



MADISON COUNTY

**ANALYSIS OF  
IMPEDIMENTS TO FAIR  
HOUSING CHOICE**

MADISON COUNTY  
COMMUNITY DEVELOPMENT  
DEPARTMENT

May 3, 2017

## ACKNOWLEDGMENTS

The completion of this AI would not have been possible without the cooperation, input, and assistance of several outstanding stakeholder organizations in Madison County. Their time and their insights are greatly appreciated.

- Alton Housing Authority
- Greater Gateway Realtors
- Granite City Housing Authority
- IMPACT Center for Independent Living
- Land of Lincoln Legal Services
- Madison County Catholic Charities
- Madison County Housing Authority
- Madison County Mental Health Board
- Madison County Urban League
- Metropolitan St. Louis Equal Housing and Opportunity Council

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## I. EXECUTIVE SUMMARY

Madison County's Analysis of Impediments to Fair Housing Choice (AI) is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA). The AI also outlines fair housing priorities and goals to overcome fair housing issues. In addition, the AI lays out meaningful strategies that can be implemented to achieve progress towards Madison County's obligation to affirmatively furthering fair housing. The Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee), in consultation with Madison County and with input from a wide range of stakeholders through a community participation process, prepared this AI. To provide a foundation for the conclusions and recommendations presented in this AI, the Lawyers' Committee reviewed and analyzed:

- Data from the U.S. Census Bureau and other sources about the demographic, housing, economic, and educational landscape of Madison County, nearby communities, and the broader St. Louis region;
- Various county planning documents and ordinances;
- Data reflecting housing discrimination complaints filed with the U.S. Department of Housing & Urban Development (HUD) and the Illinois Department of Human Rights (IDHR); and
- The input of a broad range of stakeholders that deal with the realities of the housing market and the lives of members of protected classes in Madison County.

The AI draws from these sources to conduct an analysis of fair housing issues such as patterns of integration and segregation of members of protected classes, racially or ethnically concentrated areas of poverty within Madison County and regionally, disparities in access to opportunity for protected classes, and disproportionate housing needs. The analysis also examines publicly supported housing in Madison County as well as fair housing issues for persons with disabilities. Private and public fair housing enforcement, outreach capacity, and resources are evaluated as well. The AI identifies contributing factors to fair housing issues and steps that should be taken to overcome these barriers.

### **Overview of Madison County**

Madison County, Illinois is located to the east of St. Louis, in Southwestern Illinois and has a population of 267,937. While the Greater St. Louis metropolitan area grew by 11.5% between 1990 and 2010, Madison County experienced significantly slower population growth of 3.9%. The county is over 86% white, 7.82% black, 2.92% Hispanic, and .85% Asian. This racial and ethnic composition differs from that of the metropolitan area as a whole, which has a higher percentage of African-American and Asian residents. The southern and western areas of the county closer to St. Louis are more densely populated and have a greater number of minority residents. Renter-occupied housing is also concentrated in the southern and western portions of the county. The eastern sections of the county are more rural and predominantly white.

Levels of segregation in Madison County have been steadily declining since 1990 and Madison County is more racially integrated than the St. Louis region as a whole, due in part to its smaller non-white population. However, non-white individuals still experience moderate levels of racial segregation. Black individuals experience high levels of segregation while Hispanics and Asians face low levels of segregation in Madison County. Blacks are segregated in the southwestern portion of the county while whites are concentrated in eastern and northern sections. Several cities in the western part of the county are relatively integrated. In the St. Louis metropolitan area, Black individuals experience very high levels of segregation, Hispanic individuals have low levels of segregation, and Asian individuals have moderate levels of segregation.

Persons with disabilities comprise 12% of the population of Madison County and 12.1% of the St. Louis region. Persons with disabilities are more likely to live in the more populated western half of Madison County but are not concentrated in particular areas, such as segregated areas. The vast majority of the housing stock in Madison County is comprised of detached single-family homes which are not required to meet design and construction standards for accessibility. Moreover, Madison County has a fairly old housing stock. The Madison County Housing Authority also does not have a plan for ensuring accessibility under Section 504 of the Rehabilitation Act. Consequently, there is a sizable unmet need for accessible units.

In terms of access to jobs, individuals living in areas of Madison County near St. Louis are closest to employment opportunities. Generally, labor market engagement is dependent on whether an individual lives in a more affluent area of the County. Asian Americans and Whites have the highest levels of labor market engagement while African Americans have the lowest level.

Poverty in Madison County is concentrated in the western areas of the county closer to St. Louis. The only racially or ethnically concentrated area of poverty (R/ECAP) in the county is located in the southwestern portion of the county around Venice. African Americans have the most exposure to poverty while Hispanics are the second most likely to be affected by poverty. Asian Americans are the least likely to live in areas with high exposure to poverty.

Data reveal that there are significant disproportionate housing needs in Madison County. In Madison County and the St. Louis metropolitan area, all racial or ethnic minority groups experience higher rates of housing problems, including but not limited to cost burden and severe housing cost burden, than do non-Hispanic White households. African Americans experience the highest rate of housing problems. Housing problems are concentrated in areas with higher minority populations including Madison, Venice, Alton, and Edwardsville. White and Asian households also have higher levels of home ownership than Hispanic and African American households.

The public housing stock in Madison County is concentrated in a small number of communities in the denser western areas of the county. A disproportionate percentage of African Americans live in all forms of publicly supported housing. Hispanic households make up a disproportionately high percentage of households in public housing but are underrepresented in other forms of public housing. In addition, much of the public housing stock in Madison County is skewed towards units that only have 0-1 bedrooms. Thus, families are underserved by public housing.

Within Madison County, Asians and whites are more likely than African Americans and Hispanics to live in areas where public schools have higher proficiency ratings. In particular, African Americans living near Granite City and Alton in southwestern Madison County have much more limited access to proficient schools.

Madison County is served by Madison County Transit, which provides bus service in the most populated areas of the county, primarily in the southwestern portion of the county. There is almost no service to the northeastern part of the county. The current fare system limits access to job opportunities in other communities outside of Madison County such as St. Louis. The St. Louis public transportation system, Metro Transit, does not serve Madison County.

A review of housing discrimination complaint data reveals that disability discrimination is the most common type of complaint in Madison County, followed by race and familial status discrimination.

### **Contributing Factors to Fair Housing Issues**

In the course of the AI process, the following contributing factors were identified.

- Deteriorated and abandoned properties
- Location and types of affordable housing
- Lack of private investment in specific neighborhoods
- Lending discrimination
- Land use and zoning laws
- Use of area-wide fair market rents for Housing Choice Vouchers
- Lack of regional cooperation
- Low quality of affordable housing information programs
- Discrimination based on source of income
- Lack of access to proficient schools, publicly supported housing, and transportation for persons with disabilities
- Admissions and occupancy policies and procedures, including preferences in publicly supported housing
- Lack of public fair housing enforcement
- Lack of private fair housing outreach and enforcement
- Lack of resources for fair housing agencies and organizations
- Unresolved violations of fair housing or civil rights laws

### **Proposed Goals and Actions**

To address the contributing factors described above, the AFH plan proposes the following goals and strategies.

1. Prioritize CDBG and HOME funding for developments in high-opportunity neighborhoods.

2. Promote reforms to current zoning regulations including the development of mandatory inclusionary zoning policies to support the production of affordable housing in high opportunity neighborhoods.
3. Recruit landlords in high-opportunity neighborhoods for the Housing Choice Voucher Program.
4. Provide monetary support to the Metropolitan St. Louis Equal Housing and Opportunity Commission for fair housing enforcement, education and training.
5. Provide fair housing training to the Madison County Community Development Department, Madison County Housing Authority, Granite City Housing Authority, and Alton Housing Authority.
6. Increase awareness about fair housing issues, resources, and equitable outcomes through enhanced media outreach especially during Fair Housing Month each year.
7. Organize and convene a Fair Housing Task Force to implement the recommendations in the AI through the Consolidated Plan process.
8. Prioritize resources to develop permanent, accessible supportive housing for persons experiencing homelessness.
9. In conjunction with the cities of Alton and Granite City, rescind occupancy permit requirements, which place a disproportionate burden on persons with disabilities and individuals based on their national origin.
10. Draft and introduce both City and County legislation prohibiting housing discrimination based on source of income.
11. Develop policies and training materials for housing authorities and private landlords that ensure transparency and accuracy in background checks used to secure public and private rental housing.
12. Repeal crime-free rental housing ordinances in Collinsville, and Granite City.
13. Reform zoning ordinances to allow increased residential density in high opportunity areas throughout the county.
14. Collect data on accessibility of newly constructed housing units to ensure compliance with the Fair Housing Act.
15. Ensure fair housing and other housing resource materials are available in languages other than English.
16. Prioritize County CDBG funding to support infrastructure upgrades, blight reduction efforts, and commercial development within disproportionately African American neighborhoods.
17. Study and advocate for extension of MetroLink into Madison County.
18. Develop and implement a strategic plan to address environmental hazards in disproportionately African American neighborhoods, including lead, mold, and toxic waste.

The AI lays out a series of achievable action steps that will help Madison County to not only meet its obligation to affirmatively fair housing but also allow it to become a model for equity and inclusion in the St. Louis region.

## II. COMMUNITY PARTICIPATION PROCESS

### SUMMARY OF COMMUNITY PARTICIPATION

In order to ensure that the analysis contained in an AI truly reflects conditions in a community and that action steps are feasible, the participation of stakeholders from the community in the process of developing the AI is of pivotal importance. In particular, the insights of fair housing organizations, civil rights and advocacy organizations, legal services providers, social services providers, housing developers, and industry groups is necessary to drawing accurate conclusions about the state of fair housing in a community. In preparing this AI, the Lawyers' Committee reached out and held in-person meetings with the organizations that fill these roles in Madison County. The organizations are listed on the Acknowledgements page of the AI. The broad themes that emerged are cataloged below:

- Madison County has a reputation as a collaborative partner that is committed to advancing equity goals.
- Some jurisdictions in the region have zoning and land use policies that severely restrict the development of multi-family housing.
- Discrimination on the basis of disability is the most widely reported type of housing discrimination.
- The supply of permanent supportive housing for persons with disabilities is limited.
- The three housing authorities in Madison County could benefit from increased transparency and possible consolidation.
- There has been a net loss of public housing units after the demolition of several developments.
- New public housing developments have prioritized housing for the elderly and disabled over housing for families.
- The loss of local manufacturing jobs has exacerbated the need for affordable housing.
- There has been “white flight” in some of the southern municipalities such as Alton, Madison and Venice.
- Newly constructed multifamily housing in Edwardsville targets students, not families.
- Occupancy permits are not popular with both landlords and tenants.
- It is often more expensive to rent than own a home in Madison County.

In addition to the face-to-face meetings with individual stakeholder groups, the County held a series of public hearings in March and April 2017 to discuss the AI. In addition, there was a separate meeting with stakeholder groups to provide additional comments on the draft AI and their feedback was incorporated into the final AI.



### III. ASSESSMENT OF PAST GOALS, ACTIONS AND STRATEGIES

- a. Indicate what fair housing goals were selected by program participant in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:*

Goals articulated in the most recent Analyses of Impediments in 2010 included:

- Improve public engagement in the fair housing planning and implementation process
- Increase fair housing education for consumers, front-line advocates, social service staff, and county officials
- Provide support for housing discrimination testing
- Reduce concentrated poverty and segregation through housing assistance programs and improving affirmative fair marketing plans
- End exclusionary practices and policies
- Increase collaboration among school districts in order to improve educational equity
- Provide support for programs that help create stable, integrated communities
- Bring opportunities and investment to low wealth areas
- Prepare for an increase in the senior population
- Increase accessible housing opportunities for persons with disabilities
- Promote equal access for Limited English Proficient (LEP) residents by hiring an LEP coordinator
- Create sustainable communities and preserve green space

- b. Discuss what progress has been made toward their achievement*

1. Improving Public Engagement

- Madison County Community Development (MCCD) made the findings of the AI available to the community through community forums held over five years.
- MCCD partnered with community organizations to foster local participation.
- MCCD contracted with the Metropolitan St. Louis Equal Housing Opportunity Council (EHOC) to design flyers addressing various Fair Housing issues that are distributed at forums.
- MCCD presented the findings of the AI to county officials including building, zoning, planning, and community development staff, so that they were aware of the AI's analysis and recommendations. Strategies to address impediments were developed as a result.

2. Increasing Fair Housing Education

- MCCD has provided fair housing education through Justine Petersen Housing and Reinvestment Corporation as well as the Madison County Urban League. These agencies offer services including pre-purchase homebuyer counseling, credit counseling, foreclosure mitigation, and employment and job development services.
  - Madison County has created a plan to give fair housing information to new real estate agents and other agents and affiliates. In addition, fair housing information will be given to lenders who are new participants in the county's HOMEbuyer programs. During the 2014 program year, the local real estate board held four new realtor training sessions. Approximately 80 realtors received some Fair Housing training during programming sessions.
  - MCCD distributed fair housing information to all participants in its HOMEbuyer program. Fair housing information has also been presented during mandatory pre-purchase counseling. From FY 2010 to FY 2014, a total of 584 households received fair housing counseling education through county homebuyer programs.
3. Providing Support for Housing Discrimination Testing
    - MCDC contracts with EHOC to conduct fair housing testing in Madison County. The tests look for possible discrimination based on race, national origin, familial status, and disability.
  4. Reducing Concentrated Poverty
    - MCCD advertised for affordable and accessible housing through local cable networks, the Madison County Homes magazine, the Madison County website, and through brochures that are mailed to prospective homebuyers.
  5. Ending Exclusionary Practices
    - Madison County requires all communities applying for funding to adopt a fair housing ordinance or to pass a fair housing resolution.
  6. Improving Educational Equity
    - MCCD operated an Adult Basic Education Program with Lewis & Clark Community College and Southwestern Illinois College that provided GED instruction.
    - MCCD is supporting Lewis & Clark Community College with the development of a Youthbuild project that will provide educational opportunities as well as vocational training to at-risk youth who did not complete high school.
  7. Supporting Stable, Integrated Communities

- Madison County awarded additional CDBG project competition points to communities with significant minority populations. Additional points were also awarded to projects benefitting persons with disabilities.
  - MCCD operates the HOMEbuyer program in partnership with local lending institutions. The program is designed to help revitalize and stabilize communities by increasing home ownership rates among lower income and minority households. The program provides a five-year forgivable loan to help first-time homebuyers pay down payment and closing costs.
8. Bringing Opportunities and Investment to Low Wealth Areas
- MCCD administers three state-designated enterprise zones to promote economic development in distressed or undeveloped areas. In 2014, nearly \$200,000,000 of private sector investment occurred in these areas.
  - Madison County awards additional points to projects benefitting areas that had a low or moderate-income population greater than 61% and to projects working to eliminate slums or blight.
9. Preparing for an Increase in the Senior Population
- MCCD has a weatherization program, lead-based paint abatement program, and accessibility ramps program. These programs help elderly residents remain in their homes by making improvements without increasing their monthly housing costs.
  - MCCD maintains a housing list of available and affordable units for senior citizens.
10. Increasing Accessible Housing Opportunities for Persons with Disabilities
- MCCD recommends that any single-family, two family, and three family homes built with MCCD assistance be “visitable” – a standard that ensures that persons with disabilities can access the front door of a home and can use a first floor bathroom. Madison County has not yet adopted any formal visitability requirements for housing projects.
  - MCCD operates an accessibility ramps program that helps residents with physical disabilities stay in their homes. MCCD works with a local non-profit, Impact Inc. to construct ramps. A total of 9 ramps were completed in FY 2014 and 11 ramps were completed in the 2013 program year.
  - MCCD created and maintained an assisted housing list of available and affordable units for residents with disabilities as well as a landlord listing to help residents find homes. These lists are shared with agencies and municipalities and are updated on a regular basis.

- A project to rehabilitate a 40 unit apartment building and to add 24 units is underway and will provide housing for persons with disabilities. An additional two projects that will deliver 65 units began construction in 2014.

#### 11. Promoting Equal Access for Limited English Proficient residents

- It is unclear what steps Madison County has taken to address the needs of its Limited English Proficient population.

#### 12. Creating Sustainable Communities

- Madison County is updating and finalizing its sustainability plan. The existing plan provides recommendations and best management practices for land use and development, economic development, water and air quality, energy efficiency, and recycling and solid waste management. The plan calls for measures such as promoting the development of neighborhoods rather than subdivisions, encouraging development within planned municipal growth areas, and developing a comprehensive green space plan.

- c. *Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences)*

Madison County has made improvements since the 2010 Analysis of Impediments. In particular, Madison County has implemented several recommendations to improve public awareness of the fair housing planning process and fair housing education. In addition, Madison County has worked to maintain and expand affordable housing through partnerships with developers but waiting lists for public housing and Housing Choice Vouchers remain very long.

While there has been progress in some areas, Madison County should do more to achieve a goal of furthering fair housing to produce integrated communities. Many areas of the county remain nearly all white and African Americans continue to be concentrated in the western parts of the county. Several concrete steps outlined in the last AI that have not yet been implemented could help reduce the continuing high levels of racial segregation in the county. Moreover, Madison County has created several programs to help expand educational opportunities but has not yet taken action to address fundamental problems that lead to educational inequity.

- d. *Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.*

In order to achieve past goals or to mitigate problems, Madison County can develop more specific policies that further the rights of protected classes including LEP individuals as well as persons with disabilities. For example, Madison County could pass an ordinance requiring homes built with county assistance to be “visitable”, as recommended in the 2010 AI.

The county has also acknowledged that school quality plays a large role in shaping housing choices. Madison County could take steps towards achieving educational equity by implementing a recommendation in the 2010 AI to create a formal organization that will bring school districts within the county together to collaborate on strategies to improve schools.

To help improve housing opportunities for cost-burdened households, Madison County can also expand rental assistance programs. Expanding rental assistance could help advance progress on goals to reduce the concentration of poverty and bolster efforts to create stable and integrated communities.

Madison County can also continue to meet with groups to implement fair housing goals and strategies. Additionally, they can expand and enhance stakeholder involvement in planning and implementation. Madison County should also provide more specific evaluations on progress towards individual fair housing goals.

*e. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.*

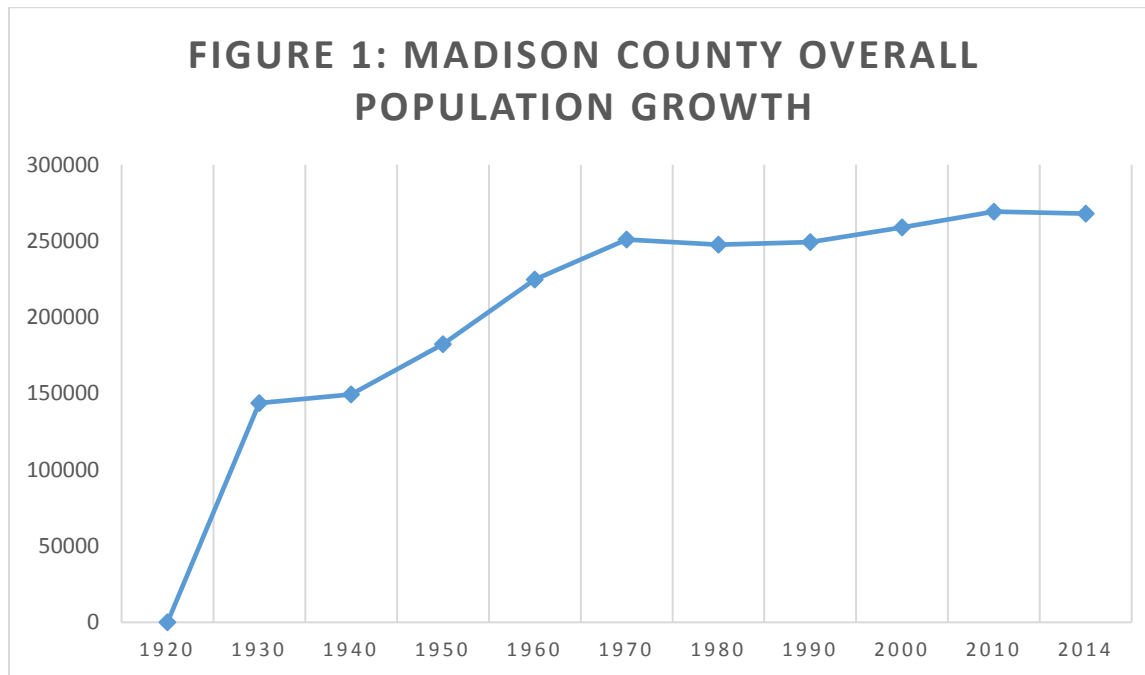
Past experience has taught that we must have goals that are specific, measurable, attainable, and timely instead of goals that lack specificity. To further fair housing, we understand that we must review and analyze data, set measurable goals, and take relevant actions that can be attained in an estimated period of time.

## IV. FAIR HOUSING ANALYSIS

### A. Demographic Summary

1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

Madison County grew by 3.9% between 1990 (249,238) and 2010 (269,282). This is substantially lower than the 11.5% population growth that the Greater St. Louis metropolitan area experienced during the same period.

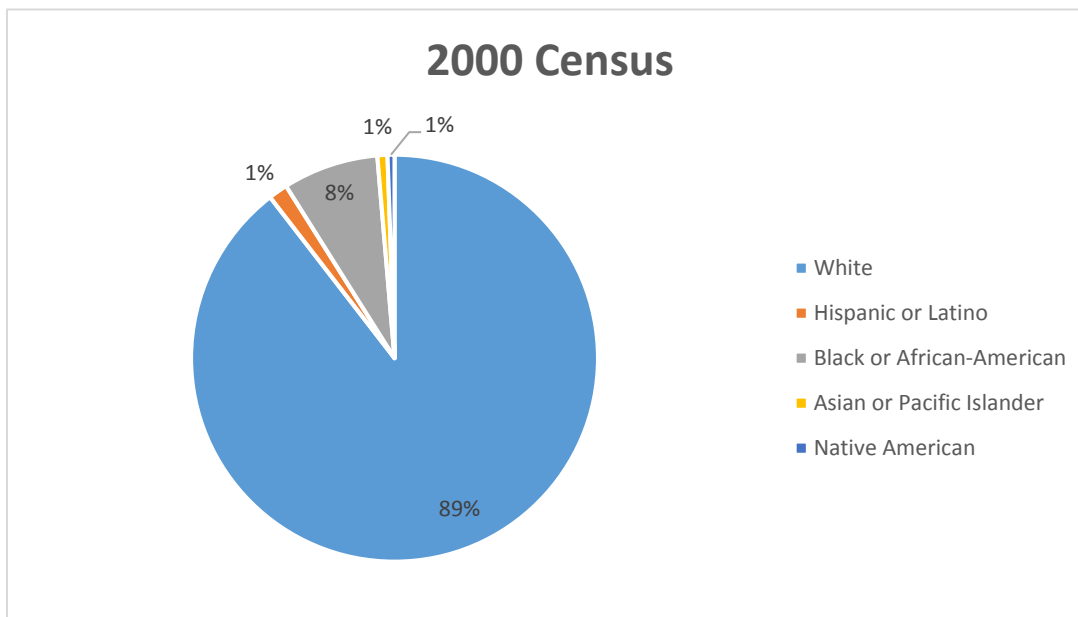


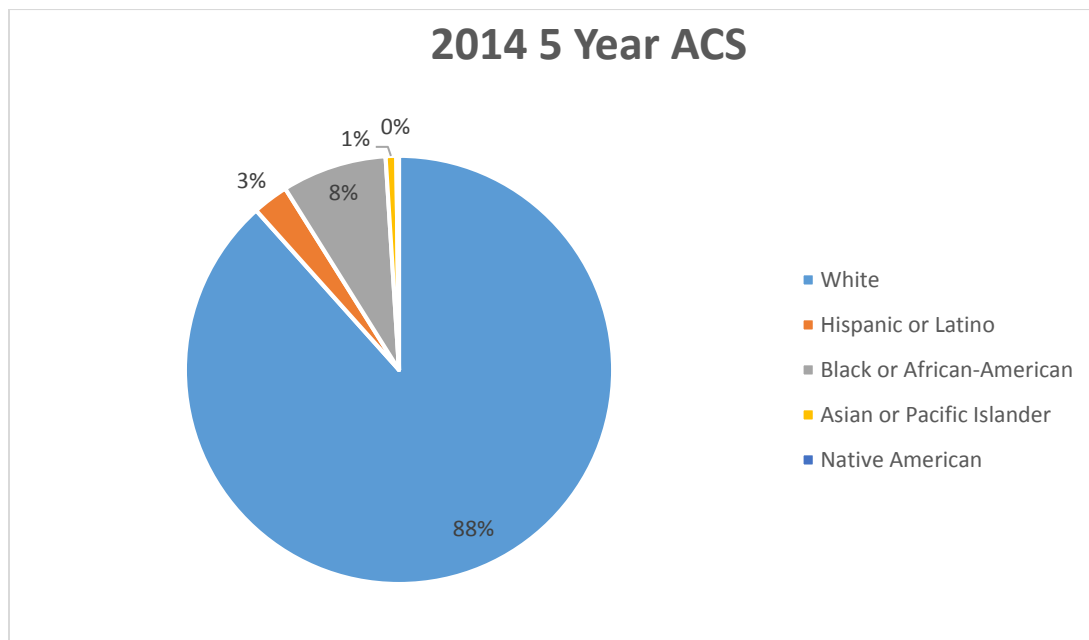
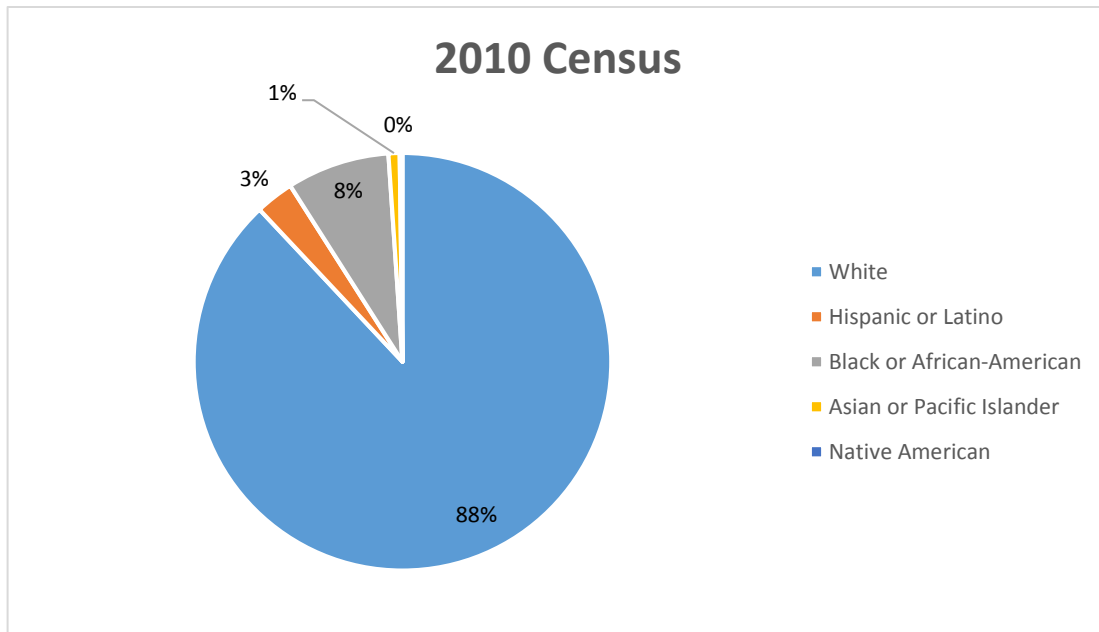
**Table 1: Population Growth – Madison County & Cities, Neighboring Counties – 2000 –2014**

Location	2000 Census	% Change 2000 – 2010	2010 Census	% Change 2010 – 2014	2014 (5 Year ACS)
Madison County	258,941	3.9%	269,282	-0.5%	267,937
Alton	30,496	-8.6%	27,865	-1.2%	27,517
Collinsville	24,707	3.5%	25,579	-1.1%	25,282
East Alton	6,830	-7.7%	6,301	-1.1%	6,231
Edwardsville	21,491	13.0%	24,293	0.7%	24,464
Glen Carbon	10,425	24.0%	12,934	1.2%	13,095
Granite City	31,301	-4.6%	29,849	-0.2%	29,764
Highland	8,438	17.5%	9,919	-1.8%	9,738

Madison	4,545	-14.3%	3,891	4.3%	4,061
Venice	2,528	-25.2%	1,890	-7.3%	1,751
Clinton County, IL	35,535	6.2%	37,762	0.5%	37,952
Jersey County, IL	21,668	6.0%	22,985	-1.0%	22,751
St. Charles County, MO	283,883	26.9%	360,485	2.5%	369,781
St. Clair County, IL	256,082	5.4%	270,056	-0.6%	268,415
St. Louis County, MO	1,016,315	-1.6%	999,954	0.05%	1,000,423

The racial and ethnic makeup of Madison County differs from that of the Greater St. Louis metropolitan area overall. In 2010, Madison County was over 86% white, compared to 74.9 % of the Greater St. Louis metropolitan area. The percentage of the black or African-American population in Madison County is 7.82%, significantly lower than the Greater St. Louis metropolitan area, which is over 18%. The African-American population of Madison County grew by 1.45% (from 6.37% to 7.82%), slightly less compared to the Greater St. Louis metropolitan area, which grew by 1.88% (from 16.52% to 18.40%). The Asian population in Madison County has not increased at the same rate as the region. From 1990 to 2010, the Asian population only grew by .32% (from .53% to .85%) which is significantly less than the 1.27% increase that the region has experienced (from .90% to 2.17%). Madison County has a slightly higher Hispanic population than the region (2.92% as compared to 2.57%).





2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

The 2010-2014 American Community Survey reveals that there are 76,625 owner-occupied units as compared to 30,673 renter-occupied units in Madison County. Accordingly, 69.5% of Madison County residents live in owner-occupied units as compared to 30.5% in renter-occupied units. The



total number of owner-occupied units has decreased slightly from the 2005-2009 estimates, where there were 79,678 units in Madison County. In comparison, the total number of renter-occupied units has increased since the 2005-2009 estimates, when there were an estimated 27,541 units in the County.

The areas in Madison County with the largest percentages of renters are primarily located in the western and southern regions. The census tracts containing Alton, Granite City, Madison, Venice, Collinsville, and Meadow Heights are the areas with the largest percentages of renter-occupied units. Each of these respective areas consists of approximately 46.7 – 54.0 percent renter-occupied units. In contrast, the areas with the lowest densities of renters are primarily located in the central and, northwestern and southeastern sections of the County. For instance, the census tracts containing Moro Township and Hamel Township consist of a range of approximately 0.0 – 15.9 percent renter-occupied units.

The 2005-2009 American Community Survey estimates reveal that the majority of renter-occupied units were similarly located in the western and southern regions of the County. A comparison of both estimates reveals that some communities experienced an increase in renter-occupied units, which is reflected in the most recent survey. For instance, the 2005-09 ACS estimates indicate that Glen Carbon contained a range of 12.4 -21.7 percent renter-occupied units as compared to a range of 35.1-48.2 percent in the 2014 ACS estimate. Similarly, the Census tracts containing Granite City, experienced an increase in renter-occupied units from a range of 35.1-48.2 percent to 46.7-54.0 percent.

In regard to owner-occupied units, the most recent American Community Survey estimates reveal that the northern and southeastern areas of the County have the highest percentages of owner-occupied units. For example, the census tracts that contain Fosterburg, Prairietown, Carpenter, Marine, and St. Jacob each have high percentages of owner-occupied units (84.1 – 100 percent). This is consistent with the 2005-2009 American Community Survey estimates, which also revealed that the northern and southeastern regions of the County had the highest percentages of owner-occupied units. An exception to this trend is Maryville, located in the central part of the County near Glen Carbon and Collinsville, which also has a high percentage of owners.

## **B. General Issues**

### **i. Segregation/Integration**

Source: HUD AFFH Tool Table 3 - Racial/Ethnic Dissimilarity Trends

	<b>(Madison County, IL CDBG) Jurisdiction</b>			<b>(St. Louis, MO-IL CBSA) Region</b>		
<b>Racial/Ethnic Dissimilarity Index</b>	<b>1990</b>	<b>2000</b>	<b>2010</b>	<b>1990</b>	<b>2000</b>	<b>2010</b>
Non-White/White	58.59	50.58	42.86	69.78	63.57	62.91
Black/White	69.32	61.54	56.08	77.18	73.25	74.41
Hispanic/White	30.17	35.21	31.86	23.36	27.67	33.89
Asian and Pacific Islander/White	32.88	27.03	32.93	39.87	41.88	47.30

## 1. Analysis

- a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.*

Madison County is more racially integrated than the St. Louis MO-IL Metro region, but non-white individuals still experience moderate levels of racial segregation in the County. Additionally, relatively low dissimilarity index values within Madison County are, in part, the result of Madison County having a relatively small non-white population in comparison to the rest of the region.

Social scientists normally consider a dissimilarity index of 55 or greater as an indication of high levels of segregation, an index of 40-54.99 signifies moderate segregation, and below 40 indicates low segregation. As the table shows, the Non-White/White dissimilarity index for Madison County indicates a moderate level of segregation for Non-White individuals in 2010. In the broader St. Louis Metro region for the same year, the Non-White/White dissimilarity index indicate a high level of segregation for the Non-White group and it is notably higher than in the County.

Black individuals experience the highest levels of segregation in both the County and the Region. In 2010, the Black/White dissimilarity index indicated high levels of segregation for Black individuals. The Black/White dissimilarity index for the St. Louis MO-IL Region that same year was significantly higher and indicated very high levels of segregation for African Americans in the broader region.

The Hispanic/White and Asian/White dissimilarity indices indicate low levels of segregation for both groups in Madison County in 2010. The Hispanic/White dissimilarity index was also low for the St. Louis MO-IL region, but the Asian/White index for the Region was notably higher and signified that Asians experience moderate levels of segregation in the St. Louis MO-IL Region when compared to White individuals.

- b. Explain how these segregation levels have changed over time (since 1990).*

Madison County has experienced steadily declining Non-White/White and Black/White dissimilarity indices since 1990, indicating a drop in its level of segregation.

The Non-White/White dissimilarity index fell substantially between 1990 and 2000, indicating a shift from a high level of segregation for Non-White individuals to a moderate level. In 2010, the dissimilarity index for Non-White individuals dropped again by about the same amount. This 2010 value still indicates moderate levels of segregation for Non-Whites in the County, but it is at the lowest end of the range of values signifying moderate segregation.

The Black/White dissimilarity index for Madison County has also steadily decreased, falling considerably in both 2000 and 2010 as shown in the table above. Although the 2010 value is still in the range in which it signifies a high level of segregation, it is nearing the moderate range. If the trend continues, segregation for Black individuals will fall to a moderate level in 2020.

The Hispanic/White and Asian and Pacific Islander/White dissimilarity indices for Madison County show no clear pattern. The 2010 values for both measures are very similar to their 1990 values despite changes in 2000. In light of the lack of decline in dissimilarity indices for these groups, it is likely that the reduction in Non-White/White dissimilarity is reflective of either or both the reduction in Black/White dissimilarity and/or more rapid population growth among Hispanic and Asian and Pacific Islander populations that face lower levels of segregation than do Black county residents.

The Non-White/White dissimilarity index in the St. Louis MO-IL region has similarly declined, although the decreases have not been as dramatic, and the indices are still troublingly high. This is likely because the dissimilarity indices for the sub-categorizations of Non-White races and ethnicities have not moved in the same direction, and most have stayed fairly constant. The Black/White dissimilarity index decreased from 1990 to 2000 but then increased from 2000 to 2010. The Hispanic/White dissimilarity index steadily increased from both 1990 to 2000 and from 2000 to 2010. The Asian and Pacific Islander/White dissimilarity index also notably increased during both time periods. It is unsurprising, then, that the Non-White dissimilarity index for the Region remains high and signifies high segregation in the region. As with Madison County, the more rapid growth of Hispanic and Asian/ Pacific Islander populations, relative to White and Black populations, likely explains how Non-White/White dissimilarity decreased.

- c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.*

In Madison County, African Americans are segregated in Madison and Venice in southwestern corner of county and, to a lesser extent, in parts of Alton. Latinos are segregated in the southwestern corner as well. Whites are segregated in eastern and northern portions of Madison County. The areas of relative integration include some of the cities in the western part of the county, north of the far southwest corner.

For the region, East St. Louis, the north side of the city of St. Louis, and North St. Louis County are areas of segregated African American population. There is some relative integration in inner suburbs west of City of St. Louis.

There are no areas of high segregation by LEP group in Madison County, although there are some smaller concentrations of LEP Spanish speakers near the County's southwestern border. There are areas of high LEP segregation in the central part of the broader St. Louis Region just beyond Madison County's western border, clustered around the city of St. Louis.

These areas correspond with areas of high levels of segregation for individuals with non-American national origin. Specifically, there are many individuals of Mexican, Indian, German, Korean, and Chinese national origin located in and around the city of St. Louis who reside in highly-segregated areas.

- d. Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.

Source: U.S. Census Bureau American FactFinder

<b>B25003: TENURE - Universe: Occupied housing units</b>				
2010-2014 American Community Survey 5-Year Estimates				
	Madison County, Illinois		St. Louis, MO-IL Metro Area	
	Estimate	Percentage	Estimate	Percentage
Total:	107,298		1,104,257	
Owner occupied	76,625	71.41%	772,093	69.92%
Renter occupied	30,673	28.59%	332,164	30.08%

<b>B25003B: TENURE (BLACK OR AFRICAN AMERICAN ALONE HOUSEHOLDER) - Universe: Occupied housing units with a householder who is Black or African American alone</b>				
2010-2014 American Community Survey 5-Year Estimates				
	Madison County, Illinois		St. Louis, MO-IL Metro Area	
	Estimate	Percentage	Estimate	Percentage
Total:	8,375		196,885	
Owner occupied	3,024	36.11%	82,808	42.06%
Renter occupied	5,351	63.89%	114,077	57.94%

<b>B25003H: TENURE (WHITE ALONE, NOT HISPANIC OR LATINO HOUSEHOLDER) - Universe: Occupied housing units with a householder who is White alone, not Hispanic or Latino</b>				
2010-2014 American Community Survey 5-Year Estimates				
	Madison County, Illinois		St. Louis, MO-IL Metro Area	
	Estimate	Percentage	Estimate	Percentage
Total:	94,873		851,544	
Owner occupied	71,079	74.92%	658,809	77.37%
Renter occupied	23,794	25.08%	192,735	22.63%

<b>B25003I: TENURE (HISPANIC OR LATINO HOUSEHOLDER) - Universe: Occupied housing units with a householder who is Hispanic or Latino</b>				
2010-2014 American Community Survey 5-Year Estimates				
	Madison County, Illinois		St. Louis, MO-IL Metro Area	
	Estimate	Percentage	Estimate	Percentage
Total:	2,345		21,720	
Owner occupied	1,342	57.23%	11,326	52.15%
Renter occupied	1,003	42.77%	10,394	47.85%

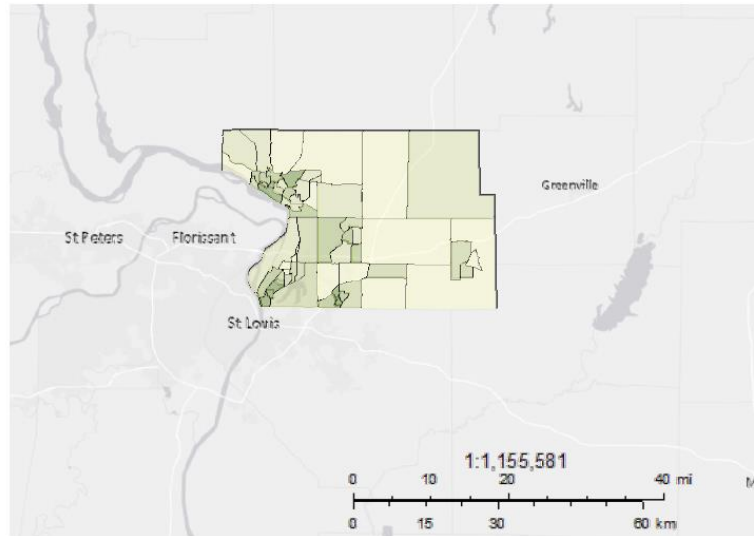
The data in the table show that in Madison County, Black and Hispanic households are disproportionately likely to rent versus own their housing unit. 71.41% of all housing units in Madison County are owner occupied, but housing units with a Black or African American householder were only 36.11% owner occupied, and housing units with a Hispanic or Latino householder were only 57.23% owner occupied.

These proportions are all very similar for the broader St. Louis Region.

**Legend:****Data Classes**

## Percent

0.0 - 15.9
18.9 - 26.5
28.9 - 35.1
36.4 - 44.5
46.7 - 54.0

**Boundaries**

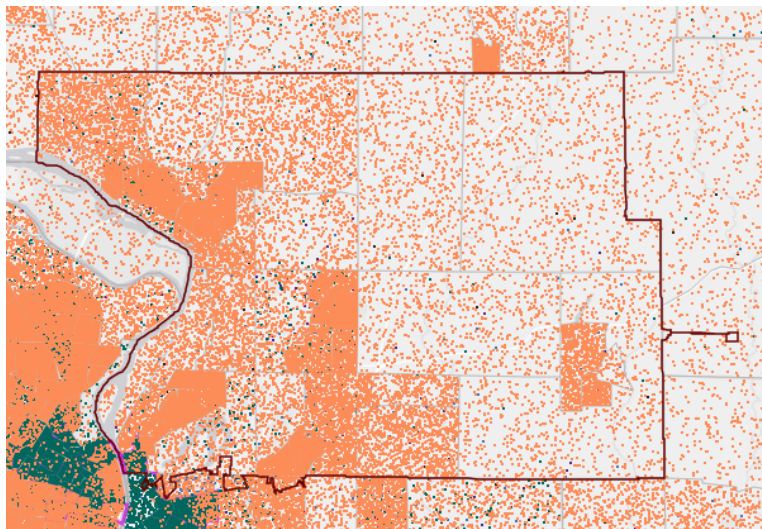
The areas of Madison County with the highest percentages of renter occupied housing are the most densely populated parts of the county. They are also the areas with higher Non-White populations.

*e. Discuss how patterns of segregation have changed over time (since 1990).*

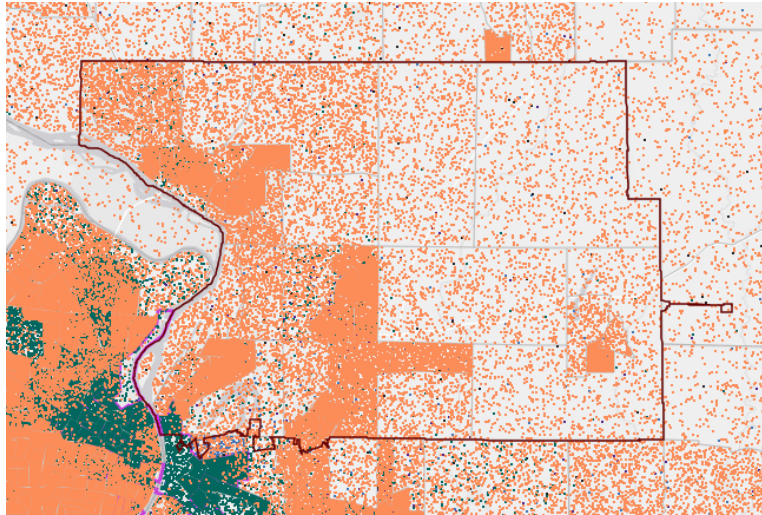
There has been little change to patterns of segregation in Madison County in some areas of Madison County from 1990 to 2000 to 2010. For example, Venice and Madison have been consistently predominantly minority in this period. However, some areas that were virtually all white previously, now have notable minority populations. Alton, the more populated area in the northwest area of the county, is one example of a city that seems to be increasingly integrated.

*Source: HUD mapping tool. Each dot represents five individuals in the images below.*

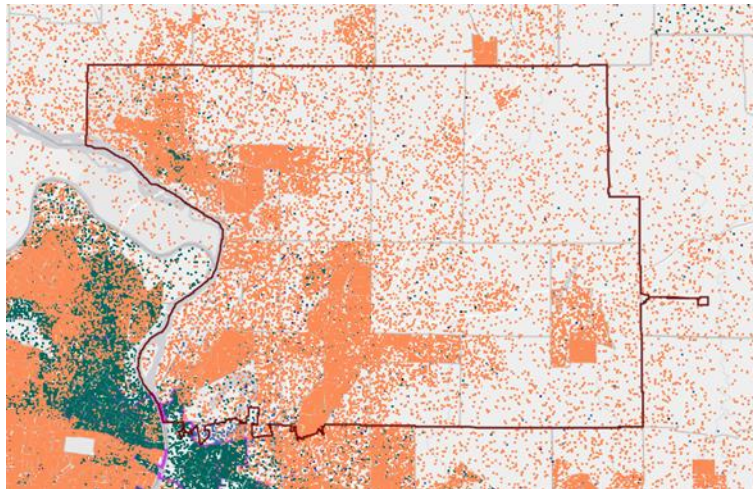
**1990**



**2000**



**2010**

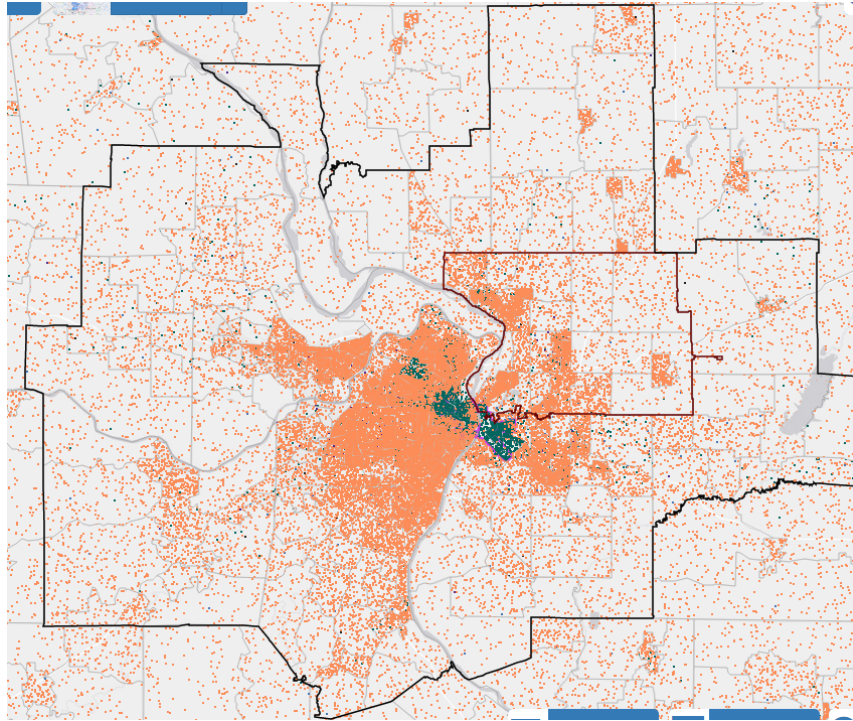


Changes to patterns of segregation in the St. Louis MO-IL region have also been slight, although still more significant than in Madison County. There have been modest increases in integration in many parts of the region including Madison County, but the most vivid trend is the increase in African American population in North St. Louis County (i.e., Ferguson and nearby communities). This signifies a pattern of resegregation caused by an influx of black population accompanied by white flight. This pattern has policy implications for Madison County, particularly in Alton.

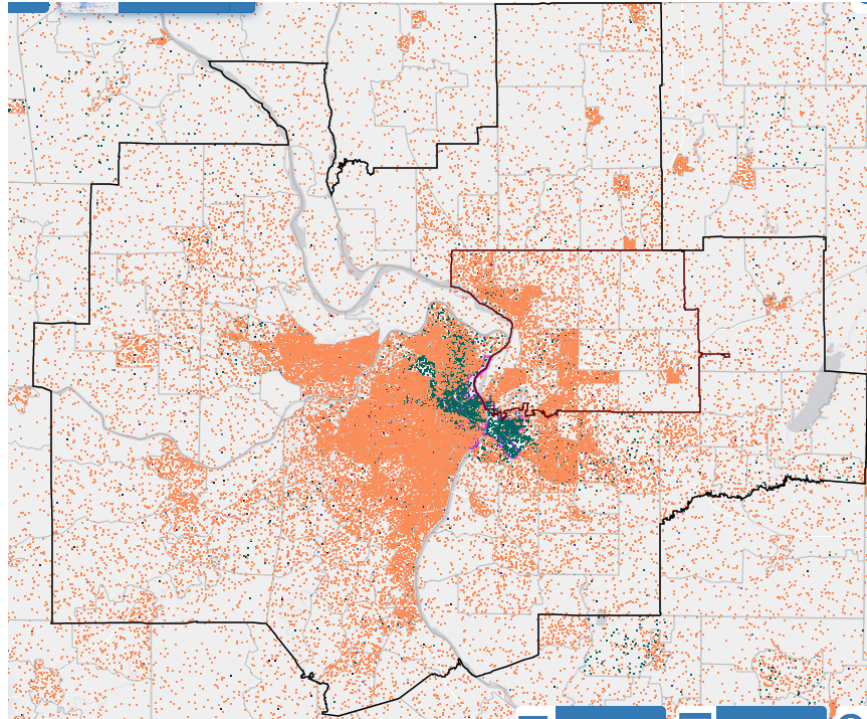
The increased diversity and integration in Alton since 1990 are clearly positive developments, but, in order for the societal and individual benefits of that integration to be fully realized, that integration has to be stable. This trend is consistent with population increases for Black and Hispanic individuals in the Region as well as a drop in dissimilarity indices for Non-White individuals in the Region.

*Source: HUD mapping tool. Each dot represents twenty-five individuals in the images below.*

1990

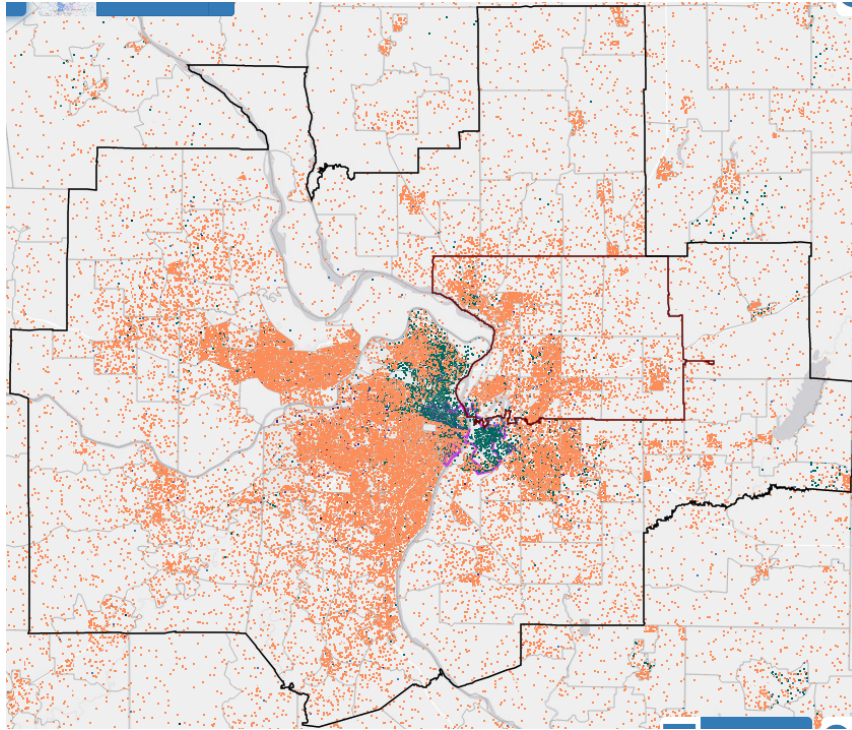


2000





2010



- f. *Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.*

There has been a trend of White individuals moving out of Mid and North St. Louis County and into St. Charles County, which may explain the emergence of high levels of segregation in those particular areas.

This trend appears to be developing in Madison County and is creating a risk of re-segregation in Alton.

## **2. Contributing Factors of Segregation**

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.*

There has been private discrimination against immigrants, who are virtually all Latino and Asian and Pacific Islander as a result of requirements of additional forms of identification by housing providers that are designed to prevent (or, at a minimum, have the effect of preventing) these ethnic groups, from living in certain communities. The cities of Alton and Granite City require that all tenants register in-person in order to be permitted to rent an apartment. This can be a barrier for immigrants who are unable to or afraid to show identification.

ii. **R/ECAPs**

1. Analysis

a. *Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.*

There is only one racially or ethnically concentrated area of poverty (R/ECAP) within Madison County. It is located in the County's southwestern corner and substantially overlaps with the City of Venice.

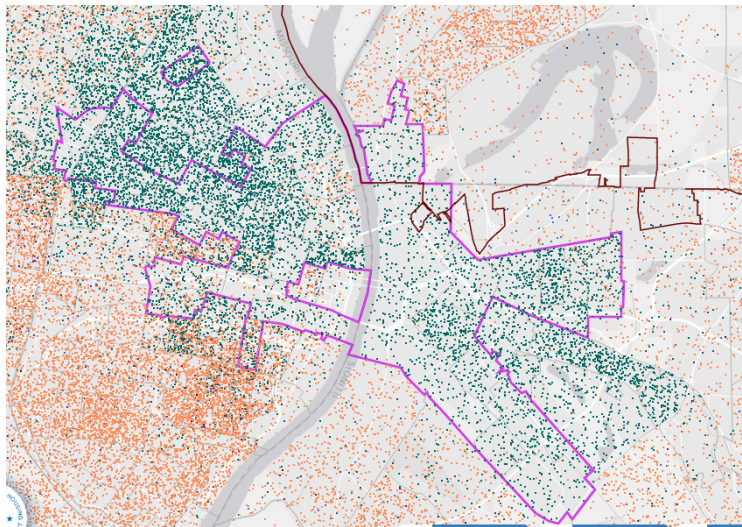
b. *Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?*

Black, Non-Hispanic individuals disproportionately reside in this R/ECAP, making up 93.54% of the population in the R/ECAP, whereas only 7.82% of the population of Madison County as a whole is Black, Non-Hispanic. The same is true for the St. Louis MO-IL region, although the disparity is slightly less stark.

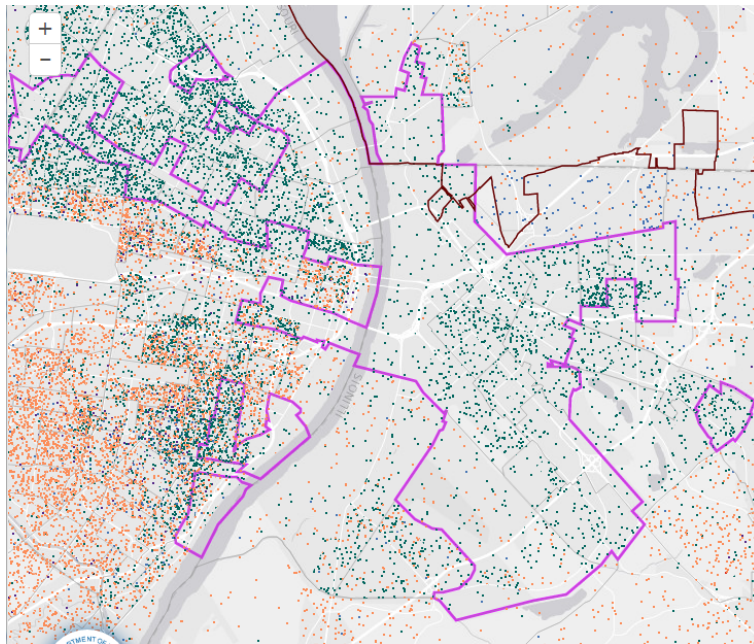
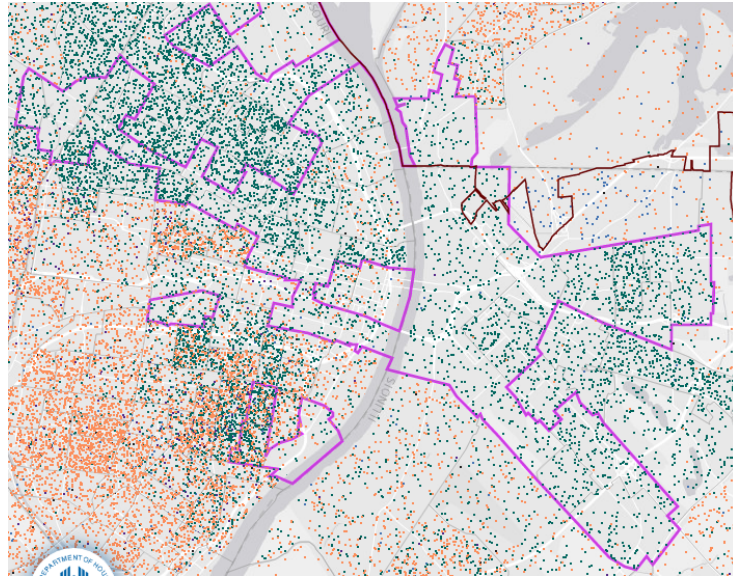
c. Describe how R/ECAPs have changed over time (since 1990).

The boundaries of the R/ECAP in Madison County remained exactly the same from 1990 through 2010.

**1990**



**2000**



**2010**

There were slight changes to the R/ECAPs in the remainder of the St. Louis MO-IL region. The great majority of areas classified as R/ECAPs in 1990 remained R/ECAPs in 2010. But, over this 20 year period, there are areas that have become newly classified as R/ECAPs and other areas where R/ECAP classification was removed. Most of the changes to the R/ECAPs occurred from 2000 to 2010 in the southeastern portion of the R/ECAP, within St. Clair County, Illinois, with some change in northern St. Louis County, as well, as shown in the maps above. In the two regions

where the classification was removed in 2010, the change appears to be the result of a loss of population from 2000 to 2010.

#### Additional Information

- a. *Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics*

Stakeholders mentioned particular issues for the elderly and individuals with disabilities—that these populations are continually underserved, and the planning to address the needs of these groups is insufficient.

- b. *The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.*

In Madison County's 2016 Annual Action Plan, the County will dedicate CDBG funds towards code enforcement activities in the R/ECAP area. Code enforcement efforts will be carefully designed to minimize the risk of displacing low-income people of color from targeted communities.

## 2. Contributing Factors of R/ECAPs

- a. *Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.*

There are a number of contributing factors identified in Madison County's previous housing reports and meetings with local stakeholders that have had an impact on R/ECAPs.

- Deteriorated and abandoned properties

Madison County has problems with deteriorated and abandoned properties, leaving older neighborhoods more dilapidated and less desirable to reside in within the R/ECAP area. A slow housing market and continuing unemployment issues place economic pressures on residents all over the County but particularly within the R/ECAP.

- Lack of public investments in specific neighborhoods, including services or amenities

Additionally, Madison County has lacked the financial resources it needs to effectively serve the populations within the R/ECAP and beyond. MCCD entitlement allocations have not kept up with community funding requests. Additionally, economic conditions have reduced state and local public funding.

- Lack of regional cooperation

A lack of regional contribution also contributes to perpetuate the R/ECAP area, particularly the portion of the R/ECAP within Granite City. There is overlapping jurisdiction between the Granite City, Alton, and Madison County Housing Authorities. Some community stakeholders also cite a lack of transparency in the way the housing authorities conduct business.

- Location and type of affordable housing

The location and types of affordable housing also have adversely impacted the R/ECAP. Much of the affordable housing in Granite City has been demolished. The Kirkpatrick Homes housing project once had 451 units but demolition on the site was completed in January 2013. Replacement housing was either not built or is not affordable in its new state. Much of the affordable housing stock in Madison County is also disproportionately comprised of one-bedroom units. Consequently, large families may be unable to afford units that can accommodate them.

- Land use and zoning laws

Families have also been underserved by some of the new housing structures in the R/ECAP. This is likely due to zoning restrictions across the county that favor the development of single-family housing and impose fairly strict density caps. Zoning ordinances in Madison County tend to severely restrict the amount of land available for multi-family development.

There has also been an increase in crime-free housing initiatives that appear to have exacerbated the housing issues within the R/ECAP.

- Other

The shooting of Michael Brown and protests in Ferguson affected the whole region in many ways, some still yet to be seen. One possible effect that may affect the boundaries and composition of the R/ECAP in the future is an increase in white flight.

Finally, there are feelings of stigmatization among individuals in need of housing services, indicating that there is likely some community opposition to fair housing initiatives outside of the R/ECAP.

### iii. **Disparities in Access to Opportunity**

#### 1. Analysis

##### a. Educational Opportunities

- Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.*

Where attendance boundary data are available, the School Proficiency Index measures the proficiency of elementary schools in the attendance area of individuals sharing a protected characteristic. Where such data are not available, the proficiency index of elementary schools

within 1.5 miles of individuals with a protected characteristic is used. The values for the School Proficiency Index are determined by the performance of 4th grade students on state exams.

The School Proficiency Index based on race varies between the total population of Madison County and the population of Madison County living below the federal poverty line. In the total population, non-Hispanic Asians and Pacific Islanders have the highest School Proficiency Index and African Americans have the lowest School Proficiency Index. Whites have the second highest School Proficiency Index, Hispanics have the third highest, and Native Americans have the second lowest Index. Therefore, within the total population of Madison County, Asians and Pacific Islanders and Whites are more likely than other races or ethnicities to live in neighborhoods where the elementary school in the attendance area has a higher proficiency rating. The African American population is the least likely to have access to schools with higher proficiency ratings.

In the population living below the federal poverty line, the School Proficiency Indices are similar, and generally follow a similar pattern based on race, with Asians and Pacific Islanders having the highest index. All racial and ethnic groups have lower School Proficiency Indices when only considering those below the federal poverty line. Whites still have the second highest School Proficiency Index, but the Index drops more significantly for Whites than it does for Asians and Pacific Islanders when only considering the population living below the federal poverty line. Under the federal poverty line, the White population's School Proficiency Index drops from 53.27 to 45.83, the Hispanic population's index drops from 44.36 to 39.37, and the African American population's drops from 34.59 to 33.31. The most significant drop, however, occurs within the Native American population, with their School Proficiency Index dropping from 49.91 to 16.81 when considering the population living below the federal poverty line. Therefore, Native Americans living below the federal poverty line are least likely to have access to schools with high proficiency ratings.

The areas with the highest percentages of families are Granite City, Edwardsville, Alton, Collinsville and Alton. Families near Edwardsville have more access to schools with higher proficiency indices, and families near Granite City and Alton have more limited access.

- ii. *Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.*

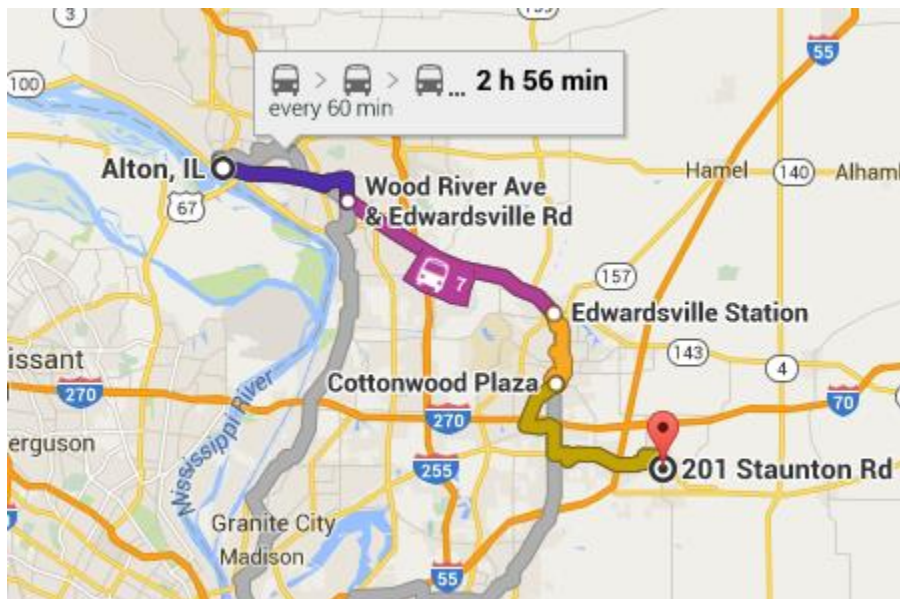
Overall, the school accessibility of a neighborhood in Madison County depends on the city in which the population is located. The communities in and around Edwardsville have access to more highly proficient schools, while the population in the southwest corner of the county and near Granite City and Alton have much more limited access. The communities living in and around Highland have School Proficiency Indices fall somewhere in between.

Racial and ethnic minorities in Madison County mostly live in and around Granite City, Alton, and Edwardsville. Minorities living in Granite City and Alton have less access to proficient schools because those areas experience the lowest School Proficiency Indices. African Americans are particularly isolated from proficient schools, even when controlling for poverty status. Because the other populations of racial and ethnic minorities in Madison County are relatively small compared to the African American population and African Americans primarily live in the southwest corner

of the County toward St. Louis, African Americans are most impacted by limited access to proficient schools.

- iii. *Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?*

In Madison County, there are 15 school districts on the Madison County Regional Office of Education (ROE 41) website. There are 82 public schools in Madison County, Illinois, serving 40,141 students. The most diverse school district in Madison County is Alton #11 School District. Minority enrollment is 24% (majority Black) and the student: teacher ratio is 21:1.<sup>1</sup> Because the Alton area of Madison County has one of the lowest School Proficiency Indices and has the highest minority enrollment, with a majority of the minority being African American, African Americans are disproportionately affected by the lack of access to proficient schools.



#### *Alton, IL to the ETC*

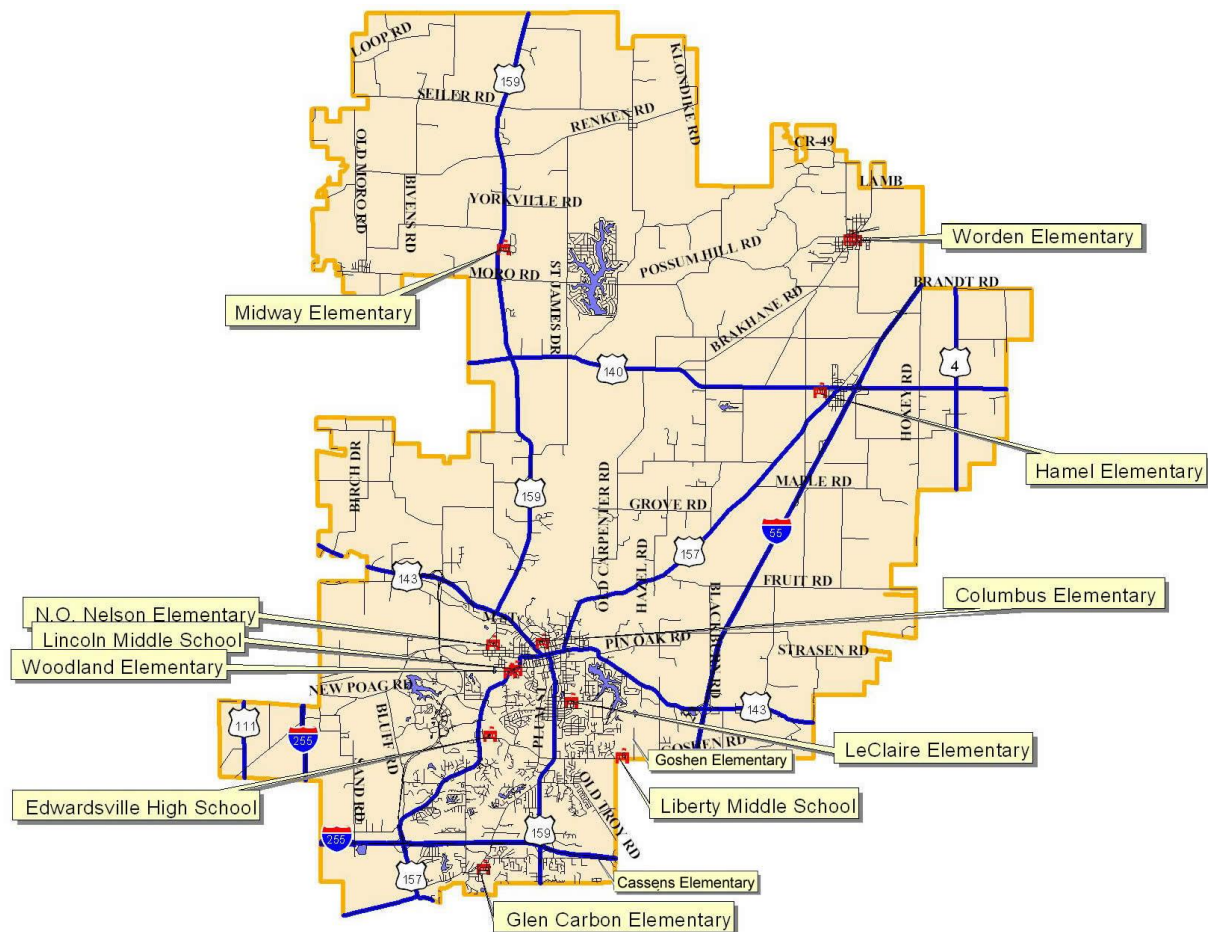
The residents of Madison County that live near Edwardsville have access to District 7, which has some of the most proficient schools in the County. In the District 7 handbook, the registration eligibility criteria require that a parent or person in custody of a child must live within the district boundaries and show proof of such residency.<sup>2</sup> District 7 provides transportation to all students within the district that live more than a mile and a half away. District 7 designates students who live closer than a mile and a half as “walkers,” but allows parents to pay ad hoc for bus services. While a principal has discretion to allow a student whose family has moved out of the district to remain in the school for the remainder of the term, the bus services for those children will cease

<sup>1</sup> <http://www.publicschoolreview.com/illinois/madison-county>

<sup>2</sup> [http://www.ecusd7.org/about\\_us/handbook.pdf](http://www.ecusd7.org/about_us/handbook.pdf)

as soon as the residency changes. Therefore, families who cannot transport their children into the district on their own after moving away will not receive assistance in transportation from District 7, and may be forced to enroll the student mid-term in another district.<sup>3</sup> This disproportionately impacts more transit-dependent families.

Access to District 7 in Madison County not only gives residents more proficient schools, but also means less poverty exposure, more labor market engagement, and higher environmental quality of life.



## b. Employment Opportunities

- i. Describe any disparities in access to jobs and labor markets by protected class groups.

The Job Proximity Index measures the physical distances between place of residence and jobs by race/ethnicity. People living closer to St. Louis have higher Job Proximity Indices than those who

<sup>3</sup> <http://www.ecusd7.org/departments/transportation/faq.asp#3>



live further away because of the impact of opportunities within the St. Louis labor market. In general, the Job Proximity indices are similar across races and ethnic groups in Madison County. Whites have a slightly lower Job Proximity Index than racial and ethnic minorities in the County. This is most likely because the white population is more spread out throughout the County and its more rural areas and thus are further away from St. Louis and the job opportunities there. Compared to the other racial and ethnic minorities, the Job Proximity Index is highest for African Americans, with non-Hispanic Asians and Pacific Islanders coming in a close second. This is probably because the African American population of Madison County is more concentrated in the southwestern portion of the County and nearer to St. Louis and the job opportunities there.

The Labor Market Engagement Index provides a measure of the unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood. The Labor Market Engagement Index follows a pattern very similar to the School Proficiency Index with respect to race and ethnicity. Therefore, the people with the highest Labor Market Engagement Indices also have the highest School Proficiency Indices and vice versa. Asians and Pacific Islanders have the highest labor market engagement, with the White population coming in a close second. Despite tending to live closer to jobs, the African American population of Madison County has the lowest labor market engagement, which indicates that African American individuals in Madison County have the most trouble actually obtaining employment.

People of non-US national origin and families with children follow the same pattern as race. Those living closer to St. Louis in the southwest portion of the County have higher Job Proximity Indices, while people of non-US national origin and people with children living in and around Edwardsville have higher Labor Market Engagement Indices than those living near other cities like Granite City and Alton.

*ii. How does a person's place of residence affect their ability to obtain a job?*

In Madison County, the populations living closer to St. Louis, Missouri, in the southwest corner of the County, experience the highest Job Proximity Indices. While there are some high indices toward the eastern part of the County in Highland, most of the populations living in close proximity to jobs are on the western part of the County toward St. Louis. Labor market engagement, however, is more dispersed throughout the county and depends more on whether or not someone is living in one of Madison County's more affluent cities. Populations living in and around Edwardsville have higher labor market engagement, whereas residents of Granite City and Alton, which have higher numbers of racial and ethnic minority populations, tend to have lower labor market engagement. People of non-US national origin and families with children follow the same pattern as race. Those living closer to St. Louis in the southwest portion of the County have higher Job Proximity Indices, while people of non-US national origin and people with children living in and around Edwardsville have higher Labor Market Engagement Indices than those living near other cities like Granite City and Alton.

Because the Labor Market Engagement Indices do not follow the Job Proximity Indices, it is clear that living closer to jobs in Madison County does not positively affect a person's ability to obtain a job. Whether a person has access to highly proficient schools is a much more impactful indicator of whether a person will be able to obtain a job and engage with the labor market in Madison

County. Populations, like African Americans, who have most limited access to highly proficient schools, also have the hardest time obtaining a job, despite living closer to more job opportunities.

*iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?*

While the African American population has the highest Job Proximity Index because they tend to live closer to St. Louis in areas like Alton and Granite City, it has the lowest Labor Market Engagement Index. Because the Labor Market Engagement Index is a measure of the unemployment rate, labor-force participation rate, and percent of the population ages 25+ with at least a bachelor's degree, the Labor Market Engagement Index indicates that the black population in Madison County is least successful in accessing and obtaining employment.

Most of the individuals from non-US national origin live closer to St. Louis and therefore live in areas with higher Job Proximity Indices. The non-US national origin populations of people living near Edwardsville and Highland have higher Labor Market Engagement indices than the non-US national origin populations living near Granite City and Alton.

Because Granite City is close to St. Louis, families with children living in the vicinity of Granite City have more access to jobs that are nearby. However, more affluent areas, like Edwardsville, seem to have higher percentages of families with children that live in areas with more labor market engagement. Areas in the northern central area of the county have lower percentages of families with children and have lower Labor Market Engagement Indices. Therefore, families with high Job Proximity Indices do not necessarily have high Labor Market Engagement Indices. While access may be more proximate, the actual ability to obtain employment and the Labor Market Engagement Indices are more dependent on the affluence of the area and follow the location distribution of the more highly proficient schools.

*c. Transportation Opportunities*

*i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.*

In Madison County, the Transportation Cost Indices are relatively stable for all racial and ethnic groups. The Low Transportation Cost Index measures cost of transport and proximity to public transportation by neighborhood. The African American population has the highest Low Transportation Cost Index and the White population has the lowest. This means that the African American population tends to live closer to lower cost public transportation. Overall, racial and ethnic minorities have slightly higher Low Transportation Cost Indices than the White population because the minority populations live primarily in the western part of the County, which is closer to St. Louis and because lower cost public transportation tends to be closer to cities. The White population is more spread out throughout the County, including in the more rural areas in the east, and as a result the White population is more likely to live further away from low cost public transportation.

The relative use of the public transportation system in Madison County is slightly less consistent across races. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. In Madison County, the African American population uses public

transportation the most, and the White population uses public transportation the least. While Transit Trips Indices are also similar across racial groups, minorities on the whole use public transportation more than Whites. Similarly to the Low Transportation Cost Index pattern, the Transit Trips Indices are higher on the western part of the County, near St. Louis.

In general, the areas of Madison County that have the higher Low Transportation Cost Indices have higher Transit Trips Indices. This indicates, not surprisingly, that more people use public transportation in the areas where there is more accessible and lower cost public transportation available. The lower cost public transportation also tends to be closer to cities surrounding St. Louis, like Granite City and Alton. The rural areas in the center, north and east of the County have less access to public transportation and thus use it less.

- ii. *Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?*

Because the African American population uses transportation the most, it would be most affected by the lack of reliable, affordable transportation. Similarly, because most people of non-US national origin live in the western part of the County and make greater use of public transportation, they also are more affected by the lack of reliable, affordable transportation than people of US national origin.

*Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.*

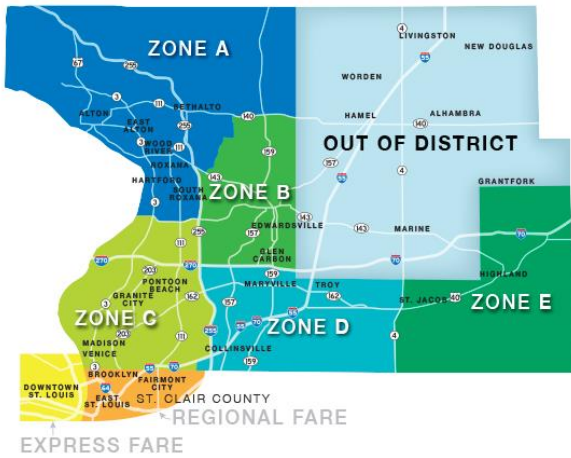
*For question (1)(c)(iii), program participants should consider whether transportation-related local programs, policies, and practices affect a person's access to proficient school, jobs, and other areas with opportunities. In answering this question, local knowledge (as defined at 24 C.F.R. § 5.152) will be relevant. Program participants should consider whether transportation systems designed for use of personal vehicles impact the ability of protected class groups' access to transportation due to the lack of vehicle ownership.*

### Madison County Public Transportation

As of 2016, the Madison County Transit system has a fleet of about 89 buses that circulate throughout the County and employs about 194 full-time and 74 part-time employees. Each day, about 10,000 Madison County residents use the MCT system. On an annual basis, there are about 2.6 million riders.<sup>4</sup> The MCT bus system operates in the most populated areas of Madison County, primarily in the southwestern portion of the County, within and between the cities of Alton, Granite City and Edwardsville. There is very little transportation to the northeast area of the County, which is predominately White and is designated as “Out of District” on the MCT zoning map.<sup>5</sup>

<sup>4</sup> [http://www.mct.org/MCTInfo/MCT\\_Overview.aspx](http://www.mct.org/MCTInfo/MCT_Overview.aspx)

<sup>5</sup> <http://www.mct.org/busServices/SystemMap.aspx>



**MCT** Madison County Transit **FARE SCHEDULE**

Adult Fares	
MCT Shuttle	\$1.50
MCT Cross County	\$2.00
MCT Regional	\$3.00
MCT Express	\$3.50

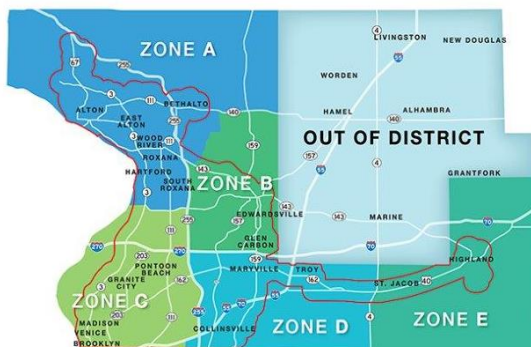
Elderly<sup>1</sup>/ Disabled<sup>2</sup> Children Under 5 / Police and Military in Uniform **FREE**

Elderly <sup>1</sup> / Disabled <sup>2</sup> Children Under 12	
MCT Shuttle	\$0.75
MCT Cross County	\$1.00
MCT Regional	\$1.50
MCT Express	\$1.75

MCT Passes	
MCT Local Pass	\$50.00
MCT System Pass	\$70.00
MCT Student Pass	\$20.00
MCT 2 Hour Zone Pass	\$2.00
MCT 2 Hour Regional Pass	\$3.00
MCT Express Round Trip Pass	\$5.00

- 1 Seniors (65 and up) with MCT Senior Free Ride ID, or seniors (75 and up) with MCT Senior Select ID.
  - 2 Registered ADA Paratransit users with valid MCT Paratransit ID, MCT ADA ID, or MCT Benefits Access ID.
  - 3 Seniors (65 and up) with MCT Half Fare ID or Metro Reduced Fare Permit. Medicare cardholders eligible.
  - 4 Persons with disabilities with MCT Half Fare ID or Metro Reduced Fare Permit. Medicare cardholders eligible.
- Please have correct change. Valid Metro passes and tickets are accepted.

The Madison County Transit system (MCT) follows a zone-based fare system. Where people get on and off the bus determines how much the trip will cost. Bus service within a single zone is cheaper than a trip during which a person would have to cross into another zone or cross the county boundary into St. Louis or St. Clair counties. Therefore, the further an individual's job is from his home, the more expensive it will usually be for him or her to commute to work. However, if a person lives on the edge of a MCT zone and works close to home but outside of the zone, he or she would still pay more for crossing zones, regardless of the actual distance traveled. For people who are actually leaving Madison County to work in cities in other counties, like St. Louis, the fares are even higher. The MCT Regional, which is currently the only option to connect Madison County residents to St. Louis's MetroLink train system in St. Clair County, is twice as expensive as a trip within a single zone. Under this system, people who live in the areas immediately outside of St. Louis and have jobs in St. Louis will have to pay more to cross the regional boundary, even though they may live closer to St. Louis than they do to other parts of Madison County that are within the same zone. The MCT Express, which offers peak commuter services with limited stops into St. Louis is the most expensive option. This system limits the commuting options for poorer residents of Madison County who do not have access to job opportunities or proficient schools within their neighborhoods or MCT zone.



\*Red line indicates ADA mandated service area, which is 3/4 of a mile from a fixed route.

Within the MCT, there does not seem to be a low-income fare option. While many people of color and low-income individuals live in western Madison County toward St. Louis, many of their nearby job opportunities are most likely in St. Louis, which is currently a more expensive fare and requires more transfers than working within the same zone an individual lives in or anywhere else within Madison County. Additionally, the primarily white areas of Madison County toward the east are not well-connected to the areas closer to St. Louis. Therefore, people of color, who are more heavily public transit-dependent than whites, are less likely to move into the eastern, predominantly white communities.

### St. Louis Transit System

The St. Louis public transportation system, called Metro Transit, operates the MetroBus program, MetroLink train system, and Metro Call-a-ride program.

The MetroLink train does not have stops within Madison County. MetroLink does, however, reach to St. Clair County, which lies directly below Madison County. Of the St. Louis Metro Bus routes, only the 1x Riverbend Express and 5 Tri-City Regional connect Madison County with downtown St. Louis via the McKinley Bridge.

The Metro Transit website provides information about accessibility, bike racks, and parking options. Because there are fewer direct lines to Madison County, the park-n-ride options that are outside of downtown St. Louis are all located to the south of Madison County in St. Clair County. Therefore, Madison County residents who drive to connections with the St. Louis Metro Transit System must drive to St. Clair County.

Metro Transit provides reduced fare programs for particular groups. These groups are the elderly over the age of 65, eligible ADA individuals with disabilities, and students enrolled in colleges or universities. The Call-A-Ride service, which is St. Louis's paratransit service, operates only within St. Louis and St. Louis County, and does not extend service to Madison County.

In 2005, Metro Transit conducted a Madison County Light Rail Feasibility Study (October 2005) This study examined the feasibility of expanding light rail into Madison County, Illinois from the existing MetroLink in East St. Louis. Based on the results, the system has a thirty year plan to extend services into Madison County. Madison County Tri-Cities would extend MetroLink from the Emerson Park station in East St. Louis, IL to Granite City, then to Edwardsville. This light rail corridor could be built in at least two phases: from the Emerson Park MetroLink Station in East St. Louis, IL, to the Granite City/Tri-Cities area, then from Granite City/Tri- St. Louis Regional Long-Range Transit Plan Moving Transit Forward 56 Cities to Edwardsville, IL. This corridor would bring MetroLink service to the communities of East St. Louis, Venice, Madison, Granite City, and eventually Edwardsville and the SIUE campus. Any expansion of service into Madison County, IL would require support and funding from Madison County and Madison County Transit. There will also be a Commuter Rail line from St. Louis to Alton, IL.

Creating a MetroLink connection to Edwardsville implicates a number of fair housing concerns. The absence of the extension disconnects residents of other areas to the opportunities in Edwardsville. Additionally the extension would allow residents of Madison County to access the MetroLink and travel into St. Louis without having to pay for county-crossing into St. Clair County. The Commuter Line from Alton to St. Louis will also give residents of Alton, an area with lower Labor Market Engagement and a place where more people are transit-dependent, more ability to access opportunities in downtown St. Louis.



[http://metrostlouis.org/Libraries/MTF\\_documents/Moving\\_Transit\\_Forward\\_executive\\_summary.pdf](http://metrostlouis.org/Libraries/MTF_documents/Moving_Transit_Forward_executive_summary.pdf)

d. Low Poverty Exposure Opportunities

i. *What role does a person's place of residence play in their exposure to poverty?*

The Low Poverty Index uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score generally indicates less exposure to poverty at the neighborhood level. The people living in the eastern part of Madison County are much less likely to be exposed to poverty in their neighborhoods than people living in the western side of the County. All areas of Madison County that are east of Granite City and Alton appear to have Low Poverty Indices that are greater than 40. The one possible exception to this pattern is around the Highland area, where the Low Poverty Index appears slightly lower than the rest of east Madison County. The areas that are most exposed to poverty are around Granite City and Alton on the western part of the County surrounding St. Louis, MO. As a general pattern, the closer in the County you live to St. Louis, the more likely you will be exposed to poverty.

Also, the only R/ECAP in Madison County is located in the southwestern corner of the County, so the closer a person lives to this concentrated area of poverty also indicates a higher likelihood to have a higher exposure to poverty factors.

ii. *Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?*

In Madison County, Asians and Pacific Islanders are the least likely to live in areas with high exposure to poverty and are therefore the least affected by poverty indicators in Madison County. The Asian and Pacific Islander Low Poverty Index is about thirty units higher than the African American Low Poverty Index, which is the lowest of all racial and ethnic groups in Madison County. There is clearly a large discrepancy between the poverty exposures of different racial groups living in Madison County. The African American population is by far the most likely to live in areas with poverty

exposure and are therefore the most affected by poverty indicators. After African Americans, Hispanics are the second most likely to be affected by poverty indicators.

In Madison County, there are more people of Mexican national origin living in the southwestern part of the County near Granite City, which is more likely to have more poverty exposure. Therefore, the Mexican population in Madison County is more likely to be affected by poverty indicators.

Because the population of Madison County resides mostly in the western part of the County in general, there are also more families living in the western part of the County. The closer families get to living to St. Louis, the more likely families will have higher poverty exposure rates. Areas with the most families with children are Granite City, Alton and Edwardsville. The families of Edwardsville are less likely to be exposed to poverty than the families of Granite City and Alton.

- iii. *Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas.*

The transportation fare policies in Madison County affect the ability of protected class groups to access low poverty areas because it is more expensive for residents to leave their zone using public transportation. This encourages residents to stay within their zone when looking for educational and employment opportunities. Additionally, the ability to access low poverty areas coincides with highly proficient school locations, so it is possible that more educational opportunities relate to higher labor market engagement, which also relates to lower poverty levels in a particular neighborhood.

- e. Environmentally Healthy Neighborhood Opportunities

- i. *Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.*

The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood. The Environmental Health Index is limited to issues related to air quality, so there may also be other indicators of environmental health, based on local data and local knowledge of Madison County. For example, environmental-related policies may include the siting of highways, industrial plants, or waste sites.

In Madison County, the poorest air quality is in the Granite City area outside of St. Louis. The Asian and Pacific Islander population and the white population have the highest Environmental Health Indices. The African American and Hispanic populations experience the lowest, with lower air quality in the neighborhoods that they live in. Therefore, the African American and Hispanic populations in Madison County have the most exposure to harmful toxins on the whole. This may be a result of less access to neighborhoods with higher air quality. However, this may also be explained by the proximity of areas with higher minority populations, like Granite City and Alton, to the St. Louis Metropolitan area, which is likely to have more air pollution as it is a major urban area. The northeast quadrant of the County has the highest Environmental Health Index, and it is also the area of the County that is furthest away from St. Louis.



- ii. *Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?*

African American and Hispanic people living in Madison County have the least access to environmentally healthy neighborhoods because most live in the in the southwest area of the County. Because most families live in the western part of the County, they are also less likely to access healthy neighborhoods.

EPA ID	Site Name	City	County	State
ILD980824866	ABANDONED DRUM	LIVINGSTON	MADISON	IL
ILD048843809	CHEMETCO	HARTFORD	MADISON	IL
ILN000510104	CSX TRAIN DERAILMENT	TROY & ST. JACOBS	MADISON	IL
ILSFN0507976	GRANITE CITY TRAILER	GRANITE CITY	MADISON	IL
ILD006282479	JENNISON-WRIGHT CORPORATION	GRANITE CITY	MADISON	IL
ILN000508283	LACLEDE STEEL COMPANY	ALTON	MADISON	IL
ILN000510839	MAGNESIUM ELEKTRON	MADISON	MADISON	IL
ILN000510101	MINTON ENTERPRISES	HIGHLAND	MADISON	IL
ILD096731468	NL INDUSTRIES/TARACORP LEAD SMELTER	GRANITE CITY	MADISON	IL
ILD006276422	OWENS ILLINOIS INC ALTON	ALTON	MADISON	IL
ILD041889023	PREMCO	HARTFORD	MADISON	IL
ILD980607006	ST. LOUIS SMELTING & REFINING CO	COLLINSVILLE	MADISON	IL
IL0213820376	US ARMY ST LOUIS AREA SUPPORT CTR	GRANITE CITY	MADISON	IL

<https://www.epa.gov/superfund/search-superfund-sites-where-you-live>

In Madison County, there are thirteen Superfund cleanup sites that are some of the nation's most environmentally hazardous land. Most of these sites lie along the western region of Madison County, in places like Granite City, Alton and Hartford. These cities are also closer to the Mississippi River. While the designation of a site as a Superfund site puts the hazardous waste sites on a registry for cleanup, it does not necessarily mean that the site will be cleaned up, as there are many sites that are on the national priority list.

Granite City is the area in Madison County with the most Superfund Sites. In the spring of 2016, Granite City launched the new Greener Cleaner Granite City Air Quality Flag and Ozone Garden program.<sup>6</sup> This project aims to provide educational programming on climate change and ways community members can improve the quality of the air in their city. The project includes an ozone garden and a citizen monitoring network using EPA's air quality index and EPA's air quality flag program.

Some of the other cities with the lowest Environmental Health Indices in Madison County are also taking several steps to address the air quality. In Alton, there are several companies that contribute to the pollution. These companies are Wood River Power Station, Ardent Mills LLC, and Alton Steel Inc. In April 2008, the Alton City Council voted to sign the U.S. Mayors Climate Protection Agreement. Since that time, the City has created a Climate Protection and Energy Efficiency Committee that meets monthly. The City has purchased two hybrid vehicles, worth \$67,000, through the Environmental Project Funding Program that the Sierra Club and American Bottom Conservancy set up with ConocoPhillips. The City has completed a lighting audit of the Public Works Building and secured grants of approximately \$60,000 for lighting upgrades at that facility. The City has hired a consultant to study energy usage and the City saved

<sup>6</sup> <http://advantagenews.com/news/granite-city-initiative-focuses-on-air-quality/>

over \$300,000 in energy costs in 2010. The City has also explored placing solar panels at the Police Station and purchasing charging stations and electric vehicles. Currently, the City is in the process of completing Stage 4 of the Cool Cities Program.<sup>7</sup> Alton's website proudly lists the accomplishments of the City since joining the Cool Cities program in 2008 here: [https://www.cityofaltonil.com/media/pdf/Cool\\_Cities\\_Accomplishments.pdf](https://www.cityofaltonil.com/media/pdf/Cool_Cities_Accomplishments.pdf).

Several other cities in Madison County are also members of the Cool Cities Program, including Alton, Edwardsville, Glen Carbon, Godfrey, South Roxana, Collinsville, Granite City and Belleville. Cool Cities is a national, nonprofit initiative of the Sierra Club, and facilitates a collaboration among community members, organizations, businesses, and local leaders to implement clean energy solutions that save money, create jobs, and help curb global warming. Five years ago, Alton became the first Metro East city to sign on to the Cool Cities initiative, which is a nonbinding agreement by which cities strive to save energy and use environmentally sustainable practices.<sup>8</sup>

f. Patterns in Disparities in Access to Opportunity

- i. *Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.*

Overall, racial and ethnic minorities have less access to opportunity. In particular, there is one R/ECAP in the southwestern corner of the County where minorities are more concentrated that has very limited opportunities compared to the rest of the County. Because the populations of minorities are higher in less resource rich communities, like Granite City and Alton, they have more poverty exposure and have fewer opportunities to attend a highly proficient school, obtain a job, and access an environmentally healthy neighborhood. The shortcomings of public transportation is also an adverse factor for racial and ethnic minorities because they rely on it more than the White population.

People living in and around Edwardsville seem to have the most access to opportunities in Madison County. Edwardsville is slightly further away from St. Louis than Alton and Granite City, leading to lower job proximity access and higher transportation costs. However, residents of communities in and around Edwardsville have much more access to proficient schools and tend to have higher labor market engagement indices overall.

2. Additional Information

- a. *Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.*

<sup>7</sup> <https://www.cityofaltonil.com/media/pdf/AltonCAP.pdf>

<sup>8</sup> <http://thetelegraph.com/archive/10810/news-news-50093762-godfrey-joins-cool-cities>

- b. *The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).*

Granite City and Alton have more limited access to opportunities than other cities in Madison County. Granite City's government seems to be particularly concerned with its image and reinventing the public perception of the city. Additionally, Granite City has issues developing and retaining its brightest students, and would like to take affirmative steps to combat the "brain drain." A recurring idea to combat its issues in quality of education and employment opportunities is to develop a connection between high schools and companies by creating an internship program for students. This has the dual goals of improving educational opportunities and developing a more highly educated and engaged workforce.<sup>9</sup>

### 3. Contributing Factors of Disparities in Access to Opportunity

- a. *Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.*

- *Access to financial services*

Lack of access to mainstream financial services is a contributing factor to disparities in access to opportunity in Madison County. Specifically, there are no bank branches in the City of Venice, which is the county's most heavily African American municipality, and there appear to be only two bank branches in the City of Madison, the county's only other majority-minority community. When individuals and families lack access to mainstream financial services, they often have little choice but to utilize high-cost products like check cashing, pawn shops, payday loans, and car title loans. These products impede individuals and families from saving money that can be used to afford transportation, access higher education, or pay to move to a higher opportunity area with clean air and proficient schools.

- *The availability, type, frequency, and reliability of public transportation*

The availability of public transportation is a contributing factor to disparities in access to opportunity in Madison County. At a high level, access to employment and access to transit are concentrated in the western half of the county, and access to proficient schools, environmentally healthy neighborhoods, and low poverty neighborhoods are concentrated in the eastern half of the county. African American and Latino households are concentrated in the western half of the county and are more likely to rely on public transit than are other groups. African American and Latino households have relatively high access to public transit, but, because of the unavailability of transit to destinations in the eastern half of the county, they are unable to use transit to access opportunities located in those communities. In addition, transit-dependent people of color who might otherwise

<sup>9</sup> <https://docs.google.com/document/d/1KUZIRGn1TiAaIJ-8j1xCmbLcdjA5zrvVcOWDjYoeNUk/edit>

desire to move to the eastern half of the county in order to access proficient schools, for example, may be deterred from doing so because of difficulties in using transit to commute to employment destinations in the western half of the county or in St. Louis. Both the lack of availability of transit and the zone-based fare structure contribute to this dynamic.

- *Lack of private investments in specific neighborhoods*

Lack of private investments in the small cities of Venice and Madison is a significant contributing factor to disparities in access to opportunity with regard to employment, exposure to poverty, and education. Madison County's predominantly African American communities are subject to high rates of vacancy and have few retail amenities. Although these communities have relatively high proximity to job centers, the actual location of jobs may be adjacent to rather than in Madison and Venice, and there may be a mismatch between available jobs and the skills and qualifications of area residents. Increased investment in jobs in the retail and services sectors would likely increase labor market engagement for African American residents of Madison County. That increase in employment, in turn, would likely decrease the concentration of poverty in the area by raising incomes for some households above the federal poverty line. Increased private investment would likely improve school proficiency both by increasing property tax revenue for schools and by decreasing the likelihood that children will attend school under the strain of living in poverty.

- *Lack of public investments in specific neighborhoods, including services or amenities*

Madison County and other public entities like the State of Illinois do target public investments that are designed to increase the availability of services and amenities in historically disinvested communities like Venice and Madison. However, the lack of public investment in those areas remains a contributing factor to disparities in access to opportunity because the degree of targeting and the overall level of resources could be increased to better achieve the goal of creating meaningful access to opportunity in Venice and Madison. For instance, in recent years, the State of Illinois has failed to pay the amount needed to reach the statutory Foundation Level for per-pupil expenditures to school districts and has instead paid a prorated amount of what has been needed. The state also provides supplemental grants to districts based on the concentration of low-income students. The total value of the supplemental grants fell for the first time between 2015 and 2016. School districts with concentrations of low-income students, which are disproportionately likely to have concentrations of students of color, are more dependent on these non-local sources of funding to provide an adequate education to their students than are whiter and more affluent districts. With regard to employment, job training resources are not readily geographically accessible to the communities that have the lowest labor market engagement. The Madison County Employment and Training Department, which is located in the Wood River Southwestern Illinois Worknet Center, is located in a predominantly white community that is an over 20 minute drive and an over one-hour trip by public transportation (requiring a transfer) from Venice. Additionally, although there are significant parks and greenspaces located in the southwestern corner of Madison County, particularly in Madison, the need for greenspace in order to mitigate the environmental health consequences of proximity to heavy industry would justify higher levels of investment in new facilities in Madison and, in particular, in Venice.

- *Lack of regional cooperation*

Lack of regional cooperation is a contributing factor to disparities in access to opportunity on a few levels. First, with regard to education, the excessive fragmentation of school districts limits the scope of possible policy solutions to disparities in access to proficient schools with minimal friction. Second, and also with regard to education, in particular, but also with regard to other municipal-level expenditures, the absence of a tax-base sharing system like the Twin Cities region's Fiscal Disparities Program undermines the ability of local governments to overcome disparities in access to opportunity by targeting funding to meet critical needs. Third, regional cooperation is a necessary precondition to any significant expansion of transit linkages between the western and eastern portions of Madison County. Any major expansion would require cooperation over issues like funding, easements, and rights of way. It is not clear that existing regional and county structures have the capacity to address those challenges. It is important to note that service expansions in Madison County would have to be undertaken with an eye toward the broader region as connectivity to the Metrolink in St. Clair County would be an important goal.

- *Land use and zoning laws*

As discussed in connection with the fair housing issue of segregation, land use and zoning laws are a contributing factor to disparities in access to opportunity because they severely limit the amount of land available for the development of housing types that are more likely to be affordable in areas with proficient schools, environmentally healthy neighborhoods, and low exposure to poverty. In theory, it is also possible for land use and zoning laws to contribute to disparities in access to employment opportunities by unduly restricting development that would likely create jobs in low-income communities of color, but that phenomenon does not appear to be occurring in Madison County's disinvested areas.

- *Lending Discrimination*

HMDA data show stark disparities in loan approval and denial rates and in prime as opposed to high-cost lending for African American households in Madison County. Additionally, rates of denial are higher in census tracts that have higher population concentrations of people of color. Lending discrimination contributes to disparities in access to opportunity in two ways. First, lending discrimination erodes the tax base of low income communities of color by increasing vacancy rates and decreasing the assessed value of homes, which are more difficult for homeowners to maintain in good condition when home equity loans are unavailable. Without an adequate tax base, school proficiency, along with a range of other public services, suffers. Second, in light of the heavily owner-occupied nature of the housing market in areas that have proficient schools and environmentally healthy neighborhoods, the inability to access home purchase loans at affordable rates makes it more difficult for African American households, in particular, to move to neighborhoods that offer such opportunities.

- *Location of employers*

Job creation and employment opportunities for Madison County are major concerns of County officials and they are creating several programs to continue expanding opportunities for Madison County, particularly in areas that have lower Labor Market Engagement Indices. Though the areas

with low Labor Market Engagement tend to have higher Job Proximity, the initiatives seem to create incentives for more jobs to open close to areas with Lower Market Engagement. Because proximity alone does not expand access to Madison County residents without particular educational levels or skillsets, Madison County will have to supplement its job creation programs with training and ensuring that the newly created jobs are accessible to those without higher educational degrees and provide living wages to low-income residents.

### Job Creation Loan Program

In Madison County, the government facilitates a Job Creation Loan Program that provides direct financing to businesses at a below-market interest rate in cooperation with private sector lenders.<sup>10</sup> This program helps finance businesses to help them expand their operations within Madison County. In order to be eligible for these loans, the businesses must agree to create permanent jobs for qualified low or moderate-income individuals within Madison County. For every \$10-15,000 given to the business through the Job Creation Loan Program, the business must create at least one job for a qualified low or moderate-income individual.

### Enterprise Zones

Madison County Community Development has designated several areas in the County as “Enterprise Zones.” Enterprise Zones are specific areas that have been designated by the State of Illinois, Madison County and participating municipalities to provide special tax incentives to encourage businesses to locate, expand and retain their operations with the enterprise zones.<sup>11</sup> According to the Illinois Department of Commerce and Economic Opportunity, statewide enterprise zones resulted in more than \$2 billion in capital investments during the 2014 fiscal year. Those investments created more than 9,000 jobs and resulted in the retention of more than 14,000 jobs.<sup>12</sup>

The benefits a community will receive as a result of the designation are: property tax abatement, sales tax exemptions, investment tax credits, enterprise zone machinery and equipment exemption, utility tax exemptions, and additional business assistance programs.<sup>13</sup> Some of these benefits have specific job creation requirements in order to reap the rewards of the program. For example, to receive the machinery and equipment exemption, which provides sales tax exemptions on purchases of tangible personal property to be used in the manufacturing or assembly process, a business must make a \$5 million investment which creates 200 full-time equivalent jobs in Illinois

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<sup>10</sup> [http://www.co.madison.il.us/departments/community\\_development/economic\\_development\\_program.php](http://www.co.madison.il.us/departments/community_development/economic_development_program.php)

<sup>11</sup>

[http://www.co.madison.il.us/departments/community\\_development/gateway\\_commerce\\_center\\_and\\_enterprise\\_zones.php](http://www.co.madison.il.us/departments/community_development/gateway_commerce_center_and_enterprise_zones.php)

<sup>12</sup>

[http://www.co.madison.il.us/Community\\_Development/Four%20Enterprise%20Zones%20Approved%20for%20Madison%20County.pdf](http://www.co.madison.il.us/Community_Development/Four%20Enterprise%20Zones%20Approved%20for%20Madison%20County.pdf)

<sup>13</sup> [http://www.co.madison.il.us/Community\\_Development/Southwestern%20EZ%20Overview.pdf](http://www.co.madison.il.us/Community_Development/Southwestern%20EZ%20Overview.pdf)

or an investment of \$40 million for the retention of 2,000 full-time jobs in Illinois or an investment of \$40 million and retaining 90 percent of the jobs in place on the date of certification.<sup>14</sup>

In 2016, four enterprise zones in Madison County were included in a bill approved by the Illinois Legislature that extended the life of the State's enterprise zones for 25 years and created a number of new zones.<sup>15</sup> The newest enterprise zone in Madison County is the Discovery zone, which includes portions of Collinsville, Glen Carbon, Maryville, Troy, Highland and St. Jacob. The three renewed enterprise zones in the county include the Riverbend, Southwestern Madison County and Gateway Commerce zones. Madison County Community Development administers the zones. The Madison County Discovery Zone is comprised of portions of the municipalities of Collinsville, Glen Carbon, Highland, St. Jacob, Maryville, Troy, and unincorporated Madison County. The Gateway Commerce Center Enterprise Zone is comprised of portions of the municipalities of Edwardsville and Pontoon Beach, as well as unincorporated areas of Madison County. The Riverbend Enterprise Zone is comprised of portions of the municipalities of Alton, Bethalto, East Alton, Hartford, Roxana, South Roxana, Wood River and unincorporated Madison County. The Southwestern Madison County Enterprise Zone is comprised of portions of Granite City, Madison, Venice and unincorporated Madison County. The Madison County Development Department provides a fact sheet for the process to get a community designated as an enterprise zone.<sup>16</sup>



<https://maps.co.madison.il.us/madco/gisviewer/index.html?config=config-commdev-enterprise.xml>

<sup>14</sup> [http://www.co.madison.il.us/Community\\_Development/Southwestern%20EZ%20Overview.pdf](http://www.co.madison.il.us/Community_Development/Southwestern%20EZ%20Overview.pdf)

<sup>15</sup>

[http://www.co.madison.il.us/Community\\_Development/Four%20Enterprise%20Zones%20Approved%20for%20Madison%20County.pdf](http://www.co.madison.il.us/Community_Development/Four%20Enterprise%20Zones%20Approved%20for%20Madison%20County.pdf)

<sup>16</sup> [http://www.co.madison.il.us/Community\\_Development/Enterprise%20Zone%20Fact%20Sheetaddterr.pdf](http://www.co.madison.il.us/Community_Development/Enterprise%20Zone%20Fact%20Sheetaddterr.pdf)

The Madison County website on economic development also boasts the arrival of an Amazon fulfillment center in Edwardsville.<sup>17</sup> As of early June 2016, the fulfillment center plans were official, and the County is expecting 1,000 new jobs to be created from this development.<sup>18</sup> The County and Amazon will be working together to host job fairs and spread the word about employment opportunities for Madison County residents. Madison County Chairman Alan Dunstan attributes this development to repairing the Madison County levy system.<sup>19</sup> Dunstan also believes that the Enterprise Zones are a large part of what attracted Amazon to Edwardsville.<sup>20</sup> Full-time employees at Amazon receive competitive hourly wages and a comprehensive benefits package, including healthcare, 401(k) and company stock awards starting on day one, as well as generous maternity and parental leave benefits. Amazon also offers employees innovative programs like Career Choice, where it will pre-pay tuition for courses related to in-demand fields, regardless of whether the skills are relevant to a career at Amazon. Edwardsville Mayor Hal Patton estimates that the jobs created by the Amazon fulfillment center will average \$35,000 a year plus benefits.<sup>21</sup> For most of the fulfillment jobs on the Amazon website, a high school degree is required, but not a college degree. County officials are particularly excited about the Amazon opening in light of the recent closure of the Granite City Mill.

### EDGE Program

The EDGE program is designed to offer a special tax incentive to encourage companies to locate or expand operations in Illinois when there is active consideration of a competing location in another State. The program can provide tax credits to qualifying companies, equal to the amount of state income taxes withheld from the salaries of employees in the newly created jobs. The non-refundable credits can be used against corporate income taxes to be paid over a period not to exceed 10 years. To qualify, a company must provide documentation that attests to the fact of competition with a competing state, and agree to make an investment of at least \$5 million in capital improvements and create a minimum of 25 new full time jobs in Illinois. For a company with 100 or fewer employees, the company must agree to make a capital investment of \$1 million and create at least 5 new full time jobs in Illinois.<sup>22</sup>

### Foreign Trade Zone (FTZ) #31

The America's Central Port located at Granite City, Illinois is the grantee and license holder for General Purpose Foreign Trade Zone #31. An FTZ is an area within the geographic limits of the United States, but is considered outside of US customs' territory. Foreign Trade Zones are sites

<sup>17</sup> [http://www.co.madison.il.us/departments/community\\_development/amazon\\_comes\\_to\\_madison\\_county.php](http://www.co.madison.il.us/departments/community_development/amazon_comes_to_madison_county.php)

<sup>18</sup> <http://www.areadevelopment.com/newsitems/6-10-2016/amazon-fulfillment-centers-edwardsville-illinois.shtml>

<sup>19</sup> [https://www.riverbender.com/articles/details/amazon-takes-applications-for-new-edwardsville-facility-will-host-future-job-fairs-13533.cfm?google\\_editors\\_picks=true](https://www.riverbender.com/articles/details/amazon-takes-applications-for-new-edwardsville-facility-will-host-future-job-fairs-13533.cfm?google_editors_picks=true)

<sup>20</sup> <https://www.riverbender.com/articles/details/its-official-amazon-is-bring-1000-fulltime-jobs-to-commerce-center-areas-in-edwardsville-13411.cfm>

<sup>21</sup> <https://www.riverbender.com/articles/details/its-official-amazon-is-bring-1000-fulltime-jobs-to-commerce-center-areas-in-edwardsville-13411.cfm>

<sup>22</sup> <http://www.illinois.gov/dceo/ExpandRelocate/Incentives/taxassistance/Pages/EDGE.aspx>



within the United States where foreign and domestic merchandise is generally considered to be in international commerce. Foreign or domestic merchandise may enter this enclave without a formal customs entry or the payment of custom duties or government excise taxes. Merchandise entering a zone may be: stored; tested; sampled; labeled; repackaged; displayed; repaired; manipulated; mixed; cleaned; assembled; manufactured; salvaged; destroyed or processed.<sup>23</sup>

If the final product is exported from the USA, no U.S. Customs duty or excise tax is levied. If, however, the final product is imported into the U.S., Custom duty and excise taxes are due only at the time of transfer from the foreign trade zone and formal entry into the U.S. The duty paid is the lower of that applicable to the product itself or its component parts. Thus, foreign trade zones provide opportunities to realize customs duty savings. In addition, foreign trade zone procedures provide one of the most flexible methods of handling domestic and imported merchandise.



<http://www.americascentralport.com/wp-content/uploads/2011/06/FTZ-31-11-7-14-NEW-Brochure.pdf>

### Business Financing Programs

In Madison County, the Southwestern Illinois Development Authority (SWIDA) has several programs to help finance businesses in the area. SWIDA was created by action of the Illinois General Assembly and the Governor in 1987. Tax Exempt revenue bonds are available through SWIDA but are limited by federal law to selected purposes including not-for-profit organization objectives, pollution control, solid waste facilities, transportation and small issue manufacturing companies. Interest on tax-exempt bonds is exempt from federal income tax, and therefore attracts a much lower rate than conventional financing. In addition, SWIDA helps organizations receive credits under the New Market Tax Credit Program.

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<sup>23</sup>

[http://www.co.madison.il.us/Community\\_Development/Summary%20of%20Economic%20Development%20Programs%20-%20Revised%203\\_31\\_2016.pdf](http://www.co.madison.il.us/Community_Development/Summary%20of%20Economic%20Development%20Programs%20-%20Revised%203_31_2016.pdf)

The Southwestern Illinois Community Development Corporation (SWICDC) also provides gap financing to small businesses when conventional lenders are unwilling to assume 100% of the risk of lending or who do not meet county CDBG loan requirements for job creation.<sup>24</sup>

- *Location of environmental health hazards*

The location of environmental health hazards is a contributing factor to disparities in access to opportunity. Environmental health hazards in Madison County are heavily concentrated in the more industrial and more heavily trafficked western portion of the county and, in particular, in the southwestern corner of the county. These are the same areas where people of color within the county are concentrated. In addition to facilitating mobility for people of color to locations throughout the county where environmental hazards are not located, any resources for the remediation of environmental harms should be targeted toward low-income communities of color.

- *Location of proficient schools and school assignment policies*

The location of proficient schools and school assignment policies contribute to disparities in access to opportunity. Proficient schools are highly concentrated in portions of Madison County that are predominantly white. Because of how fragmented the county's school districts are, school assignment policies within districts are not a major concern. Rather, the fact that students are assigned to schools within the districts in which they reside is the core problem. Either the consolidation of school districts or the establishment of programs that facilitate inter-district transfers could ameliorate the effect that the location of proficient schools has on access to proficient schools for students of color in Madison County.

- *Location and type of affordable housing*

As illustrated in the Publicly Supported Housing Analysis section of this Analysis of Impediments, affordable housing and, in particular, affordable housing for families with children is heavily concentrated in the western portions of Madison County and is not in close proximity to areas with proficient schools, environmentally healthy neighborhoods, and low exposure to poverty. Additionally, African American residents and persons with disabilities are disproportionately likely to live in affordable housing, and, as a result, have disproportionately low access to these amenities.

- *Occupancy codes and restrictions*

Occupancy codes and restrictions are not a contributing factor to disparities in access to opportunity. Although two Madison County municipalities have crime-free rental housing ordinances that raise significant fair housing concerns, those communities are largely concentrated in the western portion of the county where access to opportunity is relatively limited and from which people of color are not systemically excluded.

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<sup>24</sup>

[http://www.co.madison.il.us/Community\\_Development/Summary%20of%20Economic%20Development%20Programs%20-%20Revised%203\\_31\\_2016.pdf](http://www.co.madison.il.us/Community_Development/Summary%20of%20Economic%20Development%20Programs%20-%20Revised%203_31_2016.pdf)

- *Private discrimination*

As revealed by fair housing testing conducted by the Metropolitan St. Louis Equal Housing and Opportunity Council and fair housing complaint data, private discrimination in the housing market is all too common and contributes to disparities in access to opportunity. People of color and persons with disability who might want to move to the central and eastern portions of the county in order to access important opportunities may face challenges in doing so because of conduct that violates the Fair Housing Act. For persons with disabilities, in particular, violations of the Fair Housing Act's design and construction standards in those portions of the county are especially pernicious because, in general, those areas have relatively limited multi-family housing as an initial matter and single-family homes are unlikely to be accessible because they are not subject to design and construction standards.

#### iv. Disproportionate Housing Needs

##### 1. Analysis

Disproportionate Housing Needs	Madison County, IL			St. Louis, MO-IL MSA		
Households Experiencing Any of 4 or More Housing Problems	# with problems	# households	% with problems	# with problems	# households	% with problems
<b>Race/Ethnicity</b>						
White, Non-Hispanic	24,525	95,465	25.7%	221,523	853,352	26.0%
Black, Non-Hispanic	3,684	7,900	46.6%	96,496	195,291	49.4%
Hispanic	825	2,190	37.7%	8,511	20,550	41.4%
Asian and Pacific Islander, Non-Hispanic	205	560	36.6%	5,971	20,006	29.9%
Native American, Non-Hispanic	59	150	39.3%	548	1,797	30.5%
Other, Non-Hispanic	309	975	31.7%	4,655	12,102	38.5%
<b>Total</b>	<b>29,607</b>	<b>107,240</b>	<b>27.6%</b>	<b>337,705</b>	<b>1,103,070</b>	<b>30.6%</b>
<b>Household Type and Size</b>						

Family households, <5 people	13,430	64,035	21.0%	151,935	631,869	24.1%
Family households, 5+ people	2,595	7,700	33.7%	32,880	90,418	36.4%
Non-family households	13,570	35,495	38.2%	152,905	380,794	40.2%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	10,790	95,465	11.3%	96,386	853,352	11.3%
Black, Non-Hispanic	2,124	7,900	26.9%	52,928	195,291	27.1%
Hispanic	390	2,190	17.8%	4,957	20,550	24.1%
Asian and Pacific Islander, Non-Hispanic	125	560	22.3%	3,322	20,006	16.6%
Native American, Non-Hispanic	14	150	9.3%	237	1,797	13.2%
Other, Non-Hispanic	154	975	15.8%	2,385	12,102	19.7%
Total	13,597	107,240	12.7%	160,215	1,103,070	14.5%

Households with Severe Housing Cost Burden	Madison County, IL			St. Louis, MO-IL MSA		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	9,985	95,465	10.5%	85,850	853,352	10.1%
Black, Non-Hispanic	1,900	7,900	24.1%	48,332	195,291	24.8%

Hispanic	320	2,190	14.6%	3,583	20,550	17.4%
Asian and Pacific Islander, Non-Hispanic	110	560	19.6%	2,673	20,006	13.4%
Native American, Non-Hispanic	15	150	10.0%	204	1,797	11.4%
Other, Non-Hispanic	140	975	14.4%	2,047	12,102	16.9%
Total	12,470	107,240	11.6%	142,689	1,103,070	12.9%
Household Type and Size						
Family Households, <5 people	5,373	64,035	8.4%	60,698	631,869	9.6%
Family Households, 5+ people	825	7,700	10.7%	9,718	90,418	10.8%
Non-Family Households	6,640	35,495	18.7%	72,251	380,794	19.0%

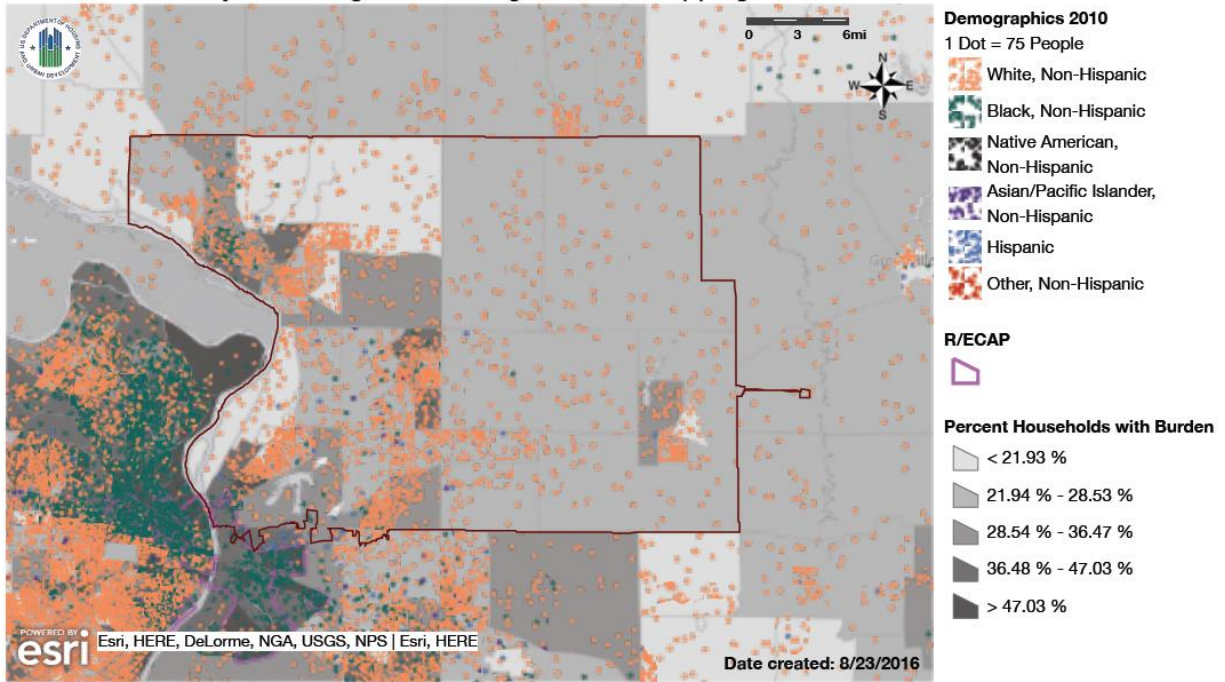
In the tables above, data for Madison County is 2009-2013 CHAS data while data for the region is from HUD's AFFH Data and Mapping Tool, which relies upon 2006-2010 CHAS data. Data in the AFFH Data and Mapping Tool for Madison County for these tables were incorrect. In obtaining the data necessary to populate the tables from the CHAS data, the decision was made to use more recent data despite the inconsistency in the years in which the Census Bureau gathered the sample data.

- a. *Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?*

Within both Madison County and the broader St. Louis region, all racial or ethnic minority groups experience higher rates of housing problems, including but not limited to cost burden and severe housing cost burden, than do Non-Hispanic White households. African American households experience housing problems, including but not limited to cost burden and severe cost burden, at the highest rate of any racial or ethnic group. Non-family households experience housing problems at the highest rate of any household type followed by large families of five or more members. Small families with four or fewer members experience housing problems at the lowest rate of any household type. Disparities between small and large families are less pronounced for severe cost burden than they are for other types of housing problems.

- b. *Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?*

### HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



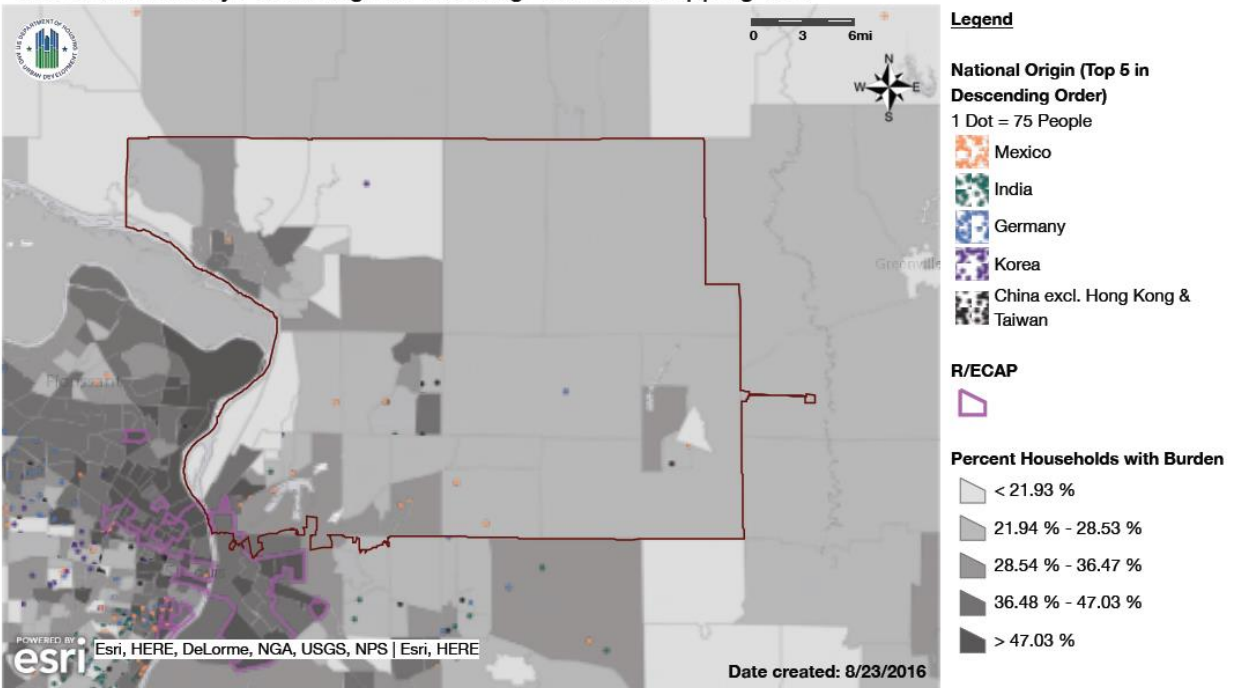
**Name:** Map 7 - Housing Burden and Race/Ethnicity

**Description:** Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and race/ethnicity dot density

**Jurisdiction:** Madison County (CDBG)

**Region:** St. Louis, MO-IL

## HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



**Name:** Map 8 - Housing Burden and National Origin

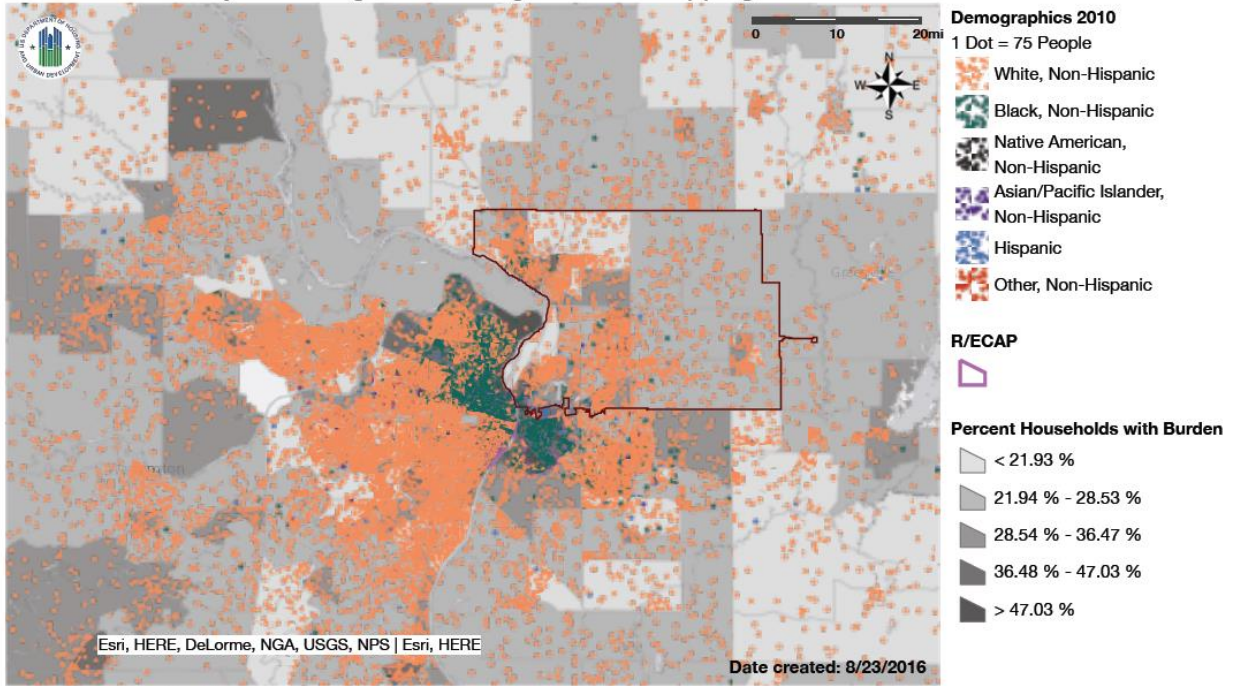
**Description:** Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and national origin dot density

**Jurisdiction:** Madison County (CDBG)

**Region:** St. Louis, MO-IL

Within Madison County, the areas with the greatest housing burdens include Madison, Venice, Alton, and Edwardsville. The Madison and Venice areas are segregated areas of African American population concentration, with Venice comprising a R/ECAP. Alton and Edwardsville are relatively integrated areas with Alton being more integrated than Edwardsville, which is predominantly Non-Hispanic White. It is likely that the presence of University of Southern Illinois students in Edwardsville contributes to the surprisingly high level of housing burden in the area. In general, the county's segregated, heavily Non-Hispanic White areas have relatively low levels of housing burden. There are no significant national origin concentrations in areas of high housing burden.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



**Name:** Map 7 - Housing Burden and Race/Ethnicity

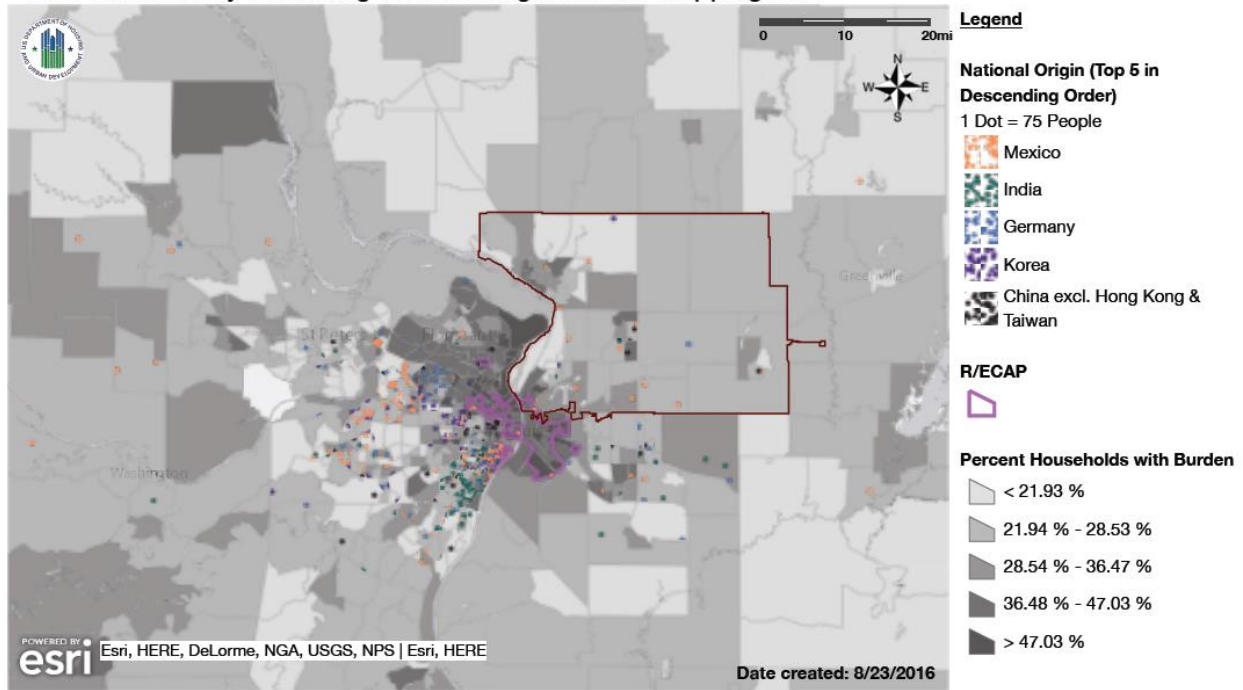
**Description:** Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and race/ethnicity dot density

**Jurisdiction:** Madison County (CDBG)

**Region:** St. Louis, MO-IL



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



**Name:** Map 8 - Housing Burden and National Origin

**Description:** Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and national origin dot density

**Jurisdiction:** Madison County (CDBG)

**Region:** St. Louis, MO-IL

Within the broader region, the City of St. Louis, northern St. Louis County, and the City of East St. Louis all feature the greatest levels of housing burden. These are all segregated, predominantly African American areas and include nearly all of the region’s R/ECAPs. There does not appear to be any relationship between areas of high housing burden and particular national origin groups.

- c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.

**Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children**

Housing Type	(Madison County, IL CDBG) Jurisdiction							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	432	51.99%	219	26.35%	169	20.34%	290	34.90%
Project-Based Section 8	885	73.44%	220	18.26%	88	7.30%	226	18.76%
Other Multifamily	54	88.52%	7	11.48%	0	0.00%	0	0.00%
HCV Program	107	13.23%	375	46.35%	287	35.48%	471	58.22%

Note 1: Data Sources: APSH

Note 2: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

The Housing Choice Voucher program supports households in a balanced mix of unit sizes, but other types of publicly supported housing, which represent hard units of housing, are skewed toward 0-1 bedroom units. This is not a surprise in the context of Other Multifamily housing, which primarily consists of Section 202 and Section 811 housing that is targeted to specific subpopulations that are disproportionately unlikely to reside in family households. With regard to public housing, which is somewhat skewed toward 0-1 bedroom units, and Project-Based Section 8, which is dramatically skewed toward 0-1 bedroom units, their failure to serve families with children is more troubling. The existing stock of public housing and Project-Based Section 8 housing is underserving families with children.

*d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.*

B25003: TENURE - Universe: Occupied housing units

2010-2014 American Community Survey 5-Year Estimates

	Madison County, Illinois		St. Louis, MO-IL Metro Area	
	Estimate	Percentage	Estimate	Percentage
Total:	107,298		1,104,257	
Owner occupied	76,625	71.41%	772,093	69.92%
Renter occupied	30,673	28.59%	332,164	30.08%

B25003H: TENURE (WHITE ALONE, NOT HISPANIC OR LATINO HOUSEHOLDER) - Universe: Occupied housing units with a householder who is White alone, not Hispanic or Latino

2010-2014 American Community Survey 5-Year Estimates

	Madison County, Illinois		St. Louis, MO-IL Metro Area	
	Estimate	Percentage	Estimate	Percentage
Total:	94,873		851,544	
Owner occupied	71,079	74.92%	658,809	77.37%

Renter occupied	23,794	25.08%	192,735	22.63%
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**B25003B: TENURE (BLACK OR AFRICAN AMERICAN ALONE HOUSEHOLDER) - Universe: Occupied housing units with a householder who is Black or African American alone**

2010-2014 American Community Survey 5-Year Estimates

	Madison County, Illinois		St. Louis, MO-IL Metro Area	
	Estimate	Percentage	Estimate	Percentage
Total:	8,375		196,885	
Owner occupied	3,024	36.11%	82,808	42.06%
Renter occupied	5,351	63.89%	114,077	57.94%

**B25003D: TENURE (ASIAN ALONE HOUSEHOLDER) - Universe: Occupied housing units with a householder who is Asian alone**

2010-2014 American Community Survey 5-Year Estimates

	Madison County, Illinois		St. Louis, MO-IL Metro Area	
	Estimate	Percentage	Estimate	Percentage
Total:	590		20,053	
Owner occupied	442	74.92%	11,540	57.55%
Renter occupied	148	25.08%	8,513	42.45%

**B25003I: TENURE (HISPANIC OR LATINO HOUSEHOLDER) - Universe: Occupied housing units with a householder who is Hispanic or Latino**

## 2010-2014 American Community Survey 5-Year Estimates

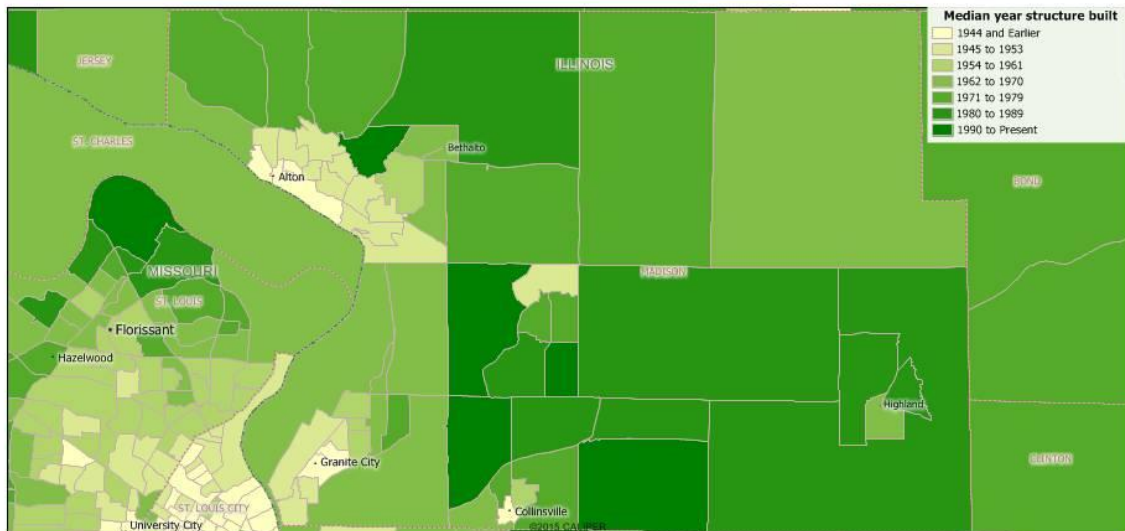
	Madison County, Illinois		St. Louis, MO-IL Metro Area	
	Estimate	Percentage	Estimate	Percentage
Total:	2,345		21,720	
Owner occupied	1,342	57.23%	11,326	52.15%
Renter occupied	1,003	42.77%	10,394	47.85%

In Madison County, Non-Hispanic White and Asian households experience relatively similar housing tenure, characterized by high levels of homeownership. Hispanic households have slightly lower homeownership rates, and African American households have significantly lower rates of homeownership. The same disparities persist at the regional level though Asian and Latino households are more likely to be homeowners in the county than in the region while the opposite is true for Non-Hispanic White and African American households.

## 2. Additional Information

- a. *Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.*

Median Year Structure Built, Madison County, Illinois



In addition to HUD-provided data, information about the age of the housing stock in Madison County may reflect housing conditions issues, potentially including lead paint exposure, that are suggestive of disproportionate housing needs. Older housing is more likely to be in substandard condition generally, in addition to the potential hazard of lead paint. The map above clearly shows the oldest housing in Madison County is found in and around Alton; in Granite City, Madison, and Venice in the southwestern corner of the county; in Edwardsville; and in Collinsville. The former two areas include concentrations of contiguous census tracts where the median year in which structures were built in 1953 or earlier. The latter two areas include just one census tract apiece with older housing. By contrast, the rural and less densely populated suburban census tracts in the county generally have newer housing stock. With some exceptions, areas with older housing stock tend to include the most heavily African American portions of the county. Areas with relatively new housing stock are predominantly Non-Hispanic White.

*b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.*

### 3. Contributing Factors of Disproportionate Housing Needs

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.*

- The availability of affordable units in a range of sizes

The availability of affordable units in a range of sizes is a significant contributing factor to disproportionate housing needs for large families. Publicly supported housing disproportionately consists of one-bedroom units. This circumstance has two predictable consequences that adversely affect large families. First, large families may experience overcrowding in affordable units that are not large enough to accommodate large families comfortably. Second, faced with a lack of sizable affordable units, large families may need to turn to larger market-rate units with rents that require more than 30% of their gross income.

- Displacement of residents due to economic pressures

Displacement of residents due to economic pressures is not a significant contributing factor for disproportionate housing needs in Madison County. Areas of minority population concentration within the county are generally struggling with disinvestment and are not coping with the distinct challenges posed by gentrification. In the broader region, displacement of residents due to economic pressures may be a slightly more pronounced issue than it is in Madison County, but, although there are some central city neighborhoods in St. Louis showing signs of gentrification, the pattern is very weak in comparison with many other large urban centers. Regionally, displacement of residents due to economic pressures does not rise to the level of a significant contributing factor.

- Lack of private investments in specific neighborhoods

Lack of private investments in specific neighborhoods is a significant contributing factor for disproportionate housing needs in Madison County, particularly in Madison and Venice, and the region. New development, except for of affordable housing, is less likely to take place in heavily African American communities. In the context of a discriminatory housing market in which middle and upper-income African American households often have limited choices outside of predominantly African American communities, the lack of quality housing in such communities disproportionately burdens African American households. Additionally, the lack of private investment in non-housing activities weakens the tax base of predominantly African American communities and reduces the ability of local governments to spend their own revenue to mitigate disproportionate housing needs. Lastly, lack of private investments leads to a lack of jobs within communities of color that would increase income levels in a manner that would reduce housing cost burden.

- Lack of public investments in specific neighborhoods, including services or amenities

As suggested above, there is a connection between the lack of private investments and the lack of public investments and their role in contributing to disproportionate housing needs. Lack of public investment is a significant contributing factor to disproportionate housing needs despite the efforts of Madison County and its older cities to prioritize investment in communities of color. The problem in Madison County is not that needed community development and revitalization efforts are not being undertaken in Madison, Venice, and Alton with the resources that are available, but rather that the level of available resources is insufficient to meet the challenge.

- Land use and zoning laws

Land use and zoning laws are a significant contributing factor to disproportionate housing needs. Specifically, restrictive land use and zoning laws outside of areas of minority population concentration inflate housing prices throughout the region, resulting in housing cost burden that disproportionately falls on minority households. Additionally, restrictive land use and zoning laws cut off access for African American households to parts of the county and region that have newer housing stock and, by extension, fewer housing conditions issues and less exposure to lead paint.

- Lending Discrimination

Lending discrimination is a significant contributing factor to disproportionate housing needs. Low-income communities of color, in Madison and Venice as well as in St. Louis, East St. Louis, and North St. Louis County, face higher loan denial rates than predominantly Non-Hispanic White areas, cutting off homeowners from home equity loans necessary to make critical improvements. Additionally, racial disparities in the origination of high-cost mortgages, though less common than in the run-up to the financial crisis, mean that homeowners of color are more likely to be cost burdened than Non-Hispanic White homeowners. Additionally, disparate approval and denial rates mean that households of color are more likely to remain renters, which, in the region, is a more costly form of housing tenure than homeownership.

### **C. Publicly Supported Housing Analysis**

#### 1. Analysis

##### a. Publicly Supported Housing Demographics.

- Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?*

<b>(Madison County, IL CDBG) Jurisdiction</b>	<b>Race/Ethnicity</b>							
	<b>White</b>		<b>Black</b>		<b>Hispanic</b>		<b>Asian or Pacific Islander</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
<b>Housing Type</b>								
Public Housing	366	44.58%	337	41.05%	113	13.76%	0	0.00%
Project-Based Section 8	896	75.29%	281	23.61%	11	0.92%	1	0.08%
Other Multifamily	45	76.27%	14	23.73%	0	0.00%	0	0.00%
HCV Program	231	29.62%	541	69.36%	4	0.51%	1	0.13%
<b>0-30% of AMI</b>	194	86.61%	30	13.39%	0	0.00%	0	0.00%
<b>0-50% of AMI</b>	274	78.51%	30	8.60%	0	0.00%	0	0.00%
<b>0-80% of AMI</b>	413	80.51%	55	10.72%	0	0.00%	0	0.00%
<b>(Madison County, IL CDBG)</b>	236,177	86.52%	21,350	7.82%	7,968	2.92%	2,323	0.85%

Note 1: Data Sources: Decennial Census; APSH; CHAS

Note 2: #s presented are numbers of households not individuals.

Note 3: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

In Madison County, African American households are more likely to reside in public housing and, in particular, to utilize Housing Choice Vouchers than they are to reside in Project-Based Section 8 units or in Other Multifamily housing. Latino households are most heavily represented in public housing, where they make up a higher percentage of households than they do of the total population, but appear to be underrepresented in all other categories of publicly supported housing. White households are most represented in Project-Based Section 8 and in Other Multifamily housing. Madison County has a very small Asian and Pacific Islander population in general, and only two Asian or Pacific Islander households appear to reside in publicly supported housing.

- ii. *Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.*

There is a higher proportion of African American households in all categories of publicly supported housing than there is in the population at large and in each segment of the income eligible population. The proportion of African American households in public housing and with Housing Choice Vouchers exceeds the percentage of the population and of the income-eligible population by the greatest degree. The proportion of Latino households in public housing exceeds the percentage of Latinos in the total population and the proportion of Latino households in all other categories of publicly supported housing is less than the percentage of the population at large that is Latino, but HUD-provided data does not depict the percentage of Latino households that are income eligible. For all categories of publicly supported housing, the percentage of White households is lower than the percentage of the population at large that is White and the percentage of the income eligible population that is White. For Project-Based Section 8 and other multifamily



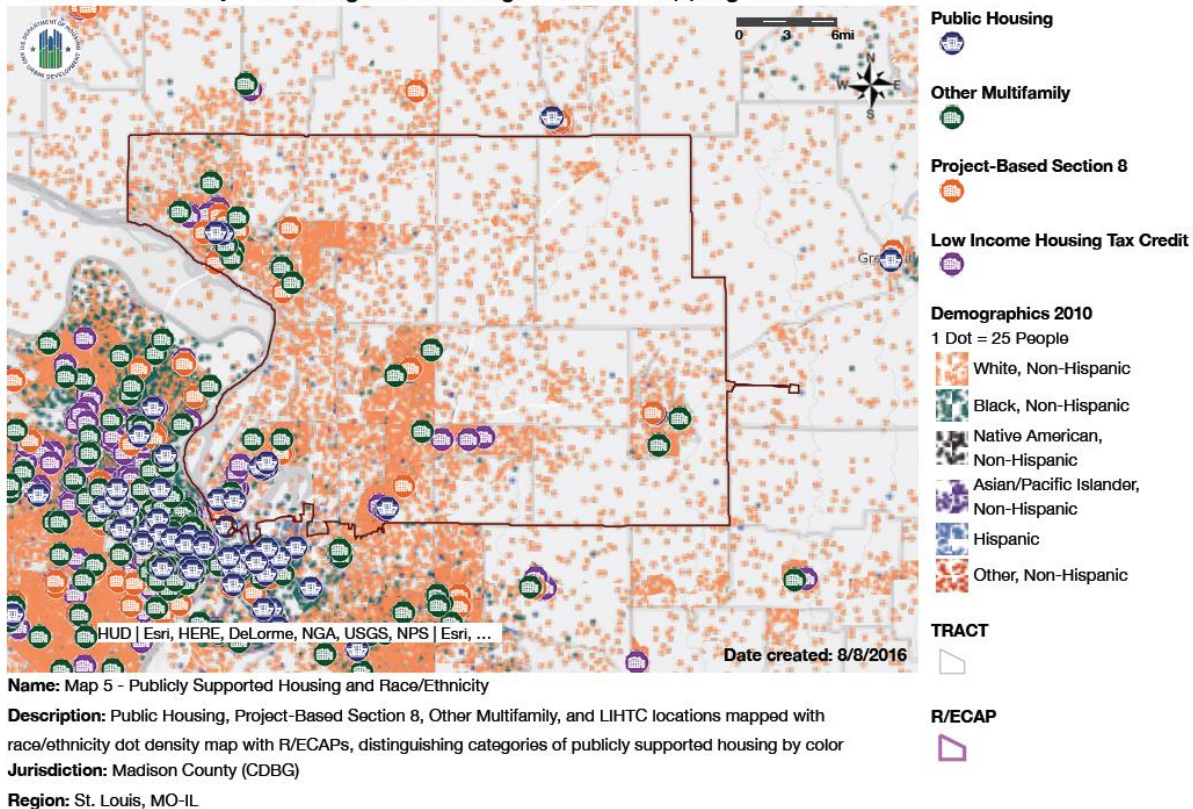
housing, the discrepancy is small while, for public housing and the Housing Choice Voucher program, the difference is large.

It is worth noting that publicly supported housing developments within Madison County, as well as the Housing Choice Voucher program, do not draw their residents solely from Madison County. People from throughout the region and even outside of the region apply for and reside in publicly supported housing in the county. As discussed in this Assessment's Demographic Summary, the proportion of African American and Asian and Pacific Islander residents in the region is markedly higher than in the county while the proportion of White residents is higher in the county and the proportion of Latino residents is relatively similar. Thus, in regional context, the extent to which it might appear that publicly supported housing programs are underserving White households is diminished, particularly with respect to programs other than the Housing Choice Voucher program. It is also important to note that in determining eligibility for publicly supported housing a household's assets are typically considered in addition to its income. In light of the persistent racial and ethnic wealth gap, White households may be disproportionately likely to have incomes that would appear to qualify for publicly supported housing while being ineligible because of such household assets.

b. Publicly Supported Housing Location and Occupancy

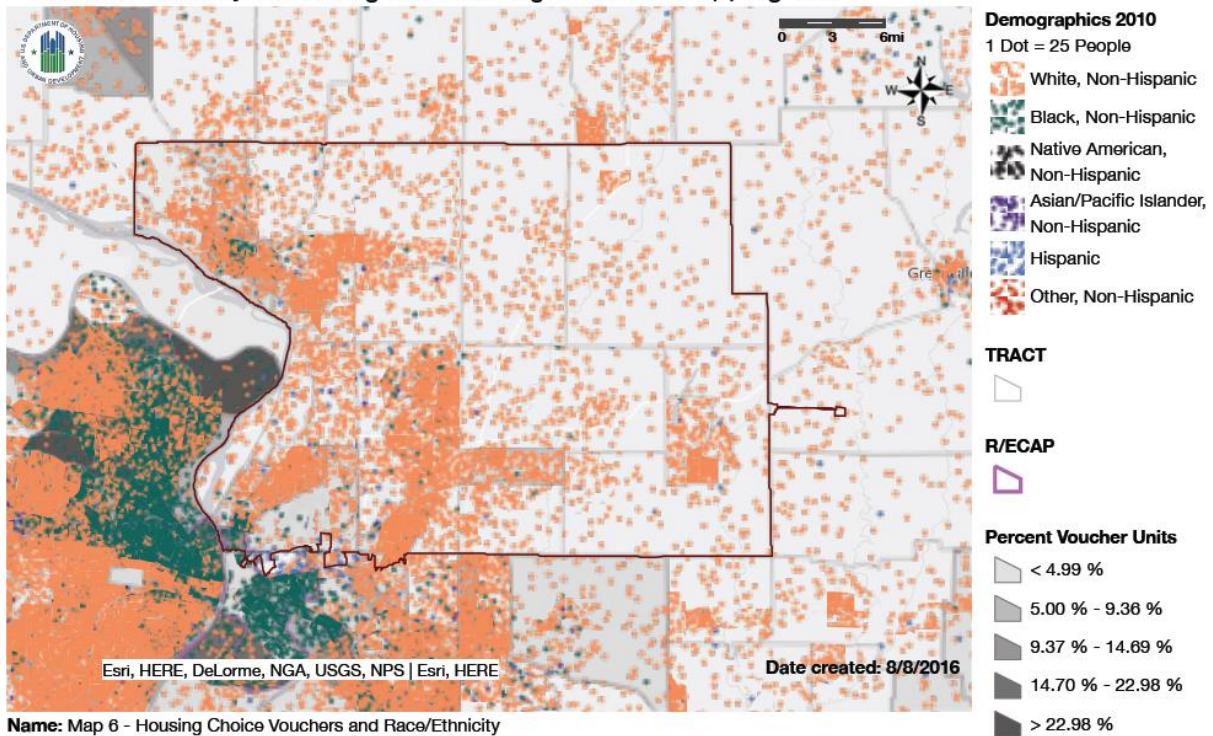
- i. *Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.*

### HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Publicly supported housing in Madison County is concentrated in a small number of communities including Venice, Madison, and Granite City in the southwestern corner of the county; Alton, East Alton, and Wood River in the northwestern portion of the county; Edwardsville, Glen Carbon, Maryville, and Collinsville in the central portion of the county; and Highland in the western portion of the county. There is no publicly supported housing at all in the north-central and northwestern portion of the county. In communities that have publicly supported housing, that housing is concentrated much more intensely in some communities than in others. In particular, Alton, Granite City, Madison, and Venice have comparatively high concentrations of publicly supported housing while Edwardsville and Glen Carbon have relatively low concentrations of publicly supported housing. Concentrations of publicly supported housing are also uneven in relation to the type of publicly supported housing. Public housing is concentrated in Alton, Granite City, Madison, and Venice. Aside from one additional development in Collinsville, public housing is entirely missing from the remainder of the county. Other types of publicly supported housing are more evenly distributed throughout the communities that have publicly supported housing but not throughout the county as a whole. With some exceptions, publicly supported housing and public housing, in particular, are more likely to be located in the county's one R/ECAP in Venice and in racially diverse or integrated areas like Alton or Madison than it is to be located in predominantly white communities.

## HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



**Name:** Map 6 - Housing Choice Vouchers and Race/Ethnicity

**Description:** Housing Choice Voucher map with race/ethnicity dot density map and R/ECAPs

**Jurisdiction:** Madison County (CDBG)

**Region:** St. Louis, MO-IL

Households that use Housing Choice Vouchers are even more concentrated within Madison County than are units of publicly supported housing. Madison, Venice, and Alton are the only communities with Census Tracts that have concentration of voucher holders. As previously noted, Venice is the location of the county's sole R/ECAP.

- ii. *Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?*

Persons with disabilities are most likely to reside in Other Multifamily housing, a category which includes disability-specific housing programs, and, to a lesser extent public housing. Housing in that category is clustered in Edwardsville, Glen Carbon, and Highland, which are all areas that tend to be disproportionately White and to have relatively low poverty. Project-Based Section 8 developments appear to be the most likely to serve elderly people while all other categories of publicly supported housing for which HUD-provided data are available tend to serve a mix of families with children and elderly households. Project-Based Section 8 housing is most highly concentrated in the northwestern portion of the county, which includes relatively integrated areas in Alton as well as predominantly White areas in and around East Alton and Wood River. There are no R/ECAPs in that portion of the county. According to HUD's LIHTC Database, there are seven LIHTC developments in Madison County that are targeted at elderly households, while, according to the AFFH Data and Mapping Tool, there are 26 total LIHTC developments. Most

LIHTC developments in the county serve families with children. There does not appear to be a relationship between the location of LIHTC developments and whether they are family-occupancy or senior housing. Developments in both categories are located in a range of communities including predominantly minority Madison, relatively integrated Alton, and predominantly white Troy. Since the total number of R/ECAPs in the county is so small, most publicly supported housing for families with children is located outside of R/ECAPs, but, in comparison to senior housing, what publicly supported housing that is in R/ECAPs is disproportionately family-occupancy.

- iii. *How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPS?*

(Madison County, IL CDBG) Jurisdiction	Total # units (occupied)	% Elderly	% with a disability*	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children
<b>Public Housing</b>								
R/ECAP tracts	5							
Non R/ECAP tracts	834	29.31%	24.97%	44.63%	40.98%	13.78%	0.00%	34.98%
<b>Project-based Section 8</b>								
R/ECAP tracts	91	11.24%	4.49%	0.00%	100.00%	0.00%	0.00%	71.91%
Non R/ECAP tracts	1,139	65.05%	21.95%	81.31%	17.51%	1.00%	0.09%	14.52%
<b>Other HUD Multifamily</b>								
R/ECAP tracts								
Non R/ECAP tracts	59	6.56%	100.00%	76.27%	23.73%	0.00%	0.00%	0.00%
<b>HCV Program</b>								
R/ECAP tracts	59	14.55%	12.73%	0.00%	100.00%	0.00%	0.00%	54.55%
Non R/ECAP tracts	794	11.54%	17.24%	31.86%	67.03%	0.55%	0.14%	58.49%

Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Note 2: Data Sources: APSH

Note 3: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

While the number of units of publicly supported housing that is located within R/ECAPs is small, 100% of the residents of those units are African American. As discussed above, the overall demographics of publicly supported housing residents are far more integrated than that. For residents of Project-Based Section 8 units, residents in R/ECAPs are less likely to have disabilities and are less likely to have disabilities than residents outside of R/ECAPs. For households with Housing Choice Vouchers, relatively similar proportions of residents inside and outside of R/ECAPs are elderly or have disabilities, with a slightly higher percentage of elderly residents within R/ECAPs and a slightly higher percentage of persons with disabilities outside of R/ECAPs.

- iv. (A) *Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.*

**Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category**

<b>Public Housing (Madison County, IL CDBG) Jurisdiction</b>						
<b>Development Name</b>	<b># Units</b>	<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Households with Children</b>
Alton Pointe Apartments	21	14%	86%	0%	0%	76%
Granite City Green Community	43	29%	71%	0%	0%	81%
Gateway Apartments	9					
Granite City Commons	48	48%	46%	4%	0%	81%
Oakwood Estates	246	3%	53%	44%	0%	49%
Northgate Homes	228	51%	46%	1%	0%	29%
Washington Avenue Apartment	7					
Meachum Crossing Apartments	5					
Anchorage Homes	108	86%	11%	3%	0%	15%
Anchorage	140	88%	11%	1%	0%	0%
<b>Project-Based Section 8 (Madison County, IL CDBG) Jurisdiction</b>						
<b>Development Name</b>	<b># Units</b>	<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Households with Children</b>
Storey Manor	50	58%	42%	0%	0%	90%
Faith Countryside Homes	84	99%	0%	1%	0%	0%
Northwood Apartments	100	7%	93%	0%	0%	64%
Town And Country Apts (lhda)	121	87%	12%	1%	0%	24%
Steven's Building	46	80%	20%	0%	0%	2%
Northtown East Apartments	24	90%	5%	0%	0%	5%
Woodland Towers	104	93%	3%	4%	0%	0%
Hillcrest Apartments	100	90%	9%	0%	1%	0%
Skyline Towers	158	92%	6%	1%	0%	0%
Belle Manor	60	3%	97%	0%	0%	58%
May Building	46	50%	41%	7%	2%	2%
Bissel Apartments	92	1%	99%	0%	0%	73%
Golden Oaks Apartment	40	100%	0%	0%	0%	0%
Marian Heights Apts.	127	90%	10%	0%	0%	0%
New Parkside Apartments	64	62%	37%	2%	0%	73%
Mt. Vernon Elderly	112	93%	6%	1%	0%	0%
<b>Other HUD Multifamily Assisted Housing (Madison County, IL CDBG) Jurisdiction</b>						
<b>Development Name</b>	<b># Units</b>	<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Households with Children</b>
Alton Cmi Apartments	16	75%	25%	0%	0%	0%
Chestnut Mainstay li	7					
Warren Hempel Apartments	18	72%	28%	0%	0%	0%
Yakubian Homes	20	85%	15%	0%	0%	0%

Note 1: For LIHTC properties, this information will be supplied by local knowledge.

Note 2: Percentages may not add to 100 due to rounding error.

Note 3: Data Sources: APSH

Note 4: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

Project-level demographic data for LIHTC properties are not available so it is not possible to compare the demographics of individual LIHTC properties. To date, there have been no RAD conversions in Madison County. The Madison County Housing Authority has indicated that, if HUD allows public housing authorities to apply to do RAD conversions for more units, it would consider applying to convert 59 units at the Olin Building in East Alton and 69 units at the Braner Building in Collinsville.

*(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.*

Four public housing developments have demographics that are significantly different from the demographics of public housing in Madison County overall. The residents of Alton Pointe Apartments in Alton are significantly more heavily African American than public housing residents as a whole. The residents of Oakwood Estates, also located in Alton, are significantly more Latino than public housing residents as a whole. The tenants of the Anchorage Homes, divided into two separate developments in Granite City, are disproportionately White. The Anchorage Homes is a senior development.

- v. *Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.*

In general, most publicly supported housing developments have residents who either resemble those of the Census Tracts in which the housing is located or are more heavily African American than the Census Tracts in which the housing is located. There are a few exceptions. Three Project-Based Section 8 properties – Woodland Towers, Skyline Towers, and Marian Heights Apartments – are more heavily White and less heavily African American than the surrounding Census Tracts. The difference is particularly evident in the latter two developments, which are both located in Alton while the former is located in Collinsville. All three of these developments are elderly-occupancy. Oakwood Estates in Alton, which is heavily Latino as noted above, is much more heavily Latino than the Census Tract in which it is located. Yakubian Homes, which is a Section 811 property that serves persons with disabilities in Alton, is more heavily White and less heavily African American than the Census Tract in which it is located. There appears to be a pattern of significant differences between individual development demographics and Census Tract developments in Alton but not elsewhere in the county. That pattern appears to be most significant in relation to housing that serves primarily elderly persons and persons with disabilities.

- c. Disparities in Access to Opportunity

- i. Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.*

In general, residents of publicly supported housing have lower access to proficient schools, labor market engagement, low poverty concentration, and environmentally healthy neighborhoods than does the general population, but have greater access to job proximity, transit trips, and low transportation costs than does the general population. These trends are consistent across all types of publicly supported housing except for Other Multifamily housing, which, in the context of Madison County, serves only persons with disabilities.

## 2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.*

Madison County has four emergency homeless shelters, which are HUD-assisted. Although the degree to which shelters are covered by the FHA can vary in relation to the length of stay of persons who reside in them, an understanding of how shelters operate is important to ascertaining how HUD grantees are using their federal funds to fill gaps that exist in housing programs. Of the county's four emergency shelters, three are exclusively for women and children, and one is open to all comers. Two of the shelters for women and children are specifically for survivors of domestic violence. Two shelters are located in Granite City, and two shelters, including the one that is open to all, are located in Alton. Madison County residents who do not live in or near those two cities and adult men who do not live in or near Alton have limited access to shelter services. The uneven distribution of shelters can have serious adverse consequences. For example, if an individual in Edwardsville or an adult male in Granite City is evicted and that person works in the same city where they live, having to commute to work from one of the county's emergency shelters can destabilize that person's employment situation and compromise attempts to achieve permanent rehousing.

The relative lack of shelters that serve adult men is problematic because of its potential to disrupt important connections that are necessary to foster stability in the lives of homeless individuals, who are disproportionately members of protected classes. The focus of the county's shelters on housing women and children and, in particular, domestic violence survivors may be reflective of fair housing contributing factors to disproportionate housing for women. Crime-free housing ordinances in Collinsville and Granite City, coupled with a lack of awareness of the protections for survivors of domestic violence provided by the Illinois Safe Homes Act, may raise fair housing concerns.

- b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

### 3. Contributing Factors-of Publicly Supported Housing Location and Occupancy

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.*

- Admissions and occupancy policies and procedures, including preferences in publicly supported housing

Admissions and occupancy policies are a significant contributing factor to disproportionate housing needs and segregation. The Granite City Housing Authority has a policy of denying housing to anyone who has history of criminal activity within the past three years for a few broad categories of offenses that include virtually all crimes, including minor offenses that are of dubious relevance like misdemeanor petty larceny. Three years may be an unreasonably long look back period for misdemeanor offenses. Restrictive criminal background screening policies are likely to have disproportionate effect on African American and Latino households. Additionally, such policies may impede attempts to promote community integration for persons with disabilities. Housing authorities must make reasonable accommodations to their criminal background policies if accommodations are necessary to afford persons with disabilities equal opportunity to use and enjoy a dwelling and if granting the accommodation would not result in an undue burden on the housing authority, pose a direct threat to residents and staff, or constitute a fundamental alteration of the housing authorities' programs.

The Granite City Housing Authority has also adopted local preferences that apply to 50% of its public housing units. The two most valuable preferences may contribute to discriminatory barriers for members of protected classes. The housing authority awards five points out of a possible sixteen to residents of the area in which the housing authority operates or people who have been hired to work in that area. Within the St. Louis region, the population that would qualify for that preference is more heavily White than the population that would not qualify for the preference. The housing authority also awards six points for working families. This preference may put persons with disabilities who are unable to work or who are unable to access work because of employment discrimination or a lack of supportive services from accessing housing.

The Madison County Housing Authority also has a system of preferences. The housing authority awards 10 points for families who live, work, or who have been hired to work in the county.



Because Madison County is more heavily White than the region as a whole, this policy is potentially a barrier to integration. At the same time, the effect of the preference is likely less than in Granite City because far more total preference points are available in Madison County. The Madison County Housing Authority also includes multiple preferences that are targeted at persons with disabilities, including, veterans with disabilities, nursing home residents, and people with disabilities who have particular service needs. The housing authority also bumps up the preference score for persons with disabilities to cancel out any discriminatory effect from its preference for working families. The housing authority also broadly bars applicants with any history of drug use or abuse or alcohol abuse. This policy appears to extend to situations in which applicants do not have criminal history related to their history of drug or alcohol use or abuse and provides no mitigation for those who have evidence of rehabilitation. An explicit policy of denying housing to individuals who are in long term recovery from a substance abuse disorder likely constitutes discrimination on the basis of disability in violation of the FHA.

- Land use and zoning laws

Land use and zoning laws are a significant contributing factor to segregation, disparities in access to opportunity, and R/ECAPs with respect to publicly supported housing. There is a substantial relationship between the location of publicly supported housing and the communities within the county that have more land zoned for multi-family housing. These are areas that, with exceptions, tend to be more racially and ethnically diverse than the county as a whole, and building publicly supported housing in these communities does less to foster integration than would building such housing in virtually all white and high opportunity areas. Additionally, publicly supported housing in parts of the county where such housing is relatively limited, (for example Edwardsville and Highland), is disproportionately likely to be Other Multifamily housing, such as housing developed under the former version of the Section 811 problem. The scale of such developments is much smaller than for the other different types of publicly supported housing so it may be practicable to develop such housing in places where multi-family housing is permitted but where density restrictions on multi-family housing are severe. The areas of the county where publicly supported housing is more common, in part because of less restrictive zoning, tend to have less access to proficient schools and environmentally healthy neighborhoods, among key opportunity indicators.

- Community opposition

Community opposition may contribute to multiple fair housing issues in Madison County, but this Assessment revealed limited evidence of its effects. That is likely because it is development of affordable housing that has the greatest potential of eliciting community opposition and developers are often hesitant to propose such projects on sites that are not already appropriately zoned, and where the conditional permitting or rezoning processes are likely to drive community opposition out into the open.

- Impediments to mobility

The use of area-wide fair market rents for the Housing Choice Voucher program is an impediment to mobility that is a contributing factor to segregation, disparities in access to opportunity, and R/ECAPs. Multiple zip codes in the county would have higher fair market rents and therefore higher allowable payment standards if the methodology underlying HUD's Proposed Rule on small area fair market rents, including those overlapping with Edwardsville, Glen Carbon, and Hamel. Although HUD currently does not plan on including the St. Louis region in the set of regions that will be subject to the Proposed Rule, local housing authorities should seek to opt in to compliance with the rule, once finalized, if HUD allows that opportunity. This Assessment did not reveal other impediments to mobility such as portability restrictions or undue limitations on unit search times.

- Lack of private investment in specific neighborhoods

Lack of private investment in specific neighborhoods is a contributing factor to R/ECAPs and disparities in access to opportunity. Specifically, Madison and Venice have experienced significant disinvestment and retail vacancy that reduce those communities' tax bases which are critical to public school funding and other public services. Disinvestment deters households from relocating to those communities and contributing to racial, ethnic, and socioeconomic diversity.

- Lack of public investment in specific neighborhoods, including services and amenities

Lack of public investment in specific neighborhoods is not a significant contributing factor to any fair housing issue. Madison County effectively prioritizes projects in communities suffering from disinvestment in a manner that partially compensates for the weakness of the local tax base in those communities. Although an overall increase in available resources for public investments in disinvested communities would be helpful in overcoming disparities in access to opportunity and ameliorating conditions in the county's one R/ECAP, the county has made an effort to target its limited resources to disinvested communities.

- Lack of regional cooperation

Lack of regional cooperation is a contributing factor to segregation. As evidenced by local housing authorities' use of residency preference, there does not appear to be a shared commitment across public sector housing and community development agencies to meeting the needs of all low-income residents in the region who need affordable housing. Land use and zoning restrictions in Madison County also reflect a lack of emphasis on the role of the county and its communities in helping to meet the broader region's affordable housing needs. Madison County and its communities' policies should be oriented toward meeting regional goals. The East-West Gateway Council of Governments would be a natural coordinating entity for the purpose of establishing shared goals.

- Quality of affordable housing information programs

While the Madison County Housing Authority has an explicit goal of advising households with Housing Choice Vouchers on their options outside of areas of African American population concentration and concentrated poverty, the lack of a meaningful mobility counseling program as part of information provided to voucher holders is a contributing factor to perpetuating segregation and frustrating access to opportunity in Madison County. .

- Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs

Although past siting selection policies, practices, and decisions contributed to residential segregation, site selection is no longer a significant contributing factor. The Illinois Housing Development Authority has among the most robust incentives for developments in high opportunity areas and perhaps the most meaningful definition of concerted community revitalization of any state housing finance agency in the country. With regard to the development of affordable multi-family housing, the county generally uses HOME funds to support and leverage LIHTC awards. Land costs and appropriate zoning are far greater barriers to the siting of new publicly supported housing in areas of opportunity than are siting policies. Importantly, the two sites that the Madison County Housing Authority is contemplating for potential RAD conversion are both outside of areas of minority population concentration. In the future, it will be important for the housing authority to ensure that any off-site replacement of public housing units as part of any RAD project does not perpetuate segregation.

- Source of income discrimination

Source of income discrimination is a significant contributing factor to segregation, disparities in access to opportunity, and R/ECAPs. The data reveals that there are significant concentrations of voucher holders in the southwest corner of the county in communities including Madison and Venice, which is the location of the county's only R/ECAP. This suggests that many landlords in other parts of the county refuse to accept vouchers. Illinois does not protect against discrimination on the basis of source of income but neither does it preempt local governments from adopting their own source of income protections. Five jurisdictions in the Chicago metro area, including Cook County and the City of Chicago, as well as the City of Urbana prohibit discrimination on the basis of source of income, but no localities in Madison County have ordinances banning such discrimination.

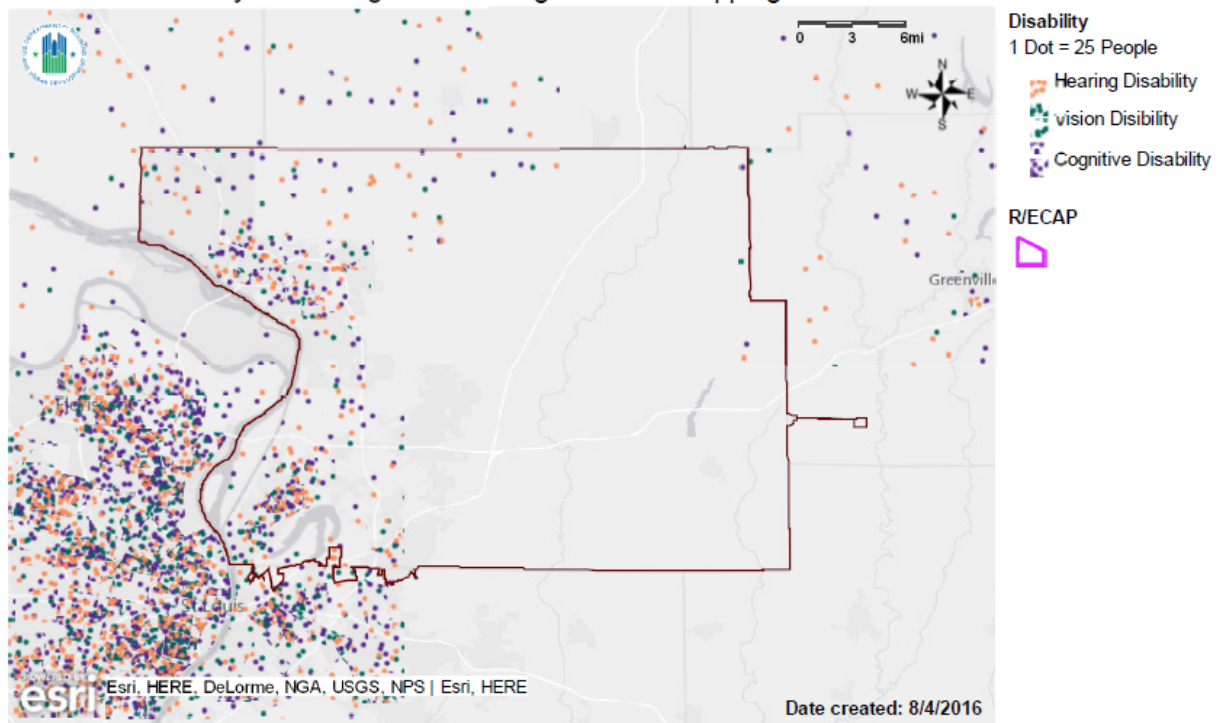
## **D. Disability and Access Analysis**

### 1. Population Profile

- How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?*

Within both Madison County and the broader St. Louis metropolitan region, based on HUD-provided data, persons with disabilities do not appear to be concentrated in particular areas, such as R/ECAPs or other segregated areas. To the extent that there are concentrations of persons with disabilities as reflected by the dot density maps, those areas of concentration tend to coincide with areas of population concentration generally. Accordingly, there are greater concentrations of persons with disabilities in the more heavily developed western half of Madison County than there are in the more rural eastern half of the county. Likewise, within the region, there are greater concentrations of persons with disabilities in the City of St. Louis, St. Louis County, and the suburban portions of Madison, St. Charles, and St. Clair Counties than there are in the rural portions of those three counties and in outlying counties.

#### HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



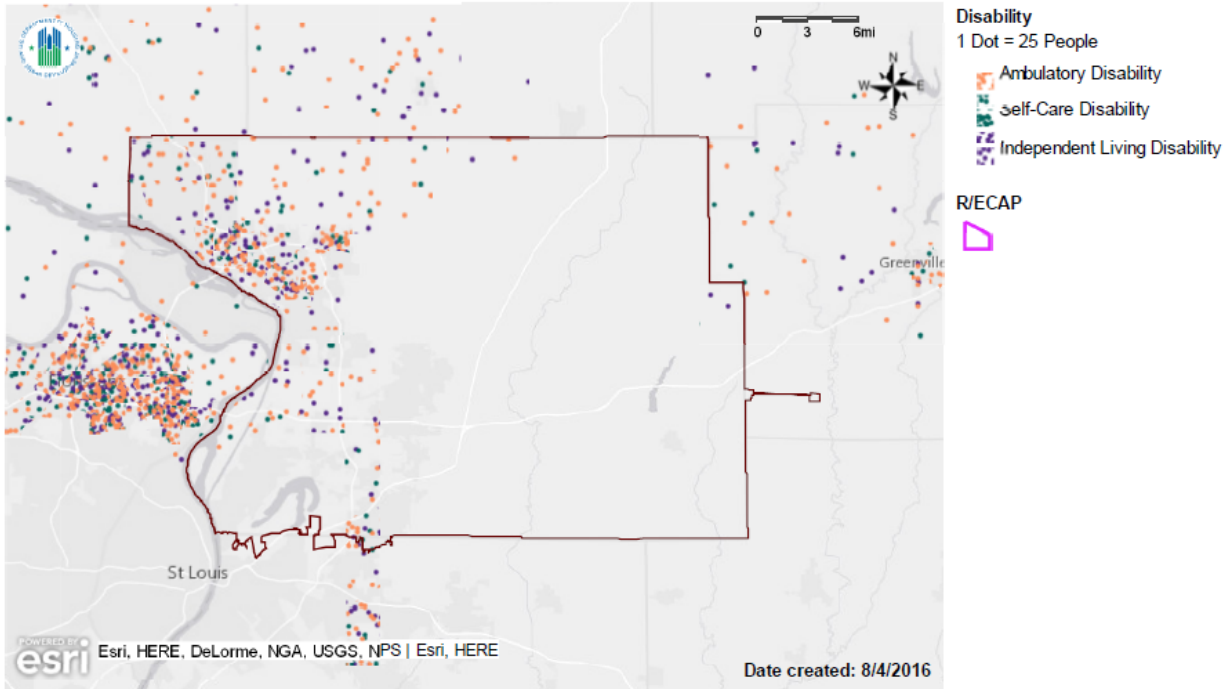
Name: Map 16 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Madison County (CDBG)

Region: St. Louis, MO-IL

### HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



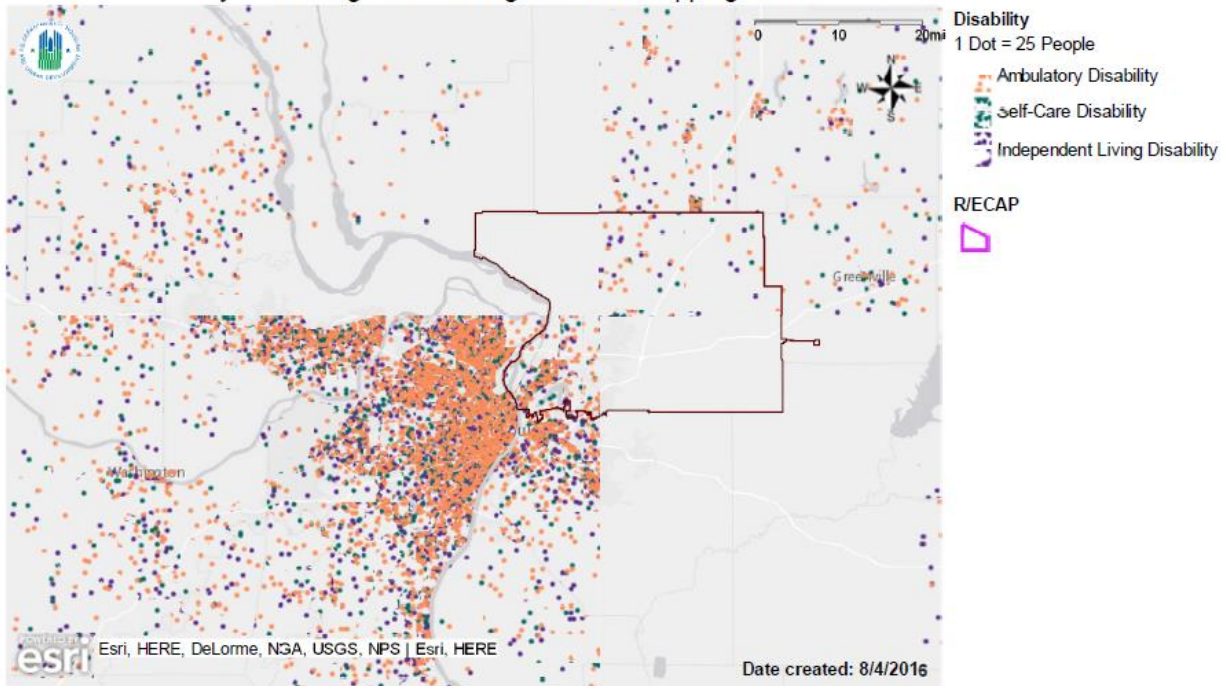
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Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

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Region: St. Louis, MO-IL

## HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



**Name:** Map 16 - Disability by Type

**Description:** Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

**Jurisdiction:** Madison County (CDBG)

**Region:** St. Louis, MO-IL



AMERICAN  
**FactFinder**



MISSOURI

KENTUCKY

VIRGINIA

VIRGINIA

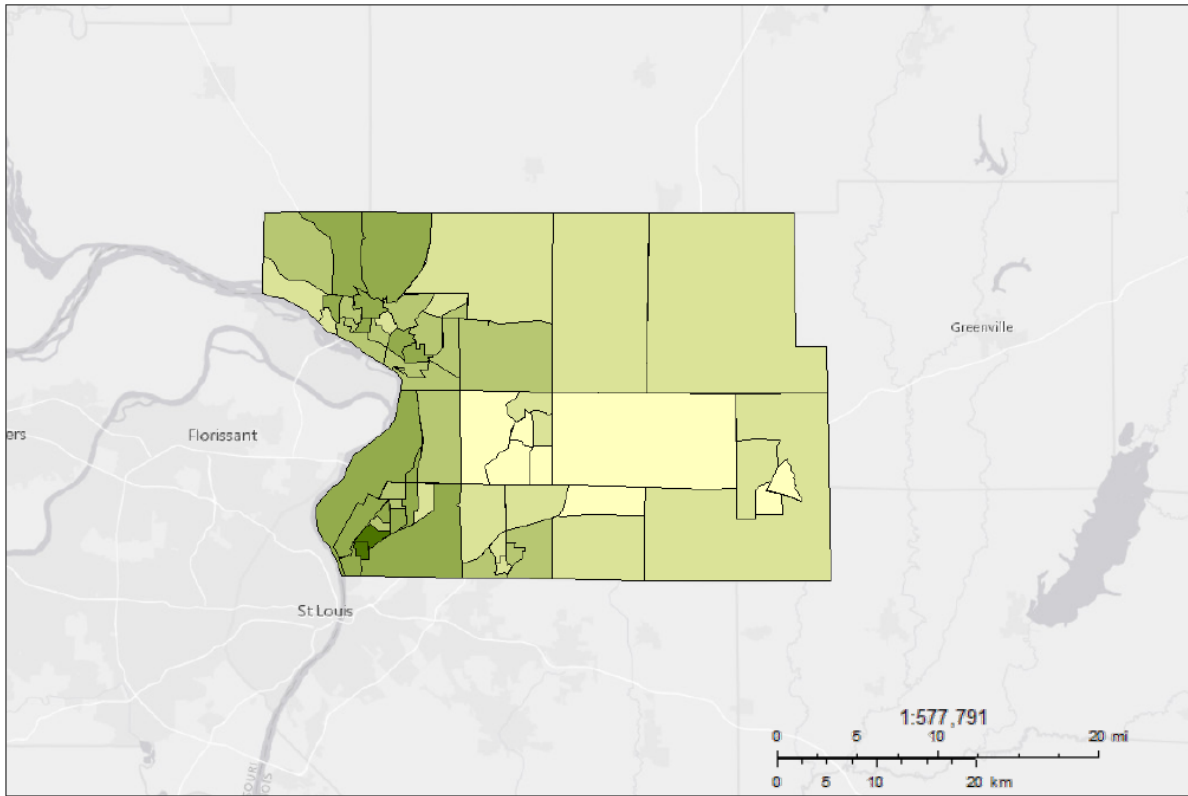
NORTH CAROLINA

S1810

**DISABILITY CHARACTERISTICS**

2010-2014 American Community Survey 5-Year Estimates

**Thematic Map of Percent with a disability; Estimate; Total civilian noninstitutionalized population  
Geography by: Census Tract**



**Legend:**

**Data Classes**

Percent

- 4.8 - 8.0
- 8.6 - 11.2
- 11.7 - 14.8
- 15.6 - 18.8
- 20.6 - 22.7

**Boundaries**

No Legend

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

In order to more accurately measure whether there are concentrations of persons with disabilities relative to the total population, additional data from the 2010-2014 American Community Survey 5-Year Estimates reflecting the percentage of the population comprised of persons with disabilities by Census Tract is helpful. This data reflects that two Census Tracts including the City of Madison and Granite City have the highest concentrations of persons with disabilities in the county. In general, the far western portion of the county has the highest concentrations of persons with disabilities. More affluent suburban areas like Glen Carbon and Edwardsville have the lowest concentrations of persons with disabilities. At a high level, the rural eastern portion of the county has lower concentrations of persons with disabilities than the developed western portion of the county, but individual communities, like Glen Carbon, within the western half of the county have lower concentrations of persons with disabilities than do rural communities. The one R/ECAP Census Tract in the county has a higher proportion of persons with disabilities than most Census Tracts within the county, but it does not have one of the very highest concentrations. The City of Madison, which is one of the areas with a particularly high concentration of persons with disabilities, is one of just two majority-minority communities within the county. In general, the far western portion of the county, which is more racially and ethnically diverse than the outer suburban and rural portions of the county, has the highest proportions of persons of disabilities, but this geographic pattern holds true even when looking at communities in the far western portion of the county like Wood River and East Alton that are predominantly White.

*b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.*

Based on HUD-provided data, there do not appear to be significant differences in these geographic patterns in relation to type of disability in the county or region. It is possible that some subtle distinctions exist in relation to type of disability and that additional data would help to reveal those nuances. Unfortunately, American Community Survey data reflecting the percentage of the population with a particular type of disability by Census Tract have extremely high margins of error thus making an analysis like the supplementary analysis done for all persons with disabilities infeasible.

With respect to the concentration of persons with disabilities by age, however, clearer patterns are discernible. First, among the relatively small population of persons with disabilities in outlying rural areas, both within Madison County and throughout the region, persons with disabilities who are 65 years of age or older appear to make up a larger share of persons with disabilities than they do in other types of communities. This does not necessarily mean that there are more elderly individuals with disabilities in rural areas, either in absolute numbers or as a percentage of the Census Tract population. It simply means that persons with disabilities who live in rural areas are more likely to be elderly than persons with disabilities who live in other areas. Second, children with disabilities appear to be more heavily represented in suburban areas than they are in either urban areas or rural areas. This is consistent with such areas generally having more significant populations of children and larger household sizes than central cities. As R/ECAPs within the region are generally concentrated in the cities of St. Louis and East St. Louis, rather than rural or suburban areas, it appears that non-elderly adult persons with disabilities are the most likely age cohort of persons with



disabilities to reside in R/ECAP areas. Children with disabilities do reside in segregated, predominantly African American areas of the region, but those areas tend to be portions of northern St. Louis County that are not R/ECAPs because their poverty rates are below 40%. The region's rural areas, in which persons with disabilities are most likely to be elderly, are segregated areas of Non-Hispanic White population concentration.

## 2. Housing Accessibility

- a. *Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.*

Neither Madison County nor the region has a sufficient supply of affordable, accessible housing in a range of unit sizes. Within Madison County, three structural features of the local housing market influence this circumstance. First, according to the 2010-2014 American Community Survey, 78.0% of housing units in Madison County are detached single-family homes, which generally are not required to meet the Fair Housing Act's design and construction standards for ensuring accessibility. This is a very high percentage. Second, Madison County's housing stock is fairly old for a suburban jurisdiction with only 23.3% of units having been built since 1990. The Fair Housing Act's design and construction standards for multi-family housing became mandatory in 1991. American Community Survey data that cross-reference the number of units in structures by the year in which structures were built combines data for 1980-1989 and 1990-1999, thus making it difficult to disaggregate what has been constructed since the Fair Housing Act's design and construction standards took effect. It is also important to note that while the design and construction standards apply to buildings, or units within buildings, with four or more units, the table cross-referencing units in structure by the years in which structures were built, combines all units in structures with two to four units.

With those caveats in mind, just 1,447 units in structures with five or more units have been built since 2000. This is a deliberate underestimate of the number of accessible units in the county. From 1980 through 1999, 2,698 units in structures with five or more units were built. Since 2000, 1,023 units in buildings with two to four units have been built while, from 1980 through 1999, 2,088 units in buildings with two to four units were built. Thus, the most aggressive overestimate of accessible units, which assumes that all units in buildings that meet accessibility requirements are accessible, that all units in structures with two to four units are in structures with four units, and that all units built from 1980 through 1999 were built in 1991 or later, would suggest that there are 7,256 accessible units in the county. In the meanwhile, leaving aside the flawed nature of those assumptions, there are 17,743 persons in the county with ambulatory disabilities. Clearly, there is a significant unmet need for accessible units.

Within the broader metropolitan area, the overall housing stock consists primarily of detached single-family homes, but that percentage, at 69.9%, is somewhat lower than for Madison County because of the inclusion of more apartment-heavy jurisdictions like the City of St. Louis. The housing stock is slightly younger than in Madison County, with 25.4% of units having been built since 1990. Newer housing stock in the region is generally located in high growth areas like St.

Charles County and western St. Louis County. Despite being somewhat less dramatic than in Madison County, these characteristics of the regional housing market form the backdrop of a significant shortfall in the volume of accessible units needed to provide adequate housing to persons with ambulatory disabilities. The deliberately underinclusive estimate of accessible units that only reflects construction since 2000 and does not reflect units in fourplexes is 18,596. From 1980 through 1999, 40,120 units were built in structures with five or more units. Since 2000, 7,523 units in structures with two to four units have been constructed. From 1980 through 1999, 16,300 units in structures with two to four units were built. The deliberately overinclusive estimate of accessible units for the region is 82,539. In the meanwhile, there are 178,614 persons with ambulatory disabilities in the region.

Data breaking down the supply of housing that is most likely to be accessible by the number of bedrooms in units are not available. Although housing supply in the region and the county tends to consist of units with three or more bedrooms, this dynamic is driven in large part by the fact that single-family homes predominate and likely have more bedrooms than apartments. One data point may be reflective of a comparative strength of the Madison County housing stock in relation to that of the region: just 9.3% of units in the county are one-bedroom or studio units as opposed to 11.9% of units in the region. Meanwhile, 31.3% of units in the county are two-bedroom units as opposed to 27.8% of units in the region. This may suggest, but does not establish, that apartments in the county are more likely to be two-bedroom units and to more meaningfully accommodate families than are apartments in the region as a whole.

American Community Survey data does not differentiate between affordable housing that is subject to design and construction standards and market rate housing subject to those requirements. HUD's LIHTC Database reflects that 1,406 affordable LIHTC units have been placed in service in Madison County from 1991 until the present. Although the date ranges do not match up with those in the American Community Survey data and it is possible that some of those LIHTC units are no longer affordable, it is clear that a significant percentage of Madison County's recently constructed, and thereby more likely to be accessible, multi-family units are affordable. Nonetheless, there remains a tremendous unmet need for affordable, accessible units in the county and the region.

Lastly, community stakeholders reported that compliance with the FHA's design and construction standards and other laws governing accessibility has been erratic. There are developments within the county that should be accessible but are not in actuality. It is in this context that the IMPACT Center for Independent Living sued the developers of a condominium project in Highland in 2001 and that IMPACT and the Metropolitan St. Louis Equal Housing and Opportunity Council sued the Granite City Housing Authority in 2004. Stakeholders also reported that the Madison County Housing Authority does not have a plan for ensuring accessibility under Section 504 of the Rehabilitation Act, a federal statute which prohibits discrimination on the basis of disability in connection with federal financial assistance.

- b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?*

Within Madison County, there is a concentration of affordable housing units, including both units that are likely to be accessible and those that are not, in the southwestern corner of the county in Madison and Venice, the latter of which includes a R/ECAP area. Overall, however, affordable units, including those that are accessible and those that are not, are also clustered in other relatively densely populated portions of the county, including in and around Granite City, Alton, Collinsville, Troy, and Maryville, which are not areas of racial or ethnic concentration. There is a lack of affordable housing generally and therefore a lack of affordable, accessible housing in other, predominantly white areas of the county. Within the broader region by contrast, affordable housing and, by extension, affordable, accessible housing is highly concentrated in R/ECAPs and segregated areas of African American population concentration.

HUD-provided data on publicly supported housing includes data for two programs, the Section 202 program and the Section 811, that primarily serve persons with disabilities. The Section 202 program serves elderly persons with disabilities, and the Section 811 program serves non-elderly persons with disabilities. Although the data for those two programs are included within an umbrella category called Other HUD Multifamily that includes four other subsidized housing programs, it seems likely that all units in that broader category in Madison County are either Section 202 or Section 811 units as 100% of households residing in that category of housing in the county include persons with disabilities. There are, however, only 61 such units so it would appear that housing programs that specifically target persons with disabilities are not playing a significant role in meeting the needs of persons with disabilities for affordable, accessible housing.

*c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?*

Across all categories of publicly supported housing, the percentage of households that includes persons with disabilities is higher than the percentage of the total population comprised of persons with disabilities, which is 12.0% in Madison County and 12.1% in the region. First, data on the proportion of households that include persons with disabilities, which are more relevant than the proportion of people with disabilities, are not available. It is not clear whether the percentage of households that include persons with disabilities would be higher or lower than the percentage of persons with disabilities. Second, persons with disabilities are disproportionately low-income and are more likely to be eligible for publicly-supported housing than are persons who do not have disabilities. In Madison County, the median earnings for persons with disabilities is \$21,751 while the median earnings for people without disabilities is \$32,480. In the region, those figures are \$21,108 and \$32,954.

Thus, it is quite possible that persons with disabilities are either proportionally represented among residents of publicly supported housing or even slightly underrepresented when income eligibility is taken into account. In Madison County, persons with disabilities appear to be least able to access the Housing Choice Voucher program and somewhat more able to access the Project-Based Section 8 program and traditional public housing. Programs like Section 202 and Section 811 explicitly target their assistance at persons with disabilities; however, prior to recent changes in the Section 811 program, those programs were criticized for perpetuating the segregation of

persons with disabilities by not affording persons with disabilities the opportunity to live alongside individuals without disabilities.

In the region, public housing and Project-Based Section 8 similarly serve persons with disabilities more extensively than does the Housing Choice Voucher program. Somewhat surprisingly, Other HUD Multifamily housing is the least likely to serve persons with disabilities. This suggests that, outside of Madison County, but within the region, housing assisted through miscellaneous programs that are not Section 202 or Section 811 may not be fully available to persons with disabilities.

### 3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

#### a. *To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?*

The primary policies that influence the extent to which persons with disabilities live in segregated or integrated settings are established at the state level, though local initiatives have the ability to support or hinder efforts to promote meaningful community integration. The State of Illinois is currently implementing multiple consent decrees in cases in which disability rights advocates alleged that the state had violated the Americans with Disabilities Act's (ADA) community integration mandate by unjustifiably segregating people with disabilities in nursing homes and intermediate care facilities. In *Williams v. Quinn*, the plaintiffs alleged that the state segregated persons with psychiatric disabilities in institutions for mental diseases. In *Ligas v. Quinn*, the plaintiffs alleged that the state segregated persons with developmental disabilities in intermediate care facilities for the developmentally disabled. In *Colbert v. Quinn*, the plaintiffs alleged that the state segregated persons with physical and psychiatric disabilities in nursing homes. In addition to implementing consent decrees resulting from this litigation brought by disability rights advocates, the state has taken affirmative steps to close institutions for persons with intellectual and developmental disabilities called developmental centers.

Local data on the extent of the segregation of persons with disabilities are limited and difficult to interpret. Information on the number of Medicaid recipients overall is available at the county level, but that information is not broken down by the specific Medicaid Home and Community Based Services waiver programs that are integral to efforts to serve persons with disabilities at home or in community-based settings rather than institutions. In Fiscal Year 2015, 6,371 adults with disabilities received Medicaid benefits in Madison County. 64,102 total people received Medicaid benefits in the county. Statewide, 252,313 adults with disabilities, and 3,247,722 total people received Medicaid benefits. 2.4% of the population of Madison County consisted of adults with disabilities who received Medicaid as opposed to 2.0% of the population of the state. The table below reflects the number of individuals that each of the state's HOME and Community Based Services waivers served in Fiscal Year 2015.

Individuals Served by Illinois Home and Community Based Services Waivers

Waiver	Individuals Served
Total	100,035
Medically Fragile/Technology Dependent Children	753
Children with Developmental Disabilities – Residential	280
Children with Developmental Disabilities – Support	1,395
Persons Diagnosed with HIV/AIDS	1,018
Adults with Developmental Disabilities	20,346
Persons with Brain Injury	3,058
Persons with Disabilities	16,140
Elderly	46,816
Supportive Living Program	10,229

The vast majority of individuals in Illinois served through Home and Community Based Services waivers are adults. If the proportion of the population of adults with disabilities who receive Medicaid who have waivers is similar to the percentage of adults with disabilities in Illinois who receive waivers, then roughly 2,500 individuals in Madison County have waivers. If the actual number is significantly below that figure, that may suggest that there are structural difficulties that impede access to community living in the county.

Another data point that is helpful in understanding the scope of the population of persons with disabilities who may need supportive services is the number of people who receive Supplemental Security Income (SSI). SSI is a cash subsidy that is available to persons with disabilities who are unable to work because of their disabilities. Although not all people who receive SSI need supportive services in order to be able to live independently and some people who do live independently are not eligible for SSI, there is a significant overlap between the population that receives SSI and the population of persons with disabilities in need of supportive services. In Madison County, a total of 5,677 of households, which is 5.3% of all households, include a person who receives SSI.

- b. *Describe the range of options for persons with disabilities to access affordable housing and supportive services.*

As the state has had to take steps to promote community integration for persons with disabilities where previously it has maintained segregated systems, the Illinois Department of Healthcare and Family Services has implemented changes to how it administers the Medicaid program in order to facilitate community living. To fulfill the goals of the Money Follows the Person demonstration program and to implement the consent decrees, the state offers nine Home and Community Based Services waiver programs to enable persons with disabilities to receive services outside of institutional settings. The Illinois Housing Development Authority (IHDA) has contributed to the state's efforts to comply with the ADA by providing scoring incentives in its Qualified Allocation

Plan for the LIHTC program for proposed developments that include project-based rental assistance and that set aside units for persons with disabilities who are connected to housing through the Statewide Referral Network created to implement the consent decrees. Although that rental assistance often comes from public housing authorities in the form of Project-Based Vouchers, IHDA also provides project-based rental assistance for permanent supportive housing through the new Section 811 Project Rental Assistance program.

Locally, the Madison County Housing Authority has endeavored to promote access to permanent supportive housing for persons with disabilities by designating public housing developments or units assisted with Project-Based Vouchers for persons with disabilities, including individuals who are in existing institutions or who are at risk of institutionalization. The May Building in Edwardsville, which is assisted with Project-Based Vouchers, has played a role in housing individuals with developmental disabilities. In addition to apartments located within truly integrated developments, four supportive living facilities operate in Madison County and provide housing and supportive services to persons with disabilities. They include Cambridge House of Maryville, Foxes Grove Supportive Living Community in Wood River, Saint Claire's Villa in Alton, and Glennhaven Gardens in Alton. Supportive living facilities are similar to assisted living facilities. They do not provide the level of community integration of a development that is occupied both by persons with disabilities and individuals without disabilities, but they are less segregated than nursing homes, intermediate care facilities, and other institutions.

In addition to health care providers who offer waiver-funded supportive services to persons with disabilities in Madison County, the IMPACT Center for Independent Living plays an important role in advocating for and providing services to persons with disabilities in the area. IMPACT CIL's Pathways to Independence/Community Integration Program is particularly noteworthy. The program is specifically geared toward aiding persons with disabilities in their efforts to leave institutions in order to live in the community.

Overall, community integration for persons with disabilities in Madison County is increasing; however, it is doing so against a backdrop of state systems that were recently so skewed toward segregation that three lawsuits were necessary in order to achieve reform. Those lawsuits, as well as affirmative efforts, have increased the resources, both in terms of supportive services and affordable housing, that are available to promote independent living. Nonetheless, in light of the starting point for those efforts, a great deal of work remains to be done, and it would be premature to suggest that meaningful community integration has been achieved.

#### 4. Disparities in Access to Opportunity

- a. *To what extent are persons with disabilities able to access the following? Identify major barriers faced concerning:*
  - i. Government services and facilities

In its 2015-2019 Consolidated Plan, Madison County reported that many aging public facilities throughout the county do not meet the accessibility requirements of the ADA. Access to

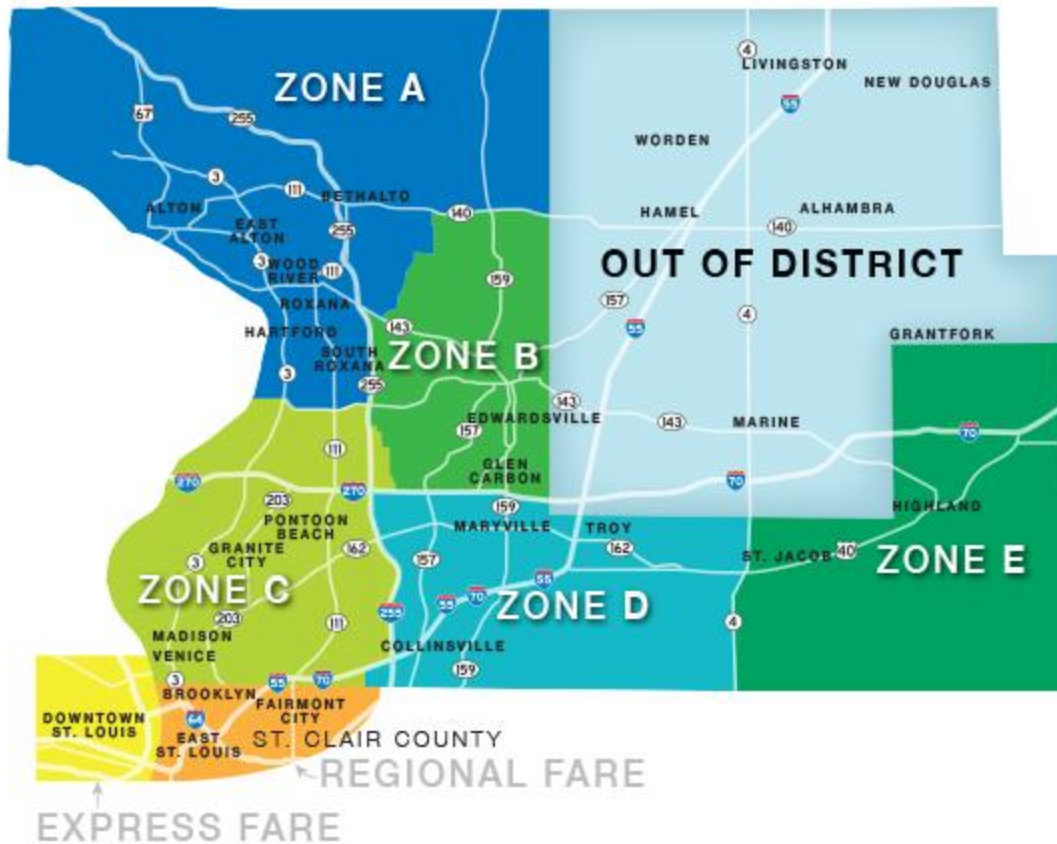
government buildings is integral to access to opportunity for persons with disabilities and to ensuring that persons with disabilities are empowered to participate fully in society. Services provided by county and local agencies may provide the linkages that individuals with disabilities need in order to experience social mobility, and, on a more basic level, employment with local government agencies may be out of reach for persons with disabilities if they cannot access the facilities in which their jobs would be located.

- ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

Stakeholders reported that a lack of curb-cuts renders sidewalks inaccessible for persons with ambulatory disabilities in parts of the county, including within new residential developments.

- iii. Transportation

In the rural, eastern portion of the county, access to transit is generally extremely limited, including access to paratransit for persons with disabilities. The Rideabout, the county's paratransit system, divides the county into five zones and one "Out of District" area where service is only available for medical purposes. The Out of District area is in the northeastern portion of the county and appears to cover roughly one-third of the county's area. Persons with disabilities who are dependent on transit and who live in the northeastern portion of the county have extremely limited options for basic tasks like grocery shopping or commuting to work. Even within the county's five zones, paratransit service is only available within three-quarters of a mile from Madison County Transit fixed bus routes. In the southwestern portion of the county, this level of coverage affords access to paratransit in more areas, but, in the northwestern and southeastern portions of the county, access is also limited.



Paratransit trips also require persons with disabilities to pay a fare of \$3 for trips within zones, \$4 for trips between zones, and \$6 for trips to St. Louis or to St. Clair County, Illinois. There is a \$5 surcharge for Out of District trips. At the same time, fares for people without disabilities on Madison County Transit’s fixed routes are considerably less expensive, and fixed route bus service is free for persons with disabilities. Fixed route buses are equipped with lifts and are wheelchair accessible. For low-income persons with disabilities who do not live in close walking distance from fixed route bus lines or who face barriers like inaccessible sidewalks between their homes and fixed route bus stops, access to transit is limited.

iv. Proficient schools and educational programs

As demonstrated by the map reflecting the percentage of residents with disabilities by Census Tract and HUD-provided data depicting concentrations of persons with disabilities by age, people with disabilities, in general, are most likely to reside in the far western portion of the county, and children with disabilities are unlikely to live in the rural eastern portion of the county. As the data reflecting access to proficient schools discussed earlier in this Assessment show, the far western portions of the county offer the least access to proficient schools in the county.

The table below suggests either that there is not a strong relationships between the overarching demographic patterns with respect to persons with disabilities as reflected in the American



Community Survey and the percentage of students who are identified as having disabilities or that some school districts are either over- or under-identifying students as having disabilities. School districts in Madison and Venice, which would appear to have higher percentages of persons with disabilities generally and do not have disproportionately low populations of children with disabilities, report having the second and third lowest concentrations of students with disabilities. In addition, these districts cover the most heavily African American and Latino parts of the county. This data does not establish that under-resourced school districts that are heavily African American and/or Latino are systematically failing to identify and provide necessary and appropriate services to students with disabilities, but it does raise concerns. At the same time, the Highland school district, which covers much of the rural eastern half of the county has the second highest concentration of students with disabilities despite this part of the county having relatively small concentrations of persons with disabilities, in general, and children with disabilities, in particular. In this predominantly Non-Hispanic White school district, it seems unlikely that students with disabilities are not being identified and provided services that might be offered in Madison and Venice.

School District	Percentage of Students with Disabilities	4-Year Graduation Rate – All Students	4-Year Graduation Rate – Students with Disabilities	5-Year Graduation Rate – All Students	5-Year Graduation Rate – Students with Disabilities
Roxana	14.5%	82.8%	63.2%	78.9%	66.7%
Triad	15.1%	93.1%	78.0%	95.6%	91.1%
Venice	12.4%	86%	-	88%	-
Highland	20.3%	90.7%	76.3%	87.3%	77.5%
Edwardsville	9.8%	93.3%	67.2%	93.7%	77.6%
Bethalto	14.6%	82.6%	66.7%	89.8%	75.0%
Granite City	20.4%	78.7%	59.4%	79.4%	66.7%
Collinsville	15.8%	77.4%	75.0%	85.1%	75.8%
Alton	20.1%	85.9%	77.4%	87.5%	79.1%
Madison	7.9%	88.4%	100%	92.9%	100%
East Alton	19.1%	-	-	-	-
East Alton-Wood River	17.9%	71.7%	56.3%	75.7%	59.1%
Wood River-Hartford	18.8%	-	-	-	-

There does not appear to be a significant relationship between concentrations of students with disabilities and how proficient individual school districts are. With respect to graduation rate, which is reflected in the table above, high performing districts like Triad, Edwardsville, and Highland run the gamut from having low to moderate to high concentrations of students with disabilities. Data from the School Proficiency Index discussed in the Disparities in Access to Opportunity section of this Assessment confirm the conclusion that there is no correlation. Across

school districts, students with disabilities tend to have lower graduation rates than students without disabilities. There does not appear to be any relationship between the magnitude of those disparities and school proficiency at the district level.

The Edwardsville School District which, as reflected above, has a relatively low percentage of students who have been identified as having disabilities, has been the subject of litigation and administrative enforcement relating to the district's administration of special education programs. In 2013, multiple parents received a favorable due process decision against the district in an administrative proceeding. The parents had alleged that the district implemented a policy of removing students with autism and emotional or behavioral disabilities from private placements and returning them to district schools where doing so would deny students a free, appropriate, public education. A 2004 lawsuit against the school district alleged that the district failed to provide a parent with a child's educational records. The case resulted in a 2006 decision from the Appellate Court of Illinois for the Fifth District that denied summary judgment for the district on that claim while affirming summary judgment for the district on the parent's other claims. This history of enforcement action in connection with the Edwardsville School District raises questions about how effective this generally high performing district has been at providing proficient schools to students with disabilities.

#### v. Jobs

Within Madison County, 75.6% of persons age 16 and over who have a disability are not in the labor force as compared to 28.8% of those without disabilities. Persons with disabilities who are employed are more likely to work for non-profit organizations or to be self-employed than are persons without disabilities. Persons with disabilities are more likely to work in production, transportation, and material moving occupations than people without disabilities and are much less likely to work in higher paying management, business, science, and arts occupations than persons without disabilities. It is clear that persons with disabilities have less access to the labor market than do persons without disabilities and that when persons with disabilities are able to access the labor market, they disproportionately obtain lower paying jobs with less potential for advancement. These findings are consistent across the nation and the region.

The Madison County Employment & Training Department provides free services to individuals who are looking for jobs and helps to connect employers to job seekers. The department does not appear to have any programs that are specifically targeted at meeting the employment needs of persons with disabilities but does advertise that its office in Wood River is accessible in compliance with the ADA and has a computer workstation that was designed for use by persons with disabilities that is equipped with accessibility software.

Challenge Unlimited, Inc., is a nonprofit organization based in Alton that provides a range of services for persons, including employment services. The organization historically has assisted persons with disabilities in finding placements in sheltered workshops, but now also offers a more integrated, supported employment model.

- b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.*

Madison County's Affirmative Action Plan states the county will provide reasonable accommodations to persons with disabilities who are employees, clients, or members of county boards or committees. The plan also states that it is the policy of the county to comply with the ADA, designates an ADA Compliance Coordinator, and sets out a grievance process for alleged violations of the ADA. The policy also establishes the ADA Compliance Coordinator as the primary point of contact for requests that sign language interpreters and other auxiliary aids be available for persons with auditory disabilities. Although these policies are crucial, locating them on Madison County's website is not an easy task as the plan is in a PDF that is not text searchable and is not available on the homepage of the county's website. The county should include a link to a clear and comprehensive reasonable accommodations policy from the homepage of the county's website and from the pages of county departments that provide services to persons with disabilities.

Improvements are also possible with respect to the county's cities and villages. If the county itself clarifies and heightens the visibility of its reasonable accommodations policy, it could serve as a model for other localities. Alton, for instance, has an ADA grievance process that is similar to the county's and much easier to locate on its website, but the page that includes the description of that process does not identify the types of conduct, including denials of reasonable accommodations, that would violate the ADA, unlike the county's Affirmative Action Plan. Alton does note that it provides reasonable accommodations in the equal opportunity statement that accompanies its job postings. Granite City includes an ADA Transition Plan on its website that includes most of the information that is needed in order to inform individuals with disabilities of their rights, but, like Madison County, one has to view a PDF in order to access that information. In the case of Granite City, the PDF is text-searchable. Documents that reference the ADA Transition Plan for the City of Edwardsville are present on that city's website, but the plan itself was not findable.

By contrast, it is much easier to find information about the rights of persons with disabilities on the websites of area school districts and Madison County Transit. In the case of Madison County Transit, while easily findable, the information is not robust and could be improved by more clearly articulating the right to reasonable accommodations and explaining how to file a complaint, which the website already does with regard to Title VI of the Civil Rights Act of 1964.

- c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.*

There are two major obstacles to homeownership for persons with disabilities in Madison County. First, as discussed above, single-family homes generally are not covered by the FHA's design and construction standards. Furthermore, townhomes, duplexes, and mobile homes are not covered either. These four types of housing account for 99.3% of all owner-occupied homes in Madison County. Of course, given the diverse nature of types of disabilities, not all persons with disabilities need homes that are built to FHA design and construction standards, but, for those who do, especially persons with ambulatory disabilities, the lack of accessible multi-family options such as condominiums or cooperative buildings makes it more difficult to achieve homeownership. To

overcome this structural barrier, Madison County has provided CDBG funds to make accessibility modifications to single-family homes resided in by low-income homeowners with disabilities. While constructive, the scale of that approach pales in comparison to the need for accessible housing. Increasing the supply of multi-family housing that is covered by the FHA's design and construction standards and adopting local provisions that either require or incentivize single-family developers to build accessible homes would be more systemic solutions to the problem.

Second, as noted above, the earnings and labor force participation levels of persons with disabilities in Madison County are significantly lower than those of persons without disabilities. Within Madison County, the median household income of households residing in owner-occupied homes is \$67,158 whereas the median household income of renter households is \$26,764. Clearly, lower income people in the county are significantly more likely to rent than to own. In order for homeownership to be affordable to low-income persons with disabilities, the supply of owner-occupied housing types, such as single-family homes on small lots in addition to condominiums and manufactured housing, that are more likely to be affordable will need to expand in tandem with down-payment assistance and access to responsible mortgage credit products.

## 5. Disproportionate Housing Needs

- a. *Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.*

Data reflecting disproportionate housing needs for persons with disabilities are not available. However, in light of the correlation between low-income status and disability status and the correlation between low-income status and disproportionate housing needs, it is likely that persons with disabilities face challenges. Cost burden is likely to be an especially pernicious problem and overcrowding may be an issue, as well.

## 6. Additional Information

- a. *Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.*

There have been complaints made to the housing authorities of Madison County, Granite City, and Alton that accessible units were not in compliance with Uniform Federal Accessibility Standards (UFAS). In the county's 2016 Annual Action Plan, it has pledged to participate in discussions with disability rights advocates and the Madison County, Granite City, and Alton Housing Authorities and engage in monitoring to ensure that both current and future affordable housing developments are fully accessible to persons with disabilities. In addition, the county will explore other opportunities for collaboration with disability rights advocates to ensure that all programs and developments within Madison County are accessible.

## 7. Disability and Access Issues Contributing Factors

- Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity*

*of disability and access issues and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.*

- Access to proficient schools for persons with disabilities

Access to proficient schools for persons with disabilities is a contributing factor for disparities in access to opportunity and disproportionate housing needs. Students with disabilities face an achievement gap in comparison to peers who do not have disabilities across all local school districts. A solid educational foundation and a high school diploma are critical to job access during adulthood and to maintaining an income that is sufficient to avoid severe cost burden in a county that has a limited supply of affordable, accessible housing.

- Access to publicly supported housing for persons with disabilities

Access to publicly supported housing for persons with disabilities is a contributing factor to segregation and disproportionate housing needs of that population. In general, persons with disabilities are able to effectively access publicly supported housing programs though they may be underrepresented in the Housing Choice Voucher program. Nonetheless, the overall lack of supply of such housing increases the likelihood of persons with disabilities either residing in more segregated congregate settings or institutions or experiencing cost burden when renting market rate housing.

- Access to transportation for persons with disabilities

Access to transportation for persons with disabilities is a contributing factor to disparities in access to opportunity and segregation. In particular, gaps in Madison County's transit system, including its paratransit system, make it difficult for persons with disabilities, particularly low-income persons with disabilities, to access jobs. Additionally, the availability of transportation services provided by housing providers in congregate settings may make the transition to truly independent housing more difficult for persons with disabilities who are leaving or who are contemplating leaving segregated settings.

- Inaccessible government facilities or services

Inaccessible government facilities or services are a problem within the county and should be reformed in order to ensure that the county and other local governments are in compliance with federal civil rights laws and that the rights of persons with disabilities are respected. At the same time, this Assessment did not reveal any causal or contributing relationship between inaccessible government facilities or services and any specific fair housing issue. Accordingly, inaccessible government facilities or services are not being listed as a significant contributing factor.

- Inaccessible sidewalks, pedestrian crossings, or other infrastructure

Inaccessible sidewalks are a contributing factor to disparities in access to opportunity and to segregation of persons with disabilities. Inaccessible sidewalks exacerbate the difficulties posed by limited transit and paratransit systems by reducing the ability of persons with ambulatory disabilities to get from their homes to less costly fixed bus route lines and to navigate the built environment as pedestrians. This burdens the paratransit system and makes it more difficult for persons with ambulatory disabilities to access employment. Additionally, as with the limited transit system, inaccessible sidewalks perpetuate segregation by increasing the relative convenience of congregate settings that offer transportation services in comparison to truly integrated independent living.

- Lack of affordable in-home or community-based supportive services

Illinois has in place the crucial Medicaid waiver and Money Follows the Person programs that are needed to provide affordable in-home or community-based supportive services; however, the number of waivers available is not sufficient to meet the need. As a result, thousands of persons with disabilities are on waiting lists. Although the capacity of the county to address what is essentially a state and federal funding issue is limited, the lack of affordable in-home or community-based supportive services is a contributing factor for the segregation of persons with disabilities in Madison County.

- Lack of affordable, accessible housing in range of unit sizes

The lack of affordable, accessible housing is a contributing factor to segregation and disproportionate housing needs for persons with disabilities in Madison County. In the absence of affordable, accessible housing, persons with disabilities are likely to experience housing cost burden, and the ability of individuals to transition from segregated congregate settings and institutions to independent living options may be limited. Although persons with disabilities reside in households of varying sizes, this Assessment did not reveal specific evidence that unit sizes for affordable, accessible housing that does exist exacerbate the problem.

- Lack of affordable, integrated housing for individuals who need supportive services

The lack of affordable, integrated housing for individuals who need supportive services is a significant contributing factor to segregation and disproportionate housing needs for persons with disabilities for similar reasons to those discussed in connection with the contributing factor above.

- Lack of assistance for housing accessibility modifications

Although the county does provide CDBG funding for housing accessibility modifications, the amount of funding available for modifications pales in comparison to the unmet need for accessible housing. Land use policies, however, are a much more significant contributing factor to

segregation and disproportionate housing needs that are attributable to the lack of accessible housing. Lack of assistance for modifications is a contributing factor but not a significant one.

- Lack of assistance for transitioning from institutional settings to integrated housing

Madison County appears to have systems in place to effectively assist persons with disabilities in transitioning from institutional settings to integrated housing. In particular, IMPACT CIL plays a key coordinating role in that process. Although IMPACT-CIL could undoubtedly use more resources to carry out that role, the shortage of affordable, accessible housing and the long waiting list for Medicaid-funded supportive services are far more significant contributing factors.

- Land use and zoning laws

Land use and zoning laws are a contributing factor to the segregation of persons with disabilities. As discussed above, the predominantly single-family nature of Madison County's housing stock inflates housing prices beyond the income levels of persons with disabilities and reduces the supply of housing that is subject to the FHA's design and construction standards. Zoning ordinances in Madison County tend to severely restrict the amount of land available for multi-family development. In the absence of housing that is both affordable and accessible to persons with disabilities, persons with disabilities are more likely to reside in segregated congregate settings or institutions.

- Lending Discrimination

This Assessment did not reveal anecdotal evidence of lending discrimination against persons with disabilities, and Home Mortgage Disclosure Act data does not break down applicants by disability status. As a result, it is not possible to conclude whether or not lending discrimination is a contributing factor for any of the fair housing issues faced by persons with disabilities. Nonetheless, the county should keep in mind that lending discrimination is often subtle and need not be intentional in order to violate the Fair Housing Act. For example, persons whose income is primarily from SSI have been treated differently than others when seeking a mortgage. The county should be sensitive to any future reports of lending discrimination against persons with disabilities.

- Location of accessible housing

The location of accessible housing is a contributing factor to disparities in access to opportunity for persons with disabilities, in particular with regard to education and environmental health. The county's multifamily housing stock contributes the lion's share of the county's accessible housing. That housing is disproportionately located in the western portion of the county within communities that have less access to proficient schools and poorer access to environmentally healthy neighborhoods than in the central and eastern portions of the county.

- Occupancy codes and restrictions

Granite City's Crime-Free Multi-Family Housing Program is a form of occupancy code or restriction that is a contributing factor to segregation and disproportionate housing needs for persons with disabilities. Although persons with disabilities are not, in general, disproportionately entangled in the criminal justice system, some individuals with psychiatric or other behavioral disabilities have criminal records or police interactions that are, in part, the product of their disabilities. Restricting access to housing for persons with disabilities who have criminal records or are the subject of 911 calls increases the likelihood that affected persons will reside in segregated congregate or other institutional settings, including in correctional facilities. Many private housing providers also have occupancy restrictions based on criminal records that, if applied without heeding the obligation to provide reasonable accommodations, have the potential to limit housing choices for persons with disabilities in a manner that perpetuates segregation.

- Regulatory barriers to providing housing and supportive services for persons with disabilities

Aside from the zoning and land use barriers discussed above, this Assessment did not reveal additional regulatory barriers to providing housing and supportive services for persons with disabilities.

- State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings

Because of landmark litigation, state or local laws that discourage individuals with disabilities from being placed in or living in apartments, family homes, or other integrated settings are no longer a contributing factor for the segregation of persons with disabilities; however, the continuing legacy of past segregative policies contributes to segregation to this day.

## **E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis**

1. *List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.*

During the period of January 2010 to the present, the Department of Housing and Urban Development did not issue a charge or letter for any of the 30 fair housing complaints filed within Madison County. Ten of the cases were closed because of no cause determinations. Six of the cases were closed because the complainant withdrew the complaint after resolution. One case was



closed because the complainant withdrew the complaint despite failing to reach a resolution. Eight cases were closed because of successful conciliation/settlement. Two cases were closed because the complainant failed to cooperate with the investigation. There are two cases currently open/pending.

The Illinois Department of Human Rights (IDHR) is the substantially equivalent state agency charged with investigating violations of federal and state fair housing laws. During the period of January 2010 to present, IDHR investigated a total of 30 fair housing complaints within Madison County. Five cases are designated as “open/pending,” and no findings have been issued. A race-based complaint, filed in February 2014, is currently pending against the Humboldt Senior Apartments in Alton. In February 2015, a race-based complaint was filed against the Granite City Housing Authority, which is currently pending. A complaint alleging familial status discrimination was filed against the City of Wood River in June 2015, which is currently pending. IDHR has also been investigating the Rocwood Apartments in Wood River for allegations of familial status discrimination since June 2015. The complaint was settled in January 2016 after the City of Wood River agreed to include a non-discrimination statement in their occupancy permit application and receive fair housing training. In July 2015, the IDHR opened an ongoing investigation into allegations of familial status discrimination against Diplomat Apartments in East Alton. Most recently, Town and Country Apartments in Granite City are being investigated for allegations of race-based discrimination. The investigation into Town and Country Apartments has been open since March 2016.

*2. Describe any state or local fair housing laws. What characteristics are protected under each law?*

The Illinois Human Rights Act (IHRA) was passed in November 1979 by the Illinois General Assembly. The IHRA is “substantially equivalent” to the federal Fair Housing Act and prohibits discrimination in real estate transactions on the basis of race, color, religion, sex, national origin, physical or mental disability and familial status. In addition, the IHRA includes additional protected classes not covered under the federal Fair Housing Act, such as ancestry, age, order of protection status, marital status, military status, sexual orientation, pregnancy, or unfavorable discharge from military service. 775 ILCS 5/3-101. Order of protection status is a protected class that was added to the IHRA in 2010. This class expands upon protections against discrimination on the basis of sex by prohibiting housing providers from discriminating against persons covered under an order of protection pursuant to the Illinois Domestic Violence Act or a court of another state. Neither Madison County, nor any of the local communities within the County, have established local fair housing laws or ordinances.

*3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.*

The Illinois Department of Human Rights (IDHR) is the state agency charged with administering the Illinois Human Rights Act and has been designated by HUD as a Fair Housing Assistance

Program since 2002. Accordingly, the IDHR investigates allegations of discrimination in real estate transactions involving both commercial and residential real property throughout Illinois. In addition, the IDHR conducts education and outreach activities aimed toward property owners, landlords, community organizations and the general public.

The Metropolitan St. Louis Equal Housing Opportunity Council (EHOC) is the sole private, non-profit fair housing enforcement agency working to ensure equal access to housing opportunities in the Greater St. Louis Metropolitan area, including Madison County. EHOC works to eliminate housing discrimination through counseling, education, investigation and enforcement, including the operation of a fair housing testing program.

Land of Lincoln Legal Assistance Foundation, Inc. provides free civil legal services to low-income persons in the 65 counties spanning central and southern Illinois. Land of Lincoln provides legal representation to low-income persons facing a variety of legal issues, such as problems in housing, family, consumer, homeownership, public benefits and health, services for senior citizens and disabled persons, and education. As part of its housing practice, Land of Lincoln provides representation and outreach to persons experiencing fair housing issues.

#### 4. Additional Information

- a. *Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.*

The following charts provide an overview of the various types of housing discrimination complaints within Madison County filed during the period of January 2010 to May 2016. The first chart details the basis for complaints filed with the U.S. Department of Housing and Urban, while the second chart provides such details for complaints filed with the Illinois Department of Human Rights. Overall, there was a total of thirty complaints filed with HUD, five of which alleged multiple bases of discrimination. The complaint data from HUD and IDHR reveal that disability discrimination is the most common type of complaint in Madison County, followed by race and familial status discrimination.

#### **HUD Fair Housing Complaints – Madison County –**

##### **January 2010 to May 2016**

<b>Basis of Complaint</b>	<b>Number of Complaints</b>
Race	10
Color	0
National Origin	1
Religion	1
Sex	2
Familial Status	4
Disability	12
Retaliation	1
<b>Total</b>	<b>31 (5 with Multiple Bases)</b>

**IDHR Fair Housing Complaints – Madison County –  
January 2010 to May 2016**

<b>Basis of Complaint</b>	<b>Number of Complaints</b>
Race	8
Color	0
National Origin	1
Religion	1
Sex	0
Familial Status	7
Disability	12
Retaliation	0
Ancestry	0
Age	0
Marital Status	1
Unfavorable Military Discharge	0
Military Status	0
Sexual Orientation	0
<b>Total</b>	<b>30</b>

**IDHR Fair Housing Complaints by City – Madison County  
January 2010 to May 2016**

The third chart provides a breakdown of fair housing complaints by their city of origin within Madison County. The City of Alton had the highest number of fair housing complaints of any jurisdiction within Madison County filed during the period of January 2010 to May 2016. Granite City had the second highest number of complaints, followed by Collinsville, Troy and Wood River.

<b>City</b>	<b>Number of Complaints</b>
Alton	6
Bethalto	1
Collinsville	4
East Alton	1
Elkville	1
Godfrey	2
Granite City	5
Trenton	1
Troy	3
Wood River	3
Other	3

- b. *The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.*

Madison County promotes fair housing by issuing a resolution each April in recognition of National Fair Housing Month and requires jurisdictions within the County to issue fair housing resolutions, as well. The County also makes fair housing information available on its website. This information includes an explanation of prohibited forms of discrimination, including denial of reasonable accommodation requests. In addition, the website provides information regarding the process for filing a housing discrimination complaint with the Department of Housing and Urban Development. The County is also exploring the possibility of providing funding to the Metropolitan St. Louis Equal Housing and Opportunity Council (EHOC) in order to expand its existing efforts to investigate and eliminate illegal housing discrimination in the Metropolitan St. Louis area through testing and outreach efforts.

#### 5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.*

- **The lack of local private fair housing outreach and enforcement is a significant contributing factor.**

The Metropolitan St. Louis Equal Housing and Opportunity Council's (EHOC) is the sole private fair housing enforcement program in the St. Louis region, which includes Madison County. However, a lack of sufficient resources has limited EHOC's ability to conduct prolonged enforcement activities, such as fair housing testing, within the County. Testing is an invaluable tool used to uncover instances of housing discrimination and many discriminatory practices can only be discovered through such means. As a result, the dearth of fair housing testing and other private enforcement within Madison County increases the severity of disparities in access to opportunity.

- **The lack of local public fair housing enforcement is a significant contributing factor.**

There has been significant fair housing enforcement within Madison County over the past several years. A review of the Illinois Department of Human Rights' Annual Report for Fiscal Year 2015 reveals that Madison County had seven fair housing complaints and was tied for sixth most amongst Illinois counties. In Fiscal Year 2014, Madison County had six fair housing complaints and was tied for ninth most amongst Illinois counties. Madison County had four fair housing complaints investigated in Fiscal Year 2013, tied for fourteenth amongst counties in Illinois. Madison County had four housing discrimination complaints in Fiscal Year 2012, which was the ninth most in Illinois. Despite a moderate number of fair housing investigations conducted by local

fair housing agencies within Madison County, more robust fair housing enforcement in the area is needed. Specifically, none of the investigations opened by IDHR led to a finding of discriminatory conduct by the respondent. The lack of aggressive enforcement of local and federal fair housing laws has a severe impact on disparities in access to opportunity.

- **The lack of resources for fair housing agencies and organizations is a significant contributing factor.**

As stated beforehand, Metropolitan St. Louis Equal Housing and Opportunity Council's (EHOC) is the sole private fair housing enforcement program in the St. Louis region. EHOC currently lacks sufficient resources to conduct prolonged enforcement activities, such as fair housing testing. As a result, the dearth of fair housing testing and other private enforcement within Madison County increases the severity of disparities in access to opportunity.

- **The lack of state or local fair housing laws is not a significant contributing factor.**

Neither Madison County nor any of the jurisdictions within the County has passed a local fair housing law that is substantially equivalent to the federal Fair Housing Act. However, Madison County residents still enjoy strong fair housing protections. Through the Illinois Human Rights Act (IHRA), the Illinois General Assembly has adopted one of the strongest fair housing laws in the country. The IHRA prohibits discrimination in real estate transactions based upon race, color, religion, sex, national origin, physical or mental disability and familial status. In addition, the IHRA includes additional protected classes not covered under the federal Fair Housing Act, such as ancestry, age, order of protection status, marital status, military status, sexual orientation, pregnancy, or unfavorable discharge from military service.

Despite the fairly robust protections that Illinoisans are afforded, the state has not amended the IHRA to prohibit discrimination based on source of income. Numerous states and municipalities have adopted laws prohibiting source of income discrimination in housing transactions, which includes housing choice vouchers, veteran's benefits, unemployment insurance and Supplemental Security Income (SSI). There have been no studies conducted to determine the prevalence of source of income discrimination in Madison County. However, national surveys indicate that source of income discrimination is widespread and often serves as a proxy for racial discrimination. Accordingly, Madison County should explore adopting a local fair housing ordinance which includes prohibitions against source of income discrimination in housing and real estate transactions in order to provide additional protection to residents and further the goals of federal and state fair housing laws.

- **Unresolved violations of fair housing or civil rights law is a significant contributing factor.**

Information provided by the Illinois Department of Human Rights reveals that the vast majority of fair housing investigations in Madison County have been resolved. However, there are five housing discrimination complaints that are currently open and pending in Madison County. For instance, a complaint filed against Humboldt Senior Apartments in Alton has been open since

February 2014. Even more troubling is the fact that there are two cases that are currently pending against the Granite City Housing Authority and the City of Wood River. The cases against both government entities have been pending since February 2015 and July 2015, respectively. In order to ensure that residents fair housing rights are fully protected and enforced, it is imperative that all complaints are thoroughly investigated and resolved in a timely manner.

- **Other**

There is a lack of transparency amongst public housing authorities located within Madison County, which significantly affects disparities in access to opportunities. For instance, the Granite City Housing Authority has a website that does not list staff members or leadership. The Alton Housing Authority does not have a dedicated website and directs residents and applicants to utilize their Facebook page or visit their office for assistance. Madison County should assist local housing authorities with efforts to increase transparency of their operations, including the development and improvement of dedicated websites, to ensure that low-income families are more able to identify available housing assistance and to utilize housing subsidies in as broad a range of communities as possible.

## V. FAIR HOUSING GOALS AND PRIORITIES

<u>Goal</u>	<u>Strategy</u>	<b>Fair Housing Issue</b>	<b>Contributing Factor</b>	<b>Time frame for Action</b>	<b>Measure of Achievement</b>	<b>Responsible Program Participant(s)</b>
<b>1. Lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies.</b>	Prioritize CDBG and HOME funding for developments in high-opportunity neighborhoods.	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need	Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures; Community Opposition	<1 yr	Reflect priority for housing in high opportunity neighborhoods in the scoring criteria of CDBG and HOME grant applications.	Madison County Community Development Department
	Promote reforms to current zoning regulations including the development of mandatory inclusionary zoning policies to support the production of affordable housing in high opportunity neighborhoods.	Segregation; Disparity in Access to Opportunity	Location and Type of Affordable Housing; Community Opposition; Land Use and Zoning Laws	1-3 yrs	Mandatory inclusionary zoning ordinances in place in Madison County jurisdictions	Madison County Community Development Department, various city councils

	Recruit landlords in high-opportunity neighborhoods for the Housing Choice Voucher Program.	Segregation; Disparity in Access to Opportunity;	Location and Type of Affordable Housing; Availability of Affordable Units in a Range of Sizes; Source of Income Discrimination	<1 yr	10% increase in landlords in two years	Madison County Community Development Department, Madison County Housing Authority, Granite City Housing Authority, Alton Housing Authority
<b>2. Reduce housing segregation and discrimination by aggressively conducting fair housing education and enforcement activities, in coordination and with fair housing organizations.</b>	Provide monetary support to the Metropolitan St. Louis Equal Housing and Opportunity Commission for fair housing enforcement, education and training.	Segregation	Private Discrimination; Lending Discrimination; Community Opposition	< 1 yr	Funding included in County budget	Madison County Community Development Department
	Provide fair housing training to the Madison County Community Development Department, Madison County Housing Authority, Granite City Housing Authority, and Alton Housing Authority	Segregation	Private Discrimination; Lending Discrimination; Community Opposition	< 1 yr	Annual training beginning in 2017	Madison County Community Development Department



	Increase awareness about fair housing issues, resources, and equitable outcomes through enhanced media outreach especially during Fair Housing Month each year.	Segregation	Private Discrimination; Lending Discrimination; Community Opposition	< 1 yr	Press release developed, PSAs developed, and related activities conducted	Madison County Community Development Department
	Organize and convene a Fair Housing Task Force to implement the recommendations in the AI through the Consolidated Plan process.	Segregation	Private Discrimination; Lending Discrimination; Community Opposition	<1 yr	Task Force convened within 90 days of submission of AI.	Madison County Community Development Department
<b>3. Ensure that internal policies and practices advance access for groups with significant challenges in accessing safe and affordable housing including, but not limited to people</b>	Prioritize resources to develop permanent, accessible supportive housing for persons experiencing homelessness.	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need	Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures; Community Opposition; Land Use and Zoning	1-3 yrs	10% of County-supported units developed are PSH units	Madison County Community Development Department

<p><b>with disabilities, people with limited English proficiency, and people with criminal records.</b></p>	<p>In conjunction with the cities of Alton and Granite City, rescind occupancy permit requirements, which place a disproportionate burden on persons with disabilities and individuals based on their national origin.</p>	<p>Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need</p>	<p>Location and Type of Affordable Housing; Community Opposition; Admission and Occupancy Policies and Procedures; Impediments to Mobility</p>	<p>&lt;1 yr</p>	<p>Policy changed to allow occupancy permit by mail</p>	<p>Madison County Community Development Department, Alton City Council, Granite City Council</p>
	<p>Draft and introduce both City and County-wide legislation prohibiting housing discrimination based on source of income.</p>	<p>Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need</p>	<p>Location and Type of Affordable Housing; Community Opposition; Admission and Occupancy Policies and Procedures; Impediments to Mobility</p>	<p>3-5 yrs</p>	<p>Legislation drafted and introduced to the City Councils and County Board</p>	<p>Madison County Community Development Department, Madison County Board City Councils</p>

	Develop policies and training materials for housing authorities and private landlords that ensure transparency and accuracy in background checks used to secure public and private rental housing.	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need	Location and Type of Affordable Housing; Community Opposition; Admission and Occupancy Policies and Procedures; Impediments to Mobility	1-3 yrs	Policies drafted and disseminated throughout the County and included in fair housing training and education.	Madison County Community Development Department
	Repeal crime-free rental housing ordinances in Collinsville and Granite City	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need	Admission and Occupancy Policies and Procedures; Occupancy Codes and Restrictions; Private Discrimination	<1 yr	Legislation drafted and introduced in city councils	Madison County Community Development Department, Alton City Council, Collinsville City Council, Granite City Council
	Reform zoning ordinances to allow increased residential density in high opportunity areas throughout the county	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need	Zoning and Land Use Laws	1-3 yrs	Study of opportunities for greater residential density in high opportunity areas; legislation drafted and introduced in city councils	Madison County Planning and Development Department, Madison County Board, various city councils

	Collect data on accessibility of newly constructed housing units to ensure compliance with the Fair Housing Act.	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need	Lack of Accessible Affordable Housing in a Range of Housing Sizes; Impediments to Mobility; Private Discrimination	<1 yr	Database of accessible units; referral of evidence of violations to EHOC or Illinois Human Rights Commission	Madison County Community Development Department
	Ensure fair housing and other housing resource materials are available in languages other than English.	Segregation; Disparity in Access to Opportunity; Disproportionate Housing Need	Inaccessible government facilities or services	<1 yr	Language accessibility provisions included in subrecipient grant agreements	Madison County Community Development Department
<b>4. Prioritize public investments in transit, quality schools, parks, and other amenities in underserved communities.</b>	Prioritize County CDBG funding to support infrastructure upgrades, blight reduction efforts, and commercial development within disproportionately African American neighborhoods.	R/ECAP; Disparity in access to opportunity;	Lack of public investments in specific neighborhoods; Lack of private investment in specific neighborhoods; Deteriorated and abandoned properties;	1-3 yrs	Increase in code enforcement; decrease in residential and commercial vacancies.	Madison County Community Development Department. City of Venice, City of Madison, City of Alton

	Study and advocate for extension of MetroLink into Madison County.	R/ECAP; Disparity in access to opportunity	Availability, type, frequency, and reliability of public transportation	1-3 years	Transportation plan developed and funding sought for expansion.	Madison County Community Development Department. Bi-State Development Agency.
<b>5. Expand efforts in creating equitable healthy housing that recognizes the direct connections between healthy housing and quality of life.</b>	Develop and implement a strategic plan to address environmental hazards in disproportionately African American neighborhoods, including lead, mold, and toxic waste.	R/ECAP; Disparity in access to opportunity; Disproportionate Housing Need	Location of environmental health hazards; Deteriorated and abandoned properties: Land use and zoning laws	< 1 yr	Strategic Plan Developed	Madison County Community Development Department. City of Venice, City of Madison, City of Alton