

Madison County, Illinois 2024 Annual Action Plan



CDBG & HOME August 14, 2024

Prepared by: Madison County Community Development

Madison County, Illinois

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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

2024 is the fifth year of Madison County Illinois' five-year consolidated plan, the purpose of which is to encourage and support jurisdictions across the County in the development of viable urban communities, principally for low- and moderate-income persons, consistent with the three principal goals of the U.S. Department of Housing and Urban Development (HUD): promoting decent housing, a suitable living environment, and expanded economic opportunities. This action plan details Madison County, the City of Alton, and the City of Granite City's fifth year activities and progress towards the five-year consolidated plan goals.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items, or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Madison County, the City of Alton and the City of Granite City remain focused on poverty alleviation, community revitalization and housing affordability. Also, the Behavioral Health Needs Assessment discussed in the five-year consolidated plan has resulted in a Community Action Plan to address the gaps in services.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

MCCD strives to improve on the activities offered with CDBG funding on a yearly basis. Although each year MCCD makes positive strides to improve communities throughout the county, MCCD continues to struggle with defining the best approach to improving low/mod individuals' status. MCCD staff are working towards improving outreach to residents and municipalities to make them aware of the activities that are offered. MCCD staff will host a contractor summit in August of 2024 to recruit contractors to the Owner-Occupied Rehabilitation Program.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The citizens of Madison County are encouraged to participate in public meetings to discuss the action plan, performance report, and every five years for the strategic (consolidated) plan. Notice was posted in the local paper 15 days prior to the needs assessment public meetings (March 2024) and the draft AAP public meetings (July 2024). The public meetings are to get feedback from the public on how the CDBG and HOME funds are going to be spent for the 2024 program year and the timeline for our planning cycle. MCCD posted the draft action plan on the MCCD website in conjunction with newspaper advertisements, flyers, and the public meetings.

The Needs Assessment Public Meetings were held on:

- Tuesday, March 5, 2024 @ 4PM - Madison County Grants Committee Meeting
- Thursday, March 21, 2024 @ 9:30AM - Continuum of Care Meeting

The Draft AAP Review Public meetings were held on:

- Tuesday, July 2, 2024 @ 4PM - Madison County Grants Committee Meeting
- Tuesday, July 9, 2024 @ 6PM - Alton Library
- Wednesday, July 10, 2024 @ 6PM - Troy Library
- Monday, July 15, 2024 @ 6PM - Edwardsville Library
- Tuesday, July 16, 2024 @ 6PM - Granite City Library
- Thursday, July 18, 2024 @ 9:30AM - Continuum of Care Meeting

MCCD provided the public with notice of the availability of FY 2024 funding. MCCD posted the Action Plan process through announcements at governmental and community meetings, Madison County Community Development's website, utilizing newspaper advertisements and posters identifying dates and times of public meetings in early spring and summer 2024.

The Needs Assessment Public Meetings were held on:

Tuesday, March 5, 2024 @ 4PM - Madison County Grants Committee Meeting

Thursday, March 21, 2024 @ 9:30AM - Continuum of Care Meeting

The Draft AAP Review Public meetings were held on:

Tuesday, July 2, 2024 @ 4PM - Madison County Grants Committee Meeting

Tuesday, July 9, 2024 @ 6PM - Alton Library

Wednesday, July 10, 2024 @ 6PM - Troy Library

Monday, July 15, 2024 @ 6PM - Edwardsville Library

Tuesday, July 16, 2024 @ 6PM - Granite City Library

Thursday, July 18, 2024 @ 9:30AM - Continuum of Care Meeting

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

More than 38 people attended the public meetings for the draft AAP. Below is a summary of what was discussed.

Summary of meetings:

1. There are questions about how the funds are being spent now. Residents would like to see more of a breakdown of how the funds are spent by category.
2. Residents would like to have more input on how the funds are spent in the future.
3. Better advertising of citizen/community participation events in the future.
4. There were questions from residents about the amount of funds spent on code enforcement and Gordon Moore Park.
5. Multiple people questioned how the funds were spent and the lack “impact” the current spending is having.
6. One suggestion was to consolidate all the services the County has for residents in one place to make it easier for people to access them.
7. One person stated that the way the AAP reads and how the money is spent do not align.

6. Summary of comments or views not accepted and the reasons for not accepting them All comments were accepted.

7. Summary

The public comments are included in the unique appendices of this document.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	MADISON COUNTY	
CDBG Administrator	MADISON COUNTY	Madison County Community Development
HOPWA Administrator		
HOME Administrator	MADISON COUNTY	Madison County Community Development
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative (optional)

Madison County Community development strives to ensure the grants it administers are used in the most effective and efficient way possible, in concert with the consolidated plan, for the benefit of Madison County's citizens.

Madison County does not receive HOPWA or HOPWA-C funding.

Consolidated Plan Public Contact Information

Questions relating to the Annual Action Plan may be directed to:

- **Chris Kalter – CDBG Coordinator**
- **Madison County Community Development**
- **157 N. Main St. Suite 312**
- **Edwardsville, IL 62025**
- **cjkalter@madisoncountyil.gov**
- **618-296-4955**

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

Madison County Community Development Department as part of the Madison County Government is the responsible entity for overseeing and developing the annual action plan for CDBG and HOME funds. MCCD established the 2024 activities based on the consolidated plan. Consultation with these organizations that belong to each of these groups and additional stakeholders was completed for the 2020-2024 Consolidated plan (CoC, Public Housing Authorities, and the Madison County Grants committee) This consultation and the results of the input have guided MCCD in the planning process for the 2024 annual action plan.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The planned activities for the 2024 annual action plan were determined by MCCD staff based on the feedback from stakeholders and residents in the 2020-2024 Consolidated Plan. The CDBG Coordinator is making strides to get to know the CoC, PHAs, and other stakeholders. It is imperative that MCCD solicit and obtain feedback from all organizations that work directly with the demographic that the CDBG/HOME funding aids. The CoC hosts monthly meetings at the MCCD offices and CDBG and HOME staff attend these meetings regularly. The CDBG Coordinator met with all the Public Housing Authorities (Madison County, Granite City, and Alton) to discuss how our organizations could work together and potential uses of CDBG and/or HOME funding could be used to expand efforts by multiple stakeholders.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

Madison County Partnership to End Homelessness is the area Continuum of Care and MCCD is the collaborative applicant for program funding. The group is comprised of approximately 45 community agencies administering homeless services, community development activities, health care, human services, mental health care, housing, and veteran services as well as advocates, local governments, formerly homeless, churches, funders, banks, and other community stakeholders. The CoC has two standing committees and one seasonal committee. These committees were formed to address the goals outlined in Madison County's Ten-Year Plan to End Homelessness.

The Quality Assurance Committee monitors the outcomes of housing programs and works to improve program performance along with developing recommendations for the implementation of coordinated intake and assessment. This committee reviews the progress toward the homeless prevention goals in the plan and works to improve program performance. The Executive Committee works to spread awareness and engage citizen and organizational participation. The committee does this by hosting an annual meeting which is designed to bring new members into the CoC and through the annual Project Homeless Connect which aims to connect service providers with those in the community who are homeless or at risk of becoming homeless. The Executive committee also serves as the governing body of the CoC and works to carry out the following efforts in determining how to allocate CoC funds, develop performance standards, evaluate outcomes, and develop funding priorities:

- Ongoing needs assessment and analysis.
- Provision of technical assistance.
- Increased stakeholder participation.
- Development of strategies for addressing identified needs.
- Monitoring of progress toward strategic objectives and action steps.
- Coordination of various organizational structures related to homelessness.
- Coordination of the annual CoC NOFA application.

There is an ad-hoc application review committee that assists with reviewing and ranking projects for the annual CoC application to HUD. This committee is made up of representatives not funded through CoC funds but with relevant expertise. When the Notice of Funding Availability for CoC funds is released, specially scheduled meetings are held to specifically work on the annual application. All CoC meetings are open to the public and are advertised through the Madison County website and an email list to CoC members.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The State of Illinois, through its Department of Human Services (IDHS), provides a Homeless Prevention Program and administers the state Emergency Shelter Grant (ESG) funding. These programs provide rental assistance, utility assistance and supportive services directly related to the prevention of homelessness to eligible individuals and families who are in danger of eviction, foreclosure or homelessness or

are currently homeless. It is designed to stabilize individuals and families in their existing homes, shorten the amount of time that individuals and families stay in shelters and assist individuals and families with securing affordable housing. The Madison County Partnership to End Homelessness annually applies for and receives funding through this program. The Partnership has developed performance standards to evaluate the agency. MCCD is the Homeless Management Intake System (HMIS) lead agency and consults with the Partnership to ensure proper operation of the HMIS.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	CITY OF ALTON
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Economic Development Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
2	Agency/Group/Organization	Terra Properties
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Public Housing Needs Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
3	Agency/Group/Organization	Abundant Life Community Church
	Agency/Group/Organization Type	Religious Organization
	What section of the Plan was addressed by Consultation?	Public Housing Needs Homeless Needs - Families with children Homelessness Needs - Veterans Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.

4	Agency/Group/Organization	Refuge
	Agency/Group/Organization Type	Services-Children Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
5	Agency/Group/Organization	IMPACT CIL
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
6	Agency/Group/Organization	St. Louis Area United Way, Southwest Illinois Division
	Agency/Group/Organization Type	Regional organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
7	Agency/Group/Organization	Salvation Army Alton
	Agency/Group/Organization Type	Food Pantry
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Food for low-income families
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.

8	Agency/Group/Organization	Behavioral Health Alternatives
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Needs - Unaccompanied youth Mental Health Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
9	Agency/Group/Organization	America's Central Port
	Agency/Group/Organization Type	Economic Development
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
10	Agency/Group/Organization	City of Granite City
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
11	Agency/Group/Organization	St. John's Community Center
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
12	Agency/Group/Organization	New Shining Light Outreach Ministry
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
13	Agency/Group/Organization	Arch House
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
14	Agency/Group/Organization	CNB Bank and Trust
	Agency/Group/Organization Type	Bank and Trust Private Sector Banking / Financing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.

15	Agency/Group/Organization	Madison County Housing Authority
	Agency/Group/Organization Type	Services - Housing Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
16	Agency/Group/Organization	Granite City Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
17	Agency/Group/Organization	Wellspring Resources
	Agency/Group/Organization Type	Not for Profit

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
18	Agency/Group/Organization	Mental Health Board
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
19	Agency/Group/Organization	Senior Services Plus
	Agency/Group/Organization Type	Services-Elderly Persons Major Employer
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Needs - Veterans Market Analysis Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
20	Agency/Group/Organization	Alton Housing Authority
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
21	Agency/Group/Organization	Phoenix Crisis Center
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.

22	Agency/Group/Organization	Chestnut Health Systems
	Agency/Group/Organization Type	Housing Mental Health Services
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
23	Agency/Group/Organization	Madison County Catholic Charities
	Agency/Group/Organization Type	Not for Profit
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
24	Agency/Group/Organization	Land of Lincoln
	Agency/Group/Organization Type	Not for Profit

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Homelessness Strategy Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
25	Agency/Group/Organization	Madison County Health Department
	Agency/Group/Organization Type	Services-Health Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
26	Agency/Group/Organization	Southern Illinois Healthcare Foundation
	Agency/Group/Organization Type	Services-Health Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
27	Agency/Group/Organization	Coordinated Youth and Human Services
	Agency/Group/Organization Type	Community Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
28	Agency/Group/Organization	Alton YWCA
	Agency/Group/Organization Type	Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.

29	Agency/Group/Organization	Riverbend Growth Association
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
30	Agency/Group/Organization	MISI
	Agency/Group/Organization Type	Not for Profit
	What section of the Plan was addressed by Consultation?	Public Housing Needs Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
31	Agency/Group/Organization	HACSM
	Agency/Group/Organization Type	Not for Profit
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Economic Development Energy Assistance

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
32	Agency/Group/Organization	Northwood Apartments
	Agency/Group/Organization Type	Not for Profit
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
33	Agency/Group/Organization	Lewis and Clark Family Health Clinic
	Agency/Group/Organization Type	Not for Profit
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Transportation Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
34	Agency/Group/Organization	CASA
	Agency/Group/Organization Type	Not for Profit

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Economic Development Integrate Resources
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
35	Agency/Group/Organization	Beverly Farm Foundation
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Housing Needs for Persons With Disabilities
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
36	Agency/Group/Organization	OASIS WOMEN'S CENTER
	Agency/Group/Organization Type	Services-Victims of Domestic Violence Violence Non-Profit
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Affordable Daycare

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
37	Agency/Group/Organization	Big Brothers Big Sisters of Southwestern Illinois
	Agency/Group/Organization Type	Non-Profit
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Market Analysis Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
38	Agency/Group/Organization	Epilepsy Foundation of Greater Southern IL
	Agency/Group/Organization Type	Non-Profit
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Economic Development Special Needs Housing and Betterment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.

39	Agency/Group/Organization	Centerstone
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development Mental Health
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
40	Agency/Group/Organization	Operation Blessing
	Agency/Group/Organization Type	Non-Profit
	What section of the Plan was addressed by Consultation?	Food Pantry
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
41	Agency/Group/Organization	Riverbend Head Start and Family Services
	Agency/Group/Organization Type	Non-Profit
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.
42	Agency/Group/Organization	Community Hope Center
	Agency/Group/Organization Type	Non-Profit

	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Food Pantry
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was consulted to provide input on the development of the consolidated plan needs.

Identify any Agency Types not consulted and provide rationale for not consulting

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Madison County Community Development	Madison County Community Development (MCCD) is the lead agency for the CoC. MCCD has consulted with the CoC on all aspects of the Action Plan, especially with the HOME-ARP portion of the plan.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Municipal and Township staff were also contacted in the consultation process.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal setting

Madison County encourages its citizens to participate in the development of the Consolidated Plan, Annual Action Plan, Consolidated Annual Performance Evaluation Report (CAPER) and any Substantial Amendments to these plans. Outreach to the community includes participation by low/moderate income persons, stakeholders, elected officials, and municipal staff. This is done through the County website, newspapers announcements, public meetings/hearings, social media, flyers, library outreach, email blasts, and word of mouth.

The public comment period for the draft annual action plan was 7/02/2024 to 8/09/2024. The needs assessment comment period was from March 1 – April 1, 2024.

Citizen Participation Outreach

1. Mode of Outreach: Public Hearing

Target of Outreach:

- Minorities, Non-English Speaking - Specify other language: Spanish
- Persons with disabilities
- Non-targeted/broad community
- Residents of Public and Assisted Housing

Summary of response/attendance:

- Public Hearing held on March 5, 2024 - Madison County Grants Committee Meeting - Needs Assessment
- Public Hearing held on July 2, 2024 - Madison County Grants Committee Meeting - Draft 2024 AAP

Summary of comments received:

No public in attendance. Two of the County Board members had questions about the draft action plan and the competitive funding subgrants for Public Facilities. Both wanted to know how "road projects" benefited low/mod income people. I explained that the municipalities and townships that apply for the subgrants must show that the project takes place in a mostly residential area and that the residents of the area have to be at least 51% or higher low/mod income.

Summary of comments not accepted and reasons:

All comments accepted

2. Mode of Outreach: Newspaper Ad

Target of Outreach:

- Minorities, Non-English Speaking - Specify other language: Spanish
- Persons with disabilities
- Non-targeted/broad community
- Residents of Public and Assisted Housing

Summary of response/attendance:

A newspaper Ad was posted in the Edwardsville Intelligencer 15 days prior to the Public Hearing on March 5 and July 2, 2024.

Summary of comments received:

N/A

Summary of comments not accepted and reasons:

N/A

3. Mode of Outreach: Internet Outreach

Target of Outreach:

- Minorities, Non-English Speaking - Specify other language: Spanish
- Persons with disabilities
- Non-targeted/broad community
- Residents of Public and Assisted Housing

Summary of response/attendance:

Notice of the Needs Assessment and the Draft 2024 AAP has been posted on the County website.

Summary of comments received:

N/A

Summary of comments not accepted and reasons:

N/A

4. Mode of Outreach: Public Meeting

Target of Outreach:

- Minorities, Non-English Speaking - Specify other language: Spanish
- Persons with disabilities
- Non-targeted/broad community
- Residents of Public and Assisted Housing

Summary of response/attendance:

Public Meetings were held on the following dates:

March 21, 2024 Madison County Administration Building, Continuum of Care Meeting
157 N. Main St., Rm. 309, Edwardsville, IL 62025

Tuesday, July 2, 2024, at 4:00PM Madison County Administration Building, Grants Committee Meeting
157 N. Main St., Rm. 203 (County Board Chambers), Edwardsville, IL 62025

Tuesday, July 9, 2024, at 6:00PM Alton Square Mall Library
132 Alton Square, Community Room, Alton, IL 62002

Wednesday, July 10, 2024, at 6:00PM Tri Township Library (Troy Library)
209 South Main St., Community Room, Troy, IL 62294

Monday, July 15, 2004, at 6:00PM Edwardsville Public Library
112 South Kansas St., Community Room, Edwardsville, IL 62025

Tuesday, July 16, 2024, at 6:00PM Six Mile Regional Library District (Granite City Library)
2001 Delmar Ave, Community Room, Granite City, IL 62040

Thursday, July 18, 2024, at 9:30AM Madison County Administration Building, Continuum of Care Meeting
157 N. Main St., Rm. 309, Edwardsville, IL 62025

The public comment period for the 2024 DRAFT Annual Action Plan was open from July 2, 2024, to August 9, 2024.

Summary of comments received:

More than 38 people attended the draft 2024 AAP Public Meetings. This was a mix of residents, elected officials, stakeholders, and municipal representatives. The comments received can be found in the appendix. Residents wanted to be more involved in the decision-making process. They wanted more transparency on how the funds would be spent. They wanted the action plan and the funding to support each other. The main

comment that summarizes the public meetings is "Just because you can spend the money on something doesn't mean you should".

Summary of comments not accepted and reasons:

All comments received and accepted.

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

Amounts listed below are estimated amounts for eligible activities for FY 2022 allocation.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,797,933	25,000	0	2,822,933	0	This is the 5th year of the five-year conplan.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	806,148	175,000	0	981,148	0	This is the 5th year of the five-year conplan.

Table 4 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Match requirements are met by developer equity, municipal investments, local fundraising, bank financing, First Time Home Buyer grants, and State of Illinois affordable housing funds and motor fuel tax and other matching grants.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Madison County Government does not own any land or property that will be used to address the needs identified in this plan. America's Central Port and St. Louis Regional Airport are publicly owned transportation assets with room to grow and available land. These sites are located within the County's Enterprise Zones and the County has provided low interest infrastructure loans to attract private sector development of these assets. Madison County Community Development's staff will continue working to attract additional development to these sites using the resources outlined in the Consolidated Plan to further the goals of increasing jobs and tax base.

Discussion

The expected amount available in FY2024 is based on the U.S. Department of Housing and Urban Development's allocation amounts for the CDBG Grant amounts for the City of Alton, Granite City and Madison County, and the HOME allocation for Madison County.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	1.1- Improve Public Facilities	2020	2024	Non-Housing Community Development	Madison County	Create a Suitable Living Environment	CDBG: \$1,087,382	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 7600 Persons Assisted
2	1.2 Demolitions	2020	2024	Non-Housing Community Development	Madison County	Create a Suitable Living Environment	CDBG: \$154,080	Buildings Demolished: 50 Buildings
3	1.3 Commercial Rehab	2020	2024	Non-Housing Community Development	Madison County	Create Economic Opportunities	CDBG: \$15,000	Facade treatment/business building rehabilitation: 3 Business
4	1.4- Code Enforcement	2020	2024	Non-Housing Community Development	Madison County	Provide Decent Affordable Housing	CDBG: \$126,174	Housing Code Enforcement/Foreclosed Property Care: 400 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	1.6- Provide Youth Services	2020	2024	Non-Housing Community Development	Madison County	Create Economic Opportunities	CDBG: \$69,077	Jobs created/retained: 50 Jobs
7	1.7- Quality of Life Programs	2020	2024	Non-Housing Community Development	Madison County	Create a Suitable Living Environment	CDBG: \$42,357	Public service activities other than Low/Moderate Income Housing Benefit: 3500 Persons Assisted
8	2.1- Rental Development	2020	2024	Affordable Housing	Madison County	Provide Decent Affordable Housing	HOME: \$725,000	Rental units constructed: 4 Household Housing Unit Rental units rehabilitated: 2 Household Housing Unit
9	2.2- Home Ownership Development - Housing Rehab	2020	2024	Affordable Housing	Madison County	Provide Decent Affordable Housing	CDBG: \$479,275	Homeowner Housing Rehabilitated: 146 Household Housing Unit
10	2.4- HOMEbuyer Assistance (DPA)	2020	2024	Affordable Housing	Madison County	Provide Decent Affordable Housing	CDBG: \$45,000 HOME: \$54,611	Direct Financial Assistance to Homebuyers: 50 Households Assisted
11	2.5- CHDO Set Aside & Pre-Development	2020	2024	Affordable Housing	Madison County	Provide Decent Affordable Housing	HOME: \$120,922	Rental units constructed: 4 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12	2.7- Provide Delivery & Technical Assistance	2020	2024	Affordable Housing Public Housing	Madison County	Provide Decent Affordable Housing	CDBG: \$65,000	Other: 60 Other
13	2.8- Homeless Services Program & Support	2020	2024	Affordable Housing Homeless	Madison County	Create a Suitable Living Environment	CDBG: \$140,000	Homelessness Prevention: 50 Persons Assisted
14	3.1- Assist Businesses & Start Up Expansion	2020	2024	Non-Housing Community Development	Madison County	Create Economic Opportunities	CDBG: \$5,000	Jobs created/retained: 1 Jobs
15	5.1- Administration	2020	2024	Administration	Madison County	Create Economic Opportunities	CDBG: \$559,587 HOME: \$80,165	Other: 1 Other

Table 5 – Goals Summary

Goal Descriptions

1	Goal Name	1.1- Improve Public Facilities
	Goal Description	Improve public facilities and section 108 loan repayment.
2	Goal Name	1.2 Demolitions
	Goal Description	Demolitions of real property.
3	Goal Name	1.3 Commercial Rehab
	Goal Description	Commercial facade rehabilitation City of Alton
4	Goal Name	1.4- Code Enforcement
	Goal Description	Code enforcement - city of Alton
6	Goal Name	1.6- Provide Youth Services
	Goal Description	Summer youth programs for Granite City and Alton
7	Goal Name	1.7- Quality of Life Programs
	Goal Description	Public services.

8	Goal Name	2.1- Rental Development
	Goal Description	Rental housing development.
9	Goal Name	2.2- Home Ownership Development - Housing Rehab
	Goal Description	Home Repair
10	Goal Name	2.4- HOMEbuyer Assistance (DPA)
	Goal Description	Homebuyer assistance.
11	Goal Name	2.5- CHDO Set Aside & Pre-Development
	Goal Description	CHDO set aside.
12	Goal Name	2.7- Provide Delivery & Technical Assistance
	Goal Description	Housing Services Technical Assistance
13	Goal Name	2.8- Homeless Services Program & Support
	Goal Description	Homeless services.
14	Goal Name	3.1- Assist Businesses & Start Up Expansion
	Goal Description	Economic development.
15	Goal Name	5.1- Administration
	Goal Description	Administration.

Projects

AP-35 Projects – 91.220(d)

Introduction

FY 2024 CDBG and HOME Projects

Projects

#	Project Name
1	CDBG - Public Facilities
2	CDBG - Public Services
3	CDBG - Housing
4	CDBG - Acquisition/Disposition
5	CDBG - Economic Development
6	CDBG - Administration
7	CDBG - Repayment of Section 108 Loans
8	HOME - Administration
9	HOME - CHDO Set Aside
10	HOME - HOMEbuyer Assistance
11	HOME - Rental Housing Development

Table 6 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The allocation priorities for PY2024 are based off the 2020-2024 Consolidated Plan. The main obstacles to addressing underserved needs are needing more funds, more contractors, and a clearer long-term plan for the CDBG and HOME funds for Madison County.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG - Public Facilities
	Target Area	Madison County
	Goals Supported	1.1- Improve Public Facilities
	Needs Addressed	Create a Suitable Living Environment
	Funding	CDBG: \$757,382
	Description	\$757,381.60 in CDBG funds will be utilized for multiple Public Facility activities throughout Madison County. The activities include the following: \$100,000.00 City of Collinsville - Sewer Lining \$180,000.00 City of Granite City - Kate St. Improvements \$77,381.60 City of Granite City - Fire Truck Loan Repayment \$100,000.00 City of Madison - Street Improvements \$100,000.00 Village of Roxana - Street Improvements \$100,000.00 City of Troy - Street Improvements \$100,000.00 City of Wood River - Water Line Improvements
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	This project will encompass six (6) activities that will serve an estimated 7600 people.
	Location Description	These public facility activities will be County wide in the following cities: Collinsville Granite City City of Madison Roxana Troy Wood River
Planned Activities	These activities are street and water/sewer line activities.	
2	Project Name	CDBG - Public Services
	Target Area	Madison County

	Goals Supported	1.6- Provide Youth Services 1.7- Quality of Life Programs 2.8- Homeless Services Program & Support
	Needs Addressed	Create a Suitable Living Environment
	Funding	CDBG: \$251,435
	Description	\$251,434.55 in CDBG funding will be utilized for Public Services throughout Madison County. The services include: \$140,000.00 Madison County Homeless Services\$42,357.00 City of Granite City - Public Safety/Dispatcher\$39,077.55 City of Granite City - Summer Youth\$30,000.00 City of Alton - Summer Youth
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	The estimated number of families that will benefit from this activity is 23,455.
	Location Description	Activities will occur county wide with a portion of the beneficiaries residing in Alton and Granite City.
	Planned Activities	The public service activities include: Summer Youth Programs in Granite City and Alton. A Granite City Dispatcher Homeless Prevention Services
3	Project Name	CDBG - Housing
	Target Area	Madison County
	Goals Supported	1.4- Code Enforcement 2.2- Home Ownership Development - Housing Rehab 2.4- HOMEbuyer Assistance (DPA) 2.7- Provide Delivery & Technical Assistance
	Needs Addressed	Create a Suitable Living Environment
	Funding	CDBG: \$750,449

	Description	\$7250,449.20 in CDBG funding will be utilized for Housing activities. These activities include:\$50,000.00 City of Alton - Housing Rehabilitation\$45,000.00 City of Alton - Homebuyer Assistance\$15,000.00 City of Alton - Housing Services\$126,174.00 City of Alton - Code Enforcement\$100,000.00 City of Granite City Housing Rehabilitation\$10,000.00 City of Granite City Housing Rehabilitation Administration\$15,000.00 Madison County Accessibility Ramp Program and administration\$219,275.20 Madison County Housing Rehabilitation\$80,000.00 Madison County Weatherization\$65,000.00 Madison County Housing Services
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	The many activities in this project will provide benefits to an estimated 1146 households.
	Location Description	Activities will occur county wide and will include Granite City and Alton.
	Planned Activities	The activities will include housing rehabilitation, homebuyer assistance, weatherization, and accessibility ramps.
4	Project Name	CDBG - Acquisition/Disposition
	Target Area	Madison County
	Goals Supported	1.2 Demolitions
	Needs Addressed	Create a Suitable Living Environment
	Funding	CDBG: \$154,080
	Description	\$154,080.65 in CDBG Funding will be utilized for demolition activities. These include: \$50,000.00 City of Alton Demolitions\$94,080.650 City of Granite City Demolitions\$10,000.00 Madison County Demolitions
	Target Date	9/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	CDBG funding will be utilized to demolish an estimated 14 structures over the 2024PY.
	Location Description	This activity will take place County wide with approximately 14 of the structures being demolished in Alton and Granite City.
	Planned Activities	Demolish of single-family structures that pose a health and safety risk to the general population.
5	Project Name	CDBG - Economic Development
	Target Area	Madison County
	Goals Supported	1.3 Commercial Rehab 3.1- Assist Businesses & Start Up Expansion
	Needs Addressed	Create Economic Opportunities
	Funding	CDBG: \$20,000
	Description	\$20,000.00 in CDBG funds will be utilized for economic development activities. These activities include \$15,000.00 in the City of Alton as Commercial Rehabilitation (Facade Improvement). \$5000.00 in CDBG funds will be utilized for economic development activities in Madison County.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	CDBG funds are made available for facade improvement on up to 3 commercial/industrial properties in the City of Alton.
	Location Description	This activity will take place City wide.
	Planned Activities	3 Facade improvement for commercial/industrial property.
6	Project Name	CDBG - Administration
	Target Area	Madison County
	Goals Supported	5.1- Administration

	Needs Addressed	Create a Suitable Living Environment Provide Decent Affordable Housing Create Economic Opportunities
	Funding	CDBG: \$559,587
	Description	\$559,586.60 in CDBG funds will be utilized for the general administration of the City of Alton, City of Granite City, and Madison County CDBG program.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	32,218 families or individuals will benefit from these activities.
	Location Description	Oversight and administration for county wide CDBG activities.
	Planned Activities	Oversight and administration of the HUD funded programs.
7	Project Name	CDBG - Repayment of Section 108 Loans
	Target Area	Madison County
	Goals Supported	5.1- Administration
	Needs Addressed	Create a Suitable Living Environment
	Funding	CDBG: \$330,000
	Description	\$330,000.00 in CDBG funds will be utilized to repay a Section 108 loan for the City of Alton.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Repayment of a section 108 loan for improvements at Gordon Moore Park in the City of Alton.
	Location Description	Gordon Moore Park in the City of Alton.
	Planned Activities	The city of Alton will be construction a facility in Gordon Moore Park to provide concessions, locker and restrooms.

8	Project Name	HOME - Administration
	Target Area	Madison County
	Goals Supported	5.1- Administration
	Needs Addressed	Create a Suitable Living Environment Provide Decent Affordable Housing Create Economic Opportunities
	Funding	HOME: \$80,615
	Description	HOME funds will be utilized for salaries, benefits, and other administrative activities cover under the HOME program.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Administration of the HOME program covers activities throughout Madison County.
	Planned Activities	Administration of HOME program activities.
9	Project Name	HOME - CHDO Set Aside
	Target Area	Madison County
	Goals Supported	2.5- CHDO Set Aside & Pre-Development
	Needs Addressed	Create a Suitable Living Environment Provide Decent Affordable Housing Create Economic Opportunities
	Funding	HOME: \$120,922
	Description	These funds will be used for eligible affordable housing projects developed by a certified Community Housing Development Organization. Funding may be used for rental housing or owner-occupied housing projects. Assisted projects will be subject to affordability period restrictions in accordance with HOME Program regulations. Funding will be provided for approved housing projects countywide.

	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	CHDO funds are utilized in affordable housing development by the organization. This activity occurs throughout Madison County.
	Planned Activities	These funds will be used for eligible affordable housing projects developed by a certified Community Housing Development Organization. Funding may be used for rental housing or owner-occupied housing projects. Assisted projects will be subject to affordability period restrictions in accordance with HOME Program regulations. Funding will be provided for approved housing projects countywide.
10	Project Name	HOME - HOMEbuyer Assistance
	Target Area	Madison County
	Goals Supported	2.4- HOMEbuyer Assistance (DPA)
	Needs Addressed	Provide Decent Affordable Housing
	Funding	HOME: \$54,611
	Description	These funds will be used for down payment and closing cost assistance for low-income households purchasing single family, owner-occupied homes. Assisted projects will be subject to affordability period restrictions in accordance with HOME Program regulations. The funds will be available to all qualified low-income families purchasing in Madison County.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Madison County estimates that four (4) households will benefit from this activity.

	Location Description	The HOMEbuyer program is a County wide program.
	Planned Activities	These funds will be used for down payment and closing cost assistance for low-income households purchasing single family, owner-occupied homes. Assisted projects will be subject to affordability period restrictions in accordance with HOME Program regulations. The funds will be available to all qualified low-income families purchasing in Madison County.
11	Project Name	HOME - Rental Housing Development
	Target Area	Madison County
	Goals Supported	2.1- Rental Development
	Needs Addressed	Create a Suitable Living Environment Provide Decent Affordable Housing Create Economic Opportunities
	Funding	HOME: \$725,000
	Description	These funds will be used for new construction of affordable rental housing units. The purpose of the program is to create decent safe affordable housing for low-income families. Assisted projects will be subject to affordability period restrictions in accordance with HOME Program regulations. Funding will be provided for approved housing projects countywide. These funds will be used to rehabilitate existing rental housing units. Assisted projects will be subject to affordability period restrictions in accordance with HOME Program regulations. Funding will be available but limited to approved rental housing developments for identified special needs populations, county wide.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	

	Location Description	County wide
	Planned Activities	<p>These funds will be used for new construction of affordable rental housing units. The purpose of the program is to create decent safe affordable housing for low-income families. Assisted projects will be subject to affordability period restrictions in accordance with HOME Program regulations. Funding will be provided for approved housing projects countywide.</p> <p>These funds will be used to rehabilitate existing rental housing units. Assisted projects will be subject to affordability period restrictions in accordance with HOME Program regulations. Funding will be available but limited to approved rental housing developments for identified special needs populations, county wide.</p>

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Madison County's 2020 (US Census Data) population was 265,859. The number of housing units in the county for 2020 was 118,579. Median household income for the county was \$66,996. The 2018 (small area income and poverty estimates) data reflects that 12.2% of the county's population lives below the poverty level.

The population is 81.4% white, about 9.3% African American, .10% Asian/Pacific Islander, .3 American Indian and Alaska Native and 6.3% are two or more races. 4% are Hispanic or Latino. The white population is dispersed throughout the county. The largest concentrations of minorities occur in the western part of the county.

Geographic Distribution

Target Area	Percentage of Funds
Hunterstown	0
Madison County	100

Table 7 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The CDBG activities are available countywide and are conducted on a first come first served basis. For HOME funds, efforts are made to ensure housing development projects occur in the western region of Madison County, including the metropolitan areas of Alton and Granite City, due to the population and low-income household density.

Discussion

It is the goal of MCCD to use the strategic planning process to come up with a better-defined way of allocating resources to different parts of the County. The hope is that our planning process can include a longer timeframe to strategize how best to use our funding to improve things county wide.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

After analyzing data in the Community Profile, and assessing our housing, homeless, community development, and economic development needs, Madison County has established three basic objectives for the 2020-2024 Consolidated Plan:

- to create a suitable living environment,
- to provide decent affordable housing, and
- to create economic opportunities

One Year Goals for the Number of Households to be Supported	
Homeless	30
Non-Homeless	30
Special-Needs	12
Total	72

Table 8 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	10
The Production of New Units	10
Rehab of Existing Units	2
Acquisition of Existing Units	72
Total	94

Table 9 - One Year Goals for Affordable Housing by Support Type

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

Public housing was established to provide decent and safe rental housing for eligible low- and moderate-income families, the elderly, and persons with disabilities. Public housing includes federally subsidized affordable housing that is owned and operated by the public housing authorities. Madison County is served by the Madison County Housing Authority, Granite City Housing Authority, and Alton Housing Authority.

The housing authorities (Madison County, Alton, and Granite City) strive to:

- * Provide safe, decent, and sanitary housing.
- * Consider the needs of its clients in program development and operation.
- * Encourage clients toward independence and self-sufficiency.
- * Develop programs that are fiscally responsible.
- * Provide opportunities for staff development.

Actions planned during the next year to address the needs to public housing

Alton Housing Authority (AHA):

Alton Housing is always working to make improvements to our existing housing, including upgrades and renovations wherever feasible. We are still working with developers to utilize the HUD RAD (Rental Assistance Demonstration) Program to update our housing stock. In addition to this, we are promoting self-sufficiency among our current public housing tenants. AHA takes pride in getting our residents involved in their community and we look forward to continuing to work with our maintenance department, the local police, and other local agencies to improve the quality of life for our tenants.

Madison County Housing Authority (MCHA):

Future projects include the acquisition and possible rehabilitation of affordable housing projects at various locations in Madison County including but not limited to the following cities: Wood River, Granite City, Alton, and Madison.

MCHA will continue to develop and implement strategies to improve the quality of units under the voucher program. This includes enforcement of NSPIRE inspection

standards, outreach to new landlords with higher quality rental units, and encouraging residents to seek out high-quality rental units in all areas of Madison County.

Granite City Housing Authority:

The Granite City Housing Authority has installed security cameras at Oaktree Villas. Security cameras for Anchorage Homes will be underway soon. To also make residents feel even safer, we will be trimming and taking down trees in the Anchorage Homes neighborhoods. Roofing work throughout the Authority will begin this summer along with sewer work at Anchorage Homes.

Granite City Housing Authority will redevelop the remaining land of the former Kirkpatrick Homes in the future based on waiting list need. The site originally contained 451 units built in the 1940s and 1950s. All 451 units were demolished and 161 of the units have been replaced. GCHA has a prototype Passive House unit. These two Passive units are net-zero energy usage and will reduce the cost of utilities for the residents.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

Alton Housing Authority:

Although the pandemic has halted our ability to hold our usual meetings and seminars, AHA will continue to partner with many local organizations to hold various seminars for our residents. The subjects of these seminars include homeownership, improving your credit score, budgeting tips, and how to have a debt-free Christmas season. We believe classes like these are instrumental in getting our tenants the information they need to make a better transition out of public housing and into a home of their own.

Madison County Housing Authority:

MCHA has approximately 48 participants in the Family Self Sufficiency program. Our FSS Coordinator works diligently with FSS participants to assist them with family self-sufficiency goals.

MCHA offers self-sufficiency support for all of its residents. MCHA has partnered with various organizations to provide financial literacy workshops at its properties and job fairs in the community. MCHA is also working with Madison County Government and Training Department and is partnering with local community colleges, and local chamber of commerce sites to organize additional job fairs and job search workshops.

MCHA will continue to work with various agencies to provide or attract supportive services to promote resident self-sufficiency.

Granite City Housing Authority:

GCHA has hosted several credit counseling and home buying sessions to prepare residents for homeownership in the past. Events to better the quality of life for our residents included Cooking Classes, referrals to partner agencies for assistance with utility costs, and Partnership for Kids. Referrals to partner agencies for assistance with utility costs, and Partnership for Kids continues. Since COVID Cooking Classes have stopped, however, the Housing Authority continues looking into the ability to start them up again. All residents are members of the Resident Advisory Board and participate in the planning process of the Annual and Five-Year Plan.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Alton Housing Authority: We are in good standing with HUD, REAC, and any other inspecting agencies!

Madison County Housing Authority: Madison County Housing Authority is in Good Standing. MCHA is designated as a High Performer on its Public Housing Assessment Score Report and received a high-performance rating on its Section 8 Management Assessment Program certification.

Granite City Housing Authority:

Granite City Housing Authority is a "high performing" housing authority as published 2/09/2024.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

Homelessness is a particularly troublesome and complex issue that plagues communities across the nation. A major reason that homelessness is so difficult to combat is that it has many causes with overlapping and interrelated variables. The cause of any one person's homelessness often lies, not in a single factor, but in the convergence of multiple events and conditions. Homelessness is an economic problem - caused by unemployment, underemployment, foreclosure, or poverty. Homelessness is a health issue - as many homeless people struggle with one or more conditions such as mental health conditions, physical disability, chronic health issues, HIV, or addiction disorders. Homelessness is a social problem - with factors such as domestic violence, educational attainment, and/or race. Fighting homelessness requires a truly collaborative, community-based approach.

The Madison County Partnership to End Homelessness, the local Continuum of Care, promotes a community collaboration to alleviate the incidences of homelessness in Madison County. The Partnership is comprised of government entities, non-profits, faith-based groups, social service agencies, businesses, health care providers, mental health providers, housing advocates, community action agencies, institutions of higher education, legal advocates, foster care providers, veteran services, and law enforcement. This Partnership works towards the elimination of homelessness in Madison County, IL.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Partnership has implemented a Coordinated Entry System (CES) for homeless services. All members are aware of the CES availability and can assist and direct people to the appropriate place, based on the current needs presented.

The creation of a CES allows persons seeking assistance for a housing crisis to be assessed and prioritized based on the level of need and then referred to the most appropriate and available resource. The CES began operations in April 2017 and is operated by Madison County. The Partnership has the Quality Assurance Committee for

the review of the CES.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Partnership supports the operation of three shelters. One serving both single individuals and families, one serving women and children, and one shelter serving victims of domestic abuse. The shelters that are currently in operation are in the western part of the county. The shelter needs of the homeless population are always greater than the supply of emergency beds available. Madison County's 2024 Point in Time count revealed a 26% increase in the number of persons utilizing emergency shelter in the jurisdiction. The Partnership is focused on stabilizing households by emphasizing the following supportive services: case managers to work with clients to develop personalized plans that address their housing, employment, and healthcare needs. They assist individuals in connecting with job training and employment services designed to equip participants with the skills and resources needed to secure stable employment. Rapid re-housing, which provides short-term rental assistance and supportive services, is being utilized to quickly move individuals and families out of shelters and into permanent housing. These initiatives aim to effectively address the emergency shelter needs of the homeless population and shorten the length of time individuals experience homelessness.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The Partnership utilizes available mainstream resources, appropriate member services, and follow-up to assist in the transition and retention of permanent housing for persons experiencing and exiting homelessness. Members can access HMIS info to determine where persons who are in crisis have been so a reconnection to the original service can be facilitated. Individuals and families determined to be chronically homeless are directed to one of the two community mental health providers for a comprehensive assessment and housing plan. Families with children are served by a variety of providers including Catholic Charities, Urban League, Head start, Salvation Army, and Riverbend Family Ministries. Veterans and their families are referred to the local SSVF

program and the local Veterans Administration.

Unaccompanied youth are served by Brightpoint. Problem solving also occurs through the email list service so solutions can be achieved before the problem results another episode of homelessness.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The strategy involves a multi-pronged approach. Among the cooperating agencies are Chestnut Health Systems and Centerstone of Illinois. These agencies deal with mental health and/or substance use diagnoses. The Salvation Army Booth House and Land of Lincoln Legal Aid assist those returning from incarceration, and Caritas Family Solutions for those leaving the foster care system. The Madison County Employment and Training Department is an important resource for persons seeking employment related services. Lewis and Clark Community College and Southwestern Illinois College serve persons seeking GED opportunities and specialized educational programs to improve employment related skills. Brightpoint focuses on the homeless youth population and can provide case management.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Madison County receives Community Development Block Grant (CDBG) funds and as the recipient of federal dollars, MCCD is required to take steps to affirmatively further fair housing as part of the obligations assumed when accepting these funds. As part of these efforts, MCCD has updated its comprehensive Analysis of Impediments (AI) to affirmatively further fair housing.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The AFFH 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 (April) each year.
7. Organize and convene a Fair Housing Task Force to implement the recommendations in the AI through the strategic planning 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. 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.

11. Advocate to repeal crime-free rental housing ordinances in Collinsville, and Granite City.

12. Reform zoning ordinances to allow increased residential density in high opportunity areas throughout the county.

13. Collect data on accessibility of newly constructed housing units to ensure compliance with the Fair Housing Act.

14. Ensure fair housing and other housing resource materials are available in languages other than English.

15. Study and advocate for extension of Metrolink into Madison County.

Discussion:

Madison County is strongly committed to affirmatively further fair housing by striving to mitigate impediments to fair housing for disadvantaged communities, promoting equal housing opportunity, and providing and expanding the availability of adequate and affordable housing.

- The County will continue its efforts to develop and expand its relationships with private developers for the purpose of increasing the availability of affordable housing in high opportunity areas and will provide appropriate assistance in the form of grant funds, donated land, letters of support, and, when located in unincorporated areas of the County, zoning, and land use incentives to encourage such development. The County will work with its municipalities to obtain similar assistance for affordable housing development in high opportunity areas.
- The County will seek to provide funding to the Metropolitan St. Louis Equal Housing and Opportunity Council (EHOC) to expand its existing efforts to

investigate and eliminate illegal housing discrimination in the Metropolitan St. Louis area through testing and outreach efforts.

- The County will participate in discussions with residents, fair housing advocates, community leaders, landlords, and other stakeholders regarding the effectiveness and potential consequences of local crime-free ordinances with the long-term goal of bringing about the repeal of such ordinances.
- The County will utilize CDBG funds to increase the capacity for homeless service providers to meet the rise in demand for such services, particularly among persons with disabilities, and will continue discussions with service providers about adopting a Housing First model.
- The County will 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. The County will explore other opportunities for collaboration with disability rights advocates to ensure that all programs and developments within Madison County are accessible.
- The County will assist local housing authorities with efforts to increase transparency of their operations, including the development 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.

AP-85 Other Actions – 91.220(k)

Introduction:

MCCD CDBG and HOME staff will expand their outreach to stakeholders throughout the County in order to continue to gain knowledge, form partnerships, and increase networking opportunities to meet underserved needs and populations.

Actions planned to address obstacles to meeting underserved needs

See the attached Analysis of Impediments to Affirmatively Furthering Fair Housing in the appendices section.

Actions planned to foster and maintain affordable housing

Develop and expand relationships with the private sector to increase the supply of housing that is affordable. Potential options that the County can explore include:

- Reaching out to local major employers to develop forgivable grants for purchasing a home or constructing new rental housing.
- Conducting forums with private developers to identify the barriers to creating lower-cost for-sale and rental housing.
- Consider establishing programs in which developers can acquire land at below-market prices to reduce the cost of developing affordable housing.

Affordable housing development opportunities could be pursued through the County Tax Sale in ways that would sell land at below-market prices to developers of affordable housing.

Participate in meetings of local affordable housing advocates. Identify incentives to encourage the development of housing below market-rate levels. To mitigate the cost associated with developing housing, the County can provide incentives to developers.

Actions planned to reduce lead-based paint hazards

Madison County Community Development has fulfilled the requirements of the Toxic Substance Control Act, Section 402, and has received certification to conduct lead-based paint renovation, repair, and painting activities pursuant to 40 CFR Part 745.89.

Madison County's Weatherization crew members use lead safe work practices when the work being done warrants such practices. The Weatherization program assists income

eligible homeowners by installing energy saving measures in their homes.

Madison County is looking to expand the efforts of the Owner-Occupied Rehabilitation Program to begin tackling lead throughout the community. CDBG staff are looking at the possibility of applying for a Healthy Homes Grant from HUD.

Actions planned to reduce the number of poverty-level families

MCCD administers the following programs: Community Development Block Grant (CDBG), HOME Investment Partnership Program, Community Services Block Grant (CSBG), Low Income Home Energy Assistance Program (LIHEAP), and the Illinois Home Weatherization Assistance Program (IHWAP). These programs have enhanced the quality of life and diminished the conditions of poverty for many Madison County citizens. Through these programs MCCD provides services to low- and moderate-income residents of Madison County.

Actions planned to develop institutional structure

MCCD serves as the lead agency in the development of the Consolidated Plan and other community development strategies to improve the community. The City of Alton and City of Granite City are part HOME Consortium Agreement to work towards alleviating housing problems in the County.

Actions planned to enhance coordination between public and private housing and social service agencies

MCCD will continue in their leadership role with the Continuum of Care (Madison County's Partnership to End Homelessness). MCCD participates in the St. Louis Area Regional Commission on Homelessness.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

- 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed 0
- 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. 0
- 3. The amount of surplus funds from urban renewal settlements 0
- 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan 0
- 5. The amount of income from float-funded activities 0
- Total Program Income: 0**

Other CDBG Requirements

- 1. The amount of urgent need activities 0
- 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. 70.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

- 1. A description of other forms of investment being used beyond those identified in

Section 92.205 is as follows:

Many of the HOME funded activities rely heavily on Low-Income Housing Tax Credit (LIHTC), partnership with IL Housing Development Authorities (IHDA) HOME funds and/ or Housing Trust Funds (HTF), DCEO grants, Federal Home Loan Bank funds as well as private investment and financing.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

See Attached Resale/ Recapture Agreement policy

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds. See 24 CFR 92.254(a)(4) are as follows:

See Attached Resale/ Recapture Agreement policy

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Madison County does not plan on using HOME funds to provide refinancing assistance.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

Madison County does not currently have a TBRA program.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR

92.209(c)(2)(ii) and 91.220(l)(2)(vii).

Madison County does not currently have a TBRA program.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

No preferences currently.

Certifications & Resolution

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

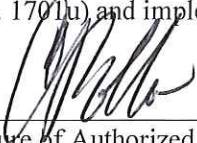
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.



Signature of Authorized Official

8/12/2024
Date

Administrator
Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2022, 2023, 2024 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

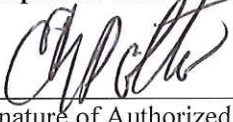
Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.



Signature of Authorized Official

8/12/2024

Date

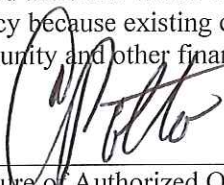
Administrator

Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.



Signature of Authorized Official

8/12/2024

Date

Administrator

Title

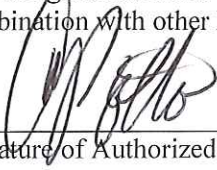
Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



Signature of Authorized Official

8/12/2024

Date

Administrator

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.



MADISON COUNTY CLERK'S OFFICE

Linda A. Andreas, County Clerk/Recorder

P. O. BOX 218 – 157 N. MAIN STREET STE 109

EDWARDSVILLE, IL 62025

PHONE (618) 692-6290 FAX (618) 692-8903

COUNTY VOTERS

REGISTRATION OFFICER

CLERK OF COUNTY BOARD

MEMO

DATE: July 18, 2024

TO: Community Development

FROM: Linda Andreas
County Clerk

RE: Madison County Board Meeting

Enclosed please find certified copies of Resolutions and/or Ordinances, which were adopted by the Madison County Board at its meeting on July 17, 2024 as follows:

1. Resolution Approving the Wieland Rolled Products North America, LLC Community Advisory Board Member Agreement
2. Resolution Making Appointment to Wieland Community Advisory Board
3. Resolution Authorizing the Submission of the 2025 Emergency Solutions Grant Application for the County of Madison, Illinois
4. First Amended Resolution Authorizing HOME Funding for Stevens Apartments, LP, Madison County Housing Authority, Stevens Apartments Rental Redevelopment
5. Resolution Authorizing the Submission of the FY 2024 Community Development Action Plan
6. Resolution Authorizing Approval of a Contract to Provide Training Services for the Madison County Employment and Training Department – Kaskaskia Community College – 10 Students
7. Resolution Authorizing Approval of a Contract to Provide Training Services for the Madison County Employment and Training Department – Kaskaskia Community College – 30 Students
8. Resolution Authorizing Approval of a Contract to Provide Training Services for the Madison County Employment and Training Department – SIUE – 10 Students

LAA/nds

Enclosure

**A RESOLUTION AUTHORIZING THE SUBMISSION OF
THE FY 2024 COMMUNITY DEVELOPMENT ACTION PLAN**

WHEREAS, the Community Development Department is responsible for the application of grant funding from the U.S. Department of Housing and Urban Development office of Community Planning and Development for the receipt of the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) programs;

WHEREAS, it is necessary to submit an Annual Action Plan to HUD for the receipt of the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) program funds;

WHEREAS, the Community Development Department has been allocated by HUD \$2,797,933.00 in Community Development Block Grant (CDBG) and \$806,148.00 in HOME Investment Partnership (HOME) program funds;

WHEREAS, the CDBG and HOME National Objectives are to benefit low to moderate income persons, the prevention or elimination of slums and blight, and to meet urgent needs;

WHEREAS, the County of Madison, Illinois has designated the Community Development Department to administer these grants and to prepare the Annual Action Plan and associated documents;

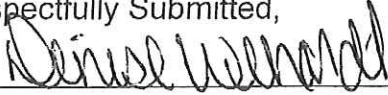
WHEREAS, the Community Development Department will adhere to and enforce all Federal Regulations and Certifications for the CDBG and HOME programs; and

WHEREAS, the County of Madison, Illinois has designated the Community Development Department to administer these grants and to prepare the Consolidated Plan, Annual Action Plan, grant agreements, Consolidated Annual Performance Evaluation Report (CAPER), and all other related documentation as required by the Department of Housing and Urban Development.

NOW, THEREFORE, BE IT RESOLVED that the County Board of the County of Madison, Illinois, hereby authorizes the filing of the FY 2024 Action Plan for the CDBG and HOME programs with the Department of Housing and Urban Development; and

BE IT FURTHER RESOLVED that the County Board hereby directs and designates the Madison County Community Development Administrator to act as the County's authorized representative in connection with the Consolidated Plan, Annual Action Plan, grant agreements, CAPER and all other related documentation as required by the Department of Housing and Urban Development.

Respectfully Submitted,



Denise Wiehardt, Chair
Grants Committee Certification of Votes

Grants Committee July 2, 2024

Denise Wiehardt	<input checked="" type="checkbox"/> AYES	<input checked="" type="checkbox"/> NAYS	<input type="checkbox"/> ABSTAIN	<input type="checkbox"/> ABSENT
Valerie Doucleff	<input checked="" type="checkbox"/> AYES	<input checked="" type="checkbox"/> NAYS	<input type="checkbox"/> ABSTAIN	<input type="checkbox"/> ABSENT
Stacey Pace	<input checked="" type="checkbox"/> AYES	<input checked="" type="checkbox"/> NAYS	<input type="checkbox"/> ABSTAIN	<input type="checkbox"/> ABSENT
Shawndell Wilson	<input checked="" type="checkbox"/> AYES	<input checked="" type="checkbox"/> NAYS	<input type="checkbox"/> ABSTAIN	<input type="checkbox"/> ABSENT
Bill Stoutenborough	<input checked="" type="checkbox"/> AYES	<input checked="" type="checkbox"/> NAYS	<input type="checkbox"/> ABSTAIN	<input type="checkbox"/> ABSENT
Victor Valentine	<input checked="" type="checkbox"/> AYES	<input checked="" type="checkbox"/> NAYS	<input type="checkbox"/> ABSTAIN	<input type="checkbox"/> ABSENT
Frank Dickerson	<input checked="" type="checkbox"/> AYES	<input checked="" type="checkbox"/> NAYS	<input type="checkbox"/> ABSTAIN	<input type="checkbox"/> ABSENT

GRANTS COMMITTEE July 2, 2024
COUNTY BOARD July 17, 2023

FY 2024 CDBG Budget	
FY 2024 CDBG Allocation	\$2,797,933.00
Program Income	\$ 25,000.00
Total	\$2,822,933.00
City of Alton	
Section 108 Loan Repayment	\$330,000.00
Demolition	\$ 50,000.00
Code Enforcement	\$126,174.40
Housing Rehabilitation	\$ 50,000.00
Housing Services	\$ 15,000.00
Commercial Rehabilitation	\$ 15,000.00
Summer Youth	\$ 30,000.00
Homeownership Assistance	\$ 45,000.00
Total	\$661,174.40
City of Granite City	
Infrastructure Improvements	\$180,000.00
Demolitions	\$ 94,080.65
Fire Truck loan repayment	\$ 77,381.60
Public Safety Services (Dispatcher)	\$ 42,357.00
Summer Youth	\$ 39,077.55
Housing Rehabilitation	\$100,000.00
Housing Rehabilitation Administration	\$ 10,000.00
Total	\$542,896.80
Competitive Funding Round	
City of Collinsville	\$100,000.00
City of Madison	\$100,000.00
Village of Roxana	\$100,000.00
City of Troy	\$100,000.00
City of Wood River	\$100,000.00
Total	\$500,000.00
Madison County Accounts	
Demolitions	\$ 10,000.00
Ramp Program	\$ 13,000.00
Ramp Program Admin	\$ 2,000.00
Economic Development	\$ 5,000.00
Housing Rehabilitation	\$219,275.20
Weatherization	\$ 80,000.00
Housing Services	\$ 65,000.00
Homeless Services	\$140,000.00
Total	\$534,275.20
Administration	\$559,586.60
Program Income	\$ 25,000.00
Total CDBG Budget	\$2,822,933.00

FY 2024 HOME Budget		
2024 HOME Allocation	\$806,148.00	
Program Income	\$175,000.00	
Total	\$981,148.00	
Admin (10% of Allocation)	\$ 80,614.80	
CHDO Set Aside (15% of Allocation)	\$120,922.20	
HOMEbuyer	\$ 54,611.00	
Rental Housing Development	\$725,000.00	(Program Income \$175,000.00)
Total	\$981,148.00	

2024 CDBG Competitive Projects Scoring Summary

Score	Applicant	Last Funded Amount	Project	\$ Requested	Project Cost	National Objective	Matrix Code
50	City of Wood River	2022 - \$100,000.00	Water Line Improvement	\$ 100,000.00	\$ 200,000.00	LMA	03J
50	Village of Roxana	N/A	Street Improvement	\$ 100,000.00	\$ 160,233.75	LMA	03K
45	City of Madison	2023 - \$100,000.00	Street Improvement	\$ 100,000.00	\$ 246,266.00	LMA	03K
44	City of Troy	2022 - \$100,000.00	Street Improvement	\$ 100,000.00	\$ 139,950.00	LMA	03K
43	City of Collinsville	2022 - \$100,000.00	Sewer Lining	\$ 100,000.00	\$ 160,000.00	LMA	03J
37	City of Venice	2023 - \$100,000.00	Sewer Lining	\$ 100,000.00	\$ 160,000.00	LMA	03J
31	Village of Livingston	2021 - \$100,000.00	Sewer and Culvert Improvements	\$ 100,000.00	\$ 122,500.00	LMA	03J
				\$ 700,000.00	\$ 1,188,949.75		

Recommended for funding

STATE OF ILLINOIS)
 SS
COUNTY OF MADISON)

I, Linda A. Andreas, County Clerk in and for said County, in the State aforesaid, and keeper of the records and files thereof, as provided by statute, do hereby certify the foregoing to be a true, perfect and complete copy of a resolution and/or ordinance adopted by the County Board of Madison County, at its regular meeting held at Edwardsville, July 17, 2024.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said County at my office in Edwardsville, in said County, this 18th day of July 2024.



Linda A. Andreas

County Clerk and Clerk of the
Madison County Board

Unique Appendices

Table of Contents

- Document Cover Letter
- Public Meeting Certificate of Publication
- Publication
- HOME Resale Recapture Guidelines
- Madison County Analysis of Impediments to Fair Housing Choice



Madison County Government
Community Development Department
157 N. Main St., Suite 312
Edwardsville, IL 62025-1636
Phone (618) 692-8940 Fax (618) 692-7022

Kurt Prenzler, CPA
County Board Chairman

August 13, 2024

Mr. Donald Kathan, Director
Community Planning and Development
U.S. Department of Housing and Urban Development
77 West Jackson Boulevard, Room 2400
Chicago, IL 60604-3507

ATTN: Ariana Tarifa

Re: 2024 Madison County, IL Annual Action Plan

Dear Mr. Kathan:

This letter hereby transmits to you the Madison County Annual Action Plan for the Program Year 2024.

Please feel free to contact Chris Kalter of the Community Development Department at 618-296-4955 if you or your staff has any questions during your review of this document.

Thank you for your cooperation and assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "C.P. Otto".

Christopher P. Otto
Administrator

Attachments

Publication Certification and Newspaper Ad

CERTIFICATE OF PUBLICATION

STATE OF ILLINOIS

MADISON COUNTY } ss

Madison County Community Development

EDWARDSVILLE PUBLISHING Co., Inc., a corporation, does

hereby certify that it is the publisher of the Edwardsville Intelligencer, a daily secular newspaper of general circulation in said County, printed and published in the City of Edwardsville, in said County and State, and that said newspaper is a newspaper as defined in "An Act to revise the law in relation to notices," approved February 13, 1874, as amended, and that the printed notice hereto annexed and hereby made a part of this certificate has been published in said newspaper at least once each week for

1 time in each and every copy and impression thereof; that the

date of the first newspaper containing said publication was

2/15/2024, and that the date of the last newspaper

containing said publications was 2/15/2024; and that **Angela Hasamear** by resolution of the Board of Directors of said Edwardsville Intelligencer, Inc., has been authorized to make this certificate.

IN TESTIMONY WHEREOF said Edwardsville Intelligencer., Inc.,

has caused this certificate to be executed in its name by said

Angela Hasamear this 15th day of February 2024

Publication Fee, \$ 389.42

EDWARDSVILLE INTELLIGENCER, INC.

By: Angela Hasamear

Angela Hasamear
Edwardsville Intelligencer

RECEIVED

MAR 01 2024

BY: _____

24-0163I

**Notice of Public Meeting on
FY 2024 Annual Action Plan Community Needs**

Madison County Community Development is in the process of preparing its Annual Action Plan for Program Year 2024. This plan is for its Community Development Block Grant (CDBG) and HOME Programs.

The geographic area we serve includes all of Madison County. In Program Year 2024, we expect to receive approximately \$2,837,101.00 for the CDBG program, and \$995,499.00 for the HOME program.

Federal regulations require the County to spend these funds with the objectives of benefiting low-moderate income persons; aiding in the prevention or elimination of slums and blight; and meeting other community development needs posing serious and immediate threats to the health and welfare of the community. The goals of the programs must be to provide decent housing, establish and maintain stable living environments, and expand economic opportunities. The County is in the process of determining the needs to be addressed in the Program Year 2024 Annual Action Plan. Examples of needs which have been addressed in our previous 2023 Annual Action Plan are: improving public infrastructure; conserving and expanding the County's housing stock; and strengthening economic development.

We are interested in your comments as we determine the needs of low and low-moderate income persons, set annual goals, and plan how to best meet these goals with the funds available. Help us to serve you and your community better.

Madison County Community Development, in compliance with the State of Illinois, will host live public meetings on the dates, and at the locations below. Any coordination for meeting accommodations should be made 72 hours in advance. Anyone requiring coordination for publication accommodations should please contact Chris Kalter at (618) 296-4955 (ckalter@madison-countyil.gov) to arrange for accommodations and document accommodations to either meeting. *Auxiliary aids and services are available upon request.*

Please attend one of our **PUBLIC MEETINGS** on the FY 2024 Community Needs Assessment on the following dates:

Tuesday, March 5, 2024, at 4:00 PM Madison County Grants Committee
Madison County Administration Building 157 North Main Street, Room #203
Edwardsville, IL 62025

Thursday, March 21, 2024, at 9:30 AM Madison County Continuum of Care
Madison County Administration Building 157 North Main Street, Room #309
Edwardsville, IL 62025-1965

All are welcome to participate! If you cannot make it to these meetings, please submit comments in writing to:

Chris Kalter
Madison County Community Development
157 North Main Street, Suite #312
Edwardsville, IL 62025-1965

Our public comment period on the Annual Action Plan Community Needs Assessment is Tuesday, March 5, 2024 – March 29, 2024. Comments for either of the meetings may be submitted to ckalter@madisoncountyil.gov .

Christopher P. Otto, Administrator
Madison County Community Development

CERTIFICATE OF PUBLICATION

STATE OF ILLINOIS

MADISON COUNTY } ss

Madison County Community Development

EDWARDSVILLE PUBLISHING Co., Inc., a corporation, does

hereby certify that it is the publisher of the Edwardsville Intelligencer, a daily secular newspaper of general circulation in said County, printed and published in the City of Edwardsville, in said County and State, and that said newspaper is a newspaper as defined in "An Act to revise the law in relation to notices," approved February 13, 1874, as amended, and that the printed notice hereto annexed and hereby made a part of this certificate has been published in said newspaper at least once each week for

Item in each and every copy and impression thereof; that the date of the first newspaper containing said publication was

6/14/2024, and that the date of the last newspaper containing said publications was 6/14/2024; and that **Angela Hasamear** by resolution of the Board of Directors of said Edwardsville Intelligencer, Inc., has been authorized to make this certificate.

IN TESTIMONY WHEREOF said Edwardsville Intelligencer., Inc.,

has caused this certificate to be executed in its name by said

Angela Hasamear this 14th day of June 2024

Publication Fee, \$ 557.91

EDWARDSVILLE INTELLIGENCER, INC.

By: Angela Hasamear

Angela Hasamear
Edwardsville Intelligencer

RECEIVED

JUL 01 2024

24-0502I

**Notice of Public Meetings on the
Madison County FY 2024 DRAFT Action Plan**

Madison County Community Development (MCCD) is preparing to submit its FY 2024 Annual Action Plan to the U.S. Department of Housing and Urban Development for the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) programs. MCCD will be holding public meetings and answering questions regarding the FY 2024 Annual Action Plan it plans to submit to HUD.

Please come to one of our PUBLIC MEETINGS at the following places. All are welcome to attend:

Tuesday, July 2, 2024, at 4:00PM

Madison County Administration Building, Grants Committee Meeting
157 N. Main St., Rm. 203 (County Board Chambers), Edwardsville, IL 62025

Tuesday, July 9, 2024, at 6:00PM

Alton Square Mall Library
132 Alton Square, Community Room, Alton, IL 62002

Wednesday, July 10, 2024, at 6:00PM

Tri Township Library – Troy Library
209 South Main St., Community Room, Troy, IL 62294

Monday, July 15, 2024, at 6:00PM

Edwardsville Public Library
112 South Kansas St., Community Room, Edwardsville, IL 62025

Tuesday, July 16, 2024, at 6:00PM

Six Mile Regional Library District – Granite City Library
2001 Delmar Ave, Community Room, Granite City, IL 62040

Thursday, July 18, 2024, at 9:30AM

Madison County Administration Building, Continuum of Care Meeting
157 N. Main St., Rm. 309, Edwardsville, IL 62025

A copy of the FY 2024 DRAFT Annual Action Plan can be found at http://www.co.madison.il.us/departments/community_development/publications.php starting on July 2, 2024.

We are interested in your input regarding the FY 2024 DRAFT Annual Action Plan.

The Annual Action Plans are the one-year strategies to identify and describe the County's needs, priorities, specific objectives, and strategies to achieve the following goals: provide decent housing; a suitable living environment; and expand economic opportunities, principally for low and low-moderate income residents of Madison County. If you cannot attend one of these meetings, please submit your comments in writing by August 9, 2024, to:

Chris Kalter
Madison County Community Development
157 N. Main St., Ste. 312
Edwardsville, IL 62025
618-296-4955
cjkalter@madisoncountyl.gov

DRAFT Action Plan Public Comment Period: July 2, 2024- August 9, 2024.

Madison County Community Development will make the Final FY 2024 Annual Action Plan available for public review at the sites listed below on or around August 15, 2024:

- Edwardsville Public Library at 112 Kansas St., Edwardsville, IL 62025;
- Highland Public Library at 1001 9th St., Highland, IL 62249;
- Six Mile Regional Library at 2001 Delmar Ave., Granite City, IL 62040;
- Hayner Library at 326 Belle St., Alton, IL 62002;
- Madison County Community Development at 157 North Main St., Ste. 312, Edwardsville, IL 62025; and

http://www.co.madison.il.us/departments/community_development/publications.php

Coordination for meeting accommodations should be made 72 hours in advance. Anyone who needs meeting or publication accommodations should please contact Chris Kalter at 618-296-4955 or cjkalter@madisoncountyl.gov.

Nuestros sitios de reuniones públicas son totalmente accesibles. La coordinación para el alojamiento de las reuniones, incluyendo los materiales en español, debe hacerse con 72 horas de anticipación. Cualquier persona que necesite alojamiento para reuniones o publicaciones en español debe comunicarse con Briseida Barrios al 618-296-4201 o bibarríos@madisoncountyl.gov.

Christopher P. Otto, Administrator
Madison County Community Development
24-05821 6/14

Public Comment

Alton Library Meeting – Tuesday, July 9, 2024 @ 6PM

Chris Dreith - Resident

Personally, I would like to see a larger proportion of the funds used for housing services and the homeless and less on loan repayment for Gordon Moore improvements.

Peter Hough - Resident

Thanks, Chris!

Appreciate how you all led us last night. Here are big-picture takeaways from my perspective, for what they're worth. I offer them in the hope it can get us talking and moving in the right direction.

Summary: It's hard to see how we are going to address poverty with our current spending habits. We need to prioritize activities that will have a direct, measurable, and particular impact on our poverty rate.

- 1. The Question I am Asking - How does this activity benefit low income neighbors?** This is the lens I'm using when I look at the CDBG budget because I believe that's the primary and unique purpose of this money. From that angle, it looks like other questions have taken priority. Questions like: How do we solve the budget deficit? Given that we want to do X project, where can we get the money for it? Can we use this money to cover basic municipal functions so we can lower or at least not raise taxes? We need to identify those questions we're asking and then name the values behind them. Only then can we ensure that our spending reflects our values and goals.
- 2. Impactful v. Allowable Activities** - Just because we're allowed to spend the money this way doesn't mean it's creating an impact. I worry that we get so lost in the weeds of what the policies allow that we lose sight of what our priorities require. Or according to the wisdom of Jeff Goldblum: "You were so preoccupied with whether or not you could, you never stopped to think if you should." Or from an older source, "**Not everything that is permissible is beneficial.**" Permissible is the floor, an important filter for which ideas get in the room at all. Impactful is the ceiling. We need to aim higher.
- 3. A New Scorecard** - We need a better way to evaluate our options. It's not that infrastructure spending is evil or that we should never use this money for code enforcement. But we've been spending the money this way for years, so we should be able to see if it's making any impact. Alton has a poverty rate that's over twice the national average and CDBG funding is intended to benefit those residents in and closest to poverty. **Our long term metric should be lowering the poverty rate.** Otherwise at best we're just treading water and making poverty slightly more bearable. At worst we're masking the problem while we wait for poor people to leave and rich people to come. How do we determine which activities will lower the poverty rate? How do we make our priorities measurable?

4. **Particular v. General Focus – We'll have the fastest and most powerful impact on the poverty rate by focusing on our neighbors who are in poverty.** If 25% of a town were suffering from malnutrition and you had a modest amount of food to give out, you wouldn't send 100% of households a smaller box of food. At least, not if you wanted to solve malnutrition as quickly as possible. And perhaps only if you subscribed to the most rigid definition of fairness. It's similar with our CDBG money. We have a tool to address poverty and we dilute its effectiveness by applying it to community progress generally and not targeting the causes and costs of poverty in particular.

5. **Direct v. Indirect Impact** - Most of our current spending has, at best, an indirect impact on residents experiencing poverty. For example, \$330,000 for concessions stand and locker rooms at Gordon Moore Park is a direct benefit to those who use the park (provided you have money for concessions, I suppose). But by and large what I've heard over the years is that Gordon Moore isn't accessible to low-income residents. So, the benefit to low-income residents is what, exactly? That the park increases civic pride and eventually generates enough revenue that we can take a little less CDBG money to cover code enforcement each year? That sounds like withholding a hundred dollars now so that maybe in a few years we can give you a couple bucks. There are a lot of good things that come from developing Gordon Moore, I just wouldn't prioritize it this highly. We're never going to move the needle on poverty if we continue to focus on it only indirectly or as an afterthought. Find where the causes and costs of poverty are greatest and aim there, directly.

On a more detailed note, there are 3 sections in the 2024 draft that, at least when I tried, don't match up. May just mean this is a draft, or I may not understand the intricacies. But for CDBG the total expected amount available on p. 54 is \$2,822,933. When I add the CDBG lines in the table on pp. 57-59 it totals \$2,971,561. Adding the projects from pp. 66-73 totals \$2,769,852 (although there is \$5,000 in commercial rehab unaccounted for). Similarly, the HOME totals are \$906,148 on p. 55, \$1,164,059 for pp. 57-59, and \$980,698 for pp. 70-73.

That's all for now. Thanks for helping to improve community engagement!

-p

314-737-6548

Denise Callahan - resident

Chris,

Thanks for the information that you and Greg Caffey provided on the Community Development Block Grants at the Hayner Library on July 9, 2024, and thank you for the

opportunity to provide feedback. Sounds like you've captured most of the concerns I heard last night. Just to reiterate my two primary concerns:

1. Lack of transparency into the planning process

Feedback needs to be solicited earlier in the process and opportunities to provide feedback need to be communicated multiple times, in several mediums to the community. If feedback was solicited earlier in the year, I was unaware of it. Greg Caffey said that he planned to submit a resolution to the Alton city council for approval of CDBG funding after this public comment session, however, that would mean the Madison County Board would vote on the spending before the Alton City Council got an opportunity to even see the planned spending.

Also, as discussed in the meeting, there needs to be a description of each line item in the City of Alton plan that indicates what the money for that line item will be spent on (e.g. Code Enforcement is for salaries for city personnel, Demolition - number of houses planned for demolition, Summer Youth - which programs, number of youth impacted, etc.)

2. Current priorities for City of Alton spending may not provide a significant impact on low-to-moderate income families as per the intention of the CDBG program.

A big focus of CDBG is providing livable housing for low-to-moderate income families. In my opinion, the planned \$3.9M in improvements to Gordon Moore park will not have a significant direct impact on low-to-moderate income families. Per Greg Caffey, these improvements will include new concession stands and locker rooms for Lloyd Hopkins field. How will that benefit low-to-moderate income families of Alton? The section 108 loan repayment will take 50% of the CDBG funds, not just for the next fiscal year but for many years to come.

Also, while the Code Enforcement function is vital, covering the salaries of code inspectors with CDBG funds doesn't help the person whose roof is leaking. Only \$110,000 of the original \$826,468 allocation for Alton falls into the 'Housing' category and is available to fund the true intention of the CDBG funds - helping provide livable housing for low-to-moderate income families. In my opinion, a higher percentage of the funds should be shifted into housing rehabilitation to halt the rate of demolitions in Alton, which will help keep properties on the tax rolls, improving the financial viability of the City of Alton long-term.

Thanks,

Denise Callahan - City of Alton, Ward 1 resident

Troy Library Wednesday, July 10, 2024 @ 6PM

Stacey Lipe - Resident

Hi Chris,

Thanks for hosting the meeting tonight in Troy. It was very informative. My biggest suggestion is how do we inform stakeholders of all of the "opportunities" Madison County has to offer.

I think Rob Werden is your first stop in terms of "getting the most bang for your buck". He could host a meeting for all of the school districts in the county. Principals, nurses and social workers could be invited. Along those same lines, he hosts an Institute Day for the teachers in the county. You could be one of the breakout sessions. Teachers and other staff would come to your session to find out what the county has to offer in terms of helping families get back on their feet.

I wonder if administrative costs could be allocated to try to steam line all of the agencies resources. Seems like with technology, an application could be created where everything was in one place, and then for the sections of the application that were filled out, each agency would receive a notice of some kind.

Thanks for all you do for our community!

Stacey Lipe

Edwardsville Library Meeting – Monday, July 15, 2024 @ 6PM

Diana Sussman - Edwardsville Library/resident

Spend more on housing and homelessness, less on things like concession stands, street improvements, fire trucks. There are other funding sources for Public Works.

CDBG funds should be used for the above types of services only in low-income neighborhoods, not in middle-high income neighborhoods within mid-low-income communities.

A lot of money targeted at a few things makes a bigger impact than a little money spread out over several projects.

We need permanent assisted living housing for chronically homeless adults who are not employable and not able to live independently due to mental health issues, brain injury, etc. which sometimes intersects with substance use disorders.

Fawn Petite - Land of Lincoln/resident

The first item I need to share with you is the updated agency name I mentioned in person. On pages 80 and 81, there are references to Children's Home + Aid. In the past year or so, the name has changed to Brightpoint.

Secondly, I want to use this opportunity to summarize my comments on the proposed use of CDBG funds in Madison County. Given my past experience as the grant administrator for an agency that was a CDBG sub-recipient, I have some familiarity with the purpose and intended uses of CDBG funds from the federal to local governments. This agency was in another region of the country, and after several moves, I now call

Madison County my home, where I am raising my family. Further, I am now the Client Support Services Manager of Land of Lincoln Legal Aid, which is the role I was in when attending the public meeting held on July 15, 2024, at the Edwardsville Public Library.

In preparation for that meeting, I reviewed the FY 2024 Draft Annual Action Plan, including the planned use of CDBG funds in Madison County for 2024. I found Madison County's stated priorities in narrative of the Plan (i.e., "poverty alleviation", "goal of preventing homelessness altogether", "stabilizing households by emphasizing . . . supportive services", etc.) to be aligned with the purpose of HUD's distribution of CDBG funds, which are discussed in the Plan's Executive Summary. The Plan also acknowledges the 26 percent increase in the homeless population from 2023 to 2024 in Madison County, which further supports the stated purposes of addressing poverty and homelessness in our community.

When I turned to the planned use of funds, I was baffled by what I found. While the presentation at the July 15th meeting conveyed that park and street improvements are permissible uses of CDBG funds, those uses are not justified by local statistics on homelessness nor aligned with HUD, or Madison County's, stated priorities. For example, the Plan proposes allocating \$330,000.00 to repay a loan for park improvements in Alton, yet the same municipality recently passed an ordinance criminalizing homelessness in its public parks, all while local efforts to establish an emergency shelter to alleviate the need of persons sleeping in public areas has been quashed by elected leaders in Madison County. I would be hard-pressed to invent a more misaligned use of HUD dollars. Other proposed allocations, such as improving the facade of a single business and filling potholes do nothing more to "alleviate poverty", "prevent homelessness", or "stabilize households" in Madison County. When it comes to rent assistance and rapid rehousing, the most direct methods of preventing and limiting homelessness, the Plan proposes allocating \$0.

I can verify that many local non-profits have qualified staff and infrastructure to efficiently utilize governmental grants to provide direct services to households to prevent or limit homelessness. For instance, my employer fights illegal evictions and seeks assistance to help tenants catch up on rent to prevent evictions. Other agencies provide shelter and support to domestic violence victims, transportation assistance to get to work and appointments, meals, and energy assistance, all of which are directly aligned with HUD and Madison County priorities. Local agencies also provide case management to address the significant increase in homelessness documented by the Point in Time count, just as discussed as a focus on page 80 of the Plan.

The proposed allocations for FY 2024 should be amended to fund activities that meet the purposes of HUD and Madison County's Plan: the alleviation of poverty, preventing homelessness, and stabilizing households. An effective method of doing so is to contract with existing shelter and services providers that have the infrastructure to manage grants.

Thank you for your time and review of my comment. If I can be of any assistance, please contact me at your convenience.

Regards,

Fawn Pettet

City of Alton Response –

The City of Alton has received and considered the public comments from the Annual Action Plan public meeting held on July 9, 2024, as well as those submitted via email subsequent thereto. All public comments received shall help to inform future allocations and local priorities. While most of the comments received focused on poverty alleviation, homelessness and affordable housing development, the City of Alton endeavors to employ CDBG funds within the leveraged context of other federal programs specifically aimed at addressing those societal concerns, i.e. Continuum of Care, Community Service Block Grant (CSBG), and HOME Investment Partnership (HOME).

Lastly, future efforts will be made to provide more robust project descriptions to aid public understanding of CDBG projects and annual allocations.

Greg Caffey

Director of Planning & Development/Code Enforcement

City of Alton

Madison County Response –

Madison County recognizes all of the comments that were received at the 2024 Draft Annual Action Plan Public Meetings. Madison County Community Development (MCCD) staff will work to improve the input from the public on how CDBG and HOME funding is spent going forward. MCCD staff are beginning the Consolidated Planning process and are working with service providers to aid in the strategic planning process.

HOME Resale Recapture Guidelines

**HOME Program Submission Requirements
Madison County Resale and Recapture Guidelines for
HOME Program- Homeownership Activities**

Madison County Community Development will use HOME Investment Partnerships Program funds to provide housing for low income persons. The forms of funding used to assist homebuyers and/or developers include: closing cost and down payment assistance, development subsidies, direct loans as second mortgages, or some combination of these methods. Madison County Community Development will use the recapture method of insuring affordability for HOME assisted rental properties and for all homebuyers receiving direct assistance. Madison County will use the resale provision of insuring affordability for for-sale housing where the homebuyer does not receive direct assistance. Only one method shall be utilized for each project, the recapture method is only allowed when there is direct HOME assistance to the homebuyer; resale provisions must be used when there is only a development subsidy provided to the project (defined as the difference between the total development cost of producing the unit and the fair market value of the property).

Recapture Provisions

Subject to recapture are the HOME funds that are invested in a HOME assisted unit, as a direct subsidy to the homebuyer. This includes down payment and closing cost assistance, and second mortgages that finance difference between fair market value based on fair market value and the homebuyer’s first mortgage. The minimum length of affordability is as follows based on the total direct HOME assistance to the homebuyer:

Affordability Requirements for the HOME Program

Total direct HOME subsidy to the buyer, per unit	Minimum period of Affordability
Under \$15,000	5 Years
\$15,000 to \$40,000	10 Years
Over \$40,000	15 Years

The recapture provisions are as follows:

- The Affordability Period shall be based on the total direct HOME subsidy to the homebuyer and does not take into account a development subsidy provided on the unit.
- Activity Types – HOME funds as direct buyer assistance may be provided as:
 1. HOMEbuyer Program -
 - a. direct subsidy to the homebuyer as closing cost and down payment assistance
 2. Single Family New Construction or Acquisition, Rehabilitation Programs -
 - a. direct subsidy to the homebuyer as closing cost and down payment assistance;
 - b. direct subsidy as a second mortgage that reduces the need for buyer equity or senior debt financing;

- c. difference between fair market value at the time of sale and sales price, if HOME funds were used to develop the property and the property is being sold below market value.
- The buyer must be purchasing the home to use as a sole principal residence. In other words, the buyer must intend to live in the home for the entire affordability period and not be buying the home for any other purpose, such as investment or rental property.
- Enforcement Mechanisms – Recapture provisions shall be detailed within each program written agreement between the homebuyer and Madison County and enforced through a mortgage filed with the Madison County Recorder’s Office and a homebuyer agreement that runs for the entire term of the affordability period. The requirements within shall be triggered upon sale or transfer of the HOME assisted property. For projects including the down payment and closing cost assistance program, for sale new construction and for sale acquisition rehabilitation programs the HOME assisted property owners will be required to maintain property insurance coverage in an amount sufficient to cover the amount of HOME assistance and list Madison County as an additional insured during the period of affordability. Monitoring of insurance policies will assist in identifying properties that are no longer occupied by the assisted buyer.
- Methods – The recapture option allows Madison County Community Development to recapture all or a portion of the HOME subsidy if the property is sold or transferred during the affordability period. All HOME assisted property sales under the recapture option shall meet the following criteria:
 1. The homebuyer may sell the property to any willing buyer.
 2. The transfer of the property during the period of affordability triggers repayment of the direct HOME subsidy to Community Development in accordance with the promissory note the buyer entered into with Madison County when he/she originally purchased the home.

In the event of recapture, the amount subject to recapture is as follows and will be further detailed within a promissory note signed by the buyer and by an agreement with the homebuyer that runs for the entire affordability period:

1. Down payment and closing cost assistance loans are forgiven on a pro-rata basis on a three (3) month quarterly schedule over the period of affordability.
2. Direct loans as second mortgages are deferred until maturity at 30 years from the closing date, at property sale, transfer or if the buyer ceases to occupy the property, then due in full.
3. The difference between fair market value at the time of sale and sales price will be forgiven on a pro-rata basis on a three (3) month quarterly schedule over the period of affordability.

The amount of recapture is subject to the availability of net proceeds available from the sale of the property. Net sale proceeds is defined as the sales price minus superior loan repayment (other than HOME funds) and any other closing costs.

For example, when down payment or closing cost assistance is provided under a 5-year Period of Affordability:

In the event that the owner sells transfers, changes or ceases to reside in the premises within five (5) years after the loan has been approved, he/she will be obligated to repay Madison County Community Development as follows:

First Year	-	80% payback required of deferred loan
Second Year	-	60% payback required of deferred loan
Third Year	-	40% payback required of deferred loan
Fourth Year	-	20% payback required of deferred loan
Fifth Year	-	0% payback required of deferred loan

The repayment schedule is pro-rated on a three (3) month quarterly schedule over the period of affordability. This repayment schedule shall also be applicable in the event that the property is vacant or in the event that the owner ceases to reside on the premises. The buyer, so long as any sums remain unpaid to Madison County Community Development and/or the period of affordability is still in effect, whichever is longer must personally occupy the premises as his/her sole principle residence. Any lease or rental of subject premises during the period of affordability shall constitute an event of non-compliance and the full loan amount shall become due and payable immediately.

- Mortgage Release – Upon receipt of recaptured funds, or at the completion of the affordability period, whichever is longer, Madison County Community Development will file a “Release of Mortgage” document with the Madison County Recorder’s Office to release the original HOME assisted property from the obligations of the affordability period and the release of the homebuyer agreement that runs for the entire period of affordability.
- Repayments – Repayment of recaptured funds shall be remitted directly to Madison County Community Development to be utilized for HOME eligible activities only.

Resale Provisions

Subject to resale provisions are the total HOME funds that are invested in a HOME-assisted unit, development subsidies and direct assistance. The minimum length of affordability is as follows based on the total HOME subsidy to the property:

Total HOME Subsidy per unit	Minimum period of Affordability
Under \$15,000	5 Years
\$15,000 to \$40,000	10 Years
Over \$40,000	15 Years

The Resale provisions are as follows:

- The affordability period is based on the total amount of HOME funds invested in the housing including down payment and closing cost assistance, direct loans as second mortgages, the difference between fair market value at the time of sale and sales price and development subsidies.
- Activity Types – Resale provisions for Homeownership shall be used when there is no direct assistance provided to the homebuyer or in a market where it is questionable that the unit will maintain affordability on its own. Madison County HOME assisted activities which may use Resale provisions include Single Family New Construction or Acquisition, Rehabilitation Programs.
- Principal Residency – The buyer must be purchasing the home to use as their sole principal residence. In other words, the buyer must intend to live in the home for the entire affordability period and not be buying the home for any other purpose, such as investment or rental property.
- Enforcement Mechanisms – Resale requirements shall be detailed within each program written agreement between the homebuyer and Madison County and enforced through deed restriction filed with the Madison County Recorder’s Office and the requirements within shall be triggered upon sale or transfer of the HOME assisted property. For homebuyer projects including the new construction and acquisition rehabilitation programs, the HOME assisted property owners will be required to maintain property insurance coverage in an amount sufficient to cover the amount of HOME assistance and list Madison County as an additional insured during the Period of Affordability. Monitoring of insurance policies will assist in identifying properties that are no longer occupied by the assisted buyer. In the event of non-compliance the full loan amount shall become due and payable immediately.
- Methods – The resale option ensures that the HOME assisted unit remains affordable over the entire period of affordability. Resale provisions must be used where there is no direct assistance to the homebuyer including down payment and closing cost assistance, direct loans as second mortgages, the difference between fair market value at the time of sale and sales price. All designated HOME-assisted property sales or transfers under the resale provision during the period of affordability shall meet the following criteria:

1. The new purchaser must meet the criteria of low income, defined as having annual household income at or below 80% of the area median income (as defined by HUD) for the St. Louis Metropolitan Area, and occupy the property as the family's principal residence.
 2. The sales price must be "affordable" to a reasonable range of low income buyers. In this instance, the affordable price results in a monthly housing cost for principal, interest, taxes and insurance of not more than 30% of the gross monthly income for a household between 60 and 80% of the area median income for the St. Louis Metropolitan Area. To ensure affordability in the event that the sales price required to provide a fair return to the original owner exceeds what is affordable to its target population of homebuyers Madison County Community Development can provide direct assistance to the subsequent income-eligible buyer.
 3. Net proceeds from the sale must provide the original homebuyer, now the home seller, a "fair return" on his/her investment (including any down payment and capital improvement investment made by the seller since purchase). The sales price may encompass the following in its formula:
 - a. The cost of any capital improvements, documented with receipts including but not limited to the following:
 - i. Any additions to the home such as a bedroom, bathroom, or garage;
 - ii. Replacement of heating, ventilation, and air conditioning systems;
 - iii. Accessibility improvements such as bathroom modifications for disabled or elderly which were not installed through a federal, state, or locally-funded grant program; and
 - iv. Outdoor improvements such as a new driveway, walkway, retaining wall, or fence.
 4. The increase in the value of owner equity and investment as calculated by the cumulative percentage of change as calculated by the Housing Price Index (HPI) calculator of the Federal Housing Finance Agency plus 1.00 times the total owner investment at time of purchase plus the documented improvements as described above.

(ex. Home purchased in 2000 for \$50,000. The HPI for 2000-2004 stayed the same at +.03 for each year, which calculates to a cumulative percentage of .12. To calculate "fair return" one must multiply \$50,000 x 1.12 = \$56,000, plus the documented improvements of \$4,000 would total \$60,000. The "fair return" to the seller would be the increase in value of \$60,000, minus the original investment of \$50,000 to equal a \$10,000 fair return.)
- Resale Provision Release – Upon completion of the affordability period, Madison County Community Development will file a "Release of Resale Prohibition" document with the Madison County Recorder's Office to release the original HOME assisted property from the obligations of the affordability period.

Madison County Analysis of Impediments to Fair Housing Choice



MADISON COUNTY

**ANALYSIS OF
IMPEDIMENTS TO FAIR
HOUSING CHOICE**

MADISON COUNTY
COMMUNITY DEVELOPMENT
DEPARTMENT

May 3, 2017

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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

In addition to the input of these organizations, the commitment, expertise, and time of the Madison County Department of Community Development was invaluable. Particular thanks to Stephanie Vonnahme, who has shown a true dedication to affirmatively furthering fair housing choice for the residents of Madison County.

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.

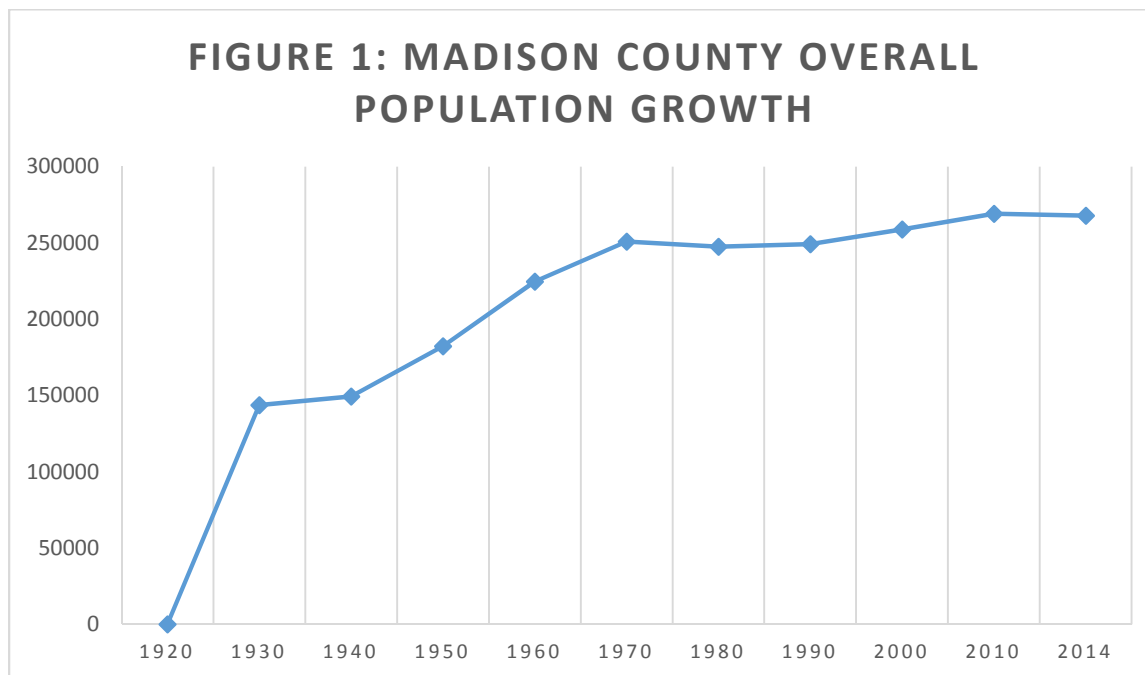
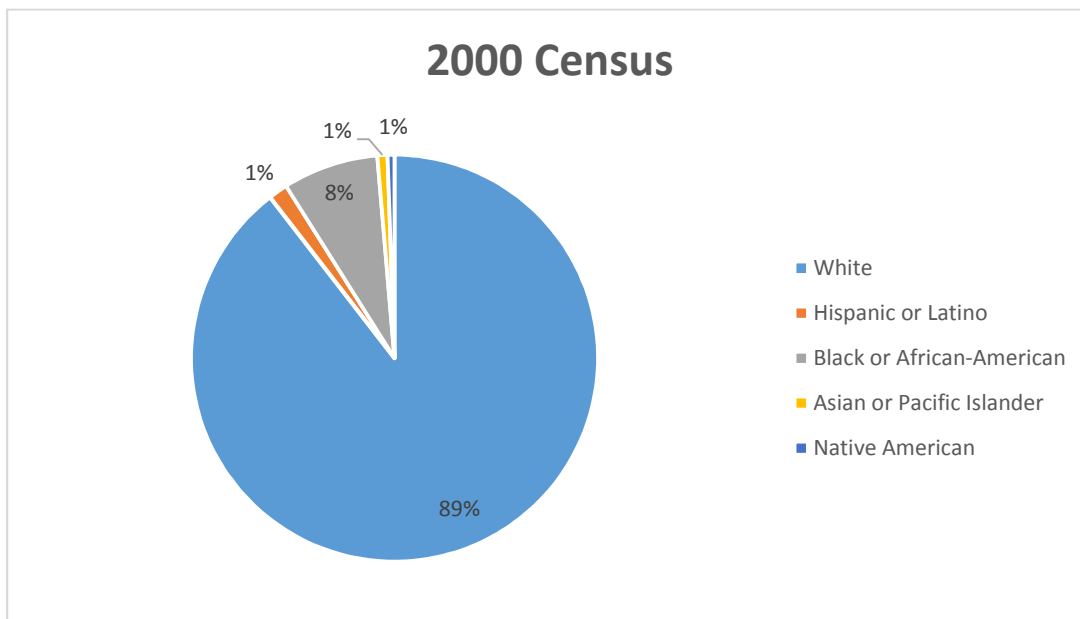


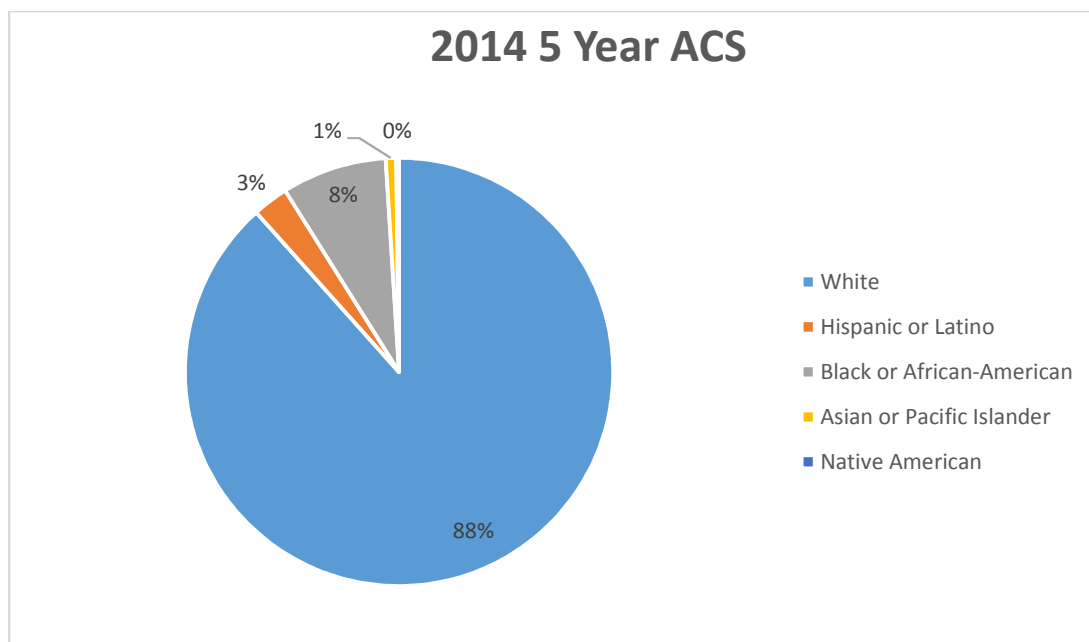
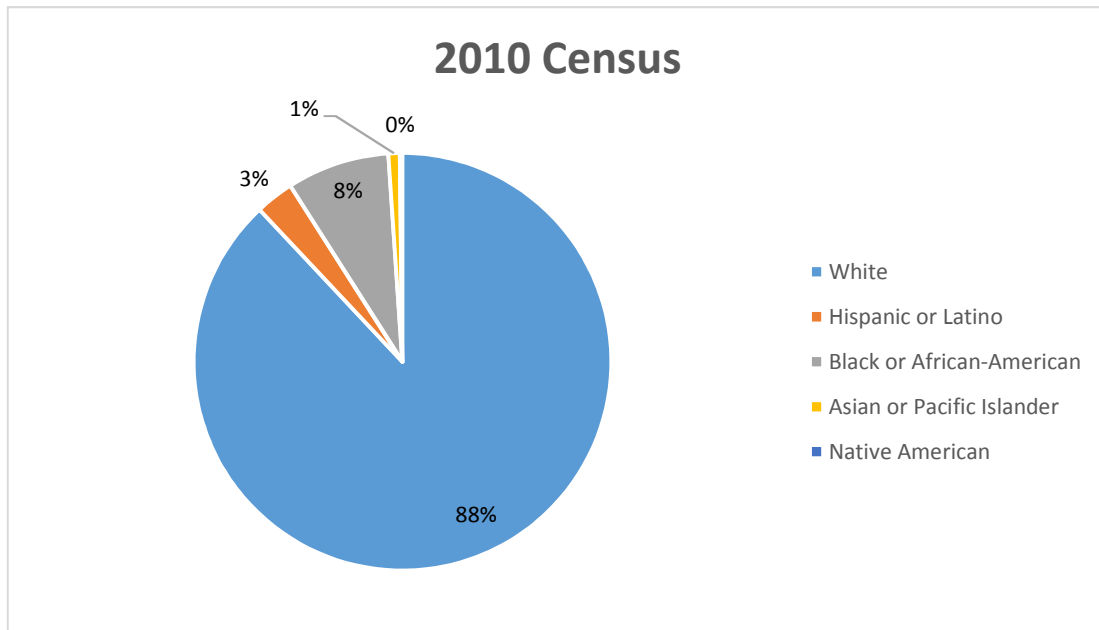
Table 1: Population Growth – Madison County & Cities, Neighboring Counties – 2000 –2014

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

	(Madison County, IL CDBG) Jurisdiction			(St. Louis, MO-IL CBSA) Region		
Racial/Ethnic Dissimilarity Index	1990	2000	2010	1990	2000	2010
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

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%

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%

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%

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%

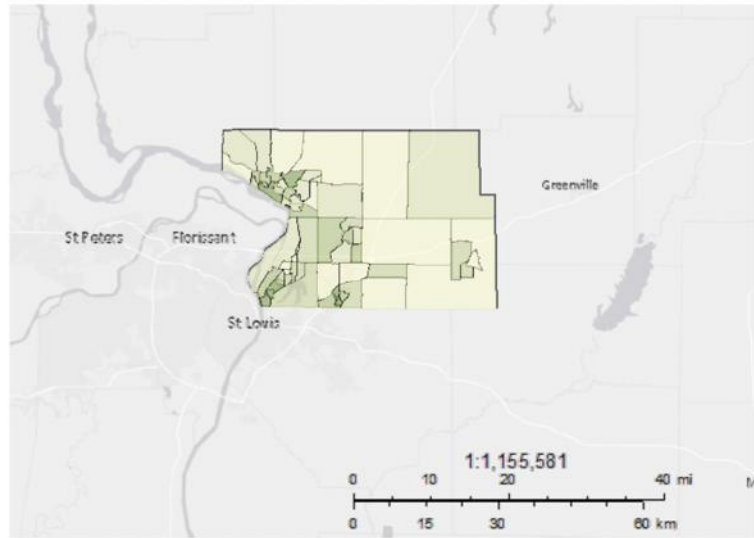
The data in the table show that in Madison County, Black and Hispanic households are disproportionately likely to rent versus own their housing unit. 71.41% of all housing units in Madison County are owner occupied, but housing units with a Black or African American householder were only 36.11% owner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

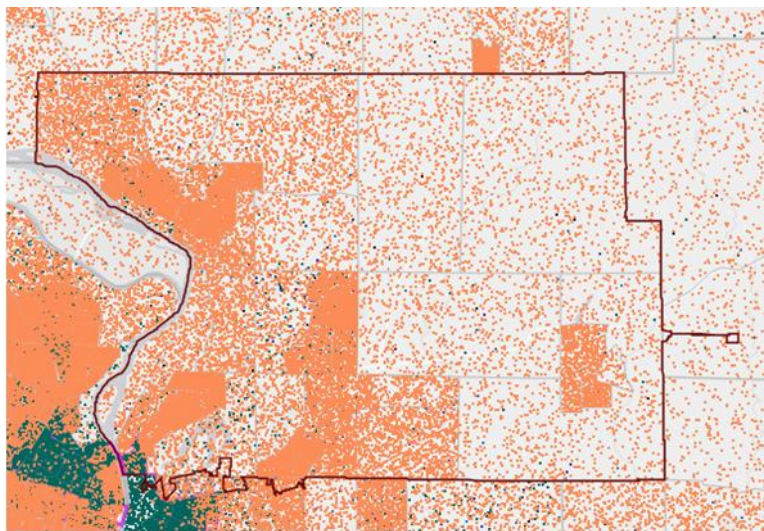
Boundaries

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.

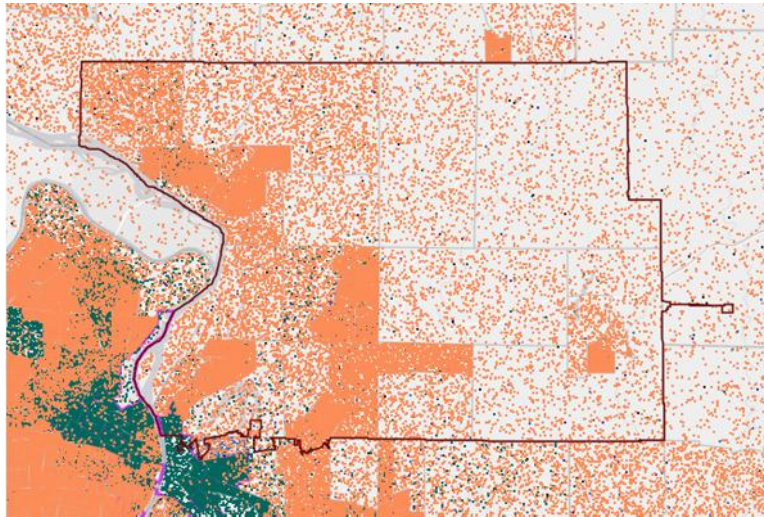
e. Discuss how patterns of segregation have changed over time (since 1990).

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.

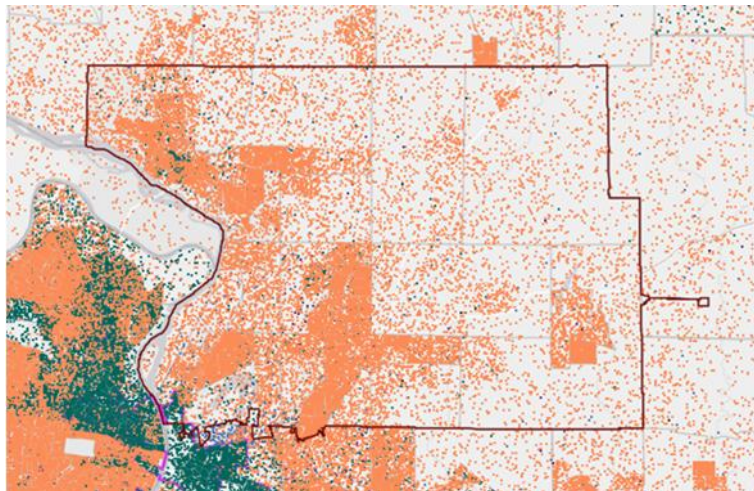
Source: HUD mapping tool. Each dot represents five individuals in the images below.
1990



2000



2010

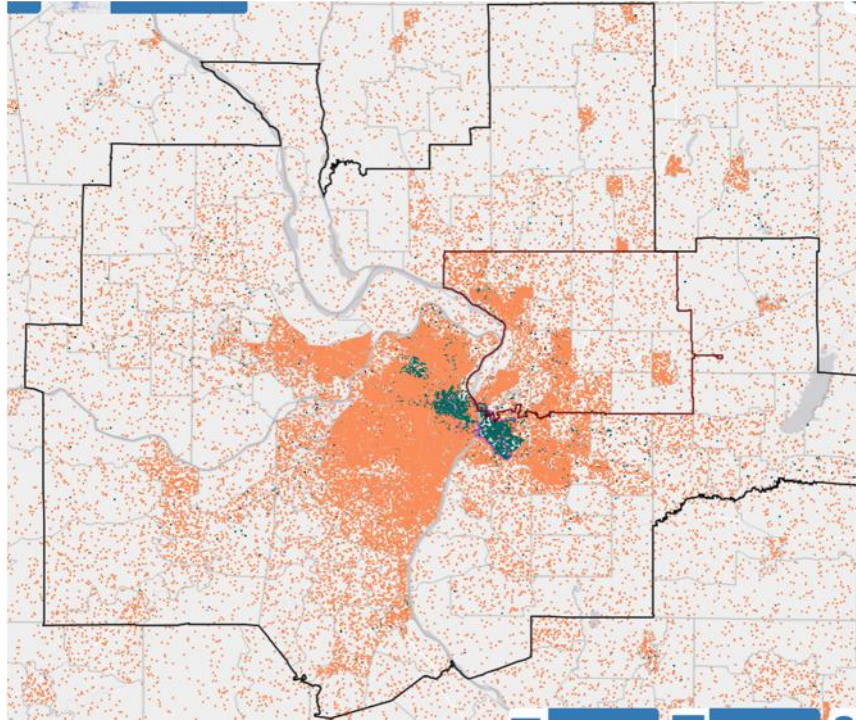


Changes to patterns of segregation in the St. Louis MO-IL region have also been slight, although still more significant than in Madison County. There have been modest increases in integration in many parts of the region including Madison County, but the most vivid trend is the increase in African American 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.

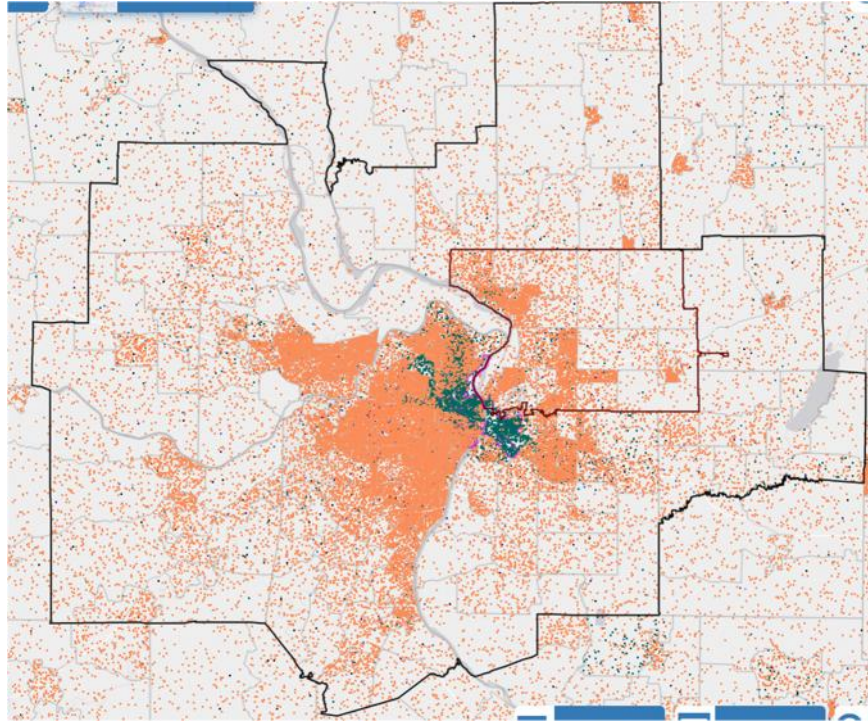
The increased diversity and integration in Alton since 1990 are clearly positive developments, but, in order for the societal and individual benefits of that integration to be fully realized, that integration has to be stable. This trend is consistent with population increases for Black and Hispanic 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.

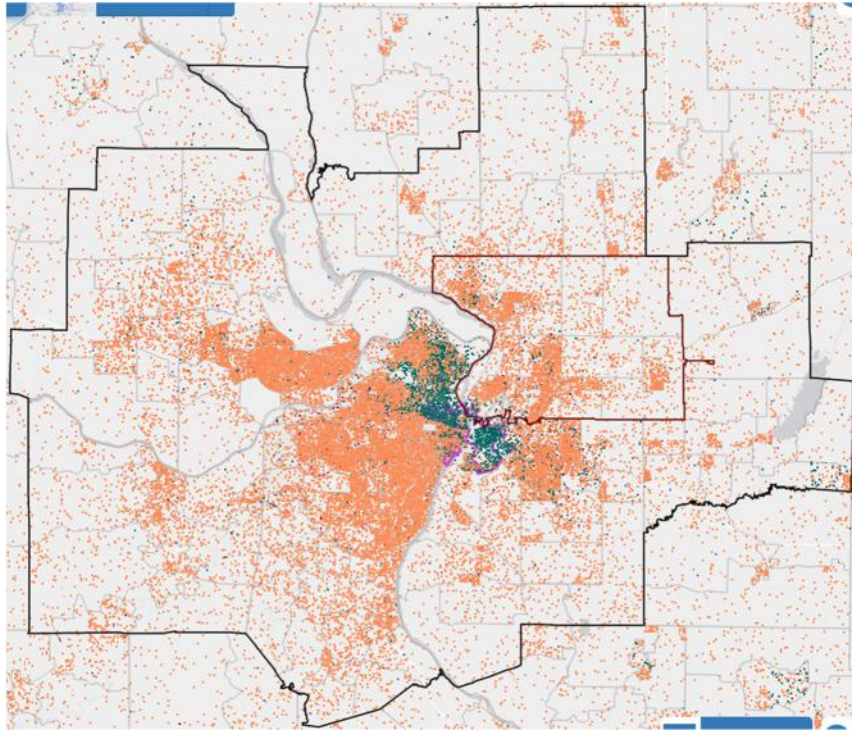
1990



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.

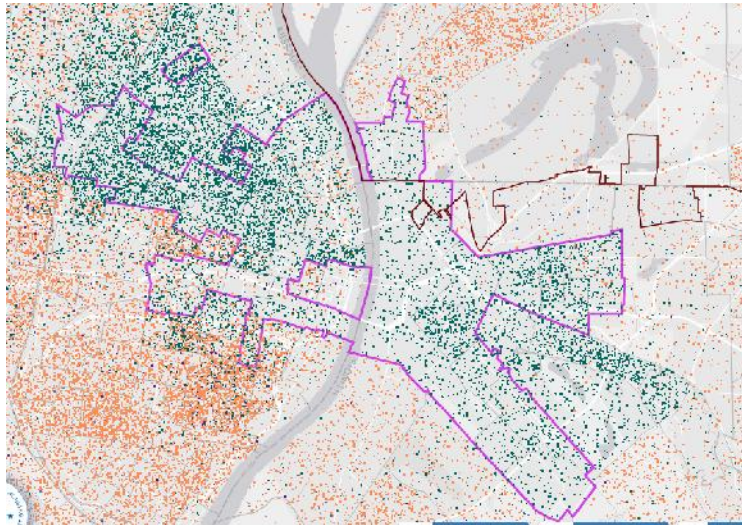
b. *Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?*

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.

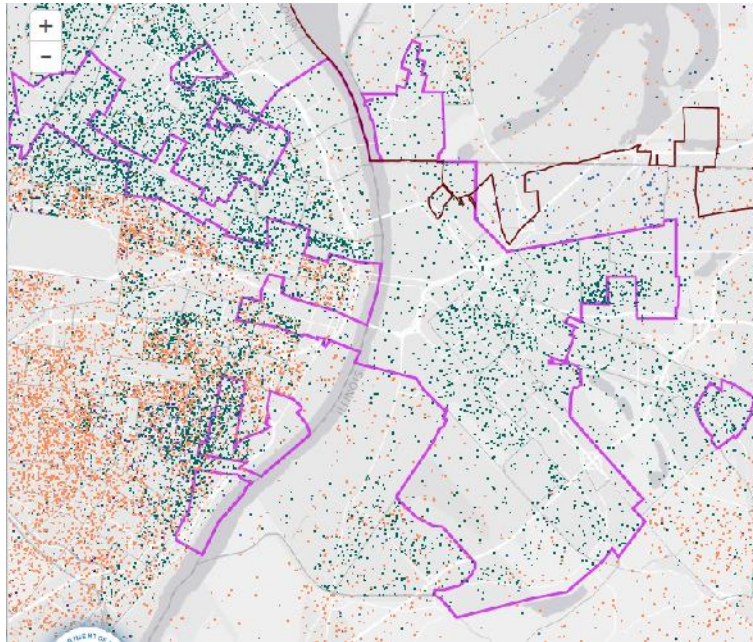
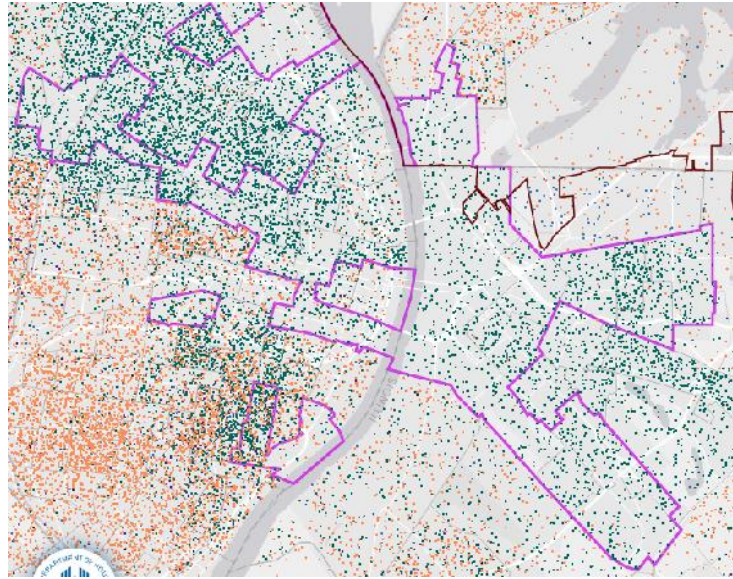
c. Describe how R/ECAPs have changed over time (since 1990).

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.*

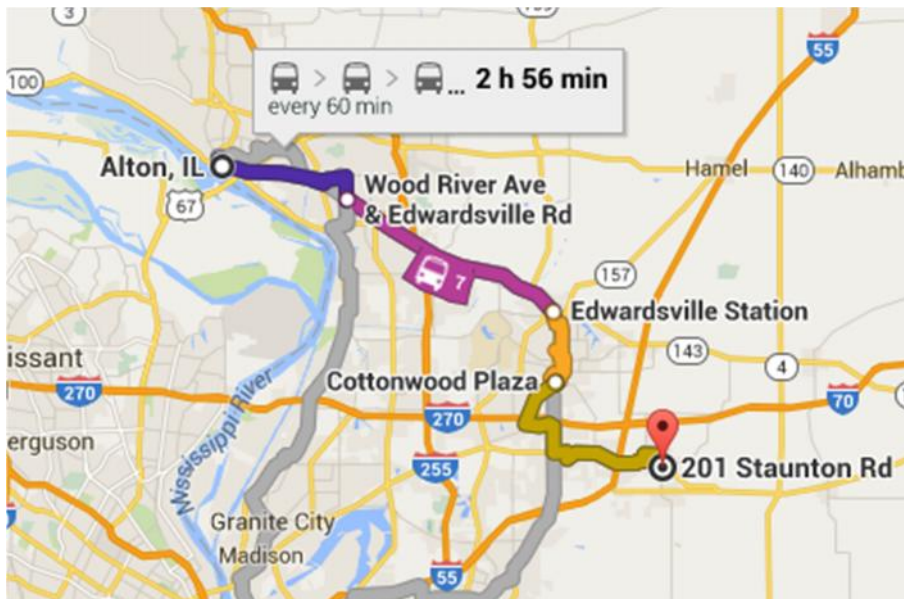
Overall, the school accessibility of a neighborhood in Madison County depends on the city in which the population is located. The communities in and around Edwardsville have access to more highly proficient schools, while the population in the southwest corner of the county and near Granite City and 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 21:1.¹ 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

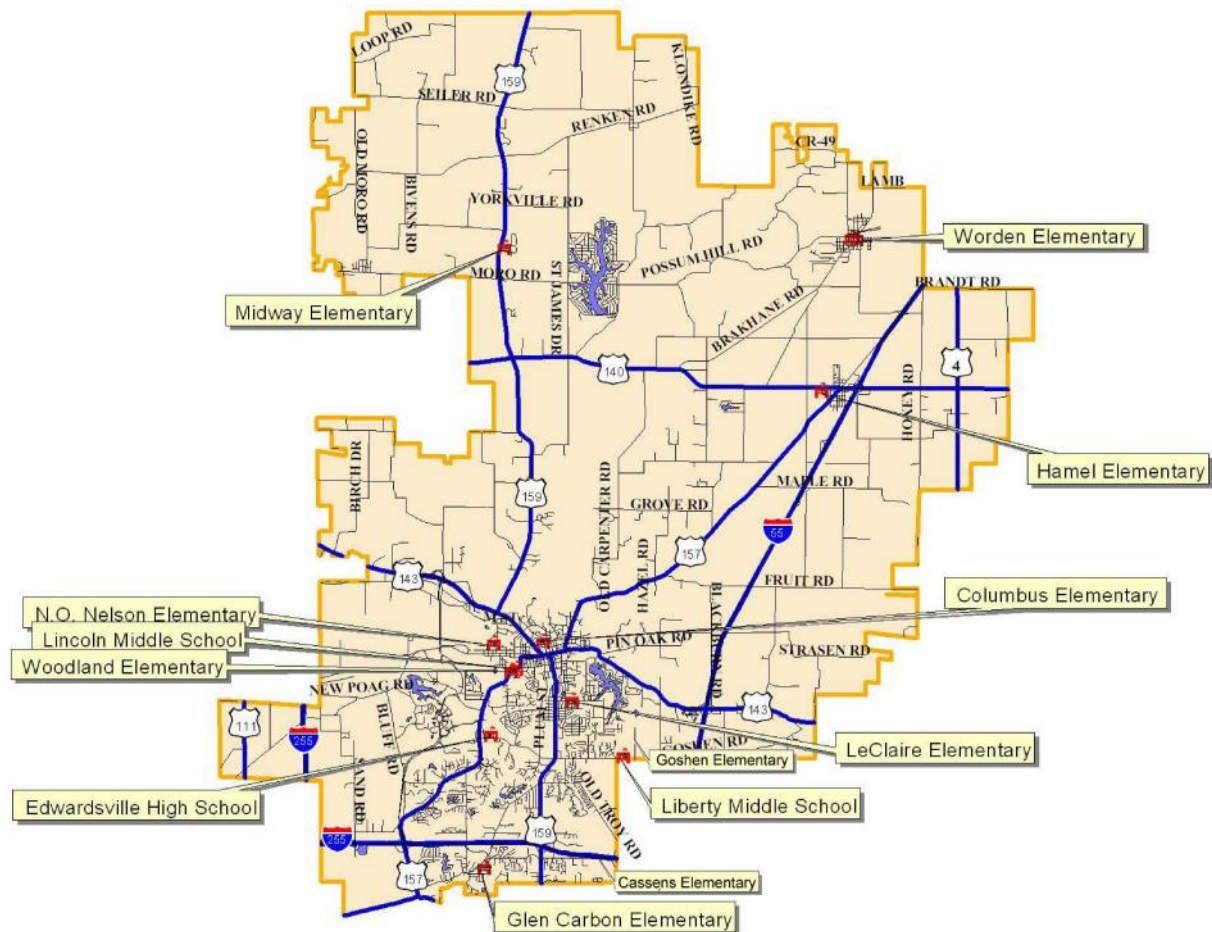
The residents of Madison County that live near Edwardsville have access to District 7, which has some of the most proficient schools in the County. In the District 7 handbook, the registration eligibility criteria require that a parent or person in custody of a child must live within the district boundaries and show proof of such residency.² 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

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

² 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.³ 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

³ <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.

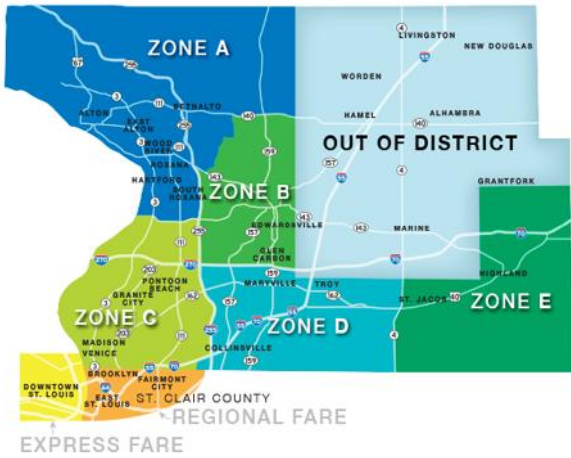
For question (1)(c)(iii), program participants should consider whether transportation-related local programs, policies, and practices affect a person's access to proficient school, jobs, and other areas with opportunities. In answering this question, local knowledge (as defined at 24 C.F.R. § 5.152) 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.⁴ 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.⁵

⁴ http://www.mct.org/MCTInfo/MCT_Overview.aspx

⁵ <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/ Disabled/ Children Under 5 / Police and Military in Uniform **FREE**

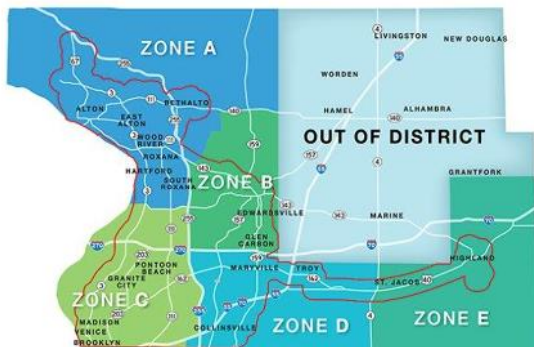
Elderly/ Disabled/ Children Under 12	
MCT Shuttle	\$0.75
MCT Cross County	\$1.00
MCT Regional	\$1.50
MCT Express	\$1.75

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

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
ILD0213820376	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.⁶ 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

⁶ <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.⁷ 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.

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.⁸

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.*

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

⁸ <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.⁹

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

⁹ <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.¹⁰ 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.¹¹ 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.¹²

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.¹³ 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

¹⁰ http://www.co.madison.il.us/departments/community_development/economic_development_program.php

¹¹

http://www.co.madison.il.us/departments/community_development/gateway_commerce_center_and_enterprise_zones.php

¹²

http://www.co.madison.il.us/Community_Development/Four%20Enterprise%20Zones%20Approved%20for%20Madison%20County.pdf

¹³ 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.¹⁴

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.¹⁵ 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.¹⁶



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

¹⁴ http://www.co.madison.il.us/Community_Development/Southwestern%20EZ%20Overview.pdf

¹⁵

http://www.co.madison.il.us/Community_Development/Four%20Enterprise%20Zones%20Approved%20for%20Madison%20County.pdf

¹⁶ 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.¹⁷ 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.¹⁸ 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.¹⁹ Dunstan also believes that the Enterprise Zones are a large part of what attracted Amazon to Edwardsville.²⁰ 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.²¹ 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.²²

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

¹⁷ http://www.co.madison.il.us/departments/community_development/amazon_comes_to_madison_county.php

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

¹⁹ https://www.riverbender.com/articles/details/amazon-takes-applications-for-new-edwardsville-facility-will-host-future-job-fairs-13533.cfm?google_editors_picks=true

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

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

²² <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.²³

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.

²³

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.²⁴

- *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.

²⁴

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		
	# with problems	# households	% with problems	# with problems	# households	% with problems
Households Experiencing Any of 4 or More Housing Problems						
Race/Ethnicity						
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%
Total	29,607	107,240	27.6%	337,705	1,103,070	30.6%
Household Type and Size						

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
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%

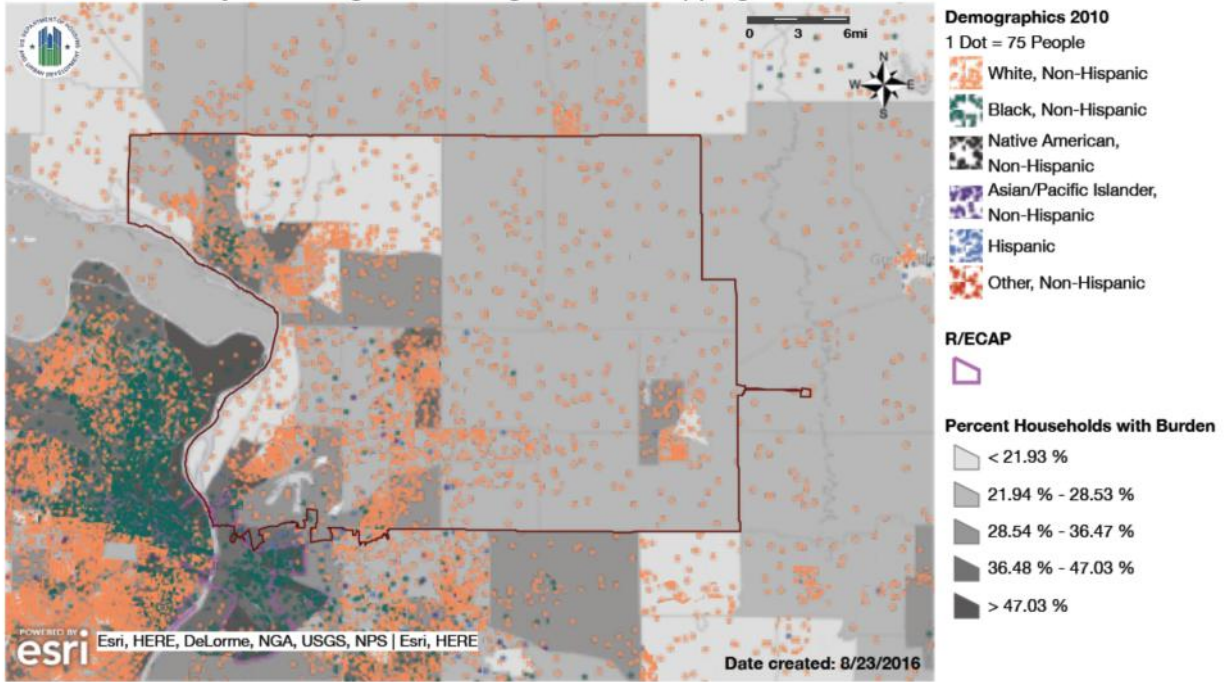
In the tables above, data for Madison County is 2009-2013 CHAS data while data for the region is from HUD's AFFH Data and Mapping Tool, which relies upon 2006-2010 CHAS data. Data in the AFFH Data and Mapping Tool for Madison County for these tables were incorrect. In obtaining the data necessary to 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



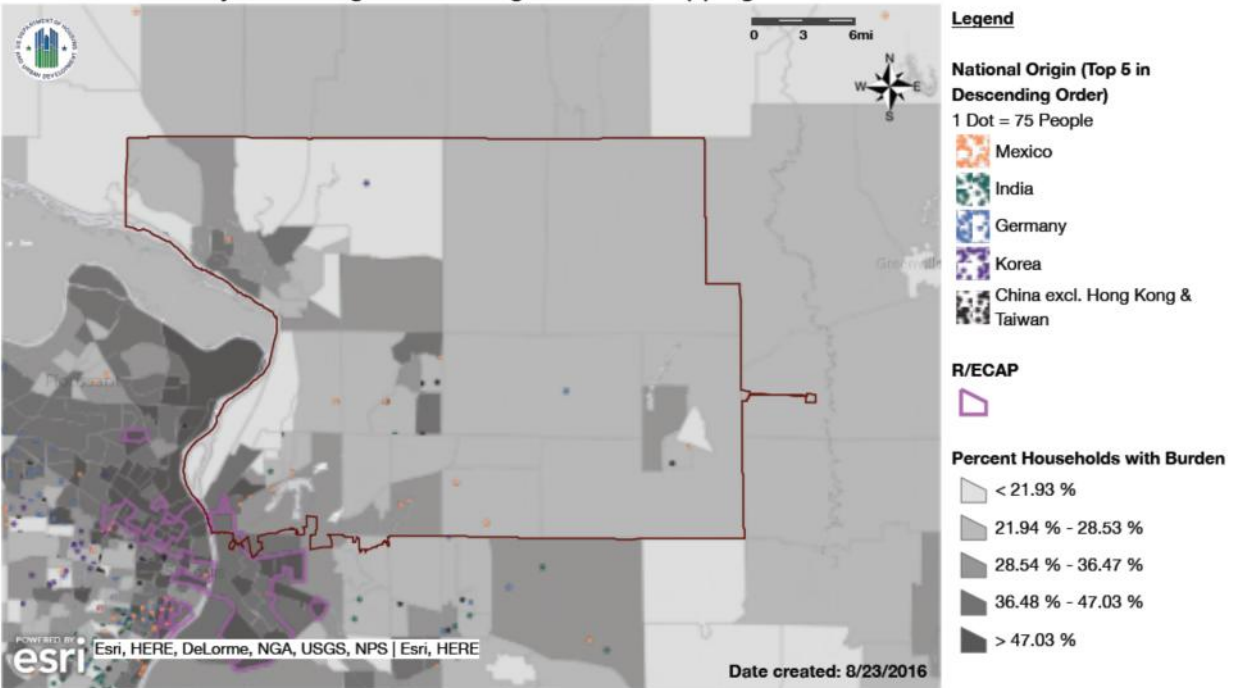
Name: Map 7 - Housing Burden and Race/Ethnicity

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

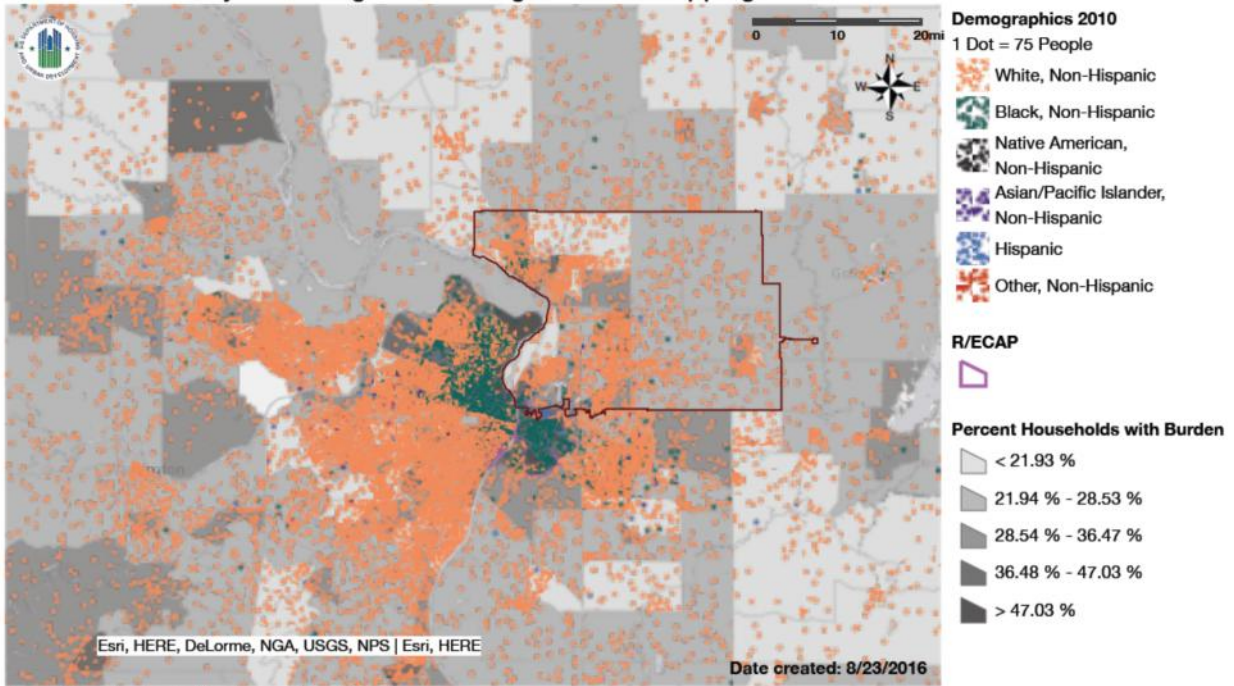
Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and national origin dot density

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



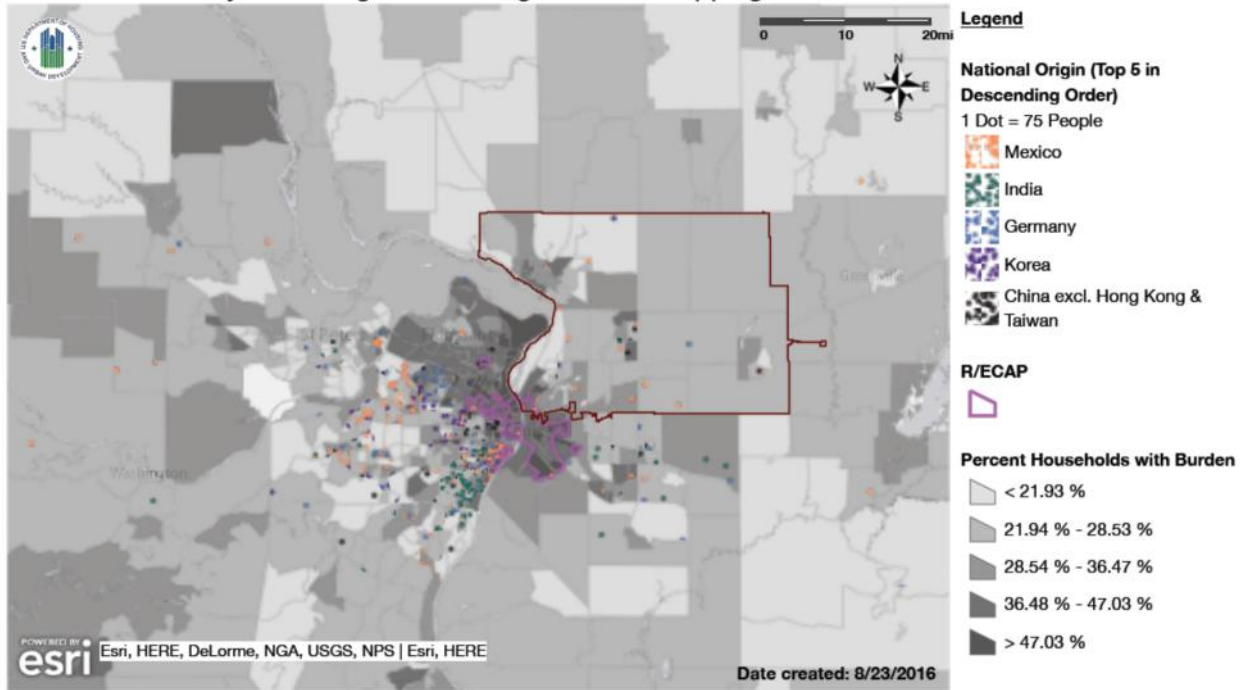
Name: Map 7 - Housing Burden and Race/Ethnicity

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).

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

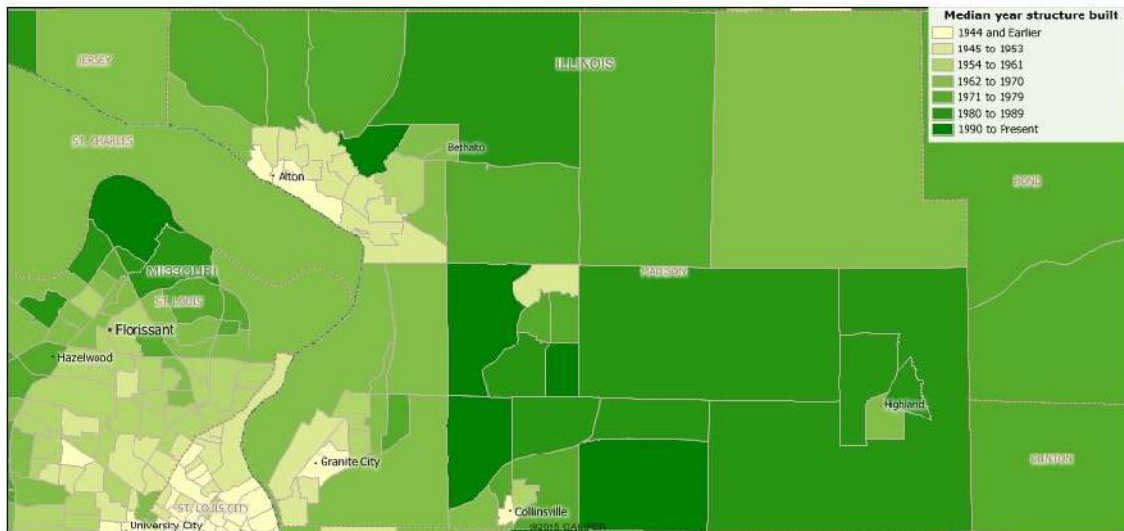
	Madison County, Illinois		St. Louis, MO-IL Metro Area	
	Estimate	Percentage	Estimate	Percentage
Total:	2,345		21,720	
Owner occupied	1,342	57.23%	11,326	52.15%
Renter occupied	1,003	42.77%	10,394	47.85%

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))?*

(Madison County, IL CDBG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type								
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%
0-30% of AMI	194	86.61%	30	13.39%	0	0.00%	0	0.00%
0-50% of AMI	274	78.51%	30	8.60%	0	0.00%	0	0.00%
0-80% of AMI	413	80.51%	55	10.72%	0	0.00%	0	0.00%
(Madison County, IL CDBG)	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).

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

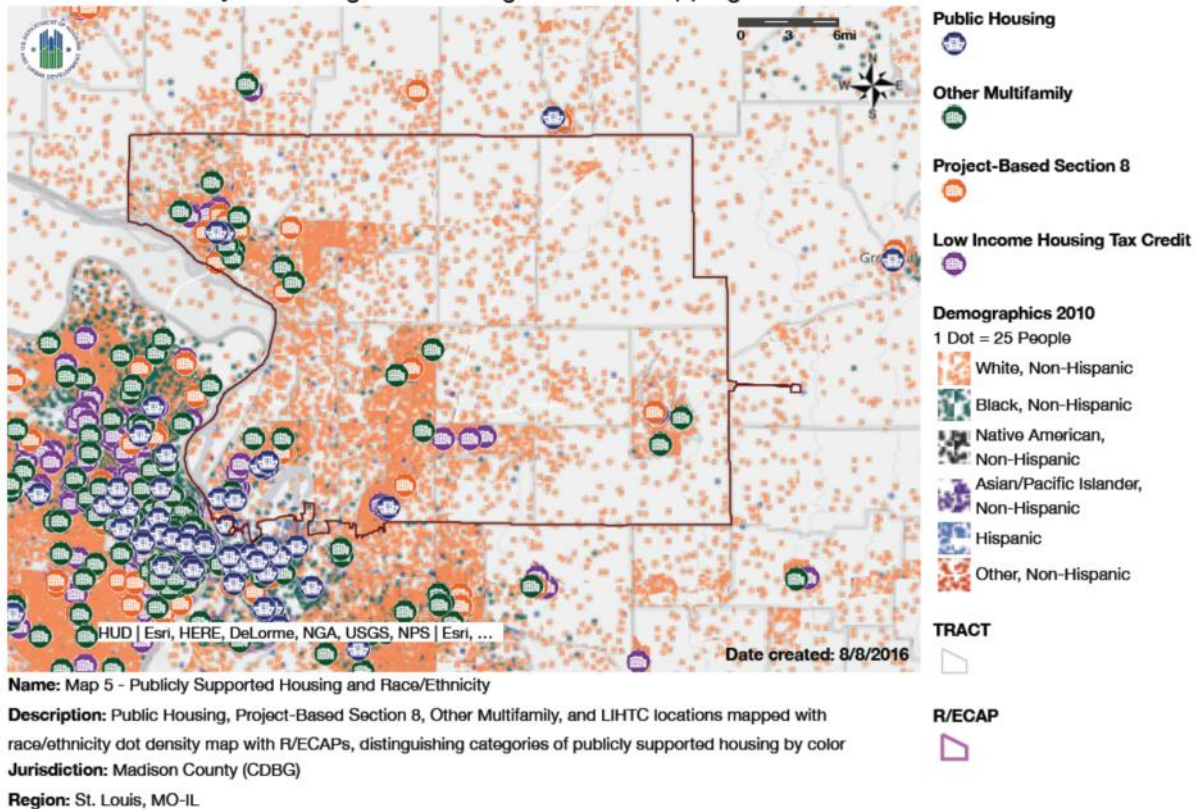
housing, the discrepancy is small while, for public housing and the Housing Choice Voucher program, the difference is large.

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

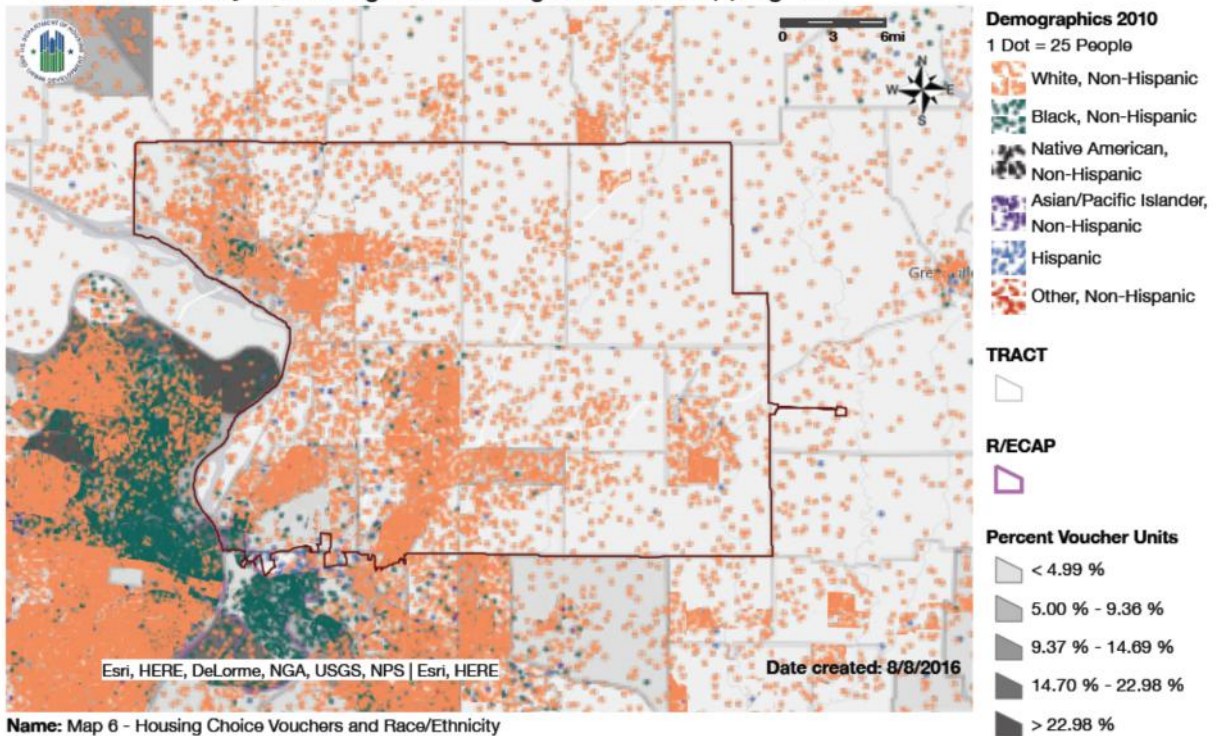
- i. *Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.*

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
Public Housing								
R/ECAP tracts	5							
Non R/ECAP tracts	834	29.31%	24.97%	44.63%	40.98%	13.78%	0.00%	34.98%
Project-based Section 8								
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%
Other HUD Multifamily								
R/ECAP tracts								
Non R/ECAP tracts	59	6.56%	100.00%	76.27%	23.73%	0.00%	0.00%	0.00%
HCV Program								
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).								

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

Public Housing (Madison County, IL CDBG) Jurisdiction						
Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
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 Apartment:	5					
Anchorage Homes	108	86%	11%	3%	0%	15%
Anchorage	140	88%	11%	1%	0%	0%
Project-Based Section 8 (Madison County, IL CDBG) Jurisdiction						
Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
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%
Other HUD Multifamily Assisted Housing (Madison County, IL CDBG) Jurisdiction						
Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
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).

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.

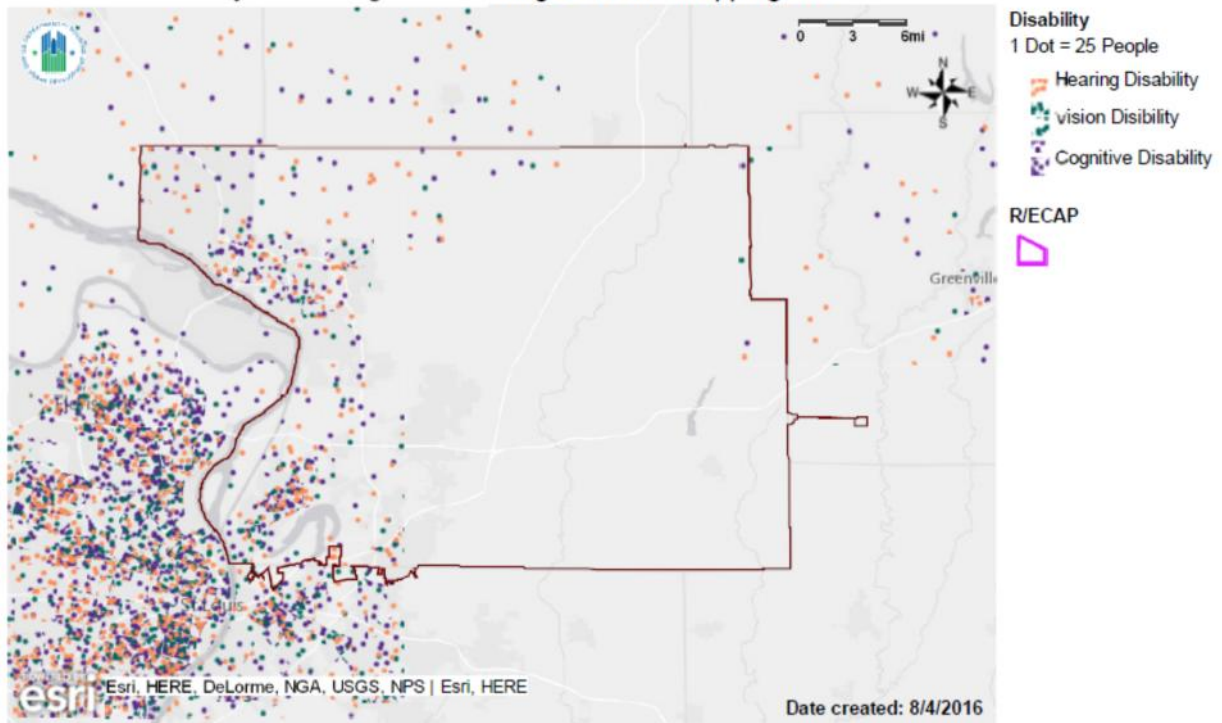
D. Disability and Access Analysis

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



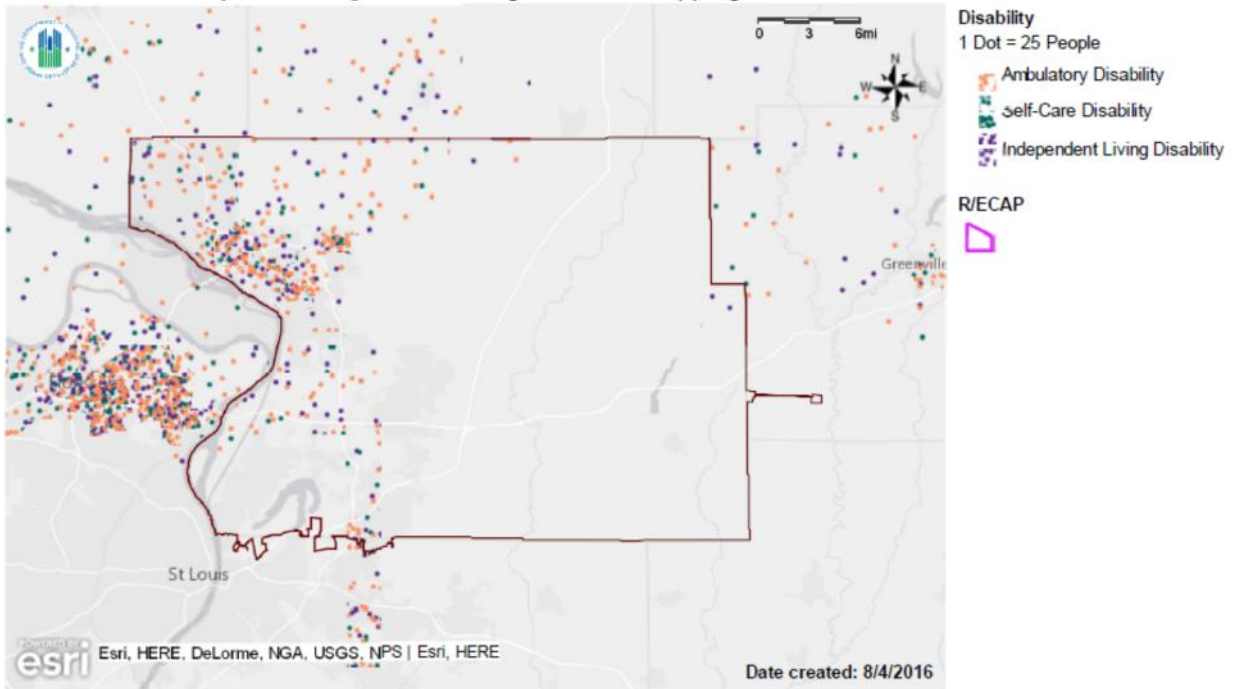
Name: Map 16 - Disability by Type

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



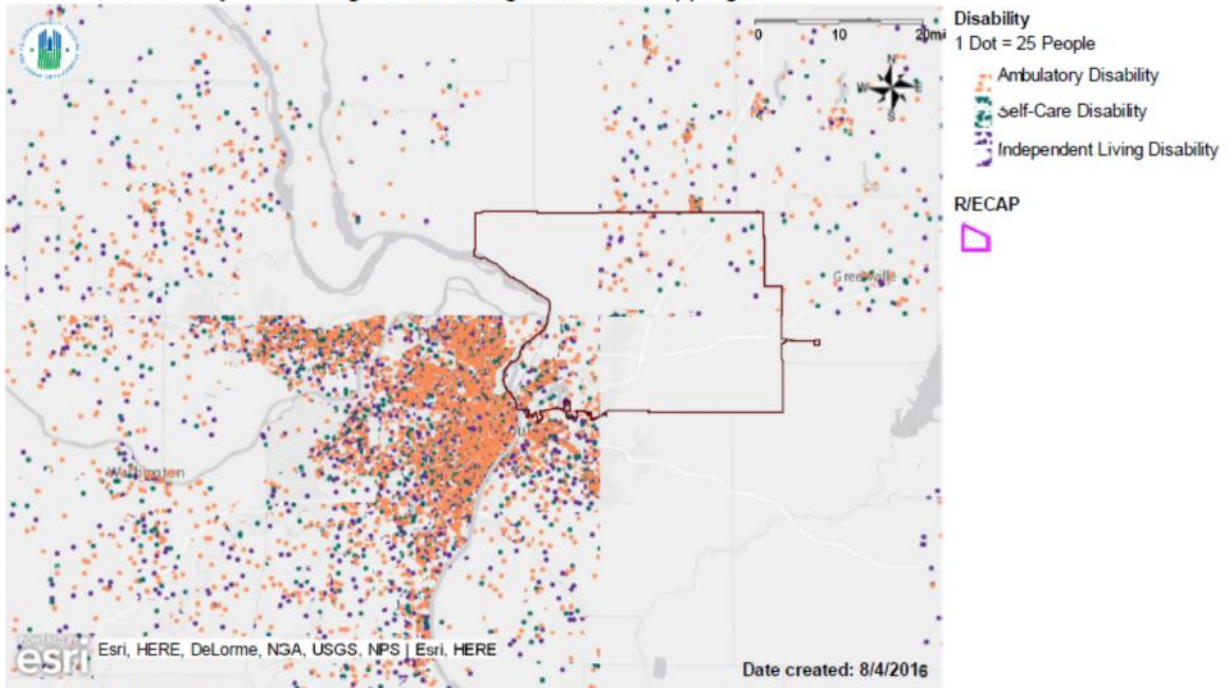
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HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



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

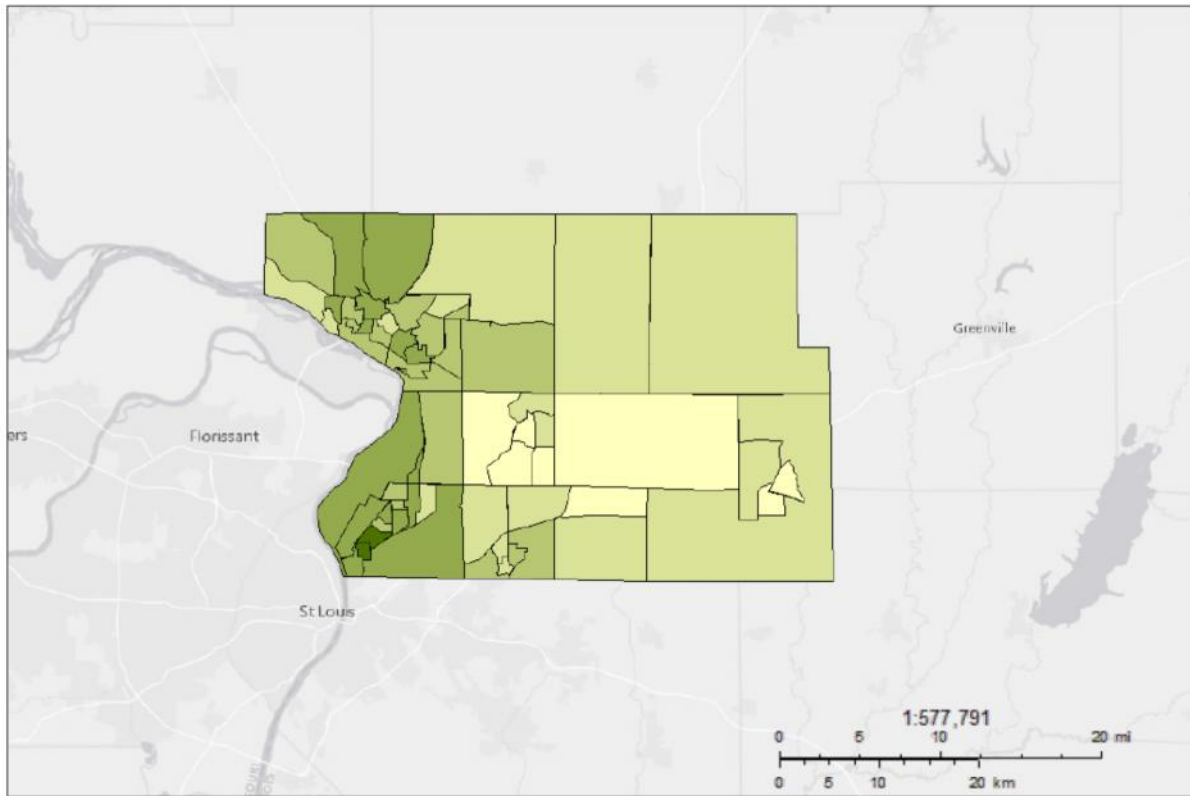
VIRGINIA

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

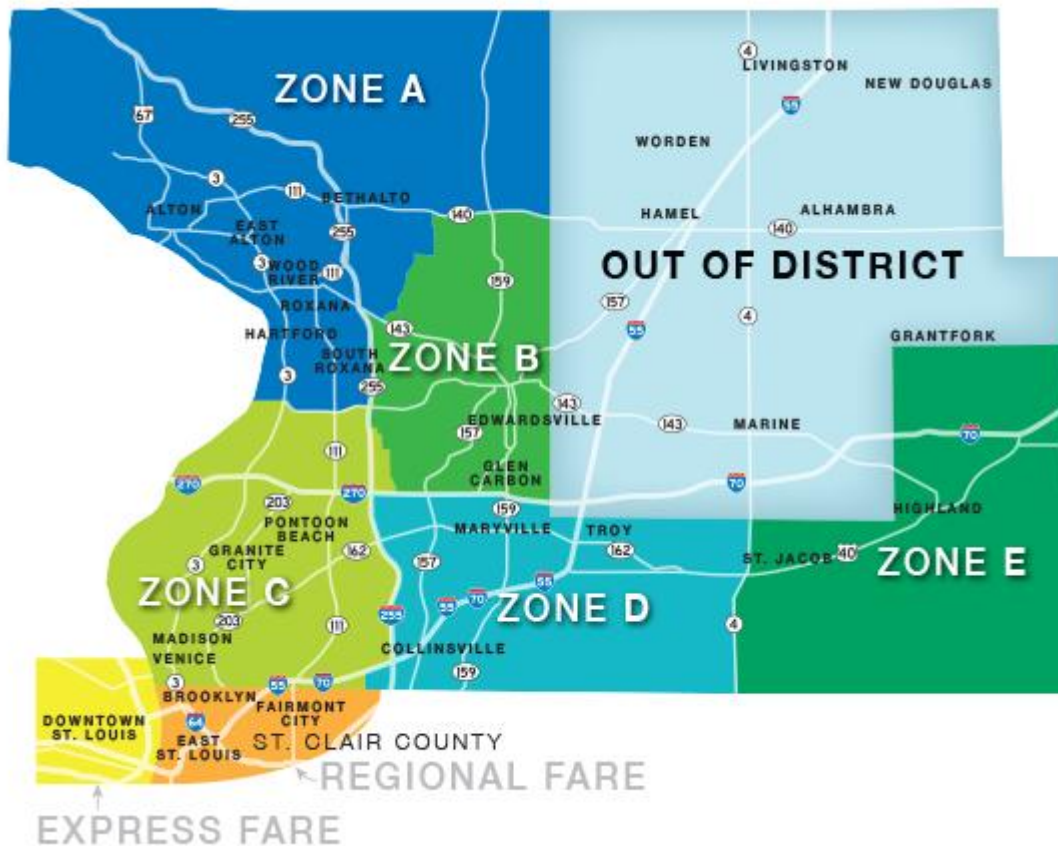
government buildings is integral to access to opportunity for persons with disabilities and to ensuring that persons with disabilities are empowered to participate fully in society. Services provided by county and local agencies may provide the linkages that individuals with disabilities need in order 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

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

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

Basis of Complaint	Number of Complaints
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
Total	30

**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.

City	Number of Complaints
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>	Fair Housing Issue	Contributing Factor	Time frame for Action	Measure of Achievement	Responsible Program Participant(s)
1. Lower barriers to expanded affordable housing in high opportunity areas through inclusive strategies.	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
2. Reduce housing segregation and discrimination by aggressively conducting fair housing education and enforcement activities, in coordination and with fair housing organizations.	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
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	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>with disabilities, people with limited English proficiency, and people with criminal records.</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><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
4. Prioritize public investments in transit, quality schools, parks, and other amenities in underserved communities.	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.
5. Expand efforts in creating equitable healthy housing that recognizes the direct connections between healthy housing and quality of life.	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