Rock Island, IL 61201

Informe de audiencias públicas
Se celebrarán audiencias públicas en las que las ciudades presentarán información sobre el informe y recibirán comentarios del público sobre el borrador. Las audiencias se realizarán de la siguiente manera:

1. Jueves, 6 de Junio del 2019. De las 5pm-6pm, Palacio Municipal de la Ciudad de Moline, 619 16 Calle, segunda planta, Sala de Conferencias Comité de Todas, Moline, IL 61265
2. Lunes, 10 de Junio del 2019. A las 6:45pm Ciudad de Rock Island Cámaras del Consejo, Palacio Municipal de la Ciudad de Rock Island, 1528 Tercera Avenida, Rock Island, IL 61201
3. Miércoles, 19 de Junio del 2019, 5:30pm, Palacio Municipal de Davenport, 226 W. 4th Calle, primera planta, Cámaras del Consejo, Davenport, IA 52801
4. Lunes, 17 de Junio del 2019. De las 10am-11am, Palacio Municipal de la Ciudad de Moline, 619 16 Calle, segunda planta, Sala de Conferencias Comité de Todas, Moline, IL 61265
5. Lunes, 24 de Junio del 2019, de las 6:45pm, Ciudad de Rock Island, Palacio Municipal de la Ciudad de Rock Island, 1528 Tercera Avenida, Rock Island, IL 61201

Para hacer comentarios
Comentarios escritos serán recibidos hasta las 5:00 de la tarde tiempo local el Viernes 28 de Junio, del 2019. Los comentarios sobre el informe pueden enviarse en línea a través del sitio web del proyecto www.quadcitiesfairhousing.com/contact-us o puede ser enviado por correo o entregado físicamente en cualquiera de las siguiente tres localidades:

1. Ciudad de Davenport Departamento de Planificación y Desarrollo Económico Comunitario, atentamente: Meghan Overton, 226 West 4th Calle, Davenport, IA 52801
 2. Ciudad de Moline Division de Desarrollo Comunitario, 619 16th Calle, Moline, IL 61265
 3. Ciudad de Rock Island Desarrollo Comunitario y Económico, 1528 Tercera Avenida, Rock Island, IL 61201
- Alternativamente, se pueden hacer comentarios en la audiencia pública descrita

PUBLIC COMMENTS RECEIVED

Received via www.quadcitiesfairhousing.com

Name:

Edward Rivers, Scott County Health Department

Email:

edward.rivers@scottcountyiowa.com

Message:

The document notes that its purpose is to “evaluate barriers to fair housing choice and develop and implement strategies and actions to overcome any identified impediments.” It contains a section entitled “Environmental Health” in which we hoped to find an analysis of, and strategies to overcome a significant threat to the health of socioeconomically disadvantaged residents: poisoning from lead-based paint. We were dismayed to find no mention of the problem in this section. Indeed, only seven sentences in the 178 page document mention the issue. The Scott County Health Department and Augustana College conducted research into the issue of poisoning by lead-based paint in Scott County, and found that over 6000 properties in central Davenport are placing its citizens at high risk for deleterious health effects. In order to have truly fair housing choice, this significant threat to health, which is visited primarily on the minority population, must be resolved. We contend that, as a function of any analysis of fair housing choice, and in the development of provisions to further affirmatively fair housing, strategies and actions to eliminate this threat must be implemented.

Received via www.quadcitiesfairhousing.com

Name:

Humility Homes & Services, Inc. Board of Directors

Email:

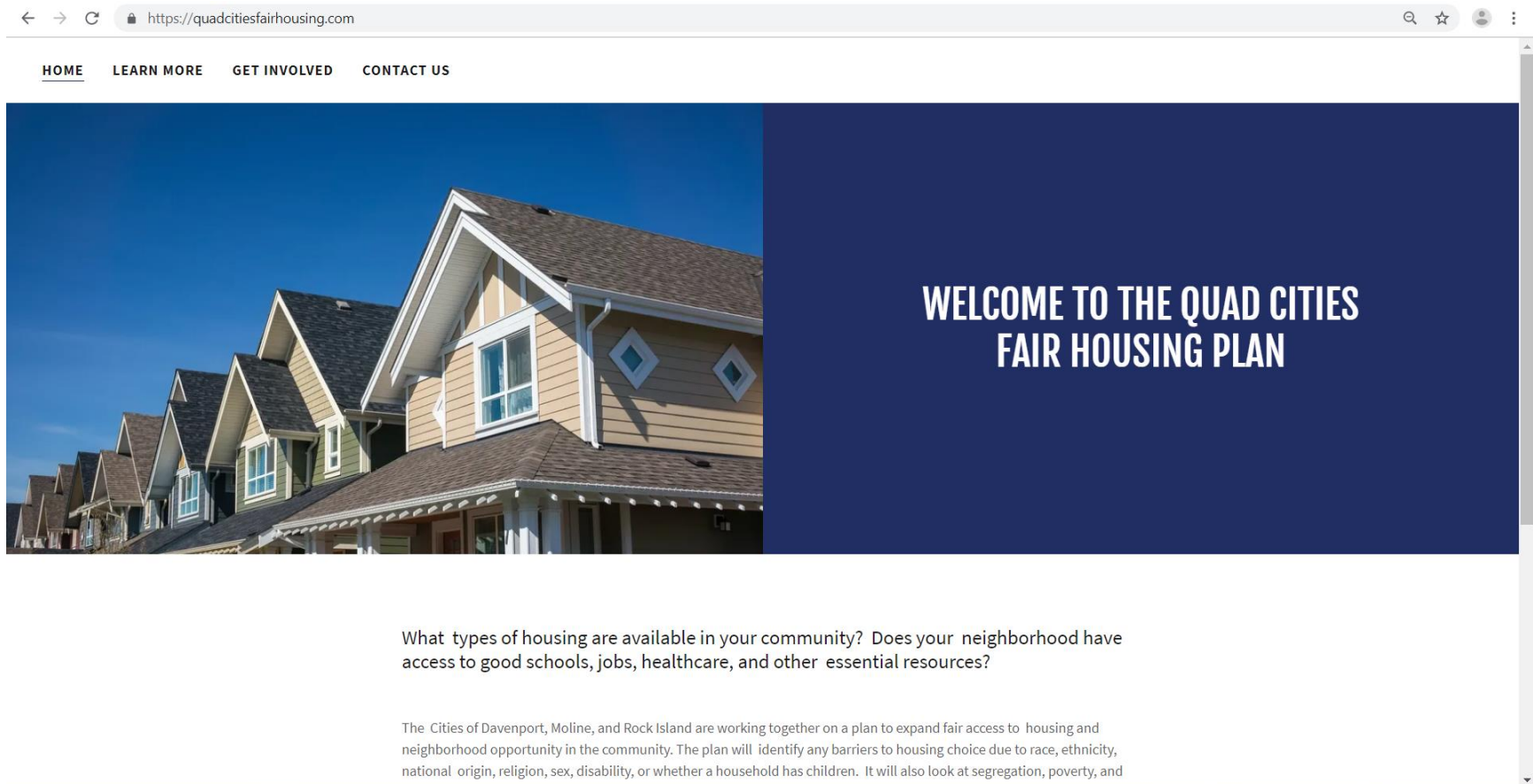
MJRickl@chmiowa.org

Message:

Thank you for the work and consideration of impediments to fair housing in the Quad Cities region. Please accept these comments as formal public requests. Recommendation 1 - Table 31 Fair Housing Goals and Activities - Rewrite sections that include passive language or suggestions (i.e., could, should, consider, etc.) and create an active outcome that is measurable such as will. For example, Impediment 4, we recommended: "The cities should utilize the King County Housing Development Consortium's Racial Equity Impact Tool (or equivalent) to perform a self-assessment of racial equity in the region by Q2, 2020. The cities will then issue a Request for Proposals for entities to facilitate the creation of an action plan based on the self-assessment, with communities of color providing input, to address racial inequities identified." Recommendation 2 - Table 31 Fair Housing Goals and Activities - Impediment #1 - "As recommended in the 2015 City of Davenport Housing Needs Assessment, the Davenport Housing Authority should seriously consider adopting a local housing voucher preference for people experiencing chronic homelessness by Q2, 2020." Recommendation 3 - Table 31 Fair Housing Goals and Activities - Impediment #1 - "In partnership with the QC Community Foundation, the cities named in this regional report should create a

revolving \$10,000,000 Housing Trust Fund to refurbish affordable units and develop new affordable units for residents at 30% AMI and below by Q4 2020." Recommendation 4 - Table 31 Fair Housing Goals and Activities - Impediment #1 - "10% of housing units in each city named in the report should have some public subsidy by Q4, 2024." Page 119 indicates that publicly supported housing programs in the housing units of all three cities range from 3.1% to 9.6%. Recommendation 5 - Table 31 Fair Housing Goals and Activities - Impediment #1 - "The cities named in the region will adopt ordinances such that in cases where the landlord's rental license has lapsed, rental fees will be placed in an escrow account until the landlord addresses the code violations. During the time the license is lapsed, the landlord is not allowed access to the rent. Recommendation 6 - Table 31 Fair Housing Goals and Activities - Impediment #1 - "Establish a regional Office of the Tenant Advocate, funded by cities named in the report, which provides tenant education, advocacy, resolve housing disputes, and provides legal assistance by Q4, 2020."

PROJECT WEBSITE



DOCUMENTS AND RESOURCES

Project Documents



A draft of the Quad Cities Analysis of Impediments to Fair Housing Choice (AI) is available to download here. Comments and feedback on the draft will be received through June 28, 2019.

[DOWNLOAD THE DRAFT](#)

National Resources



Check out HUD's website to learn more about the Fair Housing planning process using the links below.

[HUD Office of Fair Housing and Equal Opportunity Affirmatively Furthering Fair Housing HUD Fair Housing Planning Guide Community Development Block Grant \(CDBG\) Program Overview](#)

Local Resources



For more information about affordable housing and community development in the area, visit the websites at the links below.

[City of Davenport Community Development](#)
[City of Moline Community Development](#)
[City of Rock Island Community Development](#)

HEARING TIMES AND LOCATIONS

The Cities of Davenport, Moline, and Rock Island invite members of the public to attend one of the listed public hearings at which the cities will present information on the draft Analysis of Impediments to Fair Housing Choice report and receive comments from the public regarding the draft.

Any person with disabilities who wishes to attend a hearing and who requires a special accommodation, or any other person requiring a special accommodation in attending a hearing or accessing the draft report, should notify one of the following contacts at least 24 hours in advance. City of Davenport: Meghan Overton, Neighborhood Development Coordinator, (563) 888-3204; City of Moline: K.J. Whitley, Community Development Manager, kwhitley@moline.il.us or (309)524-2044; City of Rock Island: Colleen Small-Vollman, (309) 732-2900.

Thursday, June 6, 2019

5pm – 6pm
Moline City Hall
619 16 Street
Committee-of-Whole Conference Room
Moline, IL 61265

Monday, June 10, 2019

6:45pm
Rock Island City Council Chambers
Rock Island City Hall
1528 Third Avenue
Rock Island, IL 61201

Wednesday, June 19, 2019

5:30pm
Davenport City Hall
726 W. 4th Street

Can't Make a Hearing?

If you can't make it to a hearing, you can still contribute by downloading a copy of the draft and providing your [feedback](#).

[DOWNLOAD THE DRAFT](#)

CONTACT US

Get Involved!

Name

Email*

Message*

SEND

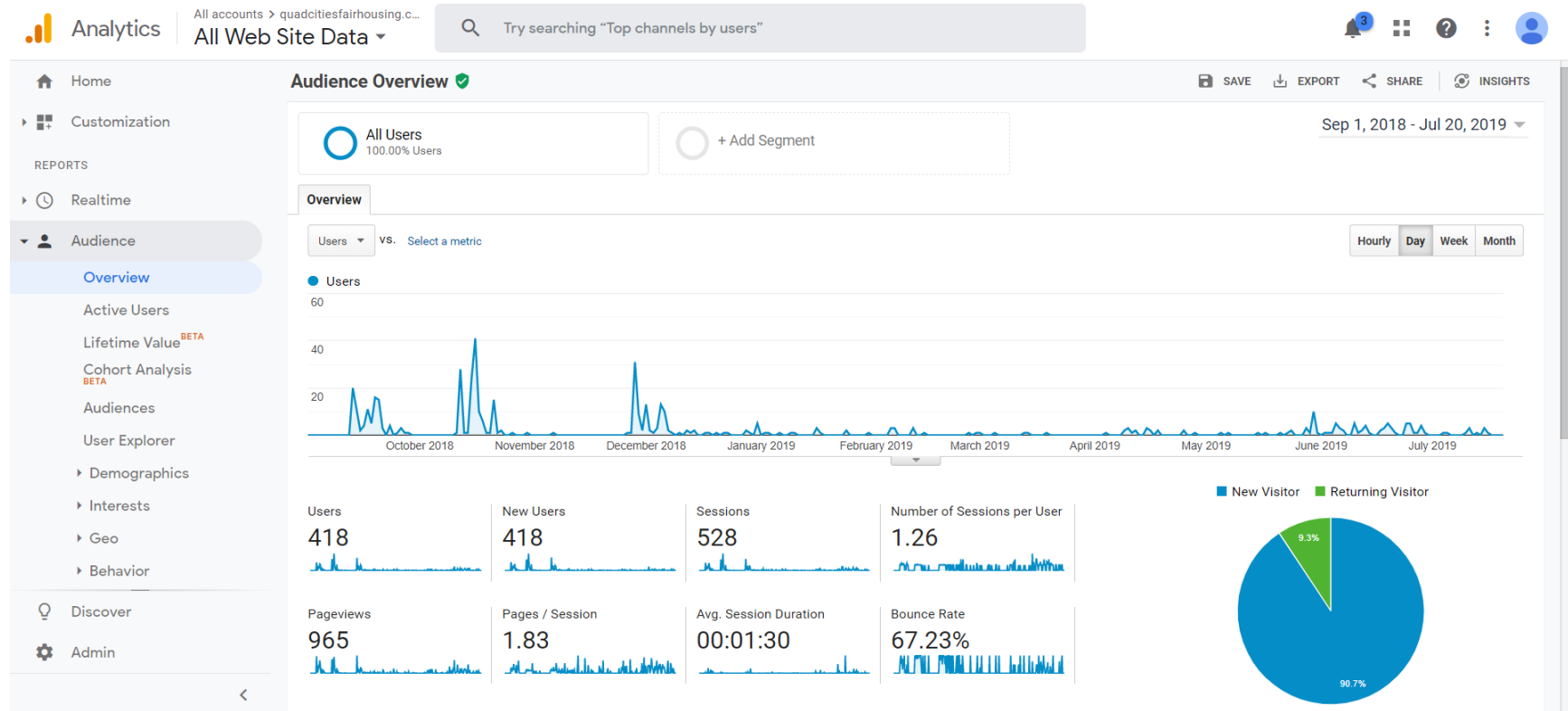
This site is protected by reCAPTCHA and the Google Privacy Policy and Terms of Service apply.

Let Us Hear from You!

Feedback and comments from the public are needed and encouraged! After reviewing the draft, please take a moment to share your thoughts on the [draft](#), its findings, and recommendations.

All comments received by June 28, 2019 will be considered in refining and finalizing the study before it is submitted to HUD.

WEBSITE ANALYTICS: WWW.QUADCITIESFAIRHOUSING.COM



APPENDIX II

COMMUNITY SURVEY

In conjunction with development of the Analysis of Impediments to Fair Housing Choice, the project partners conducted a survey to collect input from the general public, including people living or working in the region, and other stakeholders. The survey was available online and in hard copy, in English and Spanish, from September through December 2018. Paper copies were available at the public meetings and other related events held throughout the study area. A total of 170 survey responses were received.

A copy of the survey instruments as well as a report of the full survey results, is included in this Appendix. Note that for questions with open-ended response formats, only the number of responses is reported here to protect respondent anonymity.

Fair Housing Survey for Davenport, Moline, and Rock Island

Your Opinion Counts!

The Cities of Davenport, Moline, and Rock Island are working together on a study to expand fair access to housing and neighborhood opportunity. This study, called an Analysis of Impediments to Fair Housing Choice (AI), is required by the U.S. Department of Housing and Urban Development (HUD) so that they can continue to provide the best housing choices and services for their residents. The study will look at whether everyone in the area has similar choices for housing regardless of their race, ethnicity, national origin, sex, religion, whether they have children, or whether they have a disability. It will also outline a plan to address any fair housing issues in the region.

An important part of this study is listening to the public regarding concerns and issues of fair housing and housing choice. This survey is one way we'll gather input.

Your answers are confidential. We'll only report this information in combination with other survey responses and in summary format to protect your privacy. Please do not write your name or other personal information anywhere on the survey. You may stop the survey at any time without losing any benefits that you otherwise receive. If you have questions, contact Mosaic Community Planning at info@mosaiccommunityplanning.com or 770-366-7893.

Estimated time to complete: 5-7 minutes

General Information

1. Please your ZIP Code.

- | | | | |
|--------------------------------|--------------------------------|--------------------------------|-----------------------------------------------|
| <input type="checkbox"/> 52801 | <input type="checkbox"/> 52804 | <input type="checkbox"/> 61201 | <input type="checkbox"/> 61265 |
| <input type="checkbox"/> 52802 | <input type="checkbox"/> 52806 | <input type="checkbox"/> 61240 | <input type="checkbox"/> Other (please list): |
| <input type="checkbox"/> 52803 | <input type="checkbox"/> 52807 | <input type="checkbox"/> 61264 | _____ |

2. Which is your age group?

- | | | | |
|-----------------------------------|--------------------------------|--------------------------------|--------------------------------|
| <input type="checkbox"/> Under 18 | <input type="checkbox"/> 25-34 | <input type="checkbox"/> 45-54 | <input type="checkbox"/> 62-74 |
| <input type="checkbox"/> 18-24 | <input type="checkbox"/> 35-44 | <input type="checkbox"/> 55-61 | <input type="checkbox"/> 75+ |

3. What is your total household income?

- | | | |
|-----------------------------------------------|-----------------------------------------------|----------------------------------------------|
| <input type="checkbox"/> Less than \$10,000 | <input type="checkbox"/> \$25,000 to \$34,999 | <input type="checkbox"/> 75,000 to \$99,999 |
| <input type="checkbox"/> \$10,000 to \$14,999 | <input type="checkbox"/> \$35,000 to \$49,999 | <input type="checkbox"/> \$100,000 and above |
| <input type="checkbox"/> \$15,000 to \$24,999 | <input type="checkbox"/> \$50,000 to \$74,999 | |

4. What is your race/ethnicity?

- | | | |
|----------------------------------------------------|-----------------------------------------------------------|-----------------------------------------------|
| <input type="checkbox"/> White | <input type="checkbox"/> Asian or Pacific Islander | <input type="checkbox"/> Multiple races |
| <input type="checkbox"/> African American or Black | <input type="checkbox"/> Native American or Alaska Native | <input type="checkbox"/> Other (please list): |
| <input type="checkbox"/> Latino or Hispanic | | _____ |

5. Does anyone in your home regularly speak a language other than English?

- No Yes, please list the language: _____

6. Does anyone in your home have a disability?

- No Yes

7. What is your current housing status?

- | | | |
|----------------------------------------|--------------------------------------------------|-----------------------------------------------------|
| <input type="checkbox"/> I own a home | <input type="checkbox"/> I live in a hotel/motel | <input type="checkbox"/> I live with a relative |
| <input type="checkbox"/> I rent a home | <input type="checkbox"/> I am homeless | <input type="checkbox"/> Other (please list): _____ |

8. Do you currently live in public housing or receive Section 8 rental assistance?

- No Yes

About Your Neighborhood

9. How satisfied are you with the neighborhood where you live?

- Very satisfied Somewhat satisfied Not very satisfied Not at all satisfied

10. What do you like best about your neighborhood?

11. What improvements would you like to see?

12. Is there another area in the region where you would like to move?

- No
 Yes, please list where and why you would choose that area: _____

13. In your neighborhood, do you have access to the following community resources?

	<i>Yes</i>	<i>Somewhat</i>	<i>No</i>	<i>I Don't Know</i>
Quality public schools	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reliable bus service	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Areas with jobs you could get	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Places to shop and bank	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Housing that you can afford	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Housing that is in good condition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks and trails	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Clean environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

About the Region

14. Thinking about Davenport, Moline, and Rock Island, please check whether you think more is needed for each of the housing types below.

	<i>No more is needed</i>	<i>Some more is needed</i>	<i>A lot more is needed</i>	<i>I don't know</i>
Housing for people with disabilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Housing for seniors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Housing that people with lower incomes can afford	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Housing that accepts Section 8 vouchers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Apartments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
First time homebuyer assistance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please share any other comments about local housing needs: _____

15. Thinking Davenport, Moline, and Rock Island, please check whether you think each of the following are equally available and kept up in all neighborhoods.

	<i>Equally provided</i>	<i>Not equally provided</i>	<i>I don't know</i>
Schools	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bus service	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Roads and sidewalks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Grocery stores and other shopping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Banking and lending	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks and trails	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Property maintenance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Garbage collection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police & fire protection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Fair Housing Rights

16. Do you understand your fair housing rights?

- Yes Somewhat No

17. Do you know where to file a housing discrimination complaint?

- Yes Somewhat No

18. Since living in this area, have you experienced housing discrimination?

The following actions are examples of housing discrimination if they are based on race, ethnicity, national origin, sex, religion, whether you have children, or whether you have a disability: refusing to rent or sell housing, refusing to discuss the rental or sale of housing, saying that housing is not available for rent or sale when it is, having different rental or sale terms, or providing different housing or housing services.

- Yes No

19. If you answered YES to question 18, who discriminated against you? (Check all that apply)

- Landlord or property manager Mortgage lender Other (please list):
 Real estate agent City or county staff person _____

20. If you answered YES to question 18, on what basis do you believe you were discriminated against? (Check all that apply)

- Race Religion Family status (single parent with children, family with children, expecting a child)
 Ethnicity Sex
 National origin Disability

21. If you answered YES to question 18, did you file a report of that discrimination?

- Yes No

22. If you answered YES to question 18, but you did not file a report, why didn't you file? (Check all that apply)

- I didn't know what good it would do I was afraid of retaliation
 I didn't know where to file The process wasn't in my language
 I didn't have time to file The process wasn't accessible to me because of a disability
 I didn't know it was a violation of the law
 Other, please list: _____

Barriers to Fair Housing

23. Do you think housing discrimination is an issue in Davenport, Moline, and Rock Island?

- Yes, housing discrimination is an issue
- Housing discrimination may be an issue
- No, housing discrimination is not an issue
- I don't know if housing discrimination is an issue

24. Do you think any of the following are barriers to housing choice in Davenport, Moline, and Rock Island? (Check all that apply)

- Admission and occupancy policies in public housing
- Community opposition to affordable housing
- Discrimination by landlords or rental agents
- Discrimination by mortgage lenders
- Discrimination or steering by real estate agents
- Displacement of residents due to rising housing costs
- Government regulations, ordinances, or policies
- Lack of housing options for people with disabilities
- Landlords refusing to accept vouchers
- Limited access to banking and financial services
- Limited access to jobs
- Limited access to good schools
- Limited access to community resources for persons with disabilities
- Neighborhoods that need revitalization and new investment
- Not enough affordable rental housing for individuals
- Not enough affordable rental housing for large families
- Not enough affordable rental housing for small families
- Not enough Section 8 / Housing Choice Vouchers to meet needs
- Other (please list): _____

25. Please use the space below to provide any additional information about housing choice and fair housing in Davenport, Moline, and Rock Island.

Thank you for participating!

You can return completed surveys at the following locations:

Meghan Overton, City of Davenport Neighborhood Development, 226 W. 4th St, Davenport, IA 52801
K.J. Whitley, City of Moline Planning & Development Department, 619 16th St, Moline, IL 61265
Colleen Small-Vollman, City of Rock Island Community Economic Development, 1528 3rd Ave, Rock Island, IL 61201

Fair Housing Survey for Davenport, Moline, and Rock Island

Your Opinion Counts!

Las ciudades de Davenport, Moline, Y Rock Island están trabajando juntas en un estudio para expandir el acceso justo a la vivienda y la oportunidad de vecindario. El departamento de vivienda y desarrollo urbano de los estados unidos. (HUD) exige este estudio, llamado análisis de impedimentos a la opción de vivienda justa (AI), para que puedan continuar brindando las mejores opciones de vivienda y servicios para sus residentes. El estudio analizará si todos en el área tienen opciones similares para la vivienda, independientemente de su raza, etnia, origen nacional, sexo religión, si tienen hijos o si tienen una discapacidad. También describirá un plan para abordar cualquier problema de vivienda justa en la región.

Una parte importante de este estudio es escuchar al público con respecto a las preocupaciones y problemas de vivienda justa y elección/eleccionada/seleccionada de vivienda. Esta encuesta es una forma de reunir información.

Sus respuestas son confidenciales. Solo informaremos esta información en combinación con otras respuestas a la encuesta y en formato resumido para proteger su privacidad. No escriba su nombre o otra información personal en ningún lugar de la encuesta. Puede suspender la encuesta en cualquier momento sin perder ningún beneficio que de lo contrario recibiera. Si tiene alguna pregunta, comuníquese con Mosaic Planificación comunitaria en info@mosaiccommunityplanning.com o 770-366-7893.

Tiempo estimado para completar: 5-7 minutos

Información General

1. ¿Por favor, su código postal?

- | | | | |
|--------------------------------|--------------------------------|--------------------------------|--------------------------------------------------|
| <input type="checkbox"/> 52801 | <input type="checkbox"/> 52804 | <input type="checkbox"/> 61201 | <input type="checkbox"/> 61265 |
| <input type="checkbox"/> 52802 | <input type="checkbox"/> 52806 | <input type="checkbox"/> 61240 | <input type="checkbox"/> Otro (por favor lista): |
| <input type="checkbox"/> 52803 | <input type="checkbox"/> 52807 | <input type="checkbox"/> 61264 | _____ |

2. ¿Cuál es su edad del grupo?

- | | | | |
|------------------------------------|--------------------------------|--------------------------------|--------------------------------|
| <input type="checkbox"/> Debajo 18 | <input type="checkbox"/> 25-34 | <input type="checkbox"/> 45-54 | <input type="checkbox"/> 62-74 |
| <input type="checkbox"/> 18-24 | <input type="checkbox"/> 35-44 | <input type="checkbox"/> 55-61 | <input type="checkbox"/> 75+ |

3. ¿Cuál es el ingreso total de su hogar?

- | | | |
|----------------------------------------------|----------------------------------------------|---------------------------------------------|
| <input type="checkbox"/> Menos que \$10,000 | <input type="checkbox"/> \$25,000 - \$34,999 | <input type="checkbox"/> 75,000 - \$99,999 |
| <input type="checkbox"/> \$10,000 - \$14,999 | <input type="checkbox"/> \$35,000 - \$49,999 | <input type="checkbox"/> \$100,000 y arriba |
| <input type="checkbox"/> \$15,000 - \$24,999 | <input type="checkbox"/> \$50,000 - \$74,999 | |

4. ¿Cuál es su raza/etnicidad?

- | | | |
|-----------------------------------------------------|-------------------------------------------------------|--------------------------------------------------|
| <input type="checkbox"/> Blanco | <input type="checkbox"/> Asiático o Pacífico Isleño | <input type="checkbox"/> Múltiple razas |
| <input type="checkbox"/> Africano Americano o Negro | <input type="checkbox"/> Nativo Americano o Nativo de | <input type="checkbox"/> Otro (por favor lista): |
| <input type="checkbox"/> Latino o Hispano | Alaska | _____ |

5. ¿Alguien en su hogar regularmente habla un lenguaje que no sea inglés?

- No Sí, por favor lista el lenguaje: _____

6. ¿Alguien en su hogar tiene una discapacidad?

- No Sí

7. ¿Cuál es su estado actual de vivienda?

- Soy dueño de una casa Yo vivo en un hotel Vivo con un pariente
 Yo rento una casa Yo estoy sin hogar Otro (por favor lista): _____

8. ¿Actualmente vives en vivienda pública o' recibes asistencia de renta de la sección 8?

- No Sí

Acerca de su Vecindario

9. ¿Qué tan satisfecho estas con el vecindario donde vives?

- Muy satisfecho De alguna manera satisfecho No muy satisfecho Nada satisfecho

10. ¿Qué te gusta más de tu vecindario?

11. ¿Qué mejoramientos te gustaría ver?

12. ¿Existe otra área en la región donde te gustaría moverte?

- No
 Sí, por favor lista adonde y porque elegirías esa área: _____

13. ¿En tu vecindario, tienes acceso a los siguientes recursos de la comunidad?

	<i>Sí</i>	<i>Algo</i>	<i>No</i>	<i>No Lo Se</i>
Escuelas públicas de calidad	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Servicio de autobús confiable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Áreas con trabajos que podrías obtener	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lugares para comprar y ir al banco	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Viviendas que usted pueda pagar	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vivienda que esté en buenas condiciones	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parques y senderos	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ambiente limpio	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Sobre la Region

14. Pensando en Davenport, Moline, y Rock Island, por favor revise si cree que más está necesitado para cada uno de los tipos de vivienda debajo.

	<i>No se necesita más</i>	<i>Algo más está necesitado</i>	<i>Se necesita mucho más</i>	<i>No lo se</i>
Viviendas para personas con discapacidades	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Viviendas para personas mayores	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Viviendas que las personas con menores ingresos puedan pagar	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vivienda que acepta comprobante de la seccion 8	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Apartamentos	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Asistencia por primera vez para compradores de vivienda	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Por favor comparte cualquier otro comentario sobre las necesidades de vivienda locales: _____

15. Pensando en Davenport, Moline, y Rock Island, por favor revise si cree que cada uno de los siguientes esta igualmente disponible y se mantiene en todos los vecindarios.

	<i>Igualmente proporcionado</i>	<i>No igualmente proporcionado</i>	<i>No lo se</i>
Escuelas	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Servicio de autobús	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Caminos y aceras	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tienda de abarrotes y otras compras	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Banca y prestamos	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parques y senderos	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mantenimientos de la propiedad	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Recolección de basura	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Protección de policía y fuego	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Derechos de Vivienda Justa

16. ¿Usted entiende sus derechos de vivienda justa?

- Sí Algo No

17. ¿Tú sabes adonde archivar una queja de discriminación en la vivienda?

- Sí Algo No

18. ¿Desde que vives en esta área, has experimentado discriminación en la vivienda?

Las siguientes acciones son ejemplos de discriminación en la vivienda. Si se basan en la raza, etnia, origen nacional, sexo, religión, si tienes hijos o' si tienes una discapacidad: si niega a alquilar o' vender una vivienda, se niega a hablar sobre el alquiler o' la venta de la vivienda diciendo que esta vivienda no esta disponible para alquilar o' vender cuando si esta, o' con diferentes terminus de alquilat o' venta, o' que proporciona diferentes viviendas o' servicios de vivienda.

- Sí No

19. Si respondiste que sí a la pregunta 18, ¿quién lo discrimino? (Marque todo los que aplicuen)

- Dueño o' administrador de la propiedad Elagente Inmobiliario Otro (por favor lista): _____
- Prestamista de la Hipoteca Ciudad y perona del personal del condado

20. Si respondiste que sí a la pregunta 18, ¿en base a qué crees que fuiste discriminado? (Lista todo que apliqué)

- Raza Religión Estado familiar (padres soltero con hijos, familia con hijos esperando un niño)
- Etnicidad Sexo
- Origen Nacional Discapacidad

21. Si respondiste que sí a la pregunta 18, ¿archivaste un reporte de esa discriminación?

- Sí No

22. Si respondiste que sí a la pregunta 18, pero no archivaste un reporte, ¿por qué no archivaste? (Marque todo que apliqué)

- Yo no sabía lo bueno que iba a hacer Yo tenía miedo de represalias
- Yo no sabía adónde archivar El proceso no estaba en mi lenguaje
- Yo no tenía tiempo para archivar El proceso no estaba accesible a mi por una discapacidad
- Yo no sabía que era una violación de la ley
- Otro, por favor lista: _____

Barreras a la Vivienda Justa

23. ¿Crees que la discriminación en la vivienda es un problema en Davenport, Moline, y Rock Island?

- Sí, discriminación de viviendas es un problema
- Discriminación de viviendas puede ser un problema
- No, discriminación de viviendas no es un problema
- No lo sé si discriminación de vivienda es un problema

24. ¿Crees que alguna de las siguientes son barreras a la vivienda seleccionada en Davenport, Moline, y Rock Island? (Marque toda que aplicó)

- Admisión y polizas de ocupantes en vivienda publica
 - Oposición de la comunidad a viviendas económicas
 - Discriminación por propietarios o' agents de renta
 - Discriminación por prestamistas hipotecarias
 - Discriminación o' conducción por parte de agentes inmobiliarios
 - Desplazamientos de residentes debido a los aumentos de costos de viviendas
 - Regulaciones de gobierno, ordenanzas o' políticas
 - Falta de opciones de vivienda para personas con discapacidades
 - Propietarios negandose a aceptar vales
 - Acceso limitado a servicios bancarios y financieros
 - Acceso limitado a trabajos
 - Acceso limitado a Buena escuelas
 - Acceso limitado a los recursos de la comunidad para personas con discapacidades
 - Barrios que necesitan revitalización y nuevos inversión
 - No hay suficientes viviendas de alquilar económicas para individuales
 - No hay suficientes viviendas de alquilar económicas para grandes familias
 - No hay suficientes viviendas de alquilar económicas para pequeña familias
 - No hay suficientes seccion8/ vales de viviendas escojidas para satisfacer las necesidades
 - Otro (por favor lista):
-

25. Por favor use el espacio abajo para proporcionar informacion adicional sobre la vivienda eleccionada y vivienda justa en Davenport, Moline, y Rock Island.

Gracias por participar

Puedes devolver encuestas completadas las siguientes localizaciones:

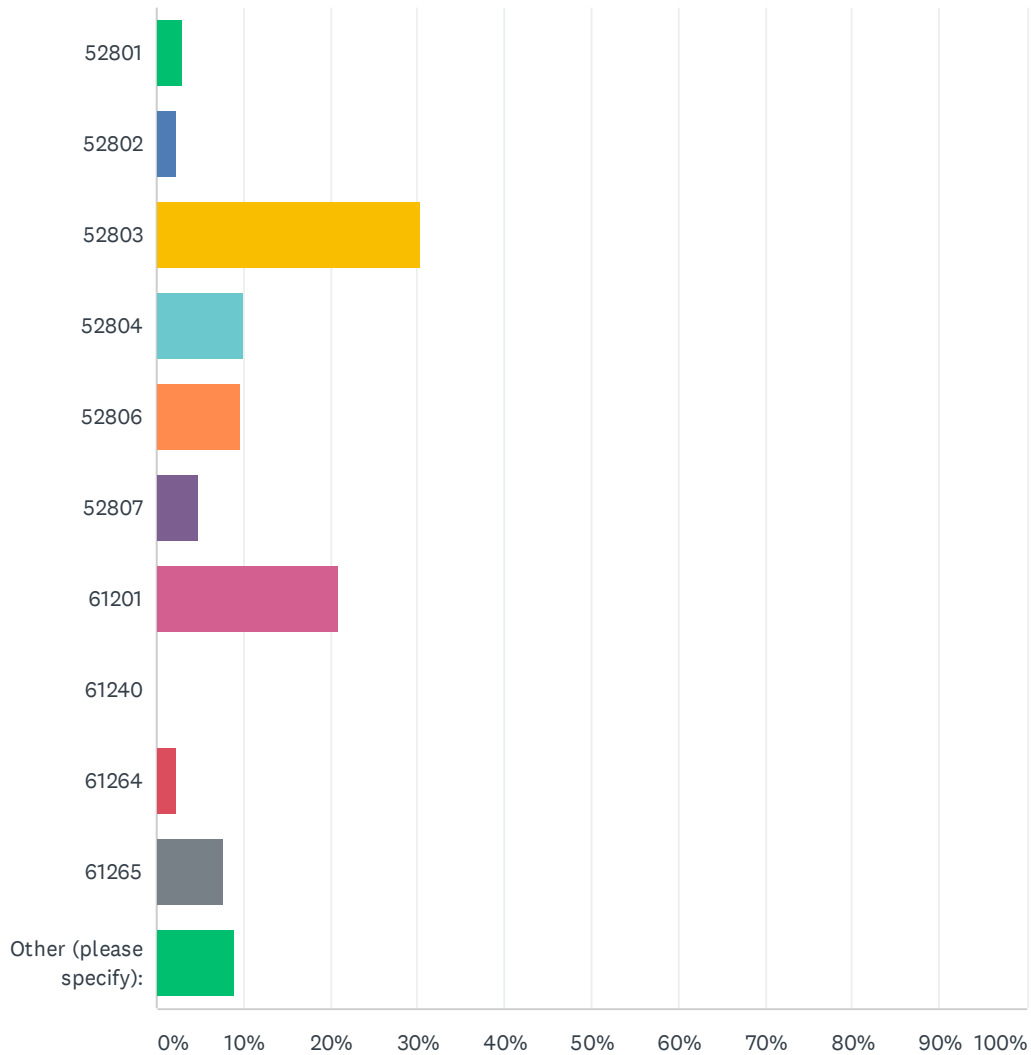
Meghan Overton, City of Davenport Neighborhood Development, 226 W. 4th St, Davenport, IA 52801

K.J. Whitley, City of Moline Planning & Development Department, 619 16th St, Moline, IL 61265

Colleen Small-Vollman, City of Rock Island Community Economic Development, 1528 3rd Ave, Rock Island, IL 61201

Q1 Please select your ZIP Code.

Answered: 168 Skipped: 2

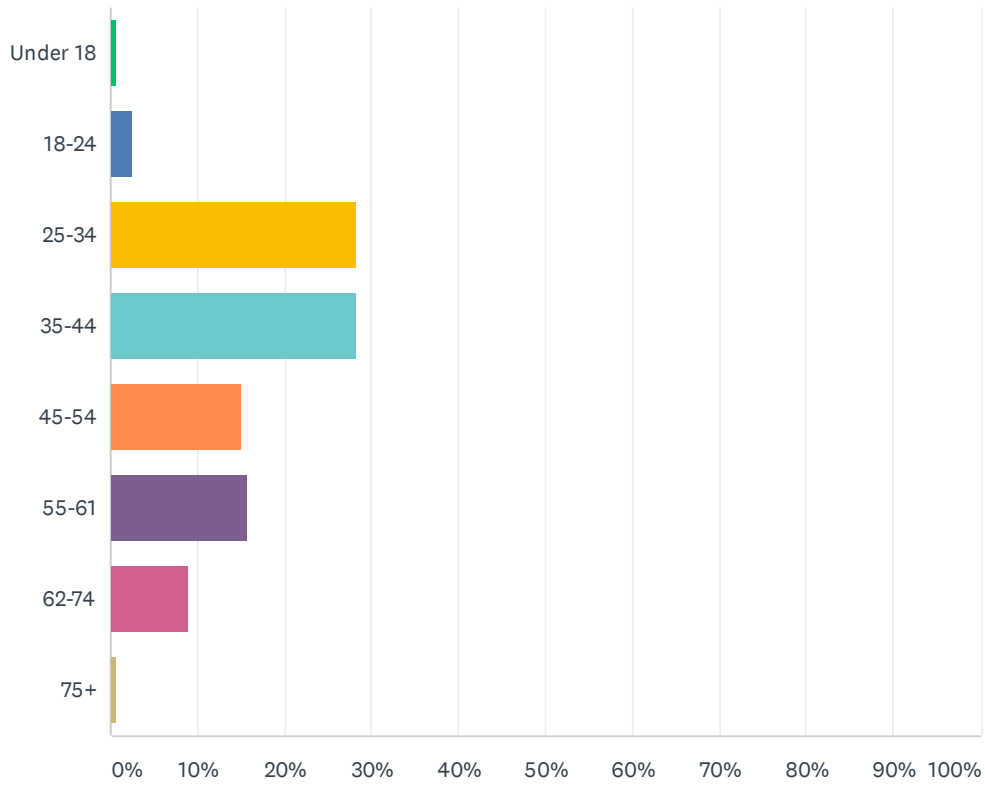


Fair Housing Survey for Davenport, Moline, and Rock Island

ANSWER CHOICES	RESPONSES	
52801	2.98%	5
52802	2.38%	4
52803	30.36%	51
52804	10.12%	17
52806	9.52%	16
52807	4.76%	8
61201	20.83%	35
61240	0.00%	0
61264	2.38%	4
61265	7.74%	13
Other (please specify):	8.93%	15
TOTAL		168

Q2 Which is your age group?

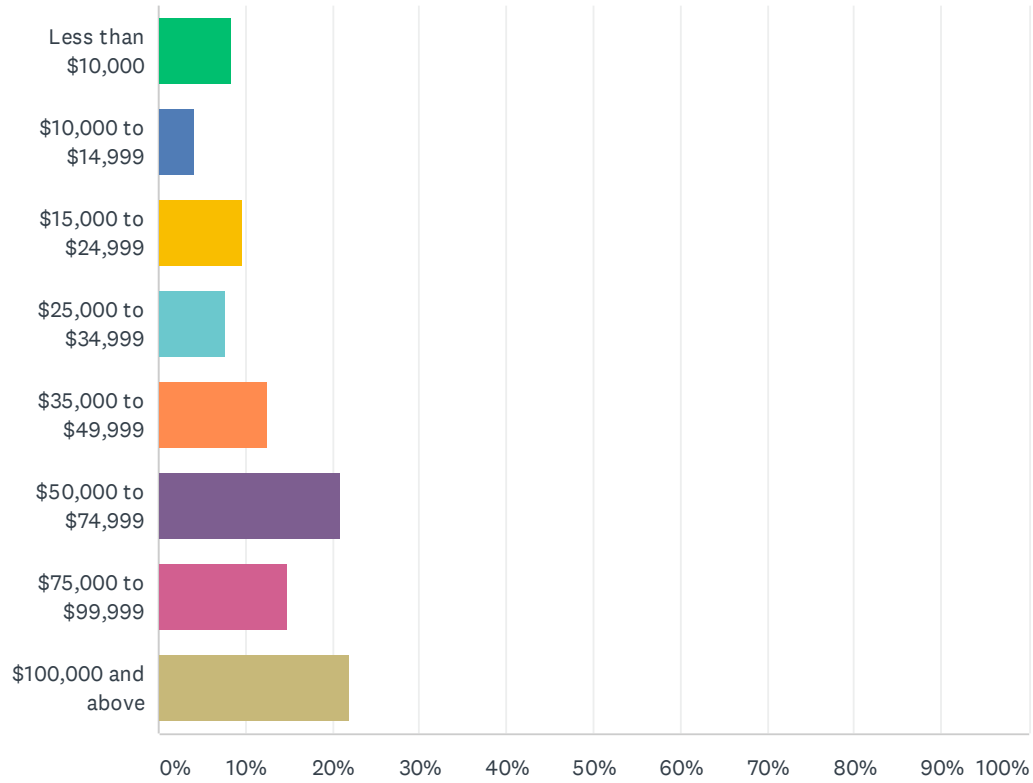
Answered: 166 Skipped: 4



ANSWER CHOICES	RESPONSES
Under 18	0.60% 1
18-24	2.41% 4
25-34	28.31% 47
35-44	28.31% 47
45-54	15.06% 25
55-61	15.66% 26
62-74	9.04% 15
75+	0.60% 1
TOTAL	166

Q3 What is your total household income?

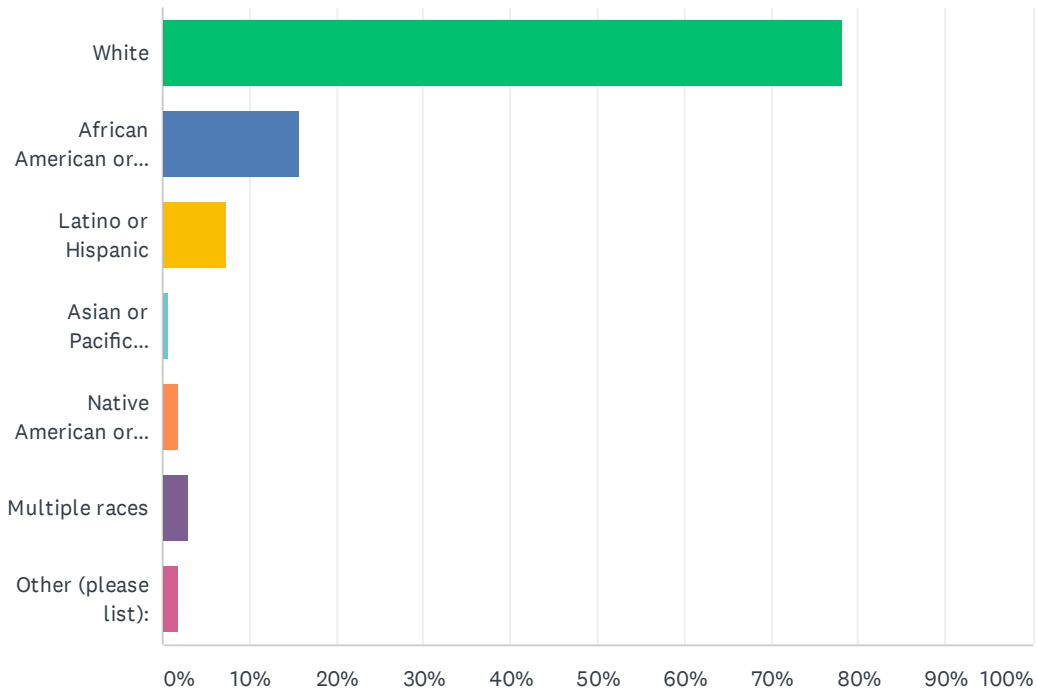
Answered: 168 Skipped: 2



ANSWER CHOICES	RESPONSES	
Less than \$10,000	8.33%	14
\$10,000 to \$14,999	4.17%	7
\$15,000 to \$24,999	9.52%	16
\$25,000 to \$34,999	7.74%	13
\$35,000 to \$49,999	12.50%	21
\$50,000 to \$74,999	20.83%	35
\$75,000 to \$99,999	14.88%	25
\$100,000 and above	22.02%	37
TOTAL		168

Q4 What is your race/ethnicity?

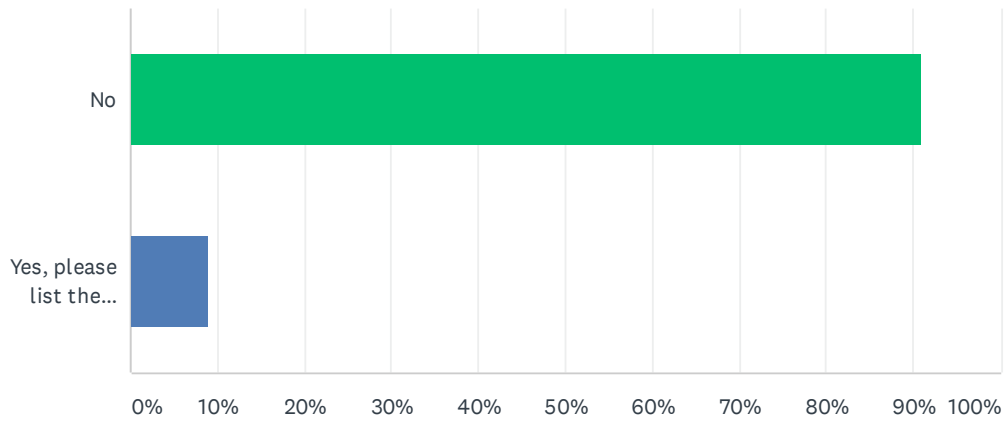
Answered: 166 Skipped: 4



ANSWER CHOICES	RESPONSES	
White	78.31%	130
African American or Black	15.66%	26
Latino or Hispanic	7.23%	12
Asian or Pacific Islander	0.60%	1
Native American or Alaska Native	1.81%	3
Multiple races	3.01%	5
Other (please list):	1.81%	3
Total Respondents: 166		

Q5 Does anyone in your home regularly speak a language other than English?

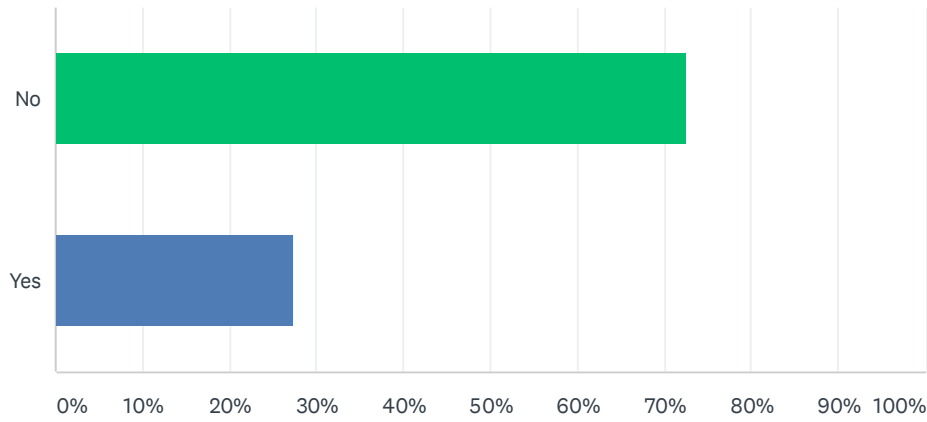
Answered: 168 Skipped: 2



ANSWER CHOICES	RESPONSES	
No	91.07%	153
Yes, please list the language:	8.93%	15
TOTAL		168

Q6 Does anyone in your home have a disability?

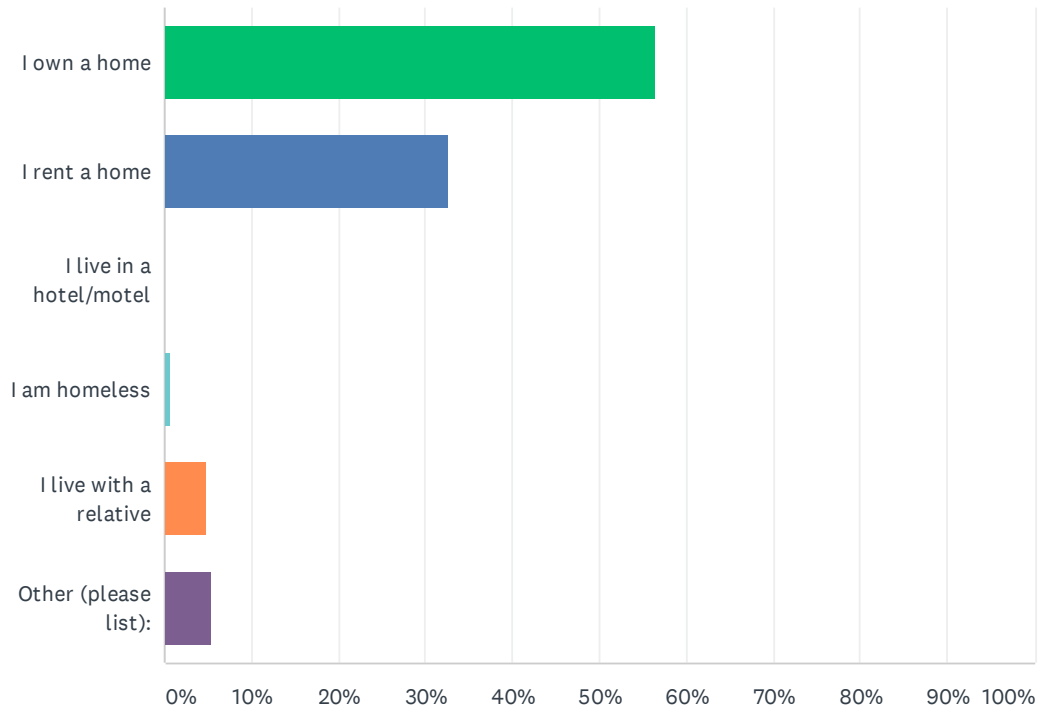
Answered: 168 Skipped: 2



ANSWER CHOICES	RESPONSES	
No	72.62%	122
Yes	27.38%	46
TOTAL		168

Q7 What is your current housing status?

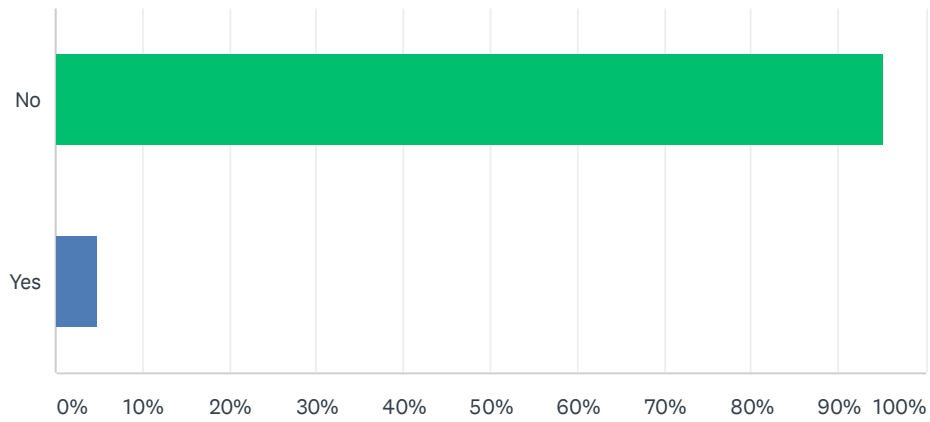
Answered: 168 Skipped: 2



ANSWER CHOICES	RESPONSES
I own a home	56.55% 95
I rent a home	32.74% 55
I live in a hotel/motel	0.00% 0
I am homeless	0.60% 1
I live with a relative	4.76% 8
Other (please list):	5.36% 9
TOTAL	168

Q8 Do you currently live in public housing or receive Section 8 rental assistance?

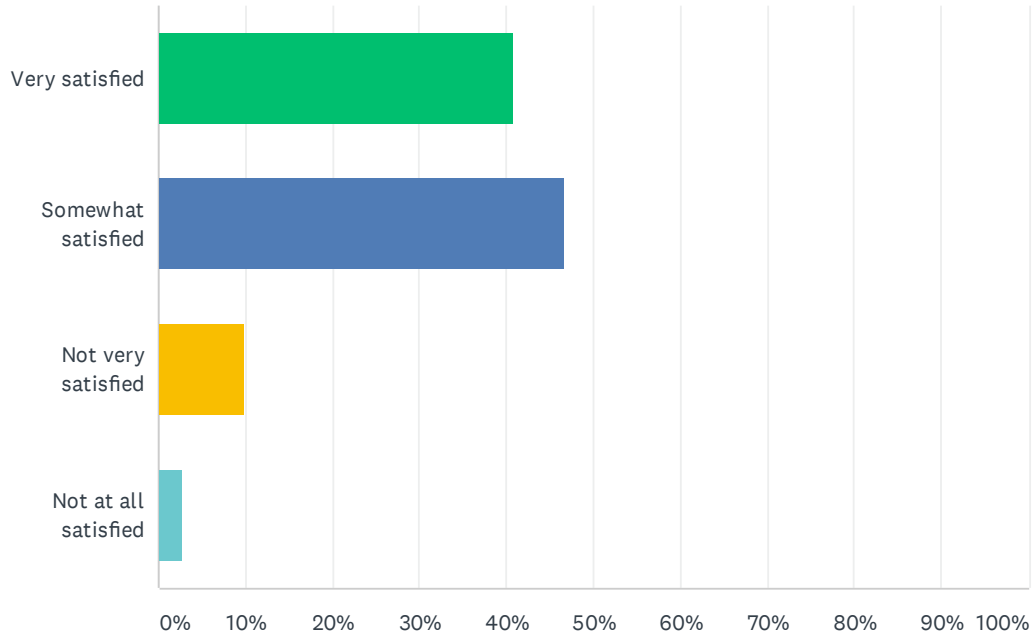
Answered: 167 Skipped: 3



ANSWER CHOICES	RESPONSES	
No	95.21%	159
Yes	4.79%	8
TOTAL		167

Q9 How satisfied are you with the neighborhood where you live?

Answered: 152 Skipped: 18



ANSWER CHOICES	RESPONSES	
Very satisfied	40.79%	62
Somewhat satisfied	46.71%	71
Not very satisfied	9.87%	15
Not at all satisfied	2.63%	4
TOTAL		152

Q10 What do you like best about your neighborhood?

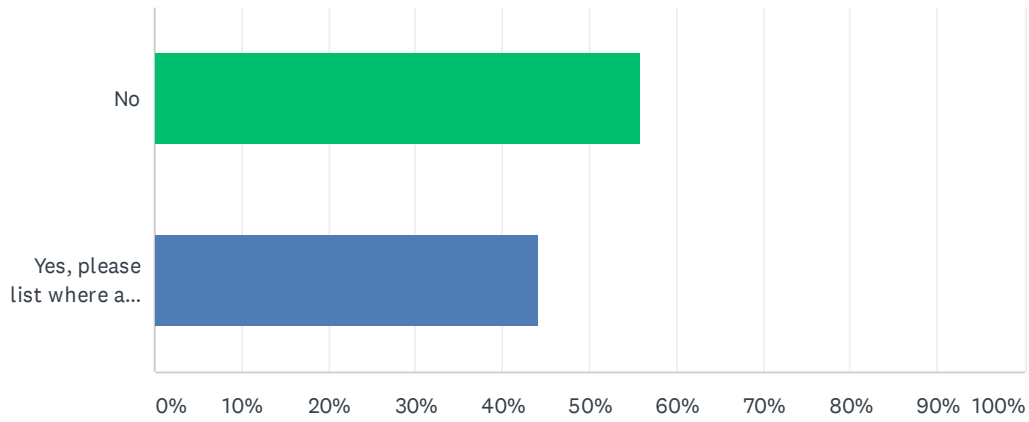
Answered: 141 Skipped: 29

Q11 What improvements would you like to see?

Answered: 133 Skipped: 37

Q12 Is there another area in the region where you would like to move?

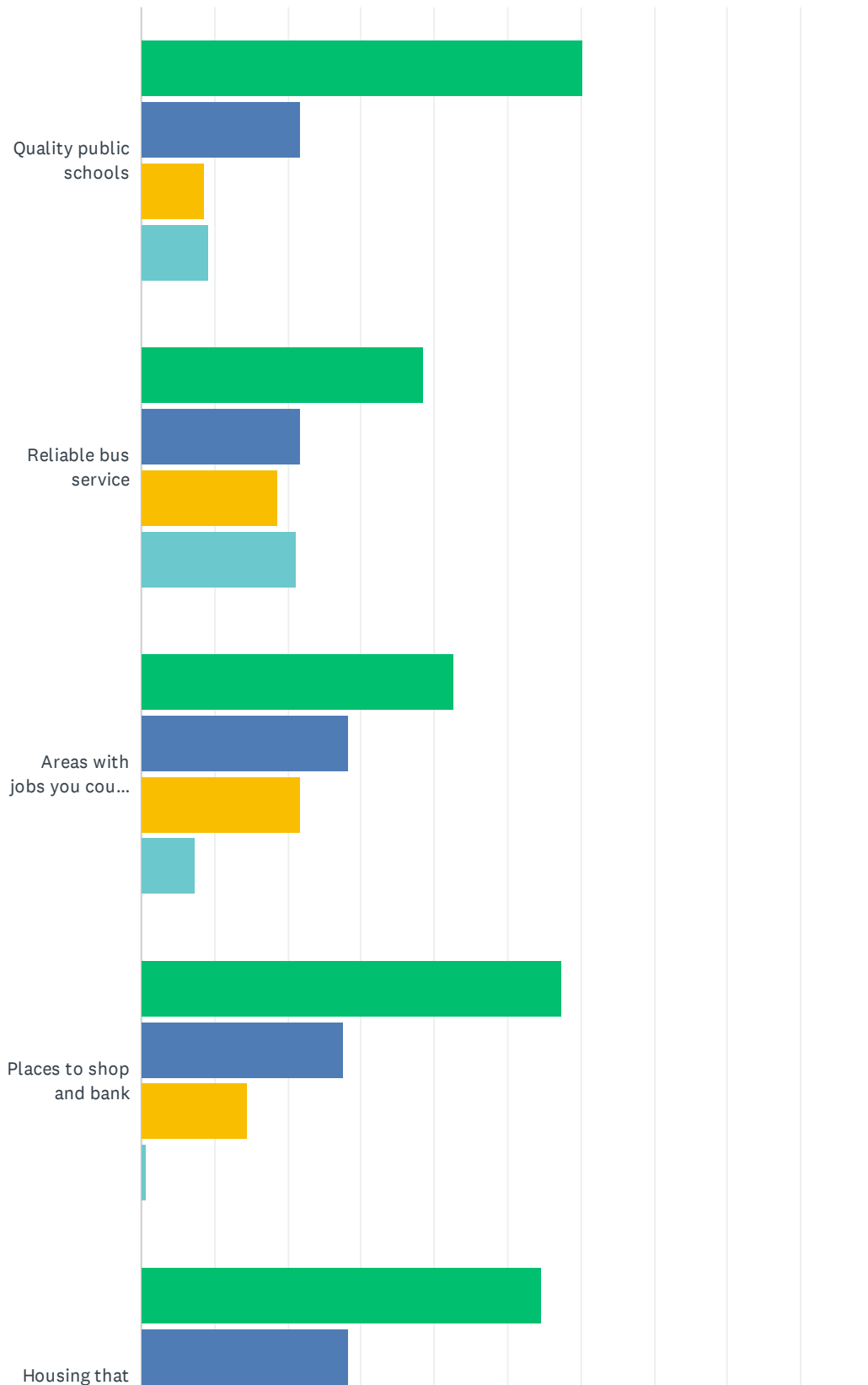
Answered: 147 Skipped: 23



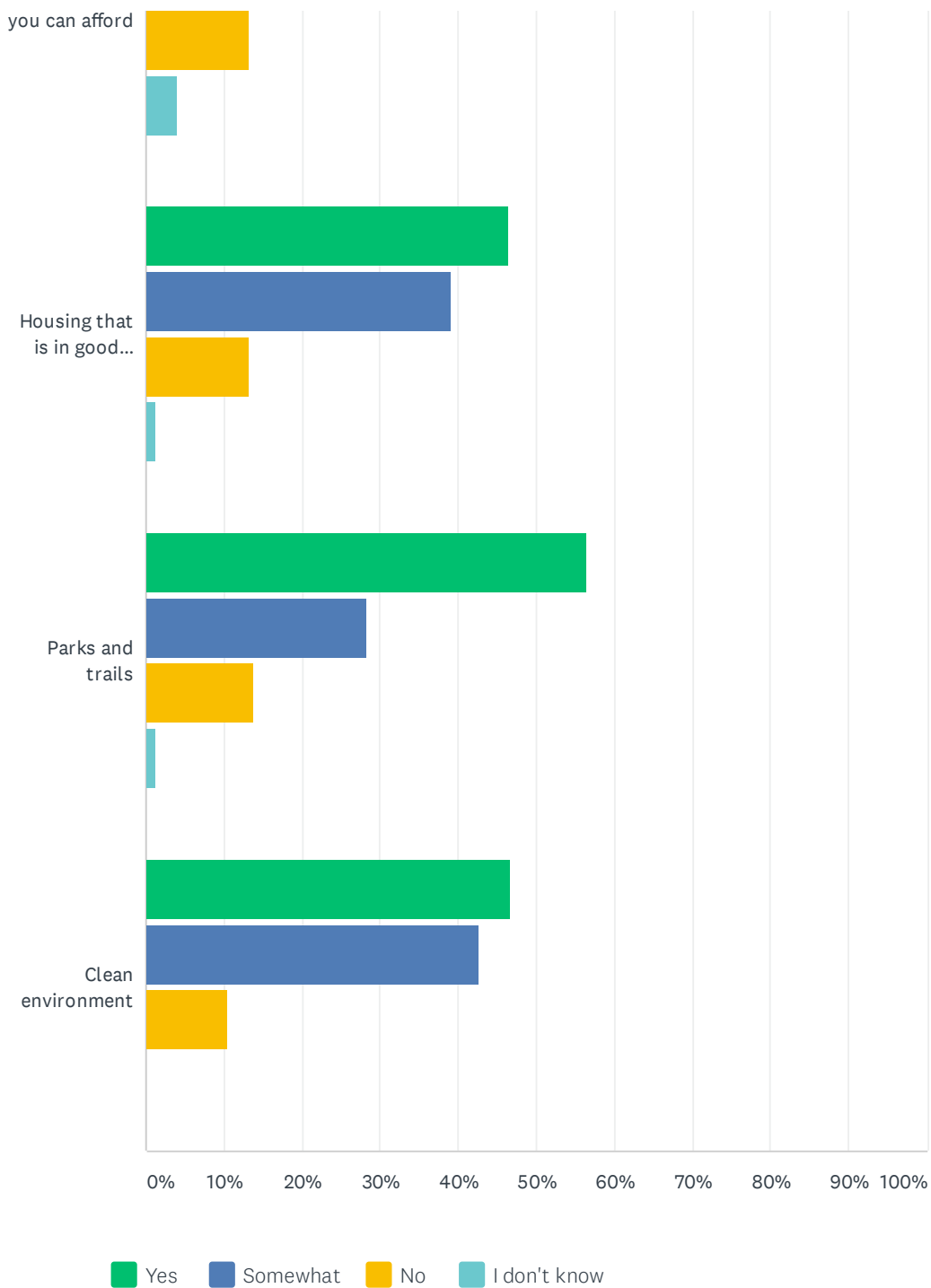
ANSWER CHOICES	RESPONSES	
No	55.78%	82
Yes, please list where and why you would choose that area:	44.22%	65
TOTAL		147

Q13 In your neighborhood, do you have access to the following community resources?

Answered: 152 Skipped: 18



Fair Housing Survey for Davenport, Moline, and Rock Island

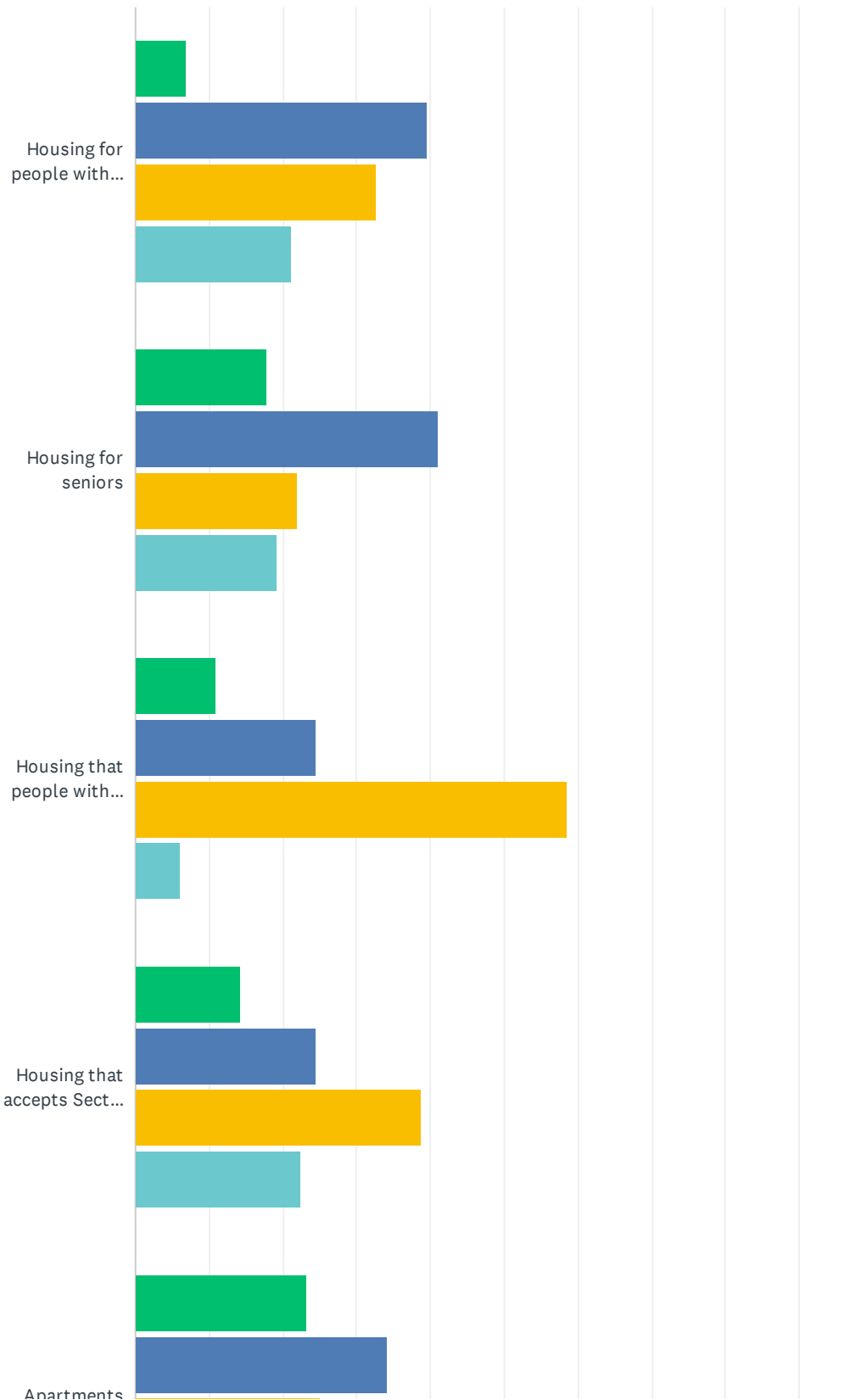


Fair Housing Survey for Davenport, Moline, and Rock Island

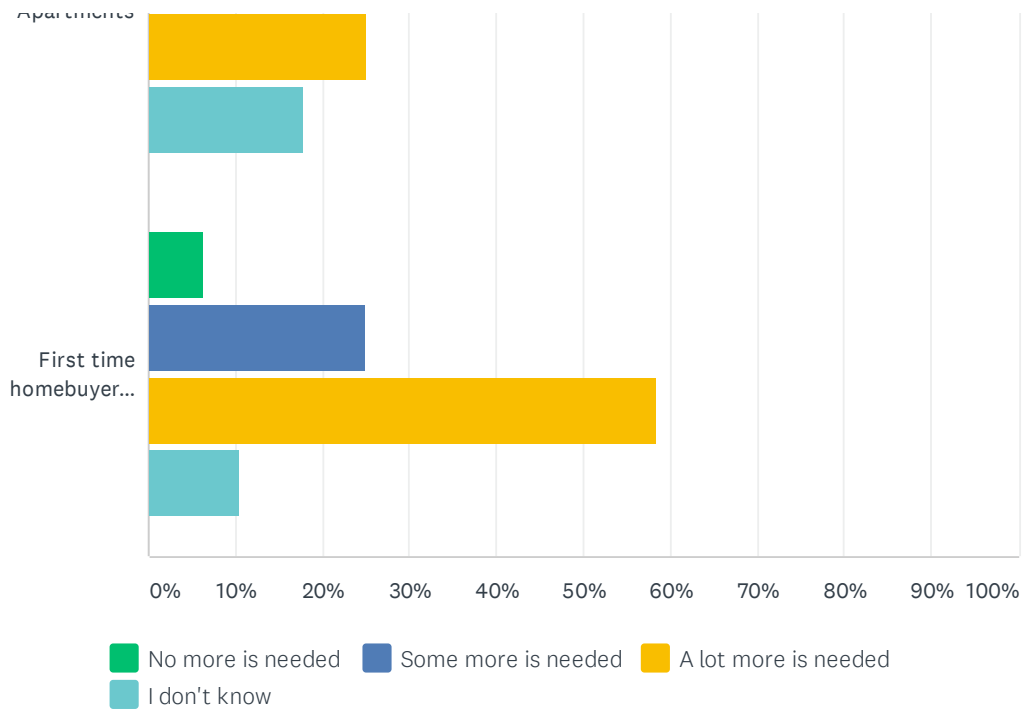
	YES	SOMEWHAT	NO	I DON'T KNOW	TOTAL	WEIGHTED AVERAGE
Quality public schools	60.26% 91	21.85% 33	8.61% 13	9.27% 14	151	2.57
Reliable bus service	38.41% 58	21.85% 33	18.54% 28	21.19% 32	151	2.25
Areas with jobs you could get	42.76% 65	28.29% 43	21.71% 33	7.24% 11	152	2.23
Places to shop and bank	57.24% 87	27.63% 42	14.47% 22	0.66% 1	152	2.43
Housing that you can afford	54.61% 83	28.29% 43	13.16% 20	3.95% 6	152	2.43
Housing that is in good condition	46.36% 70	39.07% 59	13.25% 20	1.32% 2	151	2.34
Parks and trails	56.58% 86	28.29% 43	13.82% 21	1.32% 2	152	2.43
Clean environment	46.71% 71	42.76% 65	10.53% 16	0.00% 0	152	2.36

Q14 Thinking about Davenport, Moline, and Rock Island, please check whether you think more is needed for each of the housing types below.

Answered: 147 Skipped: 23



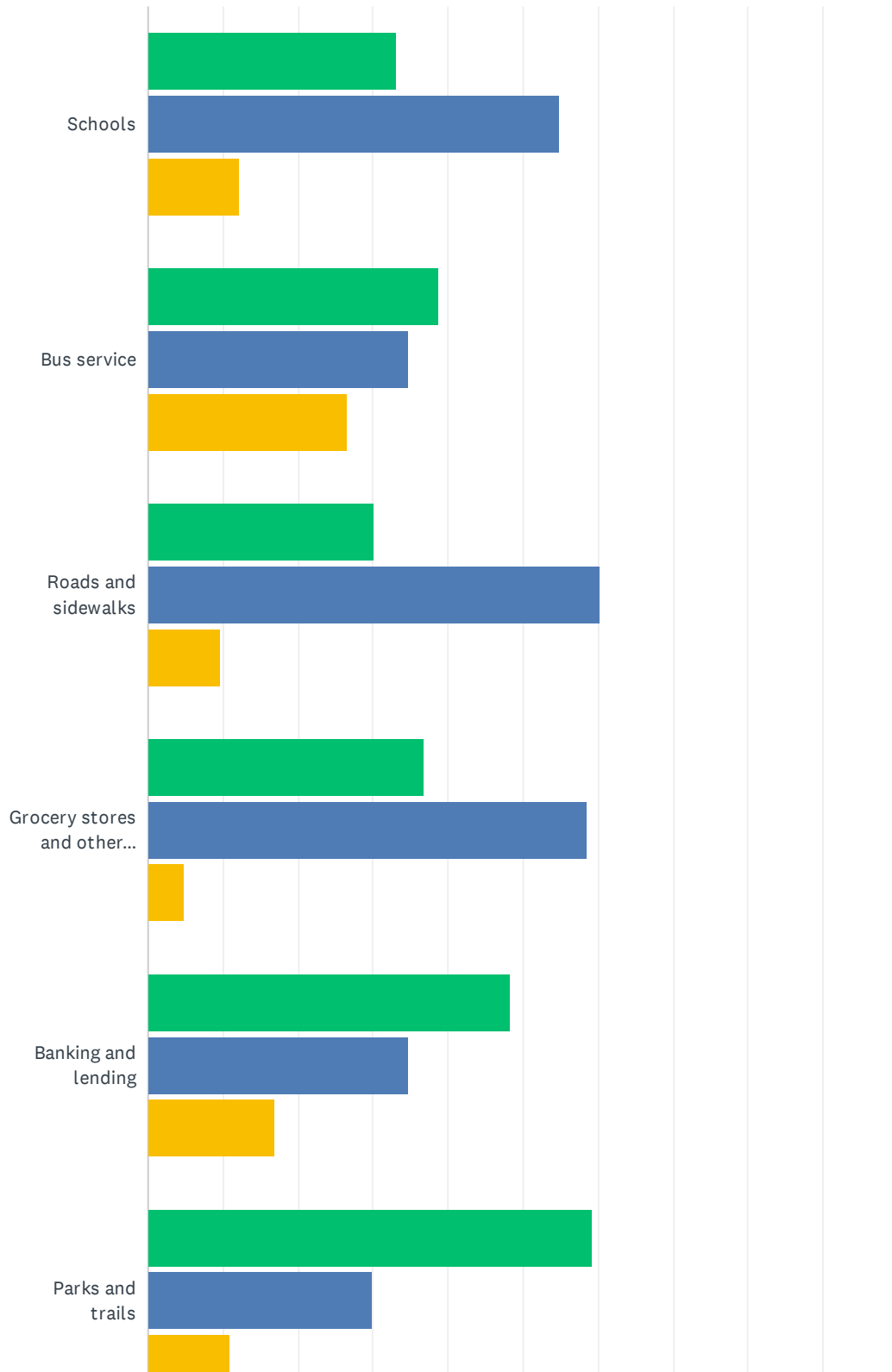
Fair Housing Survey for Davenport, Moline, and Rock Island



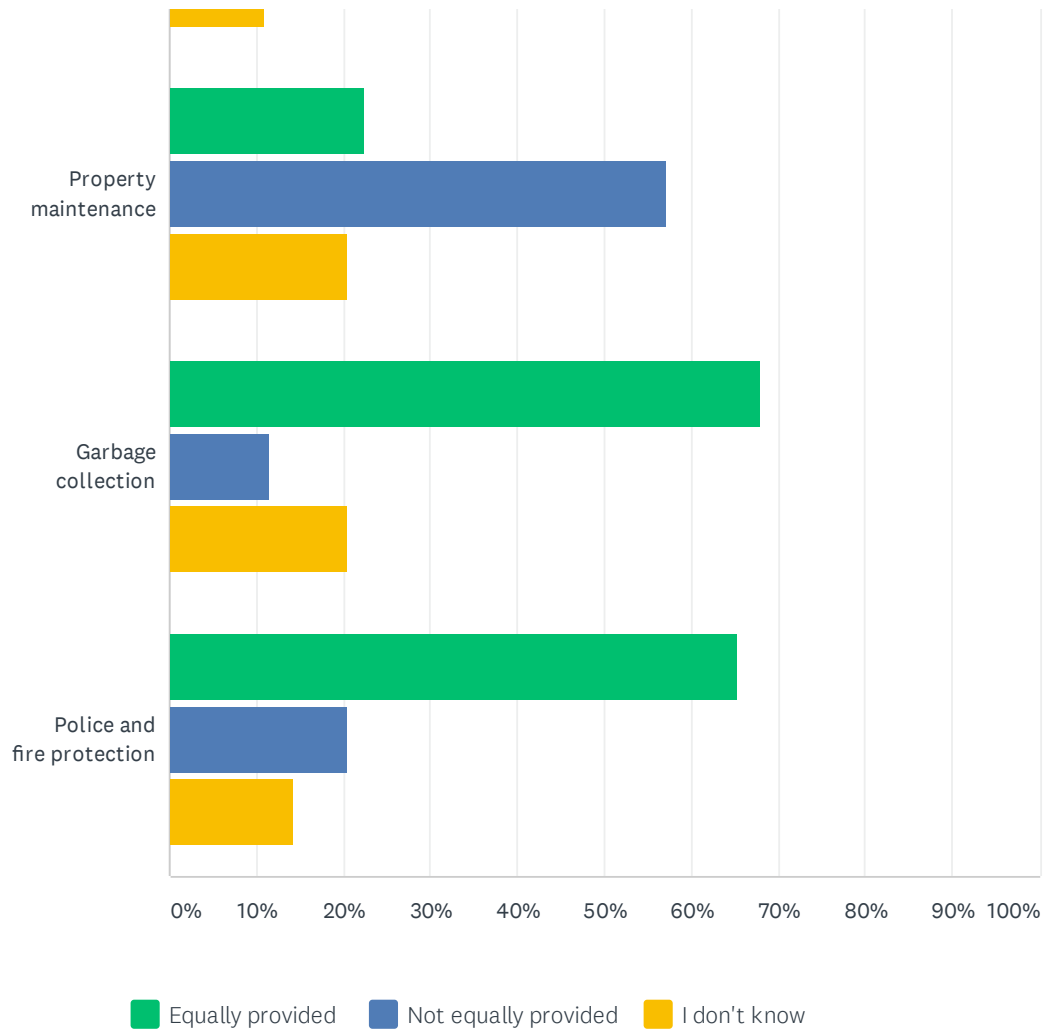
	NO MORE IS NEEDED	SOME MORE IS NEEDED	A LOT MORE IS NEEDED	I DON'T KNOW	TOTAL	WEIGHTED AVERAGE
Housing for people with disabilities	6.80% 10	39.46% 58	32.65% 48	21.09% 31	147	2.33
Housing for seniors	17.81% 26	41.10% 60	21.92% 32	19.18% 28	146	2.05
Housing that people with lower incomes can afford	10.88% 16	24.49% 36	58.50% 86	6.12% 9	147	2.51
Housing that accepts Section 8 vouchers	14.29% 21	24.49% 36	38.78% 57	22.45% 33	147	2.32
Apartments	23.13% 34	34.01% 50	25.17% 37	17.69% 26	147	2.02
First time homebuyer assistance	6.25% 9	25.00% 36	58.33% 84	10.42% 15	144	2.58

Q15 Thinking about Davenport, Moline, and Rock Island, please check whether you think each of the following are equally available and kept up in all areas.

Answered: 148 Skipped: 22



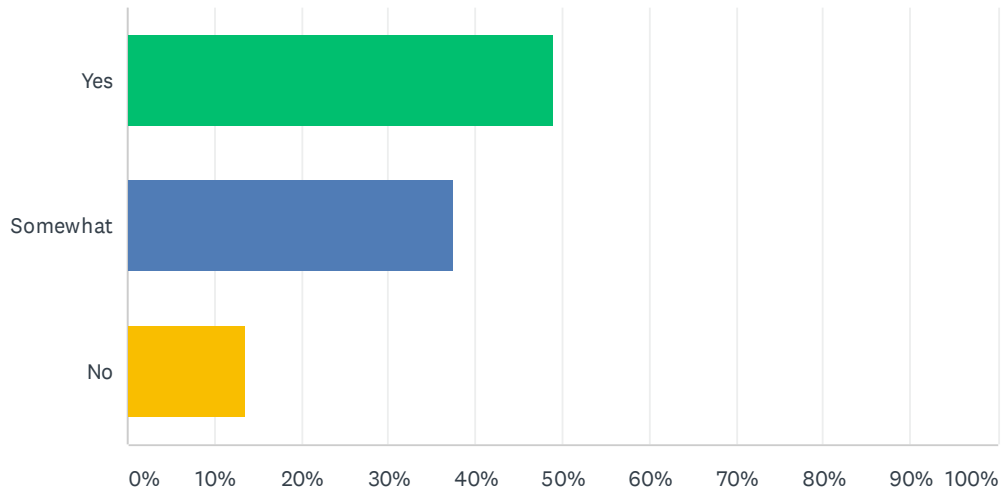
Fair Housing Survey for Davenport, Moline, and Rock Island



	EQUALLY PROVIDED	NOT EQUALLY PROVIDED	I DON'T KNOW	TOTAL	WEIGHTED AVERAGE
Schools	33.11% 49	54.73% 81	12.16% 18	148	1.38
Bus service	38.78% 57	34.69% 51	26.53% 39	147	1.53
Roads and sidewalks	30.14% 44	60.27% 88	9.59% 14	146	1.33
Grocery stores and other shopping	36.73% 54	58.50% 86	4.76% 7	147	1.39
Banking and lending	48.30% 71	34.69% 51	17.01% 25	147	1.58
Parks and trails	59.18% 87	29.93% 44	10.88% 16	147	1.66
Property maintenance	22.45% 33	57.14% 84	20.41% 30	147	1.28
Garbage collection	68.03% 100	11.56% 17	20.41% 30	147	1.85
Police and fire protection	65.31% 96	20.41% 30	14.29% 21	147	1.76

Q16 Do you understand your fair housing rights?

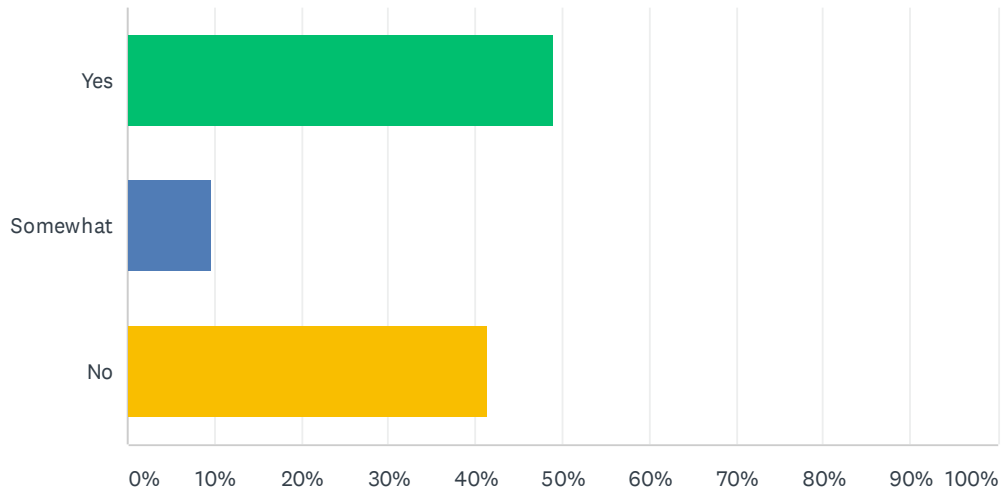
Answered: 147 Skipped: 23



ANSWER CHOICES	RESPONSES	
Yes	48.98%	72
Somewhat	37.41%	55
No	13.61%	20
TOTAL		147

Q17 Do you know where to file a housing discrimination complaint?

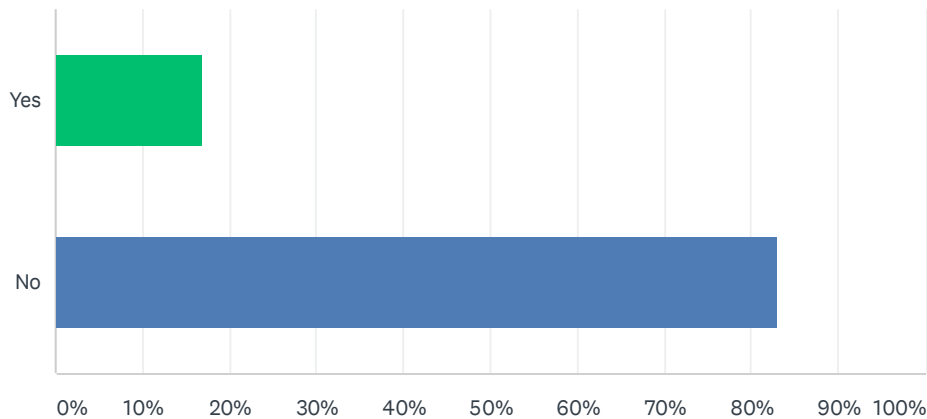
Answered: 147 Skipped: 23



ANSWER CHOICES	RESPONSES	
Yes	48.98%	72
Somewhat	9.52%	14
No	41.50%	61
TOTAL		147

Q18 Since living in this area, have you experienced housing discrimination? The following actions are examples of housing discrimination if they are based on race, ethnicity, national origin, sex, religion, whether you have children, or whether you have a disability: refusing to rent or sell housing, refusing to discuss the rental or sale of housing, saying that housing is not available for rent or sale when it is, having different rental or sale terms, or providing different housing or housing services.

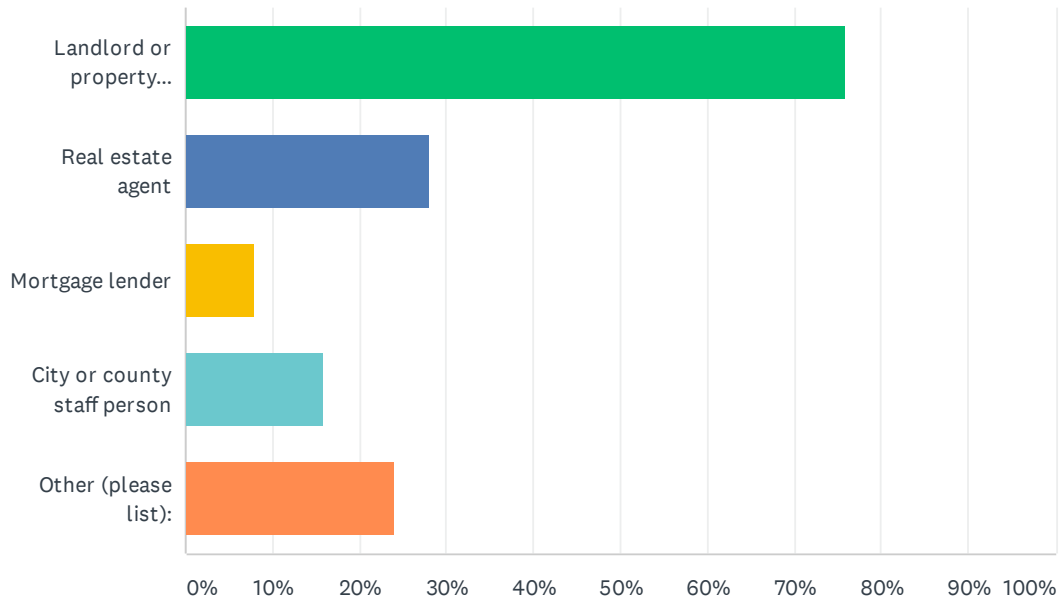
Answered: 147 Skipped: 23



ANSWER CHOICES	RESPONSES	
Yes	17.01%	25
No	82.99%	122
TOTAL		147

Q19 Who discriminated against you? (Check all that apply)

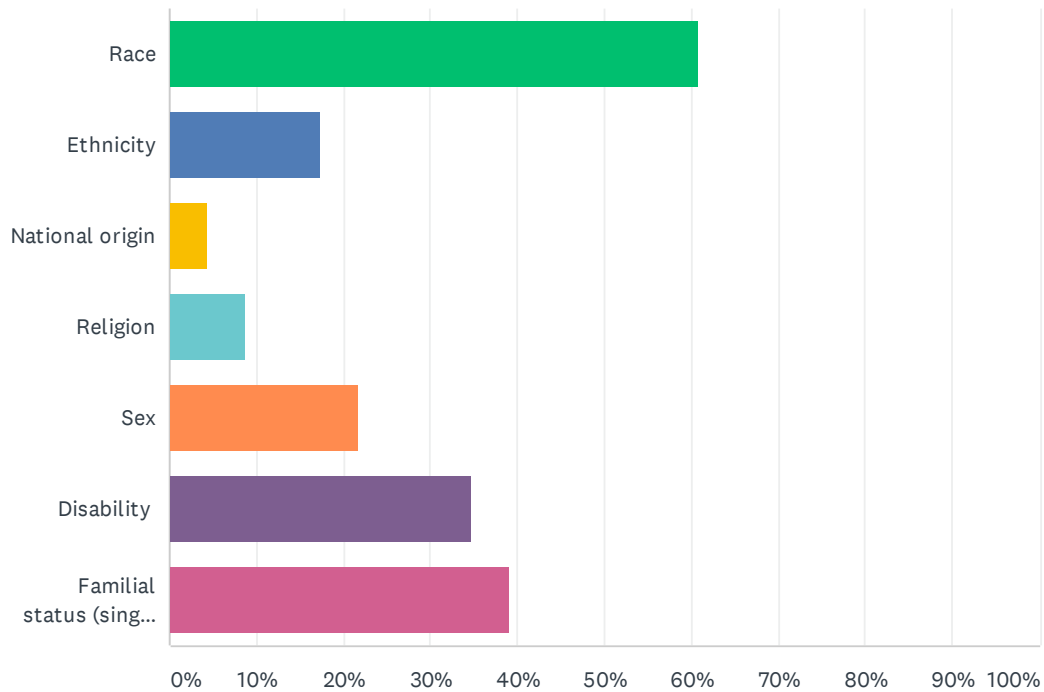
Answered: 25 Skipped: 145



ANSWER CHOICES	RESPONSES	
Landlord or property manager	76.00%	19
Real estate agent	28.00%	7
Mortgage lender	8.00%	2
City or county staff person	16.00%	4
Other (please list):	24.00%	6
Total Respondents: 25		

Q20 On what basis do you believe you were discriminated against? (Check all that apply)

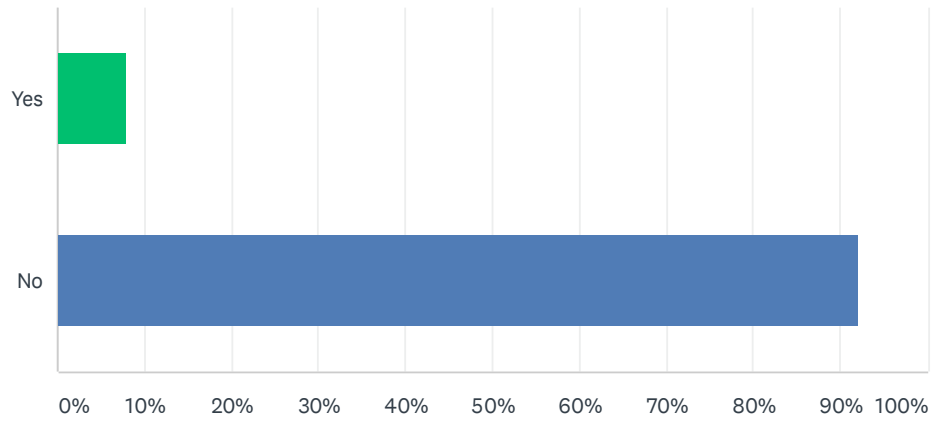
Answered: 23 Skipped: 147



ANSWER CHOICES	RESPONSES	
Race	60.87%	14
Ethnicity	17.39%	4
National origin	4.35%	1
Religion	8.70%	2
Sex	21.74%	5
Disability	34.78%	8
Familial status (single parent with children, family with children, expecting a child)	39.13%	9
Total Respondents: 23		

Q21 Did you file a report of that discrimination?

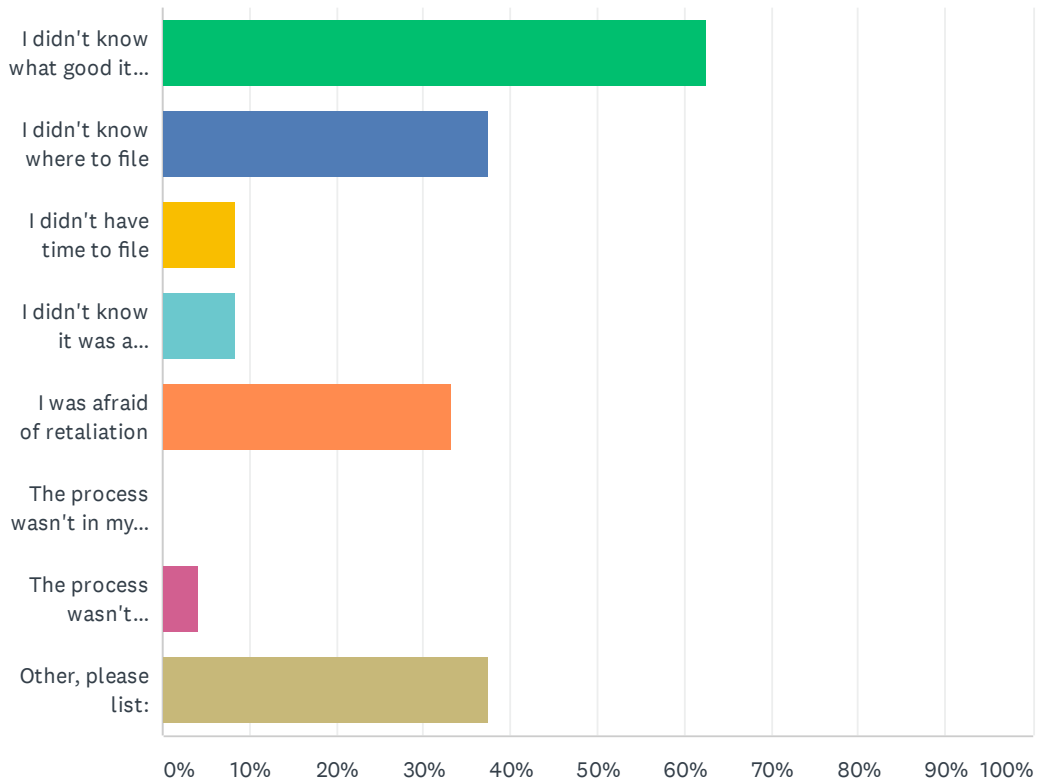
Answered: 25 Skipped: 145



ANSWER CHOICES	RESPONSES	
Yes	8.00%	2
No	92.00%	23
TOTAL		25

Q22 If you answered NO, why didn't you file? (Check all that apply)

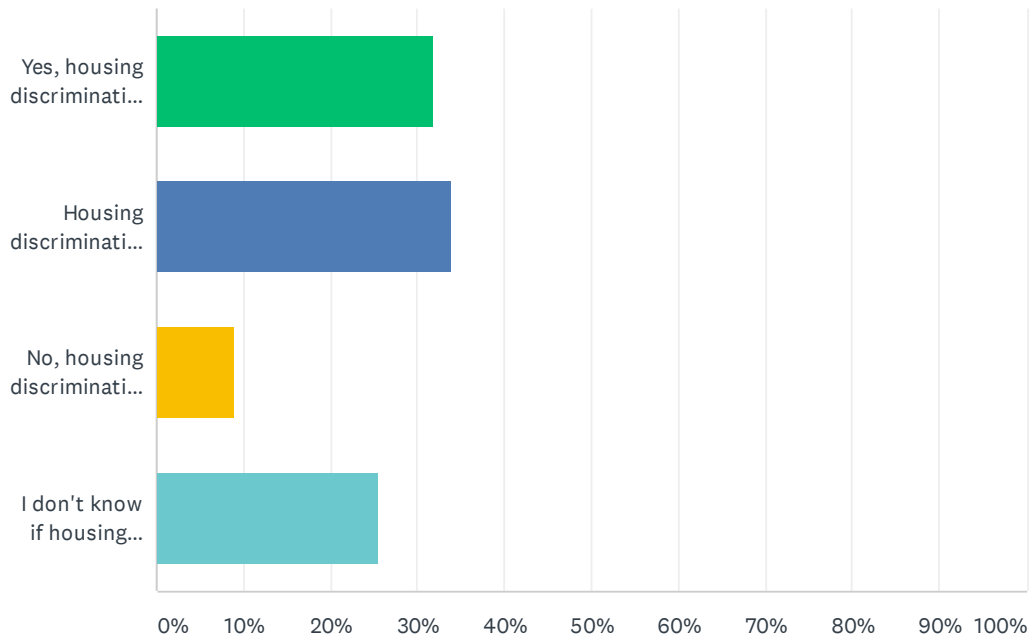
Answered: 24 Skipped: 146



ANSWER CHOICES	RESPONSES	
I didn't know what good it would do	62.50%	15
I didn't know where to file	37.50%	9
I didn't have time to file	8.33%	2
I didn't know it was a violation of the law	8.33%	2
I was afraid of retaliation	33.33%	8
The process wasn't in my language	0.00%	0
The process wasn't accessible to me because of a disability	4.17%	1
Other, please list:	37.50%	9
Total Respondents: 24		

Q23 Do you think housing discrimination is an issue in Davenport, Moline, and Rock Island?

Answered: 145 Skipped: 25

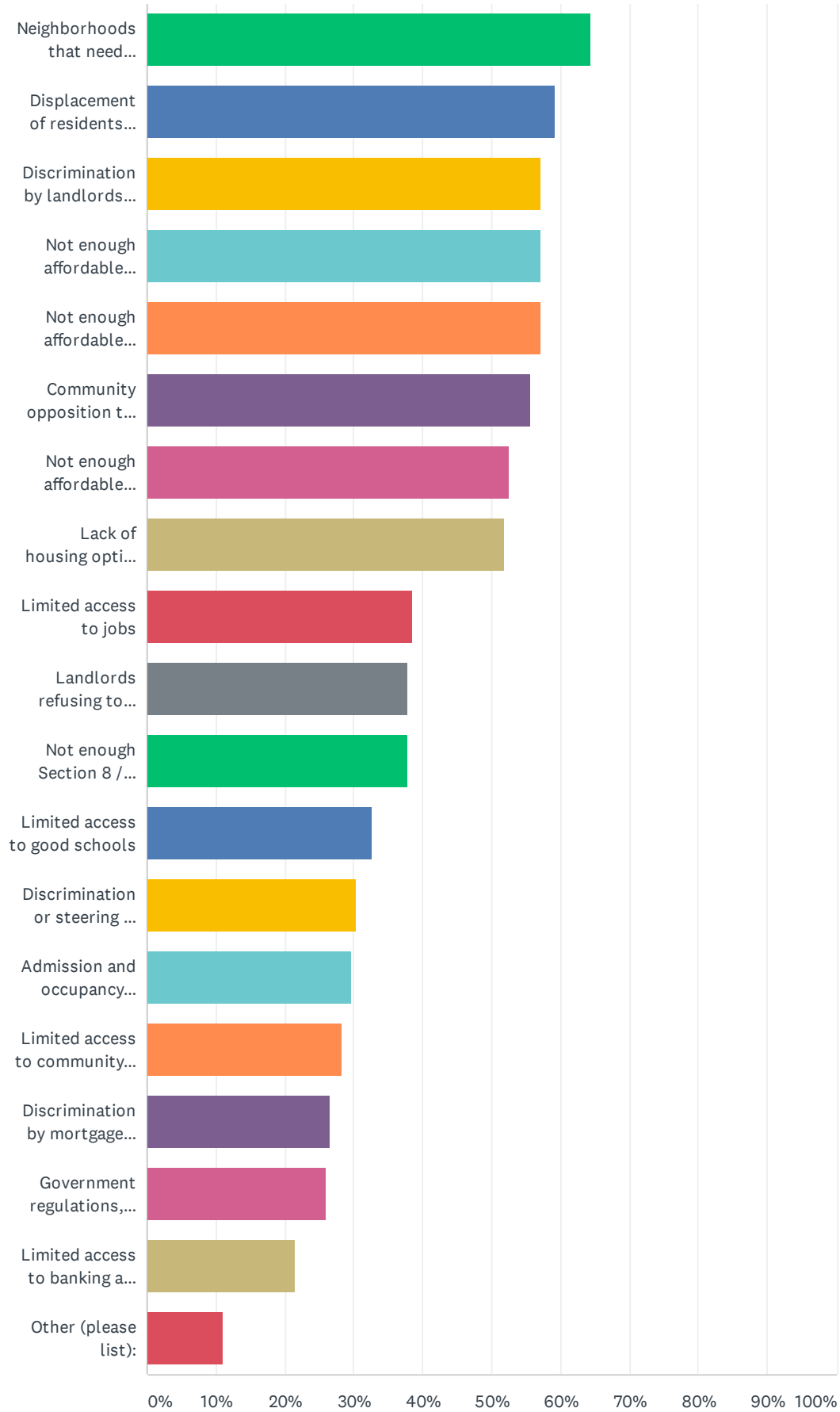


ANSWER CHOICES	RESPONSES	
Yes, housing discrimination is an issue	31.72%	46
Housing discrimination may be an issue	33.79%	49
No, housing discrimination is not an issue	8.97%	13
I don't know if housing discrimination is an issue	25.52%	37
TOTAL		145

Q24 Do you think any of the following are barriers to fair housing in Davenport, Moline, and Rock Island? (Check all that apply)

Answered: 135 Skipped: 35

Fair Housing Survey for Davenport, Moline, and Rock Island



Fair Housing Survey for Davenport, Moline, and Rock Island

ANSWER CHOICES	RESPONSES	
Neighborhoods that need revitalization and new investment	64.44%	87
Displacement of residents due to rising housing costs	59.26%	80
Discrimination by landlords or rental agents	57.04%	77
Not enough affordable rental housing for individuals	57.04%	77
Not enough affordable rental housing for large families	57.04%	77
Community opposition to affordable housing	55.56%	75
Not enough affordable rental housing for small families	52.59%	71
Lack of housing options for people with disabilities	51.85%	70
Limited access to jobs	38.52%	52
Landlords refusing to accept vouchers	37.78%	51
Not enough Section 8 / Housing Choice Vouchers to meet needs	37.78%	51
Limited access to good schools	32.59%	44
Discrimination or steering by real estate agents	30.37%	41
Admission and occupancy policies in public housing	29.63%	40
Limited access to community resources for people with disabilities	28.15%	38
Discrimination by mortgage lenders	26.67%	36
Government regulations, ordinances, or policies	25.93%	35
Limited access to banking and financial services	21.48%	29
Other (please list):	11.11%	15
Total Respondents: 135		

Q25 Please use the box below to provide any additional information about housing choice and fair housing in Davenport, Moline, and Rock Island.

Answered: 32 Skipped: 138

APPENDIX III

ZONING ANALYSIS MATRICES

Because zoning codes present a crucial area of analysis for a study of impediments to fair housing choice, the latest available zoning ordinances of Davenport, Moline, and Rock Island were reviewed and evaluated against a list of ten common fair housing issues. Taken together, these issues give a picture of (1) the degree to which exclusionary zoning provisions may impact affordable housing opportunities within those jurisdictions and (2) the degree to which the zoning code may impact housing opportunities for persons with disabilities. The zoning ordinance was assigned a risk score of either 1, 2, or 3 for each of the ten issues and was then given an aggregate score calculated by averaging the individual scores, with the possible scores defined as follows:

1 = low risk – the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice;

2 = medium risk – the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread;

3 = high risk – the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

The following matrices list the 10 issues reviewed, the jurisdiction's score for each issue, citations to relevant statutes and code sections, and explanatory comments.

Zoning Analysis Matrix City of Davenport, Iowa

Average Total Risk Score: **1.5**

Key to Risk Scores:

1 = low risk – the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice.

2 = medium risk – the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread.

3 = high risk – the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

Source Documents:

Davenport Building Codes, available at: <http://cityofdavenportiowa.com/cms/One.aspx?portalId=6481456&pageId=14252425>

Davenport Zoning Ordinance, available at
http://cityofdavenportiowa.com/our_community/building_land_development/codes_and_regulations/zoning

Davenport Zoning Map, available at:
<https://davenportiowa.maps.arcgis.com/apps/webappviewer/index.html?id=8ee7347728184fa1999dd5d7cf8819b1>

Zoning Analysis Matrix City of Davenport, Iowa

Issue	Conclusion	Risk Score	Comments
<p>1a. Does the jurisdiction's definition of "family" have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive?</p> <p>1b. Does the definition of "family" discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?</p>	<p>The City of Davenport recently amended its ordinance to completely remove a "family" definition, so as to make no distinction or limitation on the number of people, related or unrelated, who may live together in a dwelling unit.</p> <p>Group living for persons with disabilities is regulated separately. <i>See</i> Issue 2 below.</p>	1	<p><i>See</i> Davenport Zoning Ordinance Sec. 17.02 (Definitions) and 17.08.050 (Use Definitions).</p>
<p>2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.?</p> <p>2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?</p>	<p>The definitions section contains definitions for the following uses: Drug/Alcohol Treatment Facility, Domestic Violence Shelter, Group Home, Homeless Shelter, Residential Care Facility, Treatment and Recovery Facility. Residential.</p> <p>Group homes are allowed by right in nearly all residential zoning districts provided that, when a group home is located within an existing residential structure, the location, design, and operation of such facility must not alter the residential character of the structure. Treatment facilities for drug and alcohol addiction, however, always require a special use permit and then can only be sited in commercial and industrial districts. Residential Care Facilities and Domestic Violence Shelters are allowed in the R-MF district.</p>	1	<p><i>See</i> Sec. 17.08.050 (Use Definitions); Sec. 17.08-1 (Use Matrix); Sec. 17.08.030 (Principal Use Standards).</p> <p>A Joint Statement by the DOJ and HUD advises that "State and local governments' enforcement of neutral requirements regarding safety, licensing, and other regulatory requirements governing group homes do not violate the Fair Housing Act so long as the ordinances are enforced in a neutral manner, they do not specifically target group homes, and they do not have an unjustified discriminatory effect on persons with disabilities who wish to reside</p>

Zoning Analysis Matrix
City of Davenport, Iowa

			<p>in group homes.” JOINT STATEMENT OF THE DEPT. OF HOUSING AND URBAN DEVELOPMENT AND DEPT. OF JUSTICE, <i>State and Local Land Use Laws and Practices and the Application of the Fair Housing Act</i>, Nov. 10, 2016.</p>
<p>3a. Do the jurisdiction’s policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements?</p> <p>3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?</p>	<p>Davenport has not adopted a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements.</p> <p>The Board of Adjustments holds the power to hear and decide applications for variances following the public notice and hearing process. This is required for any applicant seeking a variance and is not limited to housing for persons with disabilities. Whereas simple administrative procedures may be adequate for the granting of a reasonable accommodation, the variance procedures subject the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities and unfounded speculations about the impact on neighborhoods or threats to safety may impact the outcome. Although the FHA does not require a specific process for receiving and deciding requests for reasonable accommodation, as a matter of equity, transparency, and uniformity, it is advisable that local jurisdictions adopt a standardized process.</p>	<p style="text-align: center;">2</p>	<p>See Sec. 17.13.030 (Zoning Board of Adjustment); Sec. 17.14.060 (Hardship Variance).</p> <p>The code provides a process for requesting a variance, however, the purpose of a variance is not congruent with the purpose of requesting a reasonable accommodation, as a variance requires a showing of special circumstances or conditions applying to the land.</p> <p>In contrast, a reasonable accommodation is to allow individuals with disabilities to have equal access to use and enjoy housing. The jurisdiction does not comply with its duty to provide reasonable accommodation if it applies a standard based on the physical characteristics of the property rather than considering the need for modification based on</p>

Zoning Analysis Matrix
City of Davenport, Iowa

			the disabilities of the residents.
4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?	<p>Residential drug or alcohol treatment facilities, halfway houses for people who have exited a correctional setting, and homeless shelters all require a special use permit to be located anywhere, and then must be sited in a commercial or industrial zoning district. These facilities must be spaced a minimum of 1,000 feet apart from one another and at least 300 feet from any residential area.</p> <p>This requirement could have a disproportionate impact on protected persons, specifically persons with disabilities. Where a certain number of unrelated persons are permitted by local ordinance to reside together in a home, it would violate the FHA for the local ordinance to impose a spacing requirement on residential group homes that do not exceed that permitted number of residents because the spacing requirement would be a condition imposed on persons with disabilities that is not imposed on persons without disabilities.</p>	2	<p>See Sec. 17.08-1 (Use Matrix); Sec. 17.08.030 (Principal Use Standards).</p> <p>See JOINT STATEMENT OF THE DEPT. OF HOUSING AND URBAN DEVELOPMENT AND DEPT. OF JUSTICE, <i>State and Local Land Use Laws and Practices and the Application of the Fair Housing Act</i>, Nov. 10, 2016.</p>
5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?	<p>Drug/Alcohol Treatment Facility, Residential is not allowed in any residential zoning district and requires a Specific Use Permit in districts in which it is allowed.</p> <p>While housing for persons with disabilities may be subject to state and local regulations related to health and safety, they cannot be excluded from residential districts altogether and such regulations must not be based on stereotypes or presumptions about specific types of disabilities.</p>	2	See Sec. 17.08-1 (Use Matrix); Sec. 17.08.030 (Principal Use Standards).
6. Does the jurisdiction's zoning and land use rules constitute exclusionary zoning that	Davenport's zoning code and map divide the City's residential districts into low density (R-1 and R-2),	1	See Sec. 17.04.030 (Dimensional Standards); Sec

Zoning Analysis Matrix
City of Davenport, Iowa

<p>precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?</p>	<p>moderate density (R-3) dense (R-4), high density (R-MF), and mobile home park (R-7). Minimum single-family lot sizes range from 20,000 sq. ft. per unit in the R-1 district; 10,000 sq. ft. in the R-2 district; 7,500 sq. ft. in the R-3 district; and 6,000 sq. ft. in the R-4 and R-MF districts. Although the minimum lot sizes for R-1 and R-2 are large and may make the construction of affordable housing in these districts challenging, the zoning map shows that these districts are not widespread throughout the city. R-3, with a 7,500 minimum, is more common, though this is still a fairly large lot on which to provide affordable housing. Much of the central city is zoned R-4.</p> <p>Front setbacks are 20 feet or more in all zoning districts. Building height appears to be limited to approximately 3 stories in all districts except R-MF, which allow up to 70 feet. Two-family units are allowed in all these districts except R-1 and R-2 districts with somewhat larger minimum lot area for two-family developments and other requirements.</p> <p>There are no floor area ratio, minimum bedroom, or minimum livable floor area standards. Parking requirements are the same across all single-family zoning districts, a minimum of two spaces per dwelling unit.</p> <p>PUDs (Planned Unit Developments) permit City Council to approve a plan for the use and development of all the tract of land for residential and allied purposes. The standards of the underlying zoning district apply unless modified in the PUD. Planned communities require additional design</p>	<p>17.14.080 (Planned Unit Development); Sec. 17.10.010 (Off-Street Parking and Loading, General Requirements).</p>
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Zoning Analysis Matrix
City of Davenport, Iowa

	requirements, permitting and review processes compared to traditional residential zoning.		
<p>7a. Does the zoning ordinance fail to provide residential districts where multi-family housing is permitted as of right? Are multifamily dwellings excluded from all single family dwelling districts?</p> <p>7b. Do multi-family districts restrict development only to low-density housing types?</p>	<p>Multifamily dwellings are allowed in the R-MF district. In addition, several commercial districts, C-T, C-1, C-2, C-3, C-D, C-V, and C-E allow multifamily dwellings.</p> <p>Single family lots in R-MF are required to be a minimum of 6,000 square feet, but for multifamily housing in the R-MF zoning district, a minimum of 1,500 square feet per unit is required. This equates to about 29 units per acre. Though the R-MF district allows building heights up to 70 feet, the minimum 1,500 square feet per acre maximum makes any development approaching the maximum height unlikely.</p> <p>There are no floor area ratio, minimum bedroom, or minimum livable floor area standards. A minimum of 1.5 spaces per dwelling unit are required. The zoning map shows a number of multi-family zoned tracts throughout the city.</p>	1	<p>See Sec. 17.04.030 (Dimensional Standards); Sec. 17.10.010 (Off-Street Parking and Loading, General Requirements).</p> <p>Although a cursory review of the zoning map was done to verify that districts identified in the code were applied to significant areas within the city, a determination of whether a sufficient portion of the residential zones of Davenport are zoned for multifamily development to meet demand was not made. Availability of land may impact the feasibility of developing new multifamily housing to meet demand. Permissive regulations do not necessarily translate into sufficient development of affordable housing, as other factors like housing prices and rents, market conditions, existing land-uses, public services and infrastructure, construction costs, demand for higher-end multifamily housing, and other planning goals also have an impact on the quantity of</p>

Zoning Analysis Matrix
City of Davenport, Iowa

<p>8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?</p>	<p>The code defines "accessory dwelling unit" as an additional dwelling unit incidental to a principal single-family dwelling on the same lot with separate cooking and sanitary facilities, and with its own legal means of ingress and egress. These units are expressly allowed in the R-1, R-2, R-3, and R-4 zoning districts; Accessory dwelling units are not listed as an allowable use in any other zoning district. Manufactured homes are allowed only in the MHP zoning district, but within that district do not necessarily have to be located within a manufactured home park.</p>	<p>2</p>	<p>multifamily. <i>See</i> Sec. 17.08.050 (Use Definitions); Sec. 17.08-1 (Use Matrix); Sec. 17.08.030 (Principal Use Standards).</p>
<p>9a. Are the jurisdiction's design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act's accessibility standards for design and construction?</p> <p>9b. Is there any provision for monitoring compliance?</p>	<p>Davenport has adopted the 2015 versions of the International Building and Residential Codes, with state and local amendments, including the IBC's accessibility standards. While the 2015 IBC edition is not one of the ten HUD-recognized safe harbors for compliance with the FHA's design and construction requirements, it is substantially similar to the 2006 IBC which HUD has recognized as a safe harbor for meeting the FHA's accessibility requirements. In addition, Chapter 11 of the 2015 IBC requires that buildings and facilities comply with the accessibility requirements of <i>ICC/ANSI A117.1 Accessible and Usable Buildings and Facilities</i> standard, which is a nationally recognized standard for making buildings accessible.</p> <p>The building official is authorized within the city's code to enforce all the provisions of the administrative code and the referenced technical codes. For such purposes, he shall have the powers and duties of a law enforcement officer as provided for in the Code of Iowa. The Building Code requires</p>	<p>1</p>	<p><i>See</i> Code of Ordinances, Title 15, Buildings and Building and Construction.</p>

Zoning Analysis Matrix
City of Davenport, Iowa

	permits and inspections.		
10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?	The City has not adopted specific development incentives like inclusionary zoning, reduced parking, design waivers, variances, or expedited permitting for the development of affordable or low-income housing or housing for protected classes.	2	

Zoning Analysis Matrix City of Moline, Illinois

Average Total Risk Score: **1.6**

Key to Risk Scores:

1 = low risk – the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice.

2 = medium risk – the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread.

3 = high risk – the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

Source Documents:

Moline Zoning Ordinance, available at: <http://moline.il.us/DocumentCenter/View/155/Chapter35---Zoning-and-Land-Development?bidId=>

Moline Zoning Map, available at: https://www.moline.il.us/DocumentCenter/View/363/Moline_Zoning?bidId=

Moline Building Code, available at <http://moline.il.us/DocumentCenter/View/123/Chapter08---Buildings-and-Other-Construction-and-?bidId=>

Zoning Analysis Matrix
City of Moline, Illinois

<p>2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.?</p> <p>2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?</p>	<p>The zoning code regulates housing for persons with disabilities along with other Group and Institutional land uses as follows:</p> <p><u>Institutional</u>: retirement homes, nursing homes, convents, and dormitories, care home, large, halfway house, and</p> <p><u>Group</u>: child welfare agencies, group homes for children, and community based residential facilities (though this term is not further defined in the code), care home, small residential, residential care homes, human care institution, and unrelated group family use.</p> <p>Such uses provide shelter to two or more unrelated individuals living together as a single housekeeping unit. They are defined as either “large or “small:”</p> <p><u>Small</u>. A use with eight or fewer residents, plus supervisory or overnight personnel.</p> <p><u>Large</u>. A use with more than eight residents, plus supervisory or overnight personnel.</p> <p>There are additional location and capacity requirements for each.</p> <p>Small facilities are allowed by right in C-2, AG-2, R-4, R-6, and R-7. They require a Special Use Permit in R-1, O-1, and B-2. Large facilities are not allowed by right in any zoning district and require a Special Use Permit in R-2, R-4, R-6, R-7, O-1, ORT, B-2, B-3, and B-4.</p> <p>Residential care facilities for less than four residents should be permitted by right in residential areas equally with other single-family</p>	<p style="text-align: center;">2</p>	<p><i>See Sec. 35-3405.m (Group/Institutional Residential)</i></p> <p>A Joint Statement by the DOJ and HUD advises that “State and local governments’ enforcement of neutral requirements regarding safety, licensing, and other regulatory requirements governing group homes do not violate the Fair Housing Act so long as the ordinances are enforced in a neutral manner, they do not specifically target group homes, and they do not have an unjustified discriminatory effect on persons with disabilities who wish to reside in group homes.”</p> <p>JOINT STATEMENT OF THE DEPT. OF HOUSING AND URBAN DEVELOPMENT AND DEPT. OF JUSTICE, <i>State and Local Land Use Laws and Practices and the Application of the Fair Housing Act</i>, Nov. 10, 2016.</p>
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Zoning Analysis Matrix
City of Moline, Illinois

	<p>uses (in the R-1 zone for instance), although they could also be subject to additional licensing and inspection requirements, presumably for the safety of the residents, beyond that required by state regulators. Residential care facilities for four or more residents may be permitted by right in only certain districts provided that the locations are not more restrictive than similarly situated housing for four or more unrelated individuals not requiring in-home, supportive services for disabilities. Subjecting all large facilities to the additional requirements of Special Use Permits, including approval by the Plan Commission, is an additional restriction to which other multifamily housing is not subjected, as are the spacing and capacity requirements (see #4 below).</p>		
<p>3a. Do the jurisdiction's policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements?</p> <p>3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?</p>	<p>Moline has adopted a process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. Notification of surrounding property owners is required, and the plan commission may receive citizen input at their discretion.</p> <p>Although the FHA does not require a specific process for receiving and deciding requests for reasonable accommodation, as a matter of equity, transparency, and uniformity, it is advisable that local jurisdictions adopt a standardized process. The process adopted by the City allows for special accommodations that do not meet the strict hardship requirements of a variance. However, they are at the discretion of the Plan Commission, and subjecting the applicant to the public hearing process where there is the potential that community opposition based on stereotypical</p>	1	<p>See Sec. 35.3401.3 (Land Uses Permitted as a Special Use).</p>

Zoning Analysis Matrix
City of Moline, Illinois

	<p>assumptions about people with disabilities and unfounded speculations about the impact on neighborhoods or threats to safety may impact the outcome.</p>		
<p>4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?</p>	<p>No small group residential use shall be established within 2,500 feet of any other such use regardless of its capacity.</p> <p>Among large facilities, all institutional residential structures shall be located a minimum of 50 feet from any residentially zoned property which does not contain an institutional residential land use. Also, no community living arrangement shall be established within 2,500 feet of any other such facility, regardless of capacity.</p> <p>These requirements could have a disproportionate impact on protected persons, specifically persons with disabilities. Where a certain number of unrelated persons are permitted by local ordinance to reside together in a home, it would violate the FHA for the local ordinance to impose a spacing requirement on residential housing types that do not exceed that permitted number of residents because the spacing requirement would be a condition imposed on persons with disabilities that is not imposed on persons without disabilities. The nearly half-mile spacing requirement is especially restrictive.</p>	<p>3</p>	<p><i>See Sec. 35-3405.m (Group/Institutional Residential).</i></p> <p><i>See JOINT STATEMENT OF THE DEPT. OF HOUSING AND URBAN DEVELOPMENT AND DEPT. OF JUSTICE, State and Local Land Use Laws and Practices and the Application of the Fair Housing Act, Nov. 10, 2016.</i></p>

Zoning Analysis Matrix

City of Moline, Illinois

<p>5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?</p>	<p>Halfway Houses and Group Homes are included along with other Group/Institutional Land Uses. Presumably treatment facilities would be defined as community based residential facilities though this is not explicit in the code. As discussed in #2 above, small care facilities as defined by the City require a Special Use Permit in R-1, though they are allowed by right in the other residential districts, and large care facilities require a Special Use Permit in any residential zoning district.</p> <p>This disparate treatment may violate the FHA. While housing for persons with disabilities may be subject to state and local regulations related to health and safety, they cannot be excluded from residential districts altogether and such regulations must not be based on stereotypes or presumptions about specific types of disabilities.</p>	2	<p><i>See Sec. 35-3405.m (Group/Institutional Residential)</i></p>
<p>6. Does the jurisdiction's zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?</p>	<p>The zoning code and map divide the City's residential districts into a single-family district, R-2, a one to six family district, R-4, a multifamily district, R-6, and a manufactured home district, R-7. The minimum lot size for R-2 is 6,000 square feet, and all other districts have a minimum of 5,000 square feet. R-4 requires 3,000 square feet per unit for multiple unit developments. Parking requirements are the same across all zoning districts, a minimum of three spaces per dwelling unit, which is fairly high. Front setbacks are 25 feet or more in all zoning districts. Height is limited to 2.5 stories in R-2 and R-4 and 12 stories in R-6 and R-7. Floor area ratio is limited but only for non-residential uses. There are no minimum bedroom or minimum livable floor area standards.</p>	1	<p><i>See Sec. 35-3204 ("R-2" One Family Residence District); Sec. 35-3205 ("R-4" One to Six Family Residence District); Sec. 35-3206 ("R-6" Multi-Family Residence District); Sec. 35-3207 ("R-7" Mobile Home Park District); Table 35-3201.1 (Residential and Resource Districts Principal Structure Bulk Standards); Table 35-5100.3 (Minimum Required Parking Spaces)</i></p>

Zoning Analysis Matrix
City of Moline, Illinois

	<p>PUDs (Planned Unit Development) allow variation from base standards in exchange for certain benefits, including needed housing types and/or mix. PUDs use the base zoning districts described above but allow modification to bulk, development, improvement, and other standards. However, planned communities do require additional design requirements, permitting and review processes compared to traditional residential zoning.</p>		
<p>7a. Does the zoning ordinance fail to provide residential districts where multi-family housing is permitted as of right? Are multifamily dwellings excluded from all single family dwelling districts?</p> <p>7b. Do multi-family districts restrict development only to low-density housing types?</p>	<p>Multifamily dwellings are allowed in the R-4, R-6 and R-7 districts. In addition, several commercial districts, O-1, B-2, and B-3, and B-4, allow multifamily dwellings with a special use permit. The R-2, single-family district, allows twin houses by right and town houses and multiplexes by Special Use Permit.</p> <p>Density is limited by a maximum number of units per acre of 14 for R-4 and 34 for R-6 and R-7. R-6 and R-7 also require a 1,250 square foot minimum area per unit. Height is restricted to 2.5 stories in R-4 and 12 stories in R-6 and R-7. Floor area ratio is limited but only for non-residential uses. The R-4 district is fairly limiting because of the height and maximum density requirements. The R-6 and R-7 districts allow for a fair amount of density, though the 34 units per acre maximum makes any development approaching the maximum 12 stories unlikely.</p> <p>There are no minimum bedroom or minimum livable floor area standards. Parking minimums for multifamily are 2.5 spaces per 3 bedroom unit, 2 per 2 bedroom unit, and 1 per 1 bedroom or efficiency. The zoning map shows that the R-4, R-6, and R-7 districts are in use within the City.</p>	<p>1</p>	<p>See Table 35-3401.1 (Permitted Land Uses); Sec. 35-3205 (“R-4” One to Six Family Residence District”); Sec. 35-3206 (“R-6” Multi-Family Residence District”); Sec. 35-3207 (“R-7” Mobile Home Park District”); Table 35-3201.1 (Residential and Resource Districts Principal Structure Bulk Standards); Table 35-5100.3 (Minimum Required Parking Spaces).</p> <p>Although a cursory review of the zoning map was done to verify that districts identified in the zoning ordinance were applied to significant areas within the city, a determination of whether a sufficient portion of the residential zones of Moline are zoned for multifamily development to meet demand was not</p>

Zoning Analysis Matrix
City of Moline, Illinois

		<p>made. Availability of land may impact the feasibility of developing new multifamily housing to meet demand. And permissive regulations do not necessarily translate into sufficient development of affordable housing, as other considerations like housing prices and rents, market conditions, existing land-use patterns, the provision of public services and infrastructure, construction costs, demand for luxury and higher-end multifamily housing, and other planning goals also have an impact on the quantity of multifamily and affordable housing also play a role.</p>
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Zoning Analysis Matrix
City of Moline, Illinois

<p>8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?</p>	<p>The code allows for accessory dwellings in only two scenarios: Commercial Apartment - dwelling units above the ground floor of a building used for a commercial land use. Caretaker's Residence - any residential unit which provides permanent housing for a caretaker of the subject property in either an attached or detached configuration. Except for these two, "in no instance shall an accessory use, cellar, basement, tent or recreational trailer be used as a residence." This broad statement appears to prohibit garage and basement apartments and other small accessory dwellings.</p> <p>Manufactured Homes are permitted in the C-2, AG-2, R-2, R-4, R-6, and R-7 zoning districts. Manufactured home parks are permitted in the R-7 zoning district.</p>	<p style="text-align: center;">2</p>	<p>See Sec. 35-3401.4 (Land Uses Permitted as an Accessory Use); 35-3514.4 (Accessory Commercial Land Uses); 35-3417.a (General Accessory Land Uses).</p> <p>There is opportunity to expand alternative and low-impact affordable housing options by permitting accessory dwelling units, especially in low density areas where large lot sizes would easily accommodate accessory dwellings and additional off-street parking.</p>
<p>9a. Are the jurisdiction's design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act's accessibility standards for design and construction?</p>	<p>Moline has adopted the 2012 versions of the International Building and Residential Codes, along with local modifications, including the IBC's accessibility standards. While the 2012 IBC edition is not one of the ten HUD-recognized safe harbors for compliance with the FHA's design and construction requirements, it is substantially similar to the 2006 IBC which HUD has recognized as a safe harbor for meeting the FHA's accessibility requirements. In addition, Chapter 11 of the 2012 IBC requires that buildings and facilities comply with the accessibility requirements of <i>ICC/ANSI A117.1 Accessible and Usable Buildings and Facilities</i> standard, which is a nationally recognized standard for making buildings</p>	<p style="text-align: center;">1</p>	<p>See Code of Ordinances, Chapter 5, (Buildings and Other Construction and Building Services).</p>

Zoning Analysis Matrix
City of Moline, Illinois

<p>9b. Is there any provision for monitoring compliance?</p>	<p>accessible.</p> <p>The building official shall have the power to enforce all provisions of this Building Code and may institute any appropriate action or judicial proceeding to prevent the unlawful construction or alternation of any building or structure or the unlawful establishment, change to modification of any use; to restrain, correct or abate such violations; or to prevent occupancy of the unlawful building or structure. The Building Code requires permits and inspections.</p>		
<p>10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?</p>	<p>Within Planned Unit Developments, Council may allow deviation from default development standards for the provision of affordable housing for moderate, low and very low income households pursuant to HUD definitions for no less than 15 years.</p> <p>Outside of the PUD process, the City has not adopted specific development incentives like inclusionary zoning, reduced parking, design waivers, variances, or expedited permitting for the development of affordable or low-income housing or housing for protected classes.</p>	<p>1</p>	<p><i>See Sec. 35-3702.g</i> (Deviation from Development Default Standards).</p>

Zoning Analysis Matrix City of Rock Island, Illinois

Average Total Risk Score: **1.8**

Key to Risk Scores:

1 = low risk – the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice.

2 = medium risk – the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread.

3 = high risk – the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

Source Documents:

Rock Island Zoning Ordinance, available at: <https://www.rigov.org/DocumentCenter/View/1083/Zoning-Ordinance?bidId=>

Rock Island Zoning Map, available at: <https://www.rigov.org/101/Maps-Interactive-and-PDF>

Rock Island Code of Ordinances, available at <https://www.sterlingcodifiers.com/IL/Rock%20Island/index.htm>

Zoning Analysis Matrix
City of Rock Island, Illinois

Issue	Conclusion	Risk Score	Comments
<p>1a. Does the jurisdiction’s definition of “family” have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive?</p>	<p>The City defines “family” to include one or more persons related by blood, marriage or adoption (including foster children), and in addition, any domestic servants and up to one gratuitous guest thereof, or a group of not more than three persons who need not be so related, and in addition domestic servants or gratuitous guests thereof, who are living together in a single dwelling unit and maintaining a common household. An additional definition, “Unrelated Group Family” allows a group of no more than five unrelated adults living together as a common household by doing their own cooking and living together, as distinguished from a group occupying a boarding house, lodging house, club, fraternity, sorority, or hotel. Unrelated group families are permitted with administrative approval, provided that they submit an application, pay an application fee, comply with certain standards such as a spacing requirement, and pay for and pass bi-annual inspections.</p> <p>Limiting single family to no more than three unrelated individuals is fairly restrictive, even with the additional allowance for Unrelated Group Families. More permissive definitions of family may allow up to five or more unrelated individuals by right, and even more permissive definitions do not distinguish between related and unrelated occupants so long as the residents live together as a functional family or common household sharing common space, meals, and household responsibilities, and/or leaves</p>	2	<p>See Rock Island Zoning Ordinance Article III (Definitions, 3.47, 3.123).</p>

Zoning Analysis Matrix
City of Rock Island, Illinois

<p>1b. Does the definition of “family” discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?</p>	<p>maximum occupancy per dwelling as a matter of safety under occupancy standards rather than the zoning regulations. However, there is court precedent for a more restrictive definition as it relates to the number of unrelated individuals being upheld as constitutionally permissible.</p> <p>The family definition does not treat persons with disabilities differently <i>because of</i> their disability. Group living for persons with disabilities is regulated separately. <i>See</i> Issue 2 below.</p>		
<p>2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.?</p> <p>2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?</p>	<p>The zoning code defines the following housing types for people with disabilities: <u>Care Home, Large Residential.</u> A Residential Care Home for more than eight (8) persons, plus supervisory or oversight personnel, living together as a single housekeeping unit who are disabled, as defined by "Disability" in this ordinance, for the primary purpose of providing shelter. <u>Care Home, Small Residential.</u> A Residential Care Home containing a single one family dwelling unit for eight (8) persons or fewer, plus supervisory or oversight personnel, living together as a single housekeeping unit for the primary purpose of providing shelter in a family-like atmosphere. <u>Halfway House/Group Home.</u> A temporary residential living arrangement for up to five persons, excluding staff, who are receiving therapy, counseling and/or care from support staff who are present at all times residents are present, for the following purposes: A. To help them re-enter society while housed under supervision while under constraints of alternatives to imprisonment including, but not limited to, pre-release, work release, and</p>	2	<p><i>See</i> Rock Island Zoning Ordinance Article III (Definitions, 3.24, 3.25, 3.56).</p> <p>A Joint Statement by the DOJ and HUD advises that “State and local governments’ enforcement of neutral requirements regarding safety, licensing, and other regulatory requirements governing group homes do not violate the Fair Housing Act so long as the ordinances are enforced in a neutral manner, they do not specifically target group homes, and they do not have an unjustified discriminatory effect on persons with disabilities who wish to reside in group homes.” JOINT STATEMENT OF THE DEPT.</p>

Zoning Analysis Matrix
City of Rock Island, Illinois

	<p>probationary programs. B. To help persons with family or school adjustment problems that require specialized attention and care in order to achieve personal independence; C. To provide temporary shelter for persons who are victims of domestic abuse and/or neglect; or D. To provide adult congregate living arrangements without nursing care.</p> <p>These uses are allowed as follows: Care Home, Large Residential - by Board of Zoning Appeals in R-4, R-5, and R-6 Care Home, Small Residential, allowed by right in R-1 through R-6 zoning districts Halfway House/Group House - by Board of Zoning Appeals in R-4, R-5, and R-6 None of these facilities are allowed in the SE districts, and Large Care Homes are subject to an additional discretionary approval from the Board of Zoning Appeals that other multifamily uses are not subject to.</p> <p>Residential care facilities for less than 6 residents should be permitted by right in residential areas equally with other single-family uses, although they could also be subject to additional licensing and inspection requirements, presumably for the safety of the residents, beyond that required by state regulators. Residential care facilities for 6 or more residents may be permitted by right in only certain districts provided that the locations are not more restrictive than similarly situated housing for 6 or more unrelated individuals not requiring in-home, supportive services for disabilities.</p>	<p>OF HOUSING AND URBAN DEVELOPMENT AND DEPT. OF JUSTICE, <i>State and Local Land Use Laws and Practices and the Application of the Fair Housing Act</i>, Nov. 10, 2016.</p>
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Zoning Analysis Matrix
City of Rock Island, Illinois

<p>3a. Do the jurisdiction’s policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements?</p> <p>3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?</p>	<p>Rock Island has not adopted a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements.</p> <p>The Board of Zoning Appeals holds the power to hear and decide applications for variances following the public notice and hearing process. This is required for any applicant seeking a variance and is not limited to housing for persons with disabilities. Whereas simple administrative procedures may be adequate for the granting of a reasonable accommodation, the variance procedures subject the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities and unfounded speculations about the impact on neighborhoods or threats to safety may impact the outcome. Although the FHA does not require a specific process for receiving and deciding requests for reasonable accommodation, as a matter of equity, transparency, and uniformity, it is advisable that local jurisdictions adopt a standardized process.</p>	2	<p><i>See</i> Sec. 5.10 (Variances)</p> <p>The code provides a process for requesting a variance, however, the purpose of a variance is not congruent with the purpose of requesting a reasonable accommodation, as a variance requires a showing of special circumstances or conditions applying to the land. In contrast, a reasonable accommodation is to allow individuals with disabilities to have equal access to use and enjoy housing. The jurisdiction does not comply with its duty to provide reasonable accommodation if it applies a standard based on the physical characteristics of the property rather than considering the need for modification based on the disabilities of the residents.</p>
<p>4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?</p>	<p>“Unrelated Group Families” must not be within 300 feet of another Unrelated Group Family. “Care Home, Large Residential” and “Halfway House/Group Home” must each be at least 1,000 feet from an existing similar use.</p> <p>“Care Home, Small Residential” must be at least 1,000 feet from any other community residence in the U-1 district.</p>	2	<p><i>See</i> Sec 4.6 (Unrelated Group Family Uses); Sec 17.3, 18.3, and 19.3 (When Authorized by Board of Appeals); Sec 21.5 (Restrictions).</p> <p><i>See</i> JOINT STATEMENT OF THE DEPT. OF HOUSING AND URBAN DEVELOPMENT AND DEPT. OF</p>

Zoning Analysis Matrix
City of Rock Island, Illinois

	<p>Where a certain number of unrelated persons are permitted by local ordinance to reside together in a home, it would violate the FHA for the local ordinance to impose a spacing requirement on protected classes that do not exceed that permitted number of residents because the spacing requirement would be a condition imposed on persons with disabilities that is not imposed on persons without disabilities.</p>		<p>JUSTICE, <i>State and Local Land Use Laws and Practices and the Application of the Fair Housing Act</i>, Nov. 10, 2016.</p>
<p>5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?</p>	<p>“Halfway House/Group Homes” are allowed only in the R-4, R-5, and R-6 zoning districts and only when authorized by the Board of Zoning Appeals, so they are not allowed by right in any zoning districts and are effectively prohibited in single-family districts. For facilities which house 5 or fewer unrelated persons recovering from drug or alcohol addiction, this disparate treatment may violate the FHA. While housing for persons with disabilities may be subject to state and local regulations related to health and safety, they cannot be excluded from residential districts altogether and such regulations must not be based on stereotypes or presumptions about specific types of disabilities.</p>	<p>3</p>	<p>See Sec 17.3, 18.3, and 19.3 (When Authorized by Board of Appeals).</p>
<p>6. Does the jurisdiction’s zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?</p>	<p>The zoning code and map divide the City’s residential districts with minimum single-family lot sizes ranging from 5 acres minimum in the SE-1 district, to 1 acre minimum in the SE-2 district, 7,500 square feet for the R-1 district, and 6,000 square feet for the R-2 district. The R-3 district, which allows one and two family residences, requires a 5,000 square foot lot for a one-family residence, and for a duplex a 6,000 square foot lot with each of the two families having 3,000 square feet minimum. Front setbacks are 25 feet or more in all zoning districts. Height is limited to 2.5 stories in the SE-1, SE-2, and R-1 - R-4</p>	<p>1</p>	<p>See Article VII (General Provisions); Articles X-XXVI (Districts), Article XII (Planned Unit Development District), and Sec. 8.14 (Off-street Parking and Loading).</p>

Zoning Analysis Matrix
City of Rock Island, Illinois

	<p>districts. R-5 allows up to six stories, and R-6 allows up to 12.</p> <p>Across all zoning districts, dwelling units must meet both the International Building Code floor area standards and must be at least 900 square feet, with the length of the unit being no more than the width. There are no floor area ratio or minimum bedroom requirements. Parking requirements are the same across all single-family zoning districts, a minimum of two spaces per dwelling unit.</p> <p>PUDs (Planned Unit Developments) allow for flexibility from base standards. However, PUDs do require additional design requirements, permitting and review processes compared to traditional residential zoning.</p>		
<p>7a. Does the zoning ordinance fail to provide residential districts where multi-family housing is permitted as of right? Are multifamily dwellings excluded from all single family dwelling districts?</p> <p>7b. Do multi-family districts restrict development only to low-density housing types?</p>	<p>Multifamily dwellings are allowed in the R-4, R-5, and R-6 districts. These districts require a minimum of 2,000 square feet of lot area per dwelling unit, which results in approximately 22 units allowed per acre. This allows for only moderate density, despite the allowances for buildings to be up to 6 or 12 stories. In addition, several office and commercial districts, O-1, B-1, and B-2, allow dwellings above the ground floor and do not contain density restrictions. Across all zoning districts, dwelling units must meet both the International Building Code floor area standards and must be at least 900 square feet, with the length of the unit being no more than the width. There are no floor area ratio or minimum bedroom standards. Parking requirements are the same across all zoning districts, a minimum of two spaces per dwelling unit, and for six-plexes or greater, guest parking equal to 10% of the total dwelling units. The</p>	1	<p><i>See Article VII (General Provisions); Articles X-XXVI (Districts), and Sec. 8.14 (Off-street Parking and Loading).</i></p> <p>Although a cursory review of the zoning map was done to verify that districts identified in the zoning ordinance were applied to significant areas within the city, a determination of whether a sufficient portion of the residential zones of Rock Island are zoned for multifamily development to meet demand was not made. Availability of land may</p>

Zoning Analysis Matrix
City of Rock Island, Illinois

	<p>zoning map shows that the multifamily zoning districts are applied to a number of properties on the ground.</p>	<p>impact the feasibility of developing new multifamily housing to meet demand. And permissive regulations do not necessarily translate into sufficient development of affordable housing, as other considerations like housing prices and rents, market conditions, existing land-use patterns, the provision of public services and infrastructure, construction costs, demand for luxury and higher-end multifamily housing, and other planning goals also have an impact on the quantity of multifamily and affordable housing.</p>
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Zoning Analysis Matrix
City of Rock Island, Illinois

<p>8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?</p>	<p>Accessory dwelling units are not expressly discussed in the zoning ordinance. In the AG-1 and AG-2 districts, a single farmhouse is allowed and no secondary dwellings of any type. In SE-1, SE-2 and R-1, under permitted accessory uses, living quarters are allowed but only for persons employed on the premises and subject to additional dimensional limitations such as a maximum size of 30% of the yard area. In the R-2 district, Dwelling Groups, which allow multiple units on a lot, may be allowed by the Board of Zoning Appeals. The other residential districts (R-3, R-4, R-5, and R-6) allow multiple dwelling units on a lot but do not contain provisions for accessory dwelling units. The R-7 district allows mobile home parks, and Modular Housing is permitted subject to the same standards as site built homes if state and local criteria are met.</p>	<p style="text-align: center;">2</p>	<p><i>See</i> Articles X-XIX; Sec. 3.87 (Modular Home) Sec. 8.5 (Accessory Buildings in Residence Districts), Article XX (Mobile Home/Manufactured Housing District).</p> <p>There is opportunity to expand alternative and low-impact affordable housing options by permitting accessory dwelling units and not restricting to employees, especially in low density areas where large lot sizes would easily accommodate accessory dwellings and additional off-street parking. The R-7 district is the only district that allows permanent mobile/manufactured homes.</p>
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Zoning Analysis Matrix
City of Rock Island, Illinois

<p>9a. Are the jurisdiction's design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act's accessibility standards for design and construction?</p> <p>9b. Is there any provision for monitoring compliance?</p>	<p>Rock Island has adopted the 2015 versions of the International Building and Residential Codes, along with the Illinois Accessibility Code. While the 2015 IBC edition is not one of the ten HUD-recognized safe harbors for compliance with the FHA's design and construction requirements, it is substantially similar to the 2006 IBC which HUD has recognized as a safe harbor for meeting the FHA's accessibility requirements. In addition, Chapter 11 of the 2015 IBC requires that buildings and facilities comply with the accessibility requirements of <i>ICC/ANSI A117.1 Accessible and Usable Buildings and Facilities</i> standard, which is a nationally recognized standard for making buildings accessible.</p> <p>The Building Code contains a provision authorizing the building official to enforce the provisions of the Building Code as well as requiring permits and inspections.</p>	1	<p>See Code of Ordinances, Chapter 4, Buildings and Building Regulations.</p>
<p>10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?</p>	<p>Currently, the City has not adopted specific development incentives like inclusionary zoning, reduced parking, design waivers, variances, or expedited permitting for the development of affordable or low-income housing or housing for protected classes.</p>	2	

APPENDIX IV
HUD FAIR HOUSING DOCUMENTATION

consultancies, and research grants or contracts. The selected candidates must fill out the U.S. Office of Government Ethics (OGE) Confidential Financial Disclosure Report, OGE Form 450. Disclosure of this information is necessary to determine if the selected candidate is involved in any activity that may pose a potential conflict with their official duties as a member of the committee.

A nomination package should include the following information for each nominee: (1) A letter of nomination from an employer, a colleague, or a professional organization stating the name, affiliation, and contact information for the nominee, the basis for the nomination (*i.e.*, what specific attributes, perspectives, and/or skills does the individual possess that would benefit the workings of the NACNHSC, and the nominee's field(s) of expertise); (2) a letter of interest from the nominee stating the reasons they would like to serve on the NACNHSC; (3) a biographical sketch of the nominee, a copy of his/her curriculum vitae, and his/her contact information (address, daytime telephone number, and email address); and (4) the name, address, daytime telephone number, and email address at which the nominator can be contacted.

HRSA will collect and retain nomination packages to create a pool of possible future NACNHSC voting members. When a vacancy occurs, the agency will review nomination packages from the appropriate category and may contact nominees at that time. Nominations should be updated and resubmitted every 4 years to continue to be considered for committee vacancies.

HHS strives to ensure a balance of the membership of NACNHSC in terms of points of view presented and the committee's function and makes every effort to ensure the representation of women, all ethnic and racial groups, and people with disabilities on HHS Federal Advisory Committees. Therefore, we encourage nominations of qualified candidates from these groups and endeavor to make appointments to NACNHSC without discrimination on basis of age, race, ethnicity, gender, sexual orientation, disability, and cultural, religious, or socioeconomic status.

Authority: Section 337 of the Public Health Service Act (42 U.S.C. 254j), as amended. NACNHSC is governed by provisions of the Federal Advisory Committee Act (FACA), as amended (5 U.S.C. Appendix 2), which sets for the formation and use of advisory committees, and applies to the extent that the provisions of FACA do not

conflict with the requirements of PHS Section 337.

Dated: May 17, 2018.

Jay Womack,

Acting Deputy Director, Division of Executive Secretariat.

[FR Doc. 2018-11034 Filed 5-22-18; 8:45 am]

BILLING CODE 4165-15-P

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

[Docket No. FR-5173-N-17]

Affirmatively Furthering Fair Housing: Withdrawal of the Assessment Tool for Local Governments

AGENCY: Office of the Assistant Secretary for Fair Housing and Equal Opportunity, HUD.

ACTION: Notice.

SUMMARY: HUD announces the withdrawal of the Local Government Assessment Tool developed by HUD for use by local governments that receive Community Development Block Grants, HOME Investment Partnerships Program, Emergency Solutions Grants, or Housing Opportunities for Persons With AIDS formula funding from HUD when conducting and submitting their own Assessment of Fair Housing (AFH) under the Affirmatively Furthering Fair Housing (AFFH) regulations. Through **Federal Register** notice published on January 13, 2017, HUD announced the Office of Management and Budget's renewed approval of the Assessment Tool under the Paperwork Reduction Act. Since that time, HUD has become aware of significant deficiencies in the Tool impeding completion of meaningful assessments by program participants. HUD therefore is withdrawing the Local Government Assessment Tool because it is inadequate to accomplish its purpose of guiding program participants to produce meaningful AFHs. Following this withdrawal of the Local Government Assessment Tool, HUD will review the Assessment Tool and its function under the AFFH regulations to make it less burdensome and more helpful in creating impactful fair housing goals. Accordingly, this withdrawal notice also solicits comments and suggestions geared to creating a less burdensome and more helpful AFH Tool for local governments.

DATES:

Applicability Date: May 23, 2018.

Comment Due Date: Comments on improvement to the AFH Tool for Local Governments are due on or before July 23, 2018.

ADDRESSES: Interested persons are invited to submit comments to the Office of the General Counsel, Rules Docket Clerk, Department of Housing and Urban Development, 451 Seventh Street SW, Room 10276, Washington, DC 20410-0001. Communications should refer to the above docket number and title and should contain the information specified in the "Request for Comments" section. There are two methods for submitting public comments.

1. Submission of Comments by Mail. Comments may be submitted by mail to the Regulations Division, Office of General Counsel, Department of Housing and Urban Development, 451 7th Street SW, Room 10276, Washington, DC 20410-0500. Due to security measures at all federal agencies, however, submission of comments by mail often results in delayed delivery. To ensure timely receipt of comments, HUD recommends that comments submitted by mail be submitted at least two weeks in advance of the public comment deadline.

2. Electronic Submission of Comments. Interested persons may submit comments electronically through the Federal eRulemaking Portal at <http://www.regulations.gov>. HUD strongly encourages commenters to submit comments electronically. Electronic submission of comments allows the commenter maximum time to prepare and submit a comment, ensures timely receipt by HUD, and enables HUD to make comments immediately available to the public. Comments submitted electronically through the <http://www.regulations.gov> website can be viewed by other commenters and interested members of the public. Commenters should follow instructions provided on that site to submit comments electronically.

Note: To receive consideration as public comments, comments must be submitted through one of the two methods specified above. Again, all submissions must refer to the docket number and title of the notice.

No Facsimile Comments. Facsimile (fax) comments are not acceptable.

Public Inspection of Comments. All comments and communications submitted to HUD will be available, for public inspection and copying between 8 a.m. and 5 p.m. weekdays at the above address. Due to security measures at the HUD Headquarters building, an advance appointment to review the public comments must be scheduled by calling the Regulations Division at (202) 708-3055 (this is not a toll-free number). Copies of all comments submitted are available for inspection and

downloading at <http://www.regulations.gov>.

FOR FURTHER INFORMATION CONTACT:

Krista Mills, Deputy Assistant Secretary, Office of Policy, Legislative Initiatives, and Outreach, Office Fair Housing and Equal Opportunity, Department of Housing and Urban Development, 451 7th Street SW, Room 5246, Washington, DC 20410; telephone number 202-402-6577. Individuals with hearing or speech impediments may access this number via TTY by calling the toll-free Federal Relay Service during working hours at 1-800-877-8339.

SUPPLEMENTARY INFORMATION:

I. Background

On July 16, 2015, HUD published in the **Federal Register** its Affirmatively Furthering Fair Housing (AFFH) final rule.¹ The AFFH final rule provided HUD program participants with a revised planning approach to assist them in meeting their legal obligation to affirmatively further fair housing. The AFFH regulations are codified in 24 CFR part 5, subpart A.²

To assist program participants, the revised approach involves an “Assessment Tool” for use in completing the regulatory requirement to conduct an assessment of fair housing (AFH), as set out in the AFFH rule. Because of the variations in the HUD program participants subject to the AFFH rule, HUD has been developing separate Assessment Tools for use by different types of program participants. In addition to Assessment Tools for use by public housing agencies (PHAs) and States and Insular Areas, there is one for local governments, which is the subject of this notice. It is called the Local Government Assessment Tool. All the Assessments Tools, because they are information collection documents, are subject to approval by the Office of Management and Budget (OMB) under the Paperwork Reduction Act (PRA).³

The Local Government Assessment Tool was developed by HUD for use by local governments that receive Community Development Block Grants, HOME Investment Partnerships Program, Emergency Solutions Grants, or Housing Opportunities for Persons With AIDS formula funding from HUD, when conducting and submitting their AFH. OMB granted PRA approval of the initial iteration of the Local Government Assessment Tool in December 2015, and HUD announced the approval and the availability of the Tool’s use by notice

published in the **Federal Register** on December 31, 2015.⁴ The initial iteration of the Local Government Assessment Tool (known as “LG2015”) was approved by OMB for a period of one year. In 2016, HUD began the process for renewed approval of that information collection device.

The PRA establishes a notice and comment process for information collection approvals, involving the publication of two **Federal Register** notices, one for 60 days of public comments and another for a 30-day comment period.⁵ HUD’s 60-day notice for renewed approval of the Local Government Assessment Tool was published on March 23, 2016.⁶ The 30-day notice was published on August 23, 2016, and addressed the significant issues raised by the comments received on the 60-day notice.⁷

HUD announced the renewed PRA approval by OMB of a Local Government Assessment Tool through **Federal Register** notice published on January 13, 2017.⁸ In addition to announcing the PRA approval of the Tool, the January 13, 2017, notice addressed the significant issues raised by the comments received in response to the 30-day notice. This current version of the Tool, which is the subject of this notice, is known as “LG2017.”⁹

II. This Notice—Withdrawal of the Local Government Assessment Tool

Through this notice, HUD announces its withdrawal of the current version of the Local Government Assessment Tool (OMB Control No: 2529-0054). As noted above, the PRA establishes a notice-and-comment process for information collection approvals, but not for withdrawals. Accordingly, this withdrawal is effective immediately.

In the January 13, 2017, **Federal Register** notice announcing the availability of that Assessment Tool, HUD noted its agreement with commenters that “a more accurate estimate of the time and cost involved in preparing the AFH may not be known until program participants submit their

AFHs.”¹⁰ Accordingly, that notice stated that “HUD intends to also continue to monitor and assess the impact and burden of implementation of the AFH process on program participants, including on the range of fair housing outcomes.”¹¹ Consistent with this response to comments, since the publication of this notice on January 13, 2017, HUD has become aware of significant deficiencies in the Tool that have made it unduly burdensome for program participants to use the Tool to create acceptable and meaningful AFHs with impactful fair housing goals.

HUD’s decision is, in part, informed by its review of the initial round of AFH submissions that were developed using the Local Government Assessment Tool. This review led HUD to conclude that the Tool is unworkable based upon: (1) The high failure rate from the initial round of submissions; and (2) the level of technical assistance HUD provided to this initial round of 49 AFHs, which cannot be scaled up to accommodate the increase in the number of local government program participants with AFH submission deadlines in 2018 and 2019.

1. Experience With the Initial Group of AFH Submissions Demonstrates That the Tool Is Unduly Burdensome and Ineffective at Assisting Program Participants With the Creation of Acceptable AFHs

Between October 2016 and December 2017, HUD received, reviewed, and issued initial decisions on 49 AFHs submitted by local government program participants. In 2018, the Department conducted an evaluation of these submissions and found that, among this initial group of 49 AFH submissions, a significant proportion of program participants had difficulty completing or understanding how to use the Tool to complete acceptable AFHs. Indeed, the proportion of submissions determined to be unacceptable indicates that the Tool was unduly burdensome and not working as an effective device to assist program participants with the creation of acceptable and meaningful AFHs with impactful fair housing goals.

For instance, only 37% of the initial 49 submissions (18/49) had been determined to be acceptable on initial submission. HUD returned 35% of these (17/49) as unacceptable. Many other AFH submissions (28% or 14/49) were accepted only after the program participants submitted revisions and additional information in the form of addendums in response to HUD’s

⁴ 80 FR 81840.

⁵ See, e.g., 44 U.S.C. 3506-07

⁶ 81 FR 15546.

⁷ 81 FR 57602.

⁸ 83 FR 4368.

⁹ Both the original iteration (LG2015) and current version (LG2017) of the Local Government Assessment Tool are available at <https://www.hudexchange.info/resource/5216/assessment-of-fair-housing-tool-for-local-governments/>. Program participants with a due date of October 13, 2017 or earlier were required to use the LG2015 version of the Assessment Tool. Program participants with a due date of October 14, 2017, or later must use the LG2017 version of the Assessment Tool. This notice pertains to the current (LG2017) version.

¹⁰ 82 FR 4391.

¹¹ *Id.*

¹ 80 FR 42357.

² §§ 5.150-5.168.

³ 44 U.S.C. 3501 *et seq.*

technical assistance. Taken together, 63% of the 49 AFHs submitted were either: (a) Returned as unacceptable and have not been successfully resubmitted, or (b) accepted only after the program participant supplied necessary additional information and revisions.

Tellingly, despite the fact that joint and regional submissions benefit from the sharing of resources by program participants, enabling them to address fair housing issues from the broader perspective provided by collaboration, joint and regional collaborations nonetheless suffered from the same defects as individual AFH submissions. For example, the largest regional AFH submitted to HUD involved a total of 19 program participants. In its review of the AFH, HUD determined that each of the 19 program participants would have met the regulatory standards for nonacceptance.

Additionally, many jurisdictions found it necessary to incur additional expense to hire consultants to complete their AFHs. Particularly in light of the high initial fail rates, this fact further demonstrates that the Assessment Tool is unduly burdensome as an information collection device and must be improved to reduce the burden upon respondents.

HUD's analysis shows that the excessively high rate of unacceptable AFHs was due, in large measure, to problems with the Local Government Assessment Tool, and that efficiency gains over time from experience working with the Tool would be unlikely to address HUD's concerns about both the inadequacy of the Tool and the burden to program participants in using the Tool to complete acceptable AFHs. Specifically, HUD's analysis found a pattern of problems with the initial 49 AFH submissions, indicating at least seven different categories of critical problems with the Local Government Assessment Tool: (a) Inadequate community participation; (b) insufficient use of local data and knowledge; (c) lack of regional analysis; (d) problems with identification of contributing factors; (e) prioritization of contributing factors; (f) problems with setting goals; and (g) inadequate responses due to duplication of questions. While there may have been myriad issues that caused an individual AFH submission to have been non-accepted, in the aggregate, this summary of issues describes the basis for HUD's determination that the Assessment Tool is ineffective and unduly burdensome on program participants.

(a) *Inadequate Community Participation.* A significant cause of the high non-acceptance rate was inadequate community participation.

The AFFH regulations require program participants to "give the public reasonable opportunities for involvement in the development of the AFH and in the incorporation of the AFH into the consolidated plan, PHA Plan, and other required planning documents."¹² However, the questions in the Local Government Assessment Tool regarding community participation have resulted in confusion. The questions vaguely incorporate by reference the existing community participation requirements in HUD's Consolidated Plan regulations¹³ and the comparable requirements in HUD's Public Housing regulations.¹⁴ The questions do not explicitly state the specific requirements or ask that program participants explain how they met these specific requirements. As a result, many of the initial AFH submissions did not fulfill these requirements and/or did not explain in their responses how they fulfilled the requirements. For example, the regulation at 24 CFR 91.105(b)(4) requires a period of not less than 30 calendar days for comment by the community; however, one community posted a draft AFH for public comment on a Friday and submitted the final AFH to HUD the following Monday, after providing only three days for public comment.¹⁵

(b) *Insufficient Use of Local Data and Knowledge.* The Assessment Tool requires local governments to utilize their local data and local knowledge to supplement the HUD-provided data, or, when appropriate, to replace HUD-provided data. HUD requires the use of local data only if the program participants can find and use such data at little or no cost. While many program participants utilized local data and local knowledge exactly as intended, a substantial number did not. The absence of local data, or failure to use it, resulted in an inability to address issues in a community that have not manifested themselves in the HUD-provided data. For example, when discussing environmental health issues, one program participant did not identify multiple Superfund locations in their jurisdiction. While this is information that a local government would know, specific Superfund locations are not noted on HUD maps. The questions in the Tool thus are inadequate to inform

the program participants when to use local data and knowledge.¹⁶

(c) *Lack of Regional Analysis.* Questions throughout the Assessment Tool require program participants to undertake both a jurisdictional and a regional analysis of fair housing issues. Many of the 49 AFH submissions did not complete or adequately complete the regional component of the analysis of fair housing issues. Others may have completed the analysis but did so in a way that did not compare the jurisdiction to the region. The regional analysis is often a critical component of the AFH because fair housing issues may cross jurisdictional boundaries and demographic trends may extend across entire regions. HUD provides both jurisdictional and regional data through the AFFH data and mapping tool for each program participant. However, the Assessment Tool inadequately guides program participants in the use of such data to perform the type of regional analysis of fair housing issues that would be necessary for an acceptable AFH.

(d) *Identification of Contributing Factors.* Throughout the analysis of fair housing issues, the Assessment Tool requires that the program participant identify the contributing factors that create, contribute to, or perpetuate fair housing issues in their community. However, the Assessment Tool does not explicitly require the program participant to connect the identified contributing factors to the fair housing issues they will address until the final section where the program participant determines goals to overcome those contributing factors.

Because the Assessment Tool fails to instruct the program participants to connect these concepts, many of the 49 AFH submissions identified contributing factors which did not logically connect to the analysis of fair housing issues undertaken. In addition, factors which the program participants themselves identified in other portions of the Assessment Tool were not identified in the responses to these questions. For example, one AFH included 3 pages of detailed analysis of Home Mortgage Disclosure Act (HMDA) information outlining the lending discrimination occurring, yet the program participants did not identify lending discrimination as a contributing factor.¹⁷

(e) *Prioritization of Contributing Factors.* The final section of the

¹² 24 CFR 5.158(a).

¹³ 24 CFR part 91.

¹⁴ 24 CFR part 903.

¹⁵ See, e.g., Section III, Questions 1–4 of LG2015 and LG2017.

¹⁶ See, e.g., Section V, Questions B.3.1.a.3/ B.3.1.b.3/B.3.1.c.3/B.3.1.d.3/B.3.1.e.3 (LG2017).

¹⁷ See, e.g., Section V, Questions B.1.3/B.2.3/ B.3.3/B.4.3/C.3/D.7 (LG2015 and LG2017).

Assessment Tool requires that the program participant(s) prioritize the contributing factors identified for each fair housing issue analyzed in the fair housing analysis sections. The program participant(s) must then justify the prioritization of the contributing factors. Finally, the program participant(s) set goals designed to overcome the contributing factors identified as significant. Jurisdictions must reasonably exercise their discretion to prioritize contributing factors. The justification provides an opportunity to explain the prioritization method selected. Many of the 49 submissions either included in this question contributing factors not identified in the

analysis of fair housing issues or did not include the contributing factors that were identified. Many program participants also did not explain their prioritization method. Without this critical link, the analysis of fair housing issues and the goals do not connect, making the AFH unacceptable. The Assessment Tool thus fails to provide adequate guidance for the prioritization of contributing factors.¹⁸

(f) *Goals Section was Highly Problematic.* The goals section was an issue in or the sole reason for the majority of initially non-accepted AFHs. In several submissions, the goals were not likely to result in meaningful actions, lacked metrics and milestones,

were not linked to contributing factors and fair housing issues, and generally lacked adequate discussion.

Program participants are responsible for identifying their own fair housing goals. However, the goals set by the program participant must connect to the analysis of fair housing issues *and* result in meaningful actions to affirmatively further fair housing.

These goals will then be incorporated into Consolidated Plans and Public Housing Plans. Along with extensive guidance, HUD provides the following chart in the assessment tool to assist program participants in completing this question.

Goal	Contributing factors	Fair housing issues	Metrics, milestones, and timeframe for achievement	Responsible program participant(s)

Discussion:

Many of the 49 AFHs reviewed were deficient in this section, which is the culmination of the AFH. Goals were frequently overbroad or would not result in meaningful actions, for example, to “increase housing choice,” or “partner with” Program participants frequently failed to connect their fair housing goals to the AFH analysis, or to the contributing factors or fair housing issues identified in the AFH.

Metrics and milestones for evaluating the accomplishment of fair housing goals were the most frequent source of deficiency in this section. However, frequently those established in the AFHs were neither time-bound nor measurable. The discussion section of the chart is a program participant’s opportunity to explain the goal to ensure that HUD understands its intention and can often counter-balance deficiencies in or confusion caused by other sections of the chart. Many of the program participants did not complete this section or provided only a vague discussion. HUD is therefore concerned that the roadmap provided in the Assessment Tool is inadequate to lead to the development of effective goals.¹⁹

(g) *Inadequate Responses Due to Duplication.* The Local Government Assessment Tool contains several questions that have elicited inadequate responses which merely duplicate previous responses to other questions

within the Tool without responding fully to the specific question asked. The lack of clarity in the questions led to responses that merely assumed a question was being asked twice and thus failed to respond fully to the question at hand. Similarities in the sentence structure and terminology used in the questions may have caused program participants to overlook slight or nuanced differences between questions.²⁰

2. HUD Does Not Have the Resources To Provide a Similar Level of Technical Assistance to Expanding Numbers of Program Participants in 2018 and 2019

Because of these significant problems with the Tool, HUD has provided substantial technical assistance to this initial round of program participants, even for the AFHs that have been accepted. HUD does not have the resources to continue to provide program participants with the level of technical assistance that they would need to submit acceptable AFHs using the current version of the Local Government Assessment Tool. Despite the fact that many jurisdictions reportedly have found it necessary to engage consultants to complete the Assessment Tool, HUD estimates that it has spent over \$3.5 million on technical assistance for the initial round of 49 AFH submissions. In addition to contract technical assistance services,

significant HUD staff resources are required to review an AFH for acceptability and to communicate with program participants regarding HUD’s determination to accept or non-accept an AFH.

Although HUD anticipated providing technical assistance to program participants to assist them in submitting acceptable assessments, the amount of assistance that has proved to be required with the current version of the Local Government Assessment Tool is not sustainable particularly in light of the significant increase in AFH submissions scheduled to occur in 2018 and 2019. In 2018, for example, 104 local government program participants are scheduled to submit AFHs to HUD. In 2019, the number of local governments originally scheduled to submit their AFHs rises to 752. The level of technical assistance provided to the initial 49 participants could not be extended to these numbers of AFHs due in 2018 and 2019.

And due to the deficiencies in the Local Government Assessment Tool, HUD believes that, without the withdrawal and revision of the Tool, a high percentage of AFHs in future rounds of submissions would not be initially acceptable. Because the problems with the Tool have created the above-described patterns of deficiencies in AFH submissions even from collaborative groups leveraging the resources of multiple jurisdictions, HUD

¹⁸ See, e.g., Section VI, Question 1 (LG2015 and LG2017).

¹⁹ See, e.g., Section VI, Question 2 (LG2015 and LG2017).

²⁰ See, e.g., Section III, Question 3; Section IV, Question 1; Section V, Questions B.1.1.b/B.3/B.4/C.1.2/D.2.a (LG2017).

does not believe that the level of technical assistance it has been required to provide to the initial 49 AFHs would decrease meaningfully as result of expanded usage of the Tool. As a result, in 2018 and 2019, HUD would not be able to provide all program participants with the extent of assistance provided to those in the initial round of AFHs, meaning that these participants would not have the help they would need to correct their assessments. This would lead to a great deal of uncertainty for program participants as to how to submit an acceptable AFH. Such uncertainty would, in turn, lead to uncertainty regarding the status of their HUD-funded programs so long as they do not have an accepted AFH in place.

3. In Light of HUD and Local Government Program Participants' Resource Limitations, Temporary Withdrawal of the Local Government Assessment Tool Is Necessary as the Most Efficient Way To Resolve the Tool's Significant Deficiencies

HUD is withdrawing the Tool to produce a more effective and less burdensome Assessment Tool. These improvements to the Tool will make it more effective in assisting program participants with the creation of meaningful assessments with impactful fair housing goals to help them plan to fulfill their legal obligation to affirmatively further fair housing. Withdrawal and revision of the Assessment Tool will also conserve HUD's limited resources, allowing HUD to use those limited resources more effectively to help program participants produce meaningful improvements in the communities they serve. HUD also believes that investing additional time to improve its Data and Mapping Tool (AFFH-T) and the User Interface (AFFH-UI) will result in more substantive assessments with greater fair housing impact.

III. Effects of Withdrawal of Assessment Tool

The AFFH regulations at 24 CFR 5.160(a)(1)(ii) provide that if the specified AFH submission deadline results in a submission date that is less than 9 months after the Assessment Tool designed for the relevant type of program participant is available for use, "the participants(s)' submission deadline will be extended . . . to a date that will be not less than 9 months from the date of publication of the Assessment Tool." For example, in the case of the Assessment Tool for use by PHAs, HUD published a notice in January 2017, advising that the Assessment Tool had been approved

pursuant to the PRA process, but was not yet available for use by PHAs because the HUD data needed to make the Assessment Tool workable was not yet available.²¹ Accordingly, under 24 CFR 5.160(a)(1)(ii), the deadline for first AFH submissions by PHAs was extended until a workable Assessment Tool becomes available.

Similarly, in the case of the Local Government Assessment Tool, HUD has determined that the current iteration of the Tool, although published after PRA procedures, is substantively deficient and unduly burdensome because it has resulted in great expense to program participants and HUD, yet it is not adequately guiding participants through the creation of acceptable AFHs. Accordingly, HUD is immediately withdrawing the Local Government Assessment Tool. As a result, local jurisdictions do not have an approved Assessment Tool that is published and available for use in completing the AFHs. Pursuant to 24 CFR 5.160(a)(1)(ii), the deadline for local government program participants to submit a first AFH is thus extended to a date not less than 9 months following the future publication of a revised and approved Local Government Assessment Tool. HUD is immediately seeking comment on ways to make the Local Government Assessment Tool workable and effective. Pursuant to 24 CFR 5.160(a)(1)(ii), the future published notice announcing that a revised and approved Local Government Assessment Tool is available will also provide program participants with the revised due date for first AFH submissions.

Consolidated plan program participants that have not yet submitted their first AFHs must nonetheless continue to comply with existing, ongoing legal obligations to affirmatively further fair housing (legal obligations which AFHs were merely intended to help participants plan to fulfill). Pursuant to 24 CFR 5.160(a)(3), until a consolidated plan program participant submits its first AFH, it will continue to provide the AFFH certification with its Consolidated Plan, in accordance with the requirements that existed prior to August 17, 2015. Those requirements obligate a program participant to certify that it will affirmatively further fair housing, which means that it will conduct an analysis of impediments (AI) to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain

records reflecting the analysis and actions.

For Consolidated plan program participants that are starting a new 3–5-year Consolidated plan cycle that begins before their due date for an AFH, the AI should continue to be updated in accordance with the HUD, Fair Housing Planning Guide (1996), available at <https://www.hud.gov/sites/documents/FHFG.PDF>. The data HUD has developed in order to implement the AFFH rule will remain available for program participants to use in conducting their AIs. HUD encourages program participants to collaborate to develop a regional AI, as regional collaborations provide an opportunity for program participants to share resources and address fair housing issues that cross jurisdictional boundaries.²²

Program participants that have already submitted an AFH which has been accepted by HUD must continue to execute the goals of that accepted AFH and are not required to conduct a separate AI. HUD will discontinue the review of AFHs submitted by local governments that are currently under review and will not render a decision to accept or not accept. In cases where HUD denied acceptance of an AFH submission that used the withdrawn Local Government Assessment Tool and the program participant(s) were preparing to re-submit an AFH, the participant(s) should not submit a revised AFH. Finally, local governments prepared to submit their first AFH should not submit an AFH to HUD. Local governments that have not received an accept or non-accept determination from HUD, or that have received a non-accept but will no longer be required to resubmit their AFH, are still required to prepare an AI, as described above in this notice. Program participants must continue to fulfill their legal obligations to affirmatively further fair housing.

IV. Request for Public Comment on Improvements to the Local Government Assessment Tool

This notice offers the opportunity for the public to provide information and recommendations on revisions to the Local Government Assessment Tool. HUD welcomes and will consider all

²² Please refer to HUD's 2017 interim guidance for additional information on collaboration, specifically the Q&A captioned: "How can States Collaborate with Local Governments or PHAs?". The guidance is available at: <https://www.hudexchange.info/resources/documents/Interim-Guidance-for-Program-Participants-on-Status-of-Assessment-Tools-and-Submission-Options.pdf>. This guidance is generally applicable to all types of program participants.

²¹ 82 FR 4373.

responses to this notice when reconsidering the Assessment Tool

Dated: May 18, 2018.

Anna Maria Fariás,

Assistant Secretary for Fair Housing and Equal Opportunity.

[FR Doc. 2018–11146 Filed 5–21–18; 4:15 pm]

BILLING CODE 4210–67–P

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

[Docket No. FR–5173–N–18]

Affirmatively Furthering Fair Housing (AFFH): Responsibility To Conduct Analysis of Impediments

AGENCY: Office of the Assistant Secretary for Fair Housing and Equal Opportunity, HUD.

ACTION: Notice.

SUMMARY: By notice published elsewhere in today's **Federal Register**, HUD has withdrawn the current version of the information collection device used by local government program participants to assess fair housing issues as part of their planning for use of housing and community development block grants. The device is referred to as the Local Government Assessment Tool; the resulting assessment is referred to as an Assessment of Fair Housing (AFH). As explained in that notice, the withdrawal of the lack of a working information collection device means that a program participant that has not yet submitted an AFH using that device that has been accepted by HUD must continue to carry out its duty to affirmatively further fair housing by, inter alia, continuing to assess fair housing issues as part of planning for use of housing and community development block grants in accordance with pre-existing requirements. The pre-existing requirements referred to the fair housing assessment as an "analysis of impediments to fair housing choice" (AI). This notice reminds program participants of the requirements and standards for completing the AI.

DATES: *Applicability Date:* May 23, 2018.

FOR FURTHER INFORMATION CONTACT:

Krista Mills, Deputy Assistant Secretary, Office of Policy, Legislative Initiatives, and Outreach, Office Fair Housing and Equal Opportunity, Department of Housing and Urban Development, 451 7th Street SW, Room 5246, Washington, DC 20410; telephone number 202–402–6577. Individuals with hearing or speech impediments may access this number via TTY by calling the toll-free

Federal Relay Service during working hours at 1–800–877–8339.

SUPPLEMENTARY INFORMATION: On July 16, 2015, HUD published in the **Federal Register** its Affirmatively Furthering Fair Housing (AFFH) final rule.¹ The AFFH final rule provides HUD program participants with a revised planning approach to assist them in meeting their legal obligation to affirmatively further fair housing. To assist HUD program participants in meeting this obligation, the AFFH rule provides that program participants must conduct an Assessment of Fair Housing (AFH) using an "Assessment Tool." The AFFH regulations are codified in 24 CFR part 5, subpart A (§§ 5.150–5.168).

Through notice published elsewhere in today's **Federal Register**, HUD announces its withdrawal of the Local Government Assessment Tool (OMB Control No: 2529–0054). As explained in that notice, the AFFH regulations at 24 CFR 5.160(a)(1)(ii) provide that if the specified AFH submission deadline results in a submission date that is less than 9 months after the Assessment Tool designed for the relevant type of program participant is available for use, "the participant(s)' submission deadline will be extended . . . to a date that will be not less than 9 months from the date of publication of the Assessment Tool." As a result of the withdrawal of the Local Government Assessment Tool and the lack of available HUD data for the PHA Assessment Tool, currently no type of program participant has an Assessment Tool available for use.² Pursuant to 24 CFR 5.160(a)(1)(ii), the deadline for local government program participants to submit a first AFH is thus extended to a date not less than 9 months following the future publication of a revised and approved Local Government Assessment Tool.

In the meantime, as explained in the notice withdrawing the Local Government Assessment Tool, Consolidated Plan program participants that have not yet submitted an assessment using a HUD-provided assessment tool that must be accepted, must nonetheless continue to comply with existing, ongoing legal obligations to affirmatively further fair housing. Congress has repeatedly reinforced this mandate, requiring in the Housing and Community Development Act of 1974 and the Cranston-Gonzalez National Affordable Housing Act, for example, that covered HUD program participants certify, as a condition of receiving Federal funds, that they will

affirmatively further fair housing.³ Pursuant to 24 CFR 5.160(a)(3), until a Consolidated Plan program participant submits its first accepted AFH, it will continue to provide the AFFH certification with its Consolidated Plan, in accordance with the requirements that existed prior to August 17, 2015.⁴ Those requirements obligate a program participant to certify that it will affirmatively further fair housing, which means that it will conduct an analysis of impediments (AI) to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions.

Program participants are hereby reminded that the legal obligation to affirmatively further fair housing remains in effect, and that HUD places a high priority upon the responsibility of program participants to ensure that their AIs serve as effective fair housing planning tools. For Consolidated Plan program participants that are starting a new 3–5-year Consolidated Plan cycle that begins before their due date for an AFH, the AI should continue to be updated in accordance with the HUD Fair Housing Planning Guide (1996).⁵ The data HUD has developed in order to implement the AFFH rule will remain available for program participants to use in conducting their AIs. HUD encourages program participants to collaborate to develop a regional AI, as regional collaborations provide an opportunity for program participants to share resources and address fair housing issues that cross jurisdictional boundaries.⁶

Further, program participants are hereby reminded that if HUD believes the AI or actions taken to affirmatively further fair housing to be inadequate, HUD may require submission of the full AI and other documentation. If HUD concludes that the AI is substantially incomplete, or the actions taken were plainly inappropriate to address the identified impediments, HUD may

³ See, e.g., 42 U.S.C. 5304(b)(2), 5306(d)(7)(B), 12705(b)(15).

⁴ See, e.g., 24 CFR 91.225(a)(1) (2014); 24 CFR 91.325(a)(1) (2014).

⁵ Available at <https://www.hud.gov/sites/documents/FHPG.PDF>.

⁶ Please refer to HUD's 2017 interim guidance for additional information on collaboration, specifically the Q&A captioned: "How can States Collaborate with Local Governments or PHAs?". The guidance is available at: <https://www.hudexchange.info/resources/documents/Interim-Guidance-for-Program-Participants-on-Status-of-Assessment-Tools-and-Submission-Options.pdf>. This guidance is generally applicable to all types of program participants.

¹ 80 FR 42357.

² See 82 FR 4373.

responses to this notice when reconsidering the Assessment Tool

Dated: May 18, 2018.

Anna Maria Fariás,

Assistant Secretary for Fair Housing and Equal Opportunity.

[FR Doc. 2018–11146 Filed 5–21–18; 4:15 pm]

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DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

[Docket No. FR–5173–N–18]

Affirmatively Furthering Fair Housing (AFFH): Responsibility To Conduct Analysis of Impediments

AGENCY: Office of the Assistant Secretary for Fair Housing and Equal Opportunity, HUD.

ACTION: Notice.

SUMMARY: By notice published elsewhere in today's **Federal Register**, HUD has withdrawn the current version of the information collection device used by local government program participants to assess fair housing issues as part of their planning for use of housing and community development block grants. The device is referred to as the Local Government Assessment Tool; the resulting assessment is referred to as an Assessment of Fair Housing (AFH). As explained in that notice, the withdrawal of the lack of a working information collection device means that a program participant that has not yet submitted an AFH using that device that has been accepted by HUD must continue to carry out its duty to affirmatively further fair housing by, inter alia, continuing to assess fair housing issues as part of planning for use of housing and community development block grants in accordance with pre-existing requirements. The pre-existing requirements referred to the fair housing assessment as an "analysis of impediments to fair housing choice" (AI). This notice reminds program participants of the requirements and standards for completing the AI.

DATES: *Applicability Date:* May 23, 2018.

FOR FURTHER INFORMATION CONTACT:

Krista Mills, Deputy Assistant Secretary, Office of Policy, Legislative Initiatives, and Outreach, Office Fair Housing and Equal Opportunity, Department of Housing and Urban Development, 451 7th Street SW, Room 5246, Washington, DC 20410; telephone number 202–402–6577. Individuals with hearing or speech impediments may access this number via TTY by calling the toll-free

Federal Relay Service during working hours at 1–800–877–8339.

SUPPLEMENTARY INFORMATION: On July 16, 2015, HUD published in the **Federal Register** its Affirmatively Furthering Fair Housing (AFFH) final rule.¹ The AFFH final rule provides HUD program participants with a revised planning approach to assist them in meeting their legal obligation to affirmatively further fair housing. To assist HUD program participants in meeting this obligation, the AFFH rule provides that program participants must conduct an Assessment of Fair Housing (AFH) using an "Assessment Tool." The AFFH regulations are codified in 24 CFR part 5, subpart A (§§ 5.150–5.168).

Through notice published elsewhere in today's **Federal Register**, HUD announces its withdrawal of the Local Government Assessment Tool (OMB Control No: 2529–0054). As explained in that notice, the AFFH regulations at 24 CFR 5.160(a)(1)(ii) provide that if the specified AFH submission deadline results in a submission date that is less than 9 months after the Assessment Tool designed for the relevant type of program participant is available for use, "the participant(s)' submission deadline will be extended . . . to a date that will be not less than 9 months from the date of publication of the Assessment Tool." As a result of the withdrawal of the Local Government Assessment Tool and the lack of available HUD data for the PHA Assessment Tool, currently no type of program participant has an Assessment Tool available for use.² Pursuant to 24 CFR 5.160(a)(1)(ii), the deadline for local government program participants to submit a first AFH is thus extended to a date not less than 9 months following the future publication of a revised and approved Local Government Assessment Tool.

In the meantime, as explained in the notice withdrawing the Local Government Assessment Tool, Consolidated Plan program participants that have not yet submitted an assessment using a HUD-provided assessment tool that must be accepted, must nonetheless continue to comply with existing, ongoing legal obligations to affirmatively further fair housing. Congress has repeatedly reinforced this mandate, requiring in the Housing and Community Development Act of 1974 and the Cranston-Gonzalez National Affordable Housing Act, for example, that covered HUD program participants certify, as a condition of receiving Federal funds, that they will

affirmatively further fair housing.³ Pursuant to 24 CFR 5.160(a)(3), until a Consolidated Plan program participant submits its first accepted AFH, it will continue to provide the AFFH certification with its Consolidated Plan, in accordance with the requirements that existed prior to August 17, 2015.⁴ Those requirements obligate a program participant to certify that it will affirmatively further fair housing, which means that it will conduct an analysis of impediments (AI) to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions.

Program participants are hereby reminded that the legal obligation to affirmatively further fair housing remains in effect, and that HUD places a high priority upon the responsibility of program participants to ensure that their AIs serve as effective fair housing planning tools. For Consolidated Plan program participants that are starting a new 3–5-year Consolidated Plan cycle that begins before their due date for an AFH, the AI should continue to be updated in accordance with the HUD Fair Housing Planning Guide (1996).⁵ The data HUD has developed in order to implement the AFFH rule will remain available for program participants to use in conducting their AIs. HUD encourages program participants to collaborate to develop a regional AI, as regional collaborations provide an opportunity for program participants to share resources and address fair housing issues that cross jurisdictional boundaries.⁶

Further, program participants are hereby reminded that if HUD believes the AI or actions taken to affirmatively further fair housing to be inadequate, HUD may require submission of the full AI and other documentation. If HUD concludes that the AI is substantially incomplete, or the actions taken were plainly inappropriate to address the identified impediments, HUD may

³ See, e.g., 42 U.S.C. 5304(b)(2), 5306(d)(7)(B), 12705(b)(15).

⁴ See, e.g., 24 CFR 91.225(a)(1) (2014); 24 CFR 91.325(a)(1) (2014).

⁵ Available at <https://www.hud.gov/sites/documents/FHPG.PDF>.

⁶ Please refer to HUD's 2017 interim guidance for additional information on collaboration, specifically the Q&A captioned: "How can States Collaborate with Local Governments or PHAs?". The guidance is available at: <https://www.hudexchange.info/resources/documents/Interim-Guidance-for-Program-Participants-on-Status-of-Assessment-Tools-and-Submission-Options.pdf>. This guidance is generally applicable to all types of program participants.

¹ 80 FR 42357.

² See 82 FR 4373.

question the jurisdiction's AFFH certification by providing notice to the jurisdiction that HUD believes the AFFH certification to be inaccurate and provide the jurisdiction an opportunity to comment. If, after the notice and opportunity to comment is given to the jurisdiction, HUD determines that the AFFH certification is inaccurate, HUD will reject the certification. Rejection of the certification renders the Consolidated Plan substantially incomplete and constitutes grounds for HUD to disapprove the Consolidated Plan as submitted.⁷ A jurisdiction cannot receive its Community Development Block Grants (CDBG), HOME, Emergency Solutions Grants (ESG), or Housing for Persons With AIDs (HOPWA) program grants until the Consolidated Plan is approved.

Dated: May 18, 2018.

Anna Maria Farías,

Assistant Secretary for Fair Housing and Equal Opportunity.

[FR Doc. 2018-11145 Filed 5-21-18; 4:15 pm]

BILLING CODE 4210-67-P

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

[Docket No. FR-5173-N-16]

Affirmatively Furthering Fair Housing: Withdrawal of Notice Extending the Deadline for Submission of Assessment of Fair Housing for Consolidated Plan Participants

AGENCY: Office of the Assistant Secretary for Fair Housing and Equal Opportunity, HUD.

ACTION: Notice; withdrawal.

SUMMARY: This notice withdraws HUD's January 5, 2018, notice extending the submission deadline for an Assessment of Fair Housing (AFH) by local government consolidated plan program participants.

DATES: Applicable May 23, 2018, the document published at 83 FR 683 on January 5, 2018, is withdrawn.

FOR FURTHER INFORMATION CONTACT: Krista Mills, Deputy Assistant Secretary, Office of Policy, Legislative Initiatives, and Outreach, Office Fair Housing and Equal Opportunity, Department of Housing and Urban Development, 451 7th Street SW, Room 5246, Washington, DC 20410; telephone number 202-402-6577. Individuals with hearing or speech impediments may access this number via TTY by calling the toll-free Federal Relay Service during working hours at 1-800-877-8339.

⁷ See 24 CFR 91.500.

SUPPLEMENTARY INFORMATION: HUD's Affirmatively Furthering Fair Housing (AFFH) regulations (24 CFR 5.150-5.168) provide that program participants must submit an Assessment of Fair Housing (AFH) using a HUD-provided assessment tool. See *e.g.*, 24 CFR 5.154. The regulations further provide a schedule of time frames by which different types of program participants must submit an assessment using the appropriate HUD-provided tool. See 24 CFR 5.160(a). These time frames are connected to an individual program participant's multi-year consolidated planning process. On January 5, 2018, at 83 FR 683, HUD published a **Federal Register** notice extending the time frame applicable to local government consolidated plan program participants. HUD is withdrawing the January 5, 2018, notice. If HUD later finds it prudent to revise the regulations, including by revising the submission schedule, HUD will publish a notice of proposed rulemaking to that effect for public comment.

Dated: May 18, 2018.

Anna Maria Farías,

Assistant Secretary for Fair Housing and Equal Opportunity.

[FR Doc. 2018-11143 Filed 5-21-18; 4:15 pm]

BILLING CODE 4210-67-P

DEPARTMENT OF THE INTERIOR

Fish and Wildlife Service

[FWS-R8-ES-2018-N048;
FXES1113080000-178-FF08E00000]

Endangered Species Recovery Permit Applications

AGENCY: Fish and Wildlife Service, Interior.

ACTION: Notice of receipt of permit applications; request for comment.

SUMMARY: We, the U.S. Fish and Wildlife Service, invite the public to comment on the following applications to conduct certain activities with endangered species. With some exceptions, the Endangered Species Act (ESA) prohibits activities with endangered and threatened species unless a Federal permit allows such activity. The ESA also requires that we invite public comment before issuing recovery permits to conduct certain activities with endangered species.

DATES: Comments on these permit applications must be received on or before June 22, 2018.

ADDRESSES: Written data or comments should be submitted to the Endangered Species Program Manager, U.S. Fish and

Wildlife Service, 2800 Cottage Way, Room W-2606, Sacramento, CA 95825 (telephone: 916-414-6464; fax: 916-414-6486). Please refer to the respective permit number for each application when submitting comments.

FOR FURTHER INFORMATION CONTACT: Daniel Marquez, Fish and Wildlife Biologist; see ADDRESSES (telephone: 760-431-9440; fax: 760-431-9624).

SUPPLEMENTARY INFORMATION: The following applicants have applied for scientific research permits to conduct certain activities with endangered species under section 10(a)(1)(A) of the Endangered Species Act (ESA; 16 U.S.C. 1531 *et seq.*). We seek review and comment from local, State, and Federal agencies and the public on the following permit requests

Applicants

Permit No. TE-204436

Applicant: Johanna Kisner, Orcutt, California

The applicant requests a permit renewal to take (harass by survey, capture, handle, and release) the tidewater goby (*Eucyclogobius newberryi*) in conjunction with survey activities throughout the range of the species in California for the purpose of enhancing the species' survival.

Permit No. TE-185595

Applicant: Kelly Bayne, Sacramento, California

The applicant requests a permit renewal to take (harass by survey, capture, handle, release, collect vouchers, and collect branchiopod cysts) the Conservancy fairy shrimp (*Branchinecta conservatio*), longhorn fairy shrimp (*Branchinecta longiantenna*), San Diego fairy shrimp (*Branchinecta sandiegonensis*), Riverside fairy shrimp (*Streptocephalus woottoni*), and vernal pool tadpole shrimp (*Lepidurus packardii*); and take (harass by survey, capture, handle, and release) the California tiger salamander (Santa Barbara County and Sonoma County Distinct Population Segment (DPS)) (*Ambystoma californiense*) in conjunction with survey activities throughout the range of the species in California for the purpose of enhancing the species' survival.

Permit No. TE-101462

Applicant: Peter Sarafian, Los Osos, California

The applicant requests a permit renewal to take (harass by survey, capture, handle, and release) the Morro shoulderband snail (Banded dune) (*Helminthoglypta walkeriana*) in

Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation

Data Version AFFHT0004
(Released November 17, 2017)

This document was published
on December 13, 2017

HUD, Office of Policy Development & Research¹

¹ Prepared by Cloud Nine Technologies and Brent Mast, HUD Office of Policy Development and Research

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Document Revision History

Date	Change Description / Purpose
November 30, 2017	Original document provided with Data Version AFFHT0004, released November 17, 2017.

I. Overview

The Affirmatively Furthering Fair Housing (AFFH) rule created a standardized process for fair housing planning that program participants use to help meet their longstanding requirement to affirmatively further fair housing. As part of this process, program participants analyze data and other information to assess fair housing issues in their jurisdictions and regions. Program participants use HUD-provided data, as well as local data and local knowledge, to conduct their assessment of fair housing.

This document outlines the data, methods, and sources behind the data and mapping tool that HUD provides. It describes demographic, socioeconomic, and housing characteristics, as well as access to opportunity areas through a series of Opportunity Indices.

This data package is not exhaustive and should not supplant local data or local knowledge that is more robust, timely, or accurate. It represents a baseline effort to assemble consistent, nationally available data from a variety of sources compiled into one location.

II. Data Updates, Additions and Revisions

HUD-provided data are periodically updated. Versions of HUD-provided data are labeled with the letters ‘AFFHT’ followed by four digits (e.g. AFFHT0001). The labels progress in chronological order, meaning that the greater the number, the more recent the version of HUD-provided data. More information on earlier data versions are provided on [HUD Exchange](#).

On November 17, 2017, AFFH-T provided maps and tables using data version AFFHT0004. The following additions, revisions and corrections are now included in the AFFHT0004 maps and tables.

- Maps and tables using AFFHT0004 are based on the FY2017 list of program participants. All previous data versions are based on the FY2016 list.
- In AFFHT0004, improvements were made in the aggregation of Census data for tract and block group level data matched to PHA maps and entitlement/non-entitlement boundaries in the State (beta) maps. HUD has slightly adjusted the method in which weights have been applied to better estimate data for tracts and block groups that cross multiple jurisdictional boundaries. This did not affect Local Government maps and tables, only PHA and State maps and tables were affected.
- The following fixes were implemented, and have been noted in the list of [Known Issues](#):
 - State Map 5 pop-up contained the incorrect count for publicly supported housing. This has been fixed in data version AFFHT0004 and the pop-ups now display the correct count for publicly supported housing.
 - In Maps 7-13, opportunity indices in the pop-ups did not have correct formatting. This has been corrected in data version AFFHT0004. For Local Government and PHA maps, the indices are displayed as whole numbers. For States, the indices are calculated as average tract indices across counties, for which two decimal values are displayed.

- For previous data versions applied to Map 2, Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) for 1990 and 2000 trend data were incorrect. Map 2 in the AFFH-T incorrectly displayed the location of historical R/ECAPs for 1990 and 2000. This has been corrected in data version AFFHT0004. Map 2 in the AFFH-T now displays the correct location of historical R/ECAPs for 1990 and 2000. The public use file for AFFHT0004 has the correct R/ECAP data.
- For previous data versions, the Environmental Health Index was missing in some areas and required correction. (Map 14 and Table 12) There were errors in the coding and crosswalk used when Census tracts were matched to jurisdictions or regions. This resulted in some tracts being incorrectly matched to jurisdictions or regions when the index was calculated. This has been corrected in data version AFFHT0004.
- For previous data versions, the School Proficiency Index required some correction. (Map 7 and Table 12). There were errors in the coding and crosswalk used when Census tracts were matched to jurisdictions or regions. This resulted in some tracts being incorrectly matched to jurisdictions or regions when the index was calculated. This has been corrected in data version AFFHT0004.
- In AFFHT0003, the transit trips index and the low transportation cost index for PHAs and States was calculated with a vintage of the Location Affordability Index (LAI) data that was different than what was published in the data documentation and was not consistent with the data used for Local Governments. This did not affect Local Government maps and tables, only PHA and State maps and tables were corrected. This has been corrected in data version AFFHT0004 so that all transportation indices are calculated using LAI 2008-2012.

Table 1. Data Sources by Data Version Number

AFFH-T data version Number	AFFHT0004	AFFHT0003	AFFHT0002	AFFHT0001
Boundaries for Jurisdictions	Program Participant list for FY2017	Program Participant list for FY2016	Program Participant list for FY2016	Program Participant list for FY2013
R/ECAPs	ACS 2009-13 with CBSA delineations released in July 2015	ACS 2009-13 with CBSA delineations released in July 2015	ACS 2009-13 with CBSA delineations released in July 2015	ACS 2009-13 with CBSA delineations released in February 2013
Brown Longitudinal Tract Database (LTDB)	1990, 2000 and 2010	1990, 2000 and 2010	1990, 2000 and 2010	1990 and 2000
Inventory Management System (IMS)/PIH Information Center (PIC)	2016	2016	2016	2013
Tenant Rental Assistance Certification System (TRACS)	2016	2016	2016	2013
Comprehensive Housing Affordability Strategy (CHAS)	2009-13	2009-13	2009-13	2008-12
Longitudinal Employer-Household Dynamics (LEHD)	2014	2014	2014	2013
Great Schools	2013-14*	2013-14*	2012	2012
Common Core of Data	2013-14*	2013-14*	2012	2012
School attendance boundaries	Maponics School Attendance Zone Database 2016*	Maponics School Attendance Zone Database 2016*	School Attendance Boundary Information System (SABINS) 2012	School Attendance Boundary Information System (SABINS) 2012
National Air Toxics Assessment (NATA)	2011	2011	2011	2005

Location Affordability Index (LAI)	2008-2012	2008-2012	2008-2012	2008-2012
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*Please note that school proficiency data for jurisdictions in Kansas, West Virginia, and Puerto Rico have not been updated because no data was reported for these jurisdictions in the Great Schools 2013-14 dataset. In the AFFH-T, the school proficiency index for these jurisdictions will continue to display the data from AFFHT0002 when AFFHT0004 is selected. Jurisdictions in all other states have new, updated data for school proficiency as noted in the AFFHT0004 details above. Please also refer to the section below on the School Proficiency Index for more information.

III. Data Sources

Table 2 lists data sources, years, and the spatial scale used to populate the tables and maps in the AFFH-T.

Table 2: Data Sources

Data Category	Variables	Geographic level or Primary Sampling Unit	Tables	Maps	Sources and years
Demographics	Race/Ethnicity population in 2010	Block group	1, 4	1, 5-13	Decennial Census, 2010
Demographics	Race/Ethnicity population in 2010, 2000 & 1990	Tract	2	2	Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2010, 2000 & 1990
Demographics	Limited English Proficiency (LEP) population; LEP languages; Foreign-born population; Foreign-born population place of birth (national origin)	Tract	1, 2, 4	3, 4, 6-13	American Community Survey (ACS), 2009-2013; Decennial Census, 2000; Decennial Census, 1990 ^a
Demographics	Disability Type population; Disabled population by Age	Tract	1, 13, 14	14, 15	American Community Survey (ACS), 2009-2013 ^b
Demographics	Population by Age, Sex, Family Type	Tract	1, 2, 4	7-13	Decennial Census, 2010; Decennial Census, 2000; Decennial Census, 1990
Socioeconomic	Racially/Ethnically-Concentrated Areas of Poverty (R/ECAP)	Tract	4, 7	1-17	American Community Survey (ACS), 2009-2013; Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 1990, 2000 & 2010
Housing	Population, housing units, occupied housing units, race/ethnicity, age, disability status, household type, and household size by Housing Type	Development; Tract	5-8, 11, 15	5	Inventory Management System (IMS)/ PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014 ^c
Housing	Households with Housing Problems; Households with Severe Housing Problems; Households with Income Less than 31% of Area Median Income (AMI); Households with Severe Housing Cost Burden; Households with Housing Problems	Tract	9, 10, 16	6, 16, 17	Comprehensive Housing Affordability Strategy (CHAS), 2009-2013

Data Category	Variables	Geographic level or Primary Sampling Unit	Tables	Maps	Sources and years
	by Race, Household Type, Household Size; Housing Tenure				
Opportunity Indices	Dissimilarity Index	Community Development Block Grant (CDBG); HOME Investment Partnerships Program (HOME), Core Based Statistical Area (CBSA)	3	na	Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2010, 2000 & 1990
Opportunity Indices	Low Poverty Index, Labor Market Engagement Index	Tract	12	9, 12	American Community Survey (ACS), 2009-2013
Opportunity Indices	School Proficiency Index	Block group	12	7	Great Schools (proficiency data), 2013-14; Common Core of Data (4th grade enrollment and school addresses), 2013-14; Maponics School Attendance Zone database, 2016
Opportunity Indices	Low Transportation Cost Index; Transit Trips Index	Tract	12	10, 11	Location Affordability Index (LAI) data, 2008-2012
Opportunity Indices	Jobs Proximity Index	Block group	12	8	Longitudinal Employer-Household Dynamics (LEHD), 2014
Opportunity Indices	Environmental Health Index	Tract	12	13	National Air Toxics Assessment (NATA) data, 2011
<p>^a For variables on limited English proficiency, foreign born, and foreign born by national origin, percentages using data from the American Community Survey (ACS), 2009-2013 are calculated using total population from the 2010 decennial census. Percentages using 2000 and 1990 decennial census data are also calculated using total population.</p> <p>^b For variables on disability, percentages are calculated based on the total population age 5 years and older.</p> <p>^c Because of incorrect or missing address information, which prevents 100 percent success rate in geocoding, some properties in IMS/PIC as well as TRACS may not be included in the calculation (which may impact housing data).</p>					

IV. Levels of Geography and Weights

The AFFH-T includes data for all U.S. states, the District of Columbia, and Puerto Rico. Users may access data through the AFFH-T at various spatial scales, including geo-boundaries of Census tracts, the Community Development Block Grant (CDBG), the HOME Investment Partnerships Program (HOME), the Core-based Statistical Area (CBSA), County, Public Housing Agency (PHA) Service Area, State entitlement and non-entitlement areas, and State. As shown in Table 2, most data in the AFFH-T are at the Census tract or block group levels. The selection of a spatial scale to use as the initial basis for each data element is primarily based on the lowest level in which HUD has faith in its accuracy. For example, data elements constructed from the American Community Survey (ACS) data are based on Census tract estimates rather than block group estimates due to concerns about sampling errors.

Data displayed in the AFFH-T map views are at the Census tract level for Local Governments and for PHAs, and at the county level for States. Data displayed in the report tables are aggregated from smaller geographic units (i.e. either the Census tract or block group level) to the CDBG² and CBSA, PHA Service Area, county, State entitlement and non-entitlement areas, and State levels. As shown in Table 1, the AFFH data are from multiple sources in various years. In order to compile them into one mapping tool database, data issued or released at different years need to be adjusted to the same year. The Census tract and block group boundaries in the AFFH-T are based on those released by Census in 2010. The AFFH-T incorporates minor changes indicated in the ACS “Geography Release Notes” for 2011 and 2012 on the Census Bureau website³, resulting in boundaries and corresponding data adjusted to calendar year 2012. The CDBG and HOME jurisdiction, as well as State entitlement and non-entitlement boundaries are based on political jurisdiction boundaries for calendar year 2017. The CBSA boundaries are based on OMB 2015 definitions. The PHA boundaries are based either on summary level 050 (State-County) or on summary level 160 (State-Place).

The CDBG level, the HOME level and the State entitlement and non-entitlement reflect the geographic boundaries for grantees that receive direct allocations of CDBG and HOME funds from HUD. CDBG and HOME jurisdictions as well as State entitlement and non-entitlement level are not census-designated areas, which mean that these jurisdictional boundaries do not fall consistently along Census tracts or block groups. A series of technical procedures were necessary to construct a crosswalk between census-designated areas and CDBG, HOME jurisdictions and State entitlement and non-entitlement level Census geographic identifiers at the summary level 070 (state-county-county subdivision-place/remainder), summary level 080 (state-county-county subdivision-place/remainder-census tract) and summary level 091 (state-county-county subdivision-place/remainder-census tract-block group). Similarly, although county, place, Census tract and block group are all census-designated areas, there is necessarily no direct mapping of a Census tract or

² CDBG jurisdictions in the AFFH-T exclude non-entitlement jurisdictions.

³ Tract changes between 2010 and 2011 are here: http://www.census.gov/acs/www/data_documentation/2011_geography_release_notes/; Tract changes between 2011 and 2012 are here: http://www.census.gov/acs/www/data_documentation/2012_geography_release_notes/

block group to a State-Place (summary level 160). A series of technical procedures were necessary to construct a crosswalk between the Census tract/block group and place.

Weights

At the boundaries of local government, PHA and State jurisdictions and their respective regions, some Census tracts/block groups fell partially within the boundaries and partially outside of the boundaries. Data from these tracts were weighted by the share of the population within the boundaries to approximate including only the portion of those tracts/block groups within the jurisdictions and regions in estimates reported for these levels.

V. Race/Ethnicity

Among other protected characteristics, the Fair Housing Act prohibits housing discrimination based on race. HUD offers data on both race and ethnicity. HUD provides data for non-Hispanic Whites, considering Hispanics of any race as a separate race/ethnic category that can experience housing discrimination differently than other groups. Similarly, the data provided for the other race groups – Black, Asian and Pacific Islander, Native American, and other – also exclude information for people who identify their ethnicity as Hispanic. Other race/ethnicity data are discussed in sections IX and XI.

To make the racial categories in the demographic trend data more comparable between the historic data and the 2010 data, HUD has produced two sets of 2010 race data, provided in Table 2 and Map 2. One is based on 2010 Census race/ethnicity categories and the other is based on the categories provided in the Longitudinal Tract Database (LTDB) produced by Brown University. In Table 2 and Map 2, the 1990/2000/2010 “Trend” data uses LTDB, which does not have the Other category nor the Two or More Races category. The “Current” data in Table 2 is the same data in Table 1, but without the additional categories in Table 1, in order to align with the 1990/2000/2010 “Trend” data in Table 2.

The data for R/ECAPs in Map 2 are based on LTDB 2010 data that have been normalized to 2012 Census tract boundaries. For all maps, the CBSA definitions remain the same, using the Census Bureau’s July 2015 CBSA delineation.

Data Source: American Community Survey (ACS) 2009-2013; Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 1990, 2000 & 2010

Related AFFH-T Local Government, PHA and State Tables/Maps: Tables 1, 2, 4, 12; Maps 1, 2, 5-13.

VI. National Origin and Limited English Proficiency (LEP)

The Fair Housing Act also prohibits housing discrimination based on national origin. The AFFH-T provides data for four indicators of national origin. The first two are the ten most common places of birth of the foreign-born population by jurisdiction and region and the number and percentage of the population that is foreign-born. The second two indicators are the ten most common languages spoken at home (for the population age 5 years and over) for those who speak English “less than

‘very well,’” and the number and percentage of the population who speak English “less than ‘very well.’”⁴

Data on national origin and LEP originate from the 2009-2013 American Community Survey and from 2000 and 1990 Decennial Census data. Counts of each place of birth by tract were aggregated to the jurisdiction and regional level separately. Within these geographies, the counts for places of birth were ranked and the ten most populous groups were determined and are presented.

The ten most common places of birth and LEP languages are displayed in the AFFH-T Tables, while the top five are displayed in the AFFH-T Maps. HUD limits the number of categories for the maps to enable users to better visualize the most populous groups. The data does not contain National origin and LEP for Puerto Rico.

Data Source: American Community Survey (ACS) 2009-2013; Decennial Census, 2000; Decennial Census 1990.

Related AFFH-T Local Government and PHA Tables/Maps: Tables 1, 2, 4; Maps 3, 4, 6-13.

Related AFFH-T State Tables/Maps: Tables 1, 2, 4; Maps 3, 4.

VII. Disability Status and Type

The Fair Housing Act prohibits housing discrimination against any person based on disability. The AFFH-T provides information on disability type, disability status by age group, and disability status by housing type. The disability type and disability status by age group measures are from the ACS, while the measure of persons with disabilities by housing type is from the PIC/TRACS data (see section IX). The definition of “disability” used by the Census Bureau may not be comparable to reporting requirements under certain HUD programs, which sometimes use different definitions of disability for purposes of determining eligibility.

The disability type categories are: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. These categories are based on a new set of disability questions introduced into the ACS in 2008 and are not comparable to disability type figures in prior years.⁵

Data Source: American Community Survey (ACS), 2009-2013; Inventory Management System (IMS)/ PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016

Related AFFH-T Local Government, PHA and State Tables/Maps: Tables 1, 13, 14, 15; Maps 14, 15.

⁴ Percentages using data from the American Community Survey (ACS), 2009-2013 are calculated using total population from the 2010 decennial census. Percentages using decennial census data from 2000 and 1990 are also calculated using total population.

⁵ For variables on disability, percentages are calculated based on the total population age 5 years and older.

VIII. Sex

The Fair Housing Act prohibits housing discrimination against any person based on sex. The AFFH-T provides information on male/female status.

Data Source: Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 1990, 2000 & 2010

Related AFFH-T Local Government, PHA and State Tables/Maps: Tables 1, 2.

IX. Families with Children and Age

The Fair Housing Act prohibits housing discrimination against any person based on familial status. For purposes of the Fair Housing Act, familial status includes one or more individuals under the age of 18 being domiciled with a parent or other person with legal custody of such individuals. The AFFH-T provides information on families with children. Specifically, familial status is measured as the number and percentage of all families (with two or more related people in the household) that are families with children under age 18. The AFFH-T also provides data on age group (under 18, 18-64, and 65+).

The 1990 data on families with children in Table 2 did not include information on families with a male householder, no wife present. The data have been corrected in the public use files and will be incorporated in a future update of the AFFH-T.

Data Source: Decennial Census, 2010; Decennial Census, 2000; Decennial Census 1990

Related AFFH-T Local Government and PHA Tables/Maps: Tables 1, 2, 4; Maps 7-13.

Related AFFH-T State Tables/Maps: Tables 1, 2, 4.

X. Households in Publicly Supported Housing

The AFFH-T provides data on households within the following housing categories: Public Housing, Section 8 Project-based Rental Assistance (PBRA), other assisted housing multifamily properties, and Section 8 tenant-based Housing Choice Voucher (HCV) Program. The “Other Multifamily” category includes properties funded through the Section 202 Supportive Housing for the Elderly Program (with both capital advance grants and Project Rental Assistance Contracts) and the Section 811 Supportive Housing for Persons with Disabilities Program.

The AFFH-T also provides locational information for Low-Income Housing Tax Credit properties.

The sources for data on these housing types are:

- HCV: census tract-level data extract from the Family Report Form HUD-50058 (PIC)
- Public Housing: development-level data extract from the Family Report Form HUD-50058 (PIC)
- PBRA and other multifamily properties: development-level data extract from HUD-50059 (TRACS)
- LIHTC: National Low-Income Housing Tax Credit (LIHTC) Database

The AFFH-T reports data by housing category differently depending on the report table. These details are outlined below:

Tables 5, 6, 11, and 15 present data on households in Public Housing, PBRA, other publicly supported housing multifamily properties, and HCV. Data on developments with fewer than 11 households reported or with fewer than 50 percent of occupied units reported at the CDBG, HOME, and CBSA aggregations were omitted to ensure confidentiality.

Table 5 presents the total number of units in publicly supported housing programs⁶ and their share of the total number of housing units within CDBG or HOME jurisdictions. The denominator used in Table 5 is the total number of housing units in the 2010 census block group aggregated at the CDBG or HOME level.

Table 6 presents data on the race and ethnicity of households in publicly supported housing programs. The race/ethnicity categories are non-Hispanic White, non-Hispanic Black, Hispanic, and non-Hispanic Asian or Pacific Islander. Information on the race and ethnicity of households with incomes at or below 30 percent, 50 percent, and 80 percent of the area median income (AMI) is from the Comprehensive Housing Affordability Strategy (CHAS) database.

Table 7 reports the following data on households in publicly supported housing programs within the CDBG or HOME jurisdiction: race/ethnicity (percent non-Hispanic White, non-Hispanic Black, Hispanic, and non-Hispanic Asian or Pacific Islander), percent of households with at least one member with a disability, and percent of households where the head or spouse is age 62 or older. The data in this table are presented separately for properties/households located within and outside of racially or ethnically-concentrated areas of poverty (R/ECAPs) (detailed below in section X) within the CDBG or HOME jurisdiction.

Table 8 presents data on the composition of households assisted through Public Housing, PBRA, and other multifamily properties. Population characteristics include race/ethnicity (White, Black, Hispanic, Asian), and households with children. Data on properties with fewer than 11 households reported or with fewer than 50 percent of occupied units reported at the development and at the Census tract aggregation were omitted to ensure confidentiality.

Tables 7 and 8 include only developments with spatial information that is precise enough to accurately determine their location within a Census tract, such as a rooftop location or the ZIP+4 centroid associated with the address. Developments with less precise spatial information are omitted because they cannot reliably be located to the correct street block or the correct side of the street block.

In conjunction with Tables 7 and 8, Map 5 also includes only developments with spatial information that is precise enough to accurately determine their location within a Census tract. Over 94 percent of

⁶ Publicly Supported Housing Programs include Public Housing, HCV, PBRA, and other multifamily programs. Since HCV units can be in LIHTC, LIHTC is excluded as counting both would be double counting some units.

Public Housing, PBRA, and other multifamily have sufficient geographical information to be included in the tables and maps.

Tables 11 and 15 present data on unit size (households in 0-1 bedroom units, 2 bedroom units, and 3 or more bedroom units), households with children, and households where at least one member has a disability.

Data Source: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014; Decennial Census, 2010; Comprehensive Housing Affordability Strategy (CHAS), 2009-2013

Related AFFH-T Local Government and PHA Tables/Maps: Tables 5-8, 11, 15; Map 5.

Related AFFH-T State Tables/Maps: Tables 5-8, 15; Map 5.

XI. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

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

$$\frac{R}{ECAP}_i = \text{yes ... if ...} \left\{ \begin{array}{l} PovRate_i \geq [3 * \mu_{PovRate}^{cbsa}] \\ \text{or} \\ PovRate_i \geq 0.4 \end{array} \right. \cap \left[\frac{(Pop_i - NHW_i)}{Pop_i} \right] \geq 0.50$$

Where i represents census tracts, $(\mu_{PovRate}^{cbsa})$ is the metropolitan/micropolitan (CBSA) mean tract poverty rate, $PovRate$ is the i th tract poverty rate, (NHW_i) is the non-Hispanic White population in tract i , and Pop is the population in tract i .

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

Since the R/ECAPs information is based on CBSAs, in the AFFHT0004 data version, there is no R/ECAPs information for counties in the map tool. At the State level, the current and historical R/ECAPs flags are replaced by the following attributes: County Population in R/ECAPs, Percentage

of County Population living in R/ECAPs, Number of R/ECAPs County Tracts, and Percentage of County Tracts that are R/ECAPs.

Data Source: American Community Survey (ACS), 2009-2013; Decennial Census (2010); Brown Longitudinal Tract Database (LTDB) based on decennial census data, 1990, 2000 & 2010

Related AFFH-T Local Government and PHA Tables/Maps: Tables 4, 7; Maps 1-17.

Related AFFH-T State Tables/Maps: Tables 4, 7; Maps 1-15, 18.

References:

Wilson, William J. (1980). *The Declining Significance of Race: Blacks and Changing American Institutions*. Chicago: University of Chicago Press.

XII. Housing Problems and Disproportionate Housing Needs

To assist communities in describing and identifying disproportionate housing needs in their jurisdictions and regions, the AFFH-T provides data identifying instances where housing problems or severe housing problems exist. The AFFH-T presents housing problems overall, as well as variations by race/ethnicity, household type and household size. The race/ethnicity categories presented are non-Hispanic White, non-Hispanic Black, Hispanic, non-Hispanic Asian or Pacific Islander, non-Hispanic Native American, and non-Hispanic other. The household type and size categories presented are family households of less than five people, family households of five or more people, and non-family households of any size.

Information on housing problems is drawn from CHAS, which demonstrates the extent of housing problems and housing needs, particularly for low-income households. The CHAS data are produced via custom tabulations of ACS data by the U.S. Census Bureau.

The AFFH-T provides data on the number and share of households with one of the following four housing problems:

1. Lacks complete kitchen facilities
2. Lacks complete plumbing facilities
3. More than one person per room
4. Cost Burden - monthly housing costs (including utilities) exceed 30% of monthly income

Additionally, the AFFH-T provides data on the number and share of households with one or more of the following “severe” housing problems, defined as:

1. Lacks complete kitchen facilities
2. Lacks complete plumbing facilities
3. More than one person per room
4. Severe Cost Burden - monthly housing costs (including utilities) exceed 50% of monthly income

Program participants should review these data to determine where disproportionate housing needs may be found in their jurisdictions and regions. For example, a sub-group, such as households of a

particular racial/ethnic group or household size, may experience housing problems more frequently than the overall population as a whole or than another sub-group.

Data Source: Comprehensive Housing Affordability Strategy (CHAS), 2009-2013

Related AFFH-T Local Government, PHA and State Tables/Maps: Tables 9, 10; Map 6.

XIII. Housing Tenure

To assist in understanding the entire housing stock in a jurisdiction and region, the AFFH-T provides information on housing tenure. The number and percentage of housing units occupied by renters and homeowners are available for households overall and by the race of the head of household.

Additionally, the AFFH-T contains a map showing the percentage of rental units that are affordable, defined as renting at or less than 30 percent of household income for a household whose income is at 50 percent of area median income.

Data Source: Comprehensive Housing Affordability Strategy (CHAS), 2009-2013

Related AFFH-T Local Government and PHA Tables/Maps: Table 16; Maps 16, 17.

Related AFFH-T State Tables/Maps: none.

XIV. Indices

HUD has developed a series of indices to help inform communities about segregation and disparities in access to opportunity in their jurisdiction and region. A description of the methodology for each of the following indices may be found below:

1. Dissimilarity Index
2. Low Poverty Index
3. School Proficiency Index
4. Jobs Proximity Index
5. Labor Market Engagement Index
6. Low Transportation Cost Index
7. Transit Trips Index
8. Environmental Health Index

Table 3 of the AFFH-T tables provides values for the dissimilarity index. Table 12 of the AFFH-T tables provides values for all the remaining indices, which relate to disparities in access to opportunity.

To generate Table 12, index values were calculated for each census tract. These tract values were averaged and then weighted based on the distribution of people of different racial and ethnic groups within the CDBG jurisdiction, HOME jurisdiction, CBSA, PHA Service Areas, State entitlement/non-entitlement areas, or State to generate composite index values for each race and ethnicity. A similar process was applied to weight the data based on the distribution of people of different racial and ethnic groups who are living below the federal poverty line within the CDBG, HOME, or State Entitlement jurisdiction, CBSA, PHA Service Area, and State. The population

estimates are based on the 2010 Decennial Census at the census tract or block group level, depending on the geographic level at which the index was originally calculated.

The indices from Table 12 are also used to populate maps generated by the AFFH-T, showing the overall index values of census tracts juxtaposed against data on race/ethnicity, national origin, and family type.

The following details each of the eight indices used in the AFFH-T.

A. Analyzing Segregation

1. Dissimilarity Index

Summary

The dissimilarity index (or the index of dissimilarity) is a commonly used measure of community-level segregation. The dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups. It is calculated as:

$$D_j^{WB} = 100 * \frac{1}{2} \sum_{i=1}^N \left| \frac{W_i}{W_j} - \frac{B_i}{B_j} \right|$$

Where i indexes census block groups or tracts, j is the j th jurisdiction, W is group one and B is group two, and N is the number of block groups or tracts i in jurisdiction j .

Interpretation

The values of the dissimilarity index range from 0 to 100, with a value of zero representing perfect integration between the racial groups in question, and a value of 100 representing perfect segregation between the racial groups. The following is one way to understand these values:

Measure	Values	Description
Dissimilarity Index	<40	Low Segregation
[range 0-100]	40-54	Moderate Segregation
	>55	High Segregation

In Table 3, the current dissimilarity indices for 2010 exclude multiracial individuals, while the 1990, 2000, and 2010 trend racial data from the Brown Longitudinal Tract Database includes multiracial individuals in the racial categories.

Data Source: Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2010, 2000 & 1990. Decennial Census data are Block-group level, and LTDB data are census tract level..

Related AFFH-T Local Government and PHA Tables/Maps: Table 3.

Related AFFH-T State Tables/Maps: Table 3; Map 18.

References:

Massey, Douglas S. and Nancy A. Denton. 1988. The Dimensions of Residential Segregation. *Social Forces*, 67(2): 281-315.

B. Analyzing Disparities in Access to Opportunity

HUD used a two-stage process for developing the data needed to analyze disparities in access to opportunity. The first stage involves quantifying the degree to which a neighborhood offers features commonly viewed as important opportunity indicators. In the second stage, HUD compares these rankings across people in particular racial and economic subgroups to characterize disparities in access to opportunities. To focus the analysis, HUD developed methods to quantify a selected number of the important opportunity indicators in every neighborhood. These dimensions were selected because existing research suggests they have a bearing on a range of individual outcomes. HUD has selected five dimensions upon which to focus: poverty, education, employment, transportation, and health.

Invariably, these opportunity indicators do not capture all that is encompassed in an individual's or a family's access to opportunity. In quantifying opportunity indicators, HUD is quantifying features of neighborhoods for the purpose of assessing whether significant disparities exist in the access or exposure of particular groups to these quality of life factors. While these important dimensions are identified by research as important to quality of life, the measures are not without limitations. HUD constrained the scope of HUD-provided data to those that are closely linked to neighborhood geographies and could be measured consistently at small area levels across the country. For example, HUD's measure of school performance only reflects elementary school proficiency. It does not capture academic achievement for higher grades of schooling, which is important to a community's well-being, but may not be as geographically tied to individual neighborhoods as elementary schools. Similarly, the health hazard measure only captures outdoor toxins, missing indoor exposures. The national-availability restriction is a necessity given that all HUD program participants must complete an Assessment of Fair Housing. HUD realizes that there are other opportunity indicators that may be relevant, such as neighborhood crime or housing unit lead and radon levels. However, these lack consistent neighborhood-level data across all program participant geographies. HUD encourages program participants to supplement the HUD-provided data with local data and local knowledge on these other opportunity indicators so that the analysis is as thorough as possible. The five opportunity indicators are operationalized by seven indices, described below.

2. Low Poverty Index

Summary

The low poverty index captures poverty in a given neighborhood. The index is based on the poverty rate (pv).

$$Pov_i = \left[\left(\frac{pv_i - \mu_{pv}}{\sigma_{pv}} \right) * -1 \right]$$

The mean (μ_{pv}) and standard error (σ_{pv}) are estimated over the national distribution.

The poverty rate is determined at the census tract level.

Interpretation

Values are inverted and percentile ranked nationally. The resulting values range from 0 to 100. The higher the score, the less exposure to poverty in a neighborhood.

Data Source: American Community Survey, 2009-2013

Related AFFH-T Local Government, PHA and State Tables/Maps: Table 12; Map 12. School Proficiency Index

3. School Proficiency Index

Summary

The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The school proficiency index is a function of the percent of 4th grade students proficient in reading (*r*) and math (*m*) on state test scores for up to three schools (*i*=1,2,3) within 3 miles of the block group centroid. *S* denotes 4th grade school enrollment:

$$School_i = \sum_{n=i}^3 \left(\frac{S_i}{\sum^n S_i} \right) * \left[\frac{1}{2} * r_i + \frac{1}{2} * m_i \right]$$

Elementary schools are linked with block groups based on a geographic mapping of attendance area zones from School Attendance Boundary Information System (SABINS), where available, or within-district proximity matches of up to the three-closest schools within 1.5 miles. In cases with multiple school matches, an enrollment-weighted score is calculated following the equation above.

In the AFFHT0004 data version, there is no school proficiency data for jurisdictions in Kansas, West Virginia, and Puerto Rico because no data was reported for jurisdictions in these states in the Great Schools 2013-14 dataset. For the jurisdictions in these states, the block group and county level school proficiency index in Map 7 revert to using AFFHT0002, instead of the data in AFFHT0004. In Table 12 for these jurisdictions, the school proficiency index also reverts to AFFHT0002, as well as for regions that do not cross state boundaries. However, please note if region crosses state boundaries, Table 12 region-level school proficiency index reflects AFFHT0004 data.

The raw data contain an alternative school proficiency index that is adjusted for the percentage of students that are economically disadvantaged. Please note that the use of this alternative school proficiency index is optional; program participants are not required to include the alternative school proficiency index in their analysis. The alternative school proficiency index is not included in the AFFH-T online maps and tables, but is only provided in the raw data provided on [HUD Exchange](#).

The adjusted school proficiency index is a function of the percent of 4th grade students, economically disadvantaged and not economically disadvantaged, that are proficient in reading and math on state test scores for up to three schools (*i*=1,2,3) within 3 miles of the block group centroid. In the formula below, *j*=1 denotes economically disadvantaged students, and *j*=2 denotes students that are not economically disadvantaged. *S*_{*i,j*} denotes the count of group *j* students in school *i*, and *s*_{*i*} denotes total 4th grade enrollment in school *i*.

$$School_i = \sum_{i=1}^3 \frac{s_i}{S} * \sum_{j=1}^2 \frac{s_{i,j}}{s_i} \theta_{i,j}$$

Where $\Theta_{i,j}$ is an index, percentile ranked by state, for group j in school i :

$$\Theta_{i,j} = \left[\frac{1}{2} * r_{i,j} + \frac{1}{2} * m_{i,j} \right]$$

$m_{i,j}$ denotes math scores for group j in school i , and $r_{i,j}$ denotes reading scores for group j in school i .

Interpretation

Values are percentile ranked at the state level and range from 0 to 100. The higher the score, the higher the quality of the school system in a neighborhood.

Data Source: Great Schools (proficiency data, 2013-14); Common Core of Data (4th grade school addresses and enrollment, 2013-14); Maponics (attendance boundaries, 2016).

Related AFFH-T Local Government, PHA and State Tables/Maps: Table 12; Map 7.

4. Jobs Proximity Index

Summary

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

$$A_i = \frac{\sum_{j=1}^n \frac{E_j}{d_{i,j}^2}}{\sum_{j=1}^n \frac{L_j}{d_{i,j}^2}}$$

Where i indexes a given residential block group, and j indexes all n block groups within a CBSA. Distance, d , is measured as “as the crow flies” between block groups i and j , with distances less than 1 mile set equal to 1. E represents the number of jobs in block group j , and L is the number of workers in block group j .

The Longitudinal Employer-Household Dynamics (LEHD) database has no data for Puerto Rico and has a concentration of missing records for Massachusetts.

The downloadable raw data contain an alternative jobs proximity index. Please note that the use of this alternative jobs proximity index is optional; program participants are not required to include the alternative jobs proximity index in their analysis. The alternative jobs proximity index is not included

in the AFFH-T online maps and tables, but is only provided in the raw data provided on [HUD Exchange](#).

The alternative index is computed with the following formula, weighting the numerator and denominator by the inverse of distance instead of distance squared:

$$A_i = \frac{\sum_{j=1}^n \frac{E_j}{d_{i,j}}}{\sum_{j=1}^n \frac{L_j}{d_{i,j}}}$$

Interpretation

Values are percentile ranked at the CBSA level with values ranging from 0 to 100. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.

Data Source: Longitudinal Employer-Household Dynamics (LEHD) data, 2014

Related AFFH-T Local Government, PHA and State Tables/Maps: Table 12; Map 8.

5. Labor Market Engagement Index

Summary

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

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

Where the means (μ_u, μ_l, μ_b) and standard errors ($\sigma_u, \sigma_l, \sigma_b$) are estimated over the national distribution. Also, the value for the standardized unemployment rate is multiplied by -1.

Interpretation

Values are percentile ranked nationally and range from 0 to 100. The higher the score, the higher the labor force participation and human capital in a neighborhood.

Data Source: American Community Survey, 2006-2010

Related AFFH-T Local Government, PHA and State Tables/Maps: Table 12; Map 9.

6. Low Transportation Cost Index

Summary

This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e., CBSA). The estimates come from the Location Affordability Index (LAI). The data

used in the AFFH-T correspond to those for household type 6 (hh_type6_) as noted in the LAI data dictionary. More specifically, among this household type, the AFFH-T models transportation costs as a percent of income for renters (t_rent). Neighborhoods are defined as census tracts. The LAI data do not contain transportation cost information for Puerto Rico.

Interpretation

Values are inverted and percentile ranked nationally, with values ranging from 0 to 100. The higher the value, the lower the cost of transportation in that neighborhood. Transportation costs may be low for a variety of reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community.

Data Source: Location Affordability Index (LAI) data, 2008-2012

Related AFFH-T Local Government, PHA and State Tables/Maps: Table 12; Map 11.

References:

www.locationaffordability.info

http://lai.locationaffordability.info/lai_data_dictionary.pdf

7. Transit Trips Index

Summary

This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e., CBSA). The estimates come from the Location Affordability Index (LAI). The data used in the AFFH-T correspond to those for household type 6 (hh_type6_) as noted in the LAI data dictionary. More specifically, among this household type, the AFFH-T models annual transit trips for renters (transit_trips_rent). Neighborhoods are defined as census tracts. The LAI does not contain transit trip information for Puerto Rico.

Interpretation

Values are percentile ranked nationally, with values ranging from 0 to 100. The higher the value, the more likely residents in that neighborhood utilize public transit. The index controls for income such that a higher index value will often reflect better access to public transit.

Data Source: Location Affordability Index (LAI) data, 2008-2012

Related AFFH-T Local Government, PHA and State Tables/Maps: Table 12; Map 10.

References:

www.locationaffordability.info

http://lai.locationaffordability.info/lai_data_dictionary.pdf

8. Environmental Health Index

Summary

The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The index is a linear combination of standardized EPA estimates of air quality carcinogenic (*c*), respiratory (*r*) and neurological (*n*) hazards with *i* indexing census tracts.

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

Where means (μ_c, μ_r, μ_n) and standard errors ($\sigma_c, \sigma_r, \sigma_n$) are estimated over the national distribution.

Interpretation

Values are inverted and then percentile ranked nationally. Values range from 0 to 100. The higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census tract.

Data Source: National Air Toxics Assessment (NATA) data, 2011

Related AFFH-T Local Government, PHA and State Tables/Maps: Table 12; Map 13.

References:

<http://www.epa.gov/ttn/atw/natamain/>

C. Computing Indices by Protected Class

The AFFH-T provides index values documenting the extent to which members of different racial or ethnic groups have access or exposure to particular opportunity indicators. The AFFH-T provides a weighted average for a given protected characteristic. The generic access for subgroup M to asset dimension R in jurisdiction j is calculated as:

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

Where i indicates Census tracts in jurisdiction j for subgroup M to dimension R . N is the total number of Census tracts in jurisdiction j .

It is useful to provide an example of this in practice (Table 2). Consider Jurisdiction X with a total of three neighborhoods (A, B, and C). Each neighborhood has an index score representing the prevalence of poverty within that neighborhood (Column 1), with higher values representing lower levels of poverty. To compute the index value for a particular protected class, such as White or Black individuals, the values are weighted based on the distribution of that subpopulation across the three neighborhoods. For example, 40% of the jurisdiction’s White population lives in neighborhood A, so the index value for neighborhood A represents 40% of the composite index value for the White population in the jurisdiction. The values for neighborhoods B and C are weighted at 40% and 20% respectively, based on the share of White individuals living in those neighborhoods, leading to a final weighted low poverty index for the White population in the jurisdiction of 56.

Table 3. Example of Weighting of Low Poverty Index by Race in a Hypothetical Jurisdiction

	Dimension	White			Black		
Neighborhood	Low Poverty Index	white pop	%white of total pop	Index for whites [(1)*(3)]	black pop	%black of total pop	Index for blacks [(1)*(6)]
	(1)	(2)	(3)	(4)	(5)	(6)	(7)

	Dimension	White			Black		
Neighborhood	Low Poverty Index	white pop	%white of total pop	Index for whites [(1)*(3)]	black pop	%black of total pop	Index for blacks [(1)*(6)]
A	80	400	40%	32	100	20%	16
B	50	400	40%	20	150	30%	15
C	20	200	20%	4	250	50%	10
Total		1000	100%	56	500	100%	41

This exercise can be repeated for each racial or ethnic group. For example, the low poverty index among the Black population in Jurisdiction X is 41. Using these indices, it is possible to identify disparities in access to opportunity across protected classes.

To account for differences in household income across groups, the AFFH-T also provides separate index values for persons below the federal poverty line, again breaking out values by racial or ethnic group. This will aid program participants in understanding whether there are disparities in access to opportunity indicators across protected class groups that cannot be explained by differences in income. These index values by protected class among the total and populations below the federal poverty line are available in Table 12.