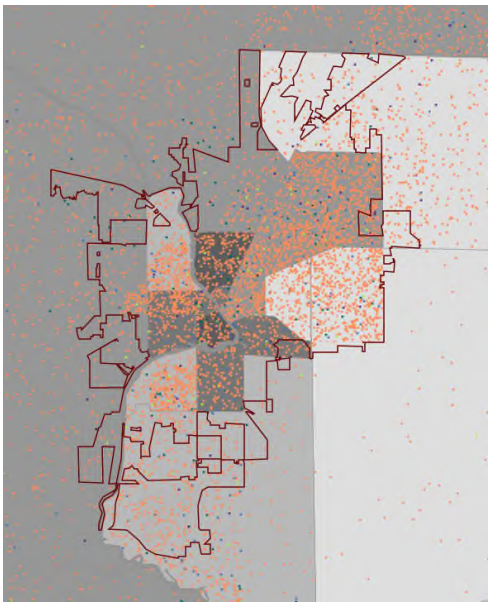

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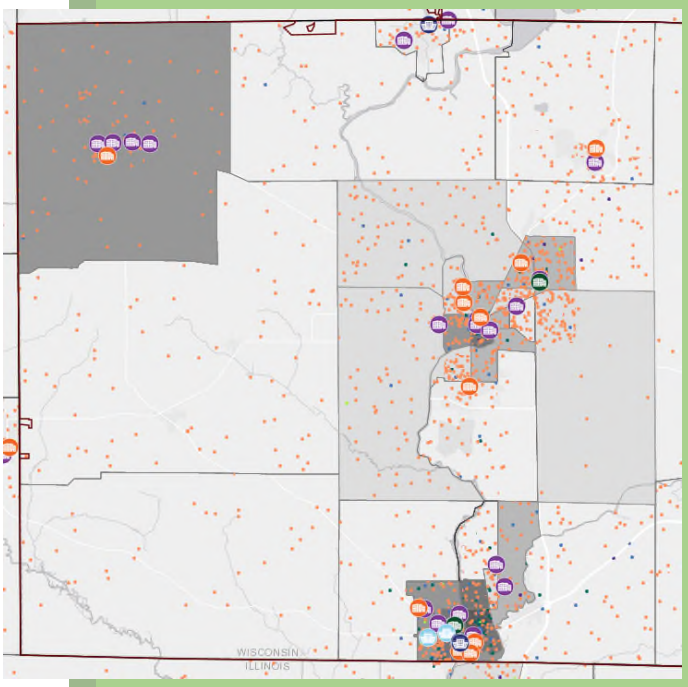
2019

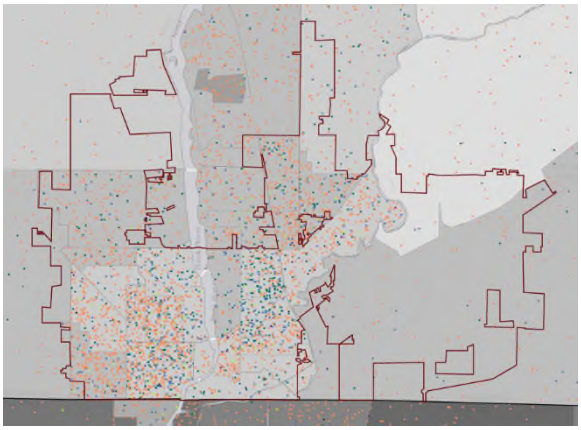
City of Beloit,

City of Janesville, and

Rock County, Wisconsin

Analysis of Impediments to Fair Housing





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Executive Summary

The Analysis of Impediments to Fair Housing (AI) is a report required of communities that receive federal housing funds such as Community Development Block Grants and HOME. This report identifies impediments to equal housing opportunities through analysis of:

- demographic data, local ordinances, and municipal policies, practices and procedures; and
- community participation, including input from a steering committee, housing surveys completed by community members, and stakeholder interviews.

Goals and strategies provided in this report's final section are recommendations designed to address and remove those impediments. It will be the responsibility of Beloit, Janesville and Rock County to implement the goals and strategies.

Key findings of this AI include:

Low housing vacancy rates in Rock County amplify other housing problems and disparities based on race, ethnicity and disability. When vacancy rates are low, rents increase, and therefore some families may become rent burdened or forced to live in substandard housing. Problems associated with low vacancy are likely to have disproportionately negative impacts on persons of color and persons with disabilities, who have lower incomes and lower rates of employment than white and non-disabled persons.

Beloit's demographics are significantly different than those of Janesville and the balance of Rock County. Beloit's median income is $38,930, compared to $52,617 in Janesville and $53,410 in the balance of the County. Almost 39 percent of Beloit's population is nonwhite, compared with just 11 percent in Janesville and 9.3 percent in the balance of Rock County. More than 17 percent of Beloit's population speaks a language other than English at home, compared with only 5.3 percent in Janesville and 8.1 percent in Rock County. These differences affect the fair housing impediments that exist in each community.

Latino and Black residents are not faring as well as whites in most indicators reviewed in this report. For instance, median income for whites in Rock County is $55,276, but only $25,810 for Blacks and $33,158 for Latinos. When assessing educational attainment by race and ethnicity, 92.3 percent of Rock County whites have high school education equivalency, 79.6 percent of Blacks and 65.3 percent of Latinos. Almost 71 percent of whites in Rock County own their home, but only 32.5 of Blacks and 50.2 percent of Latinos own their homes.

Latinos and Blacks are not accessing mortgage loans in proportion with their population. In Beloit, Latinos make up 19.8 percent of the population but only 7.6 percent of

mortgage loan originations and Blacks make up 13.1 percent of the population but only 4 percent of mortgage loan originations. In Janesville, the disparity is distinct for Latino borrowers – they make up 5.3 percent of the population, but only account for 1.9 percent of the mortgage loan originations.

There is a lack of accessible and affordable housing for persons with disabilities. A vast majority of Rock County housing was built before 1990, which means structures with 4 or more units are not likely to be accessible to persons with mobility impairments. Persons with disabilities are also more likely to have low incomes than the general population, therefore in greater need of affordable, accessible housing.

Interviews with stakeholders were instrumental in identifying multiple other barriers to fair housing that were not obvious from the data analyzed. Those interviews also reemphasized impediments that were illustrated in the demographics section of this report. Key findings of those meetings and interviews include:

- Housing discrimination is occurring throughout Rock County
- There is a lack of access to mortgage loans
- There is neighborhood resistance to development of new affordable housing, particularly in predominantly white neighborhoods (NIMBYism or Not In My Backyard)
- There is segregation based on race, including perceptions about where one can and cannot live, and based on location of affordable housing opportunities
- Linguistically isolated residents are being harmed by predatory land contracts.
- There is inadequate public transit between residential areas and other community resources, such as grocery stores, health care facilities, and employment opportunities (in Beloit and greater Rock County)
- There are land division and zoning restrictions in Janesville and other parts of Rock County that limit the ability to create affordable housing. Duplexes and multi-family housing are not permitted uses in zoning regulations without a public review process
- Some consumers have poor credit and lack of understanding of credit scores
- Some consumers have mental health conditions, particularly among the homeless population

Based on these findings, impediments to fair housing in Rock County, not listed in order of priority, include:

1. An inadequate supply of affordable housing, exacerbated by low vacancy rates
2. Zoning and land division restrictions (Janesville and Rock County balance only)
3. NIMBYism, community opposition to multi-family and affordable housing units
4. Racially and economically segregated housing patterns

5. Lack of quality affordable housing
6. Lack of consumer education for renters and homebuyers
7. Transit limitations (Beloit only)
8. Insufficient affordable housing accessible for persons with disabilities
9. Lack of resources for fair housing outreach and enforcement
10. Illegal discrimination in the private housing market
11. Fair housing enforcement in Beloit, Janesville and the balance of Rock County does not support testing as a method of investigation.
12. Predatory land contracts
13. Lack of mental health and substance abuse services
14. Barriers to homeownership for Black and Latino residents

Recommendations to remove these impediments to fair housing include:

1. Create and preserve affordable housing (rental and sale)
2. Create a strong fair housing enforcement and outreach program
3. Improve tenant and housing provider communications
4. Improve transit (Beloit only)
5. Develop an eviction reduction strategy
6. Address predatory land contracts
7. Increase access to consumer education
8. Connect Black, Latino and other underserved populations with opportunities

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About the Authors and the Report

The Metropolitan Milwaukee Fair Housing Council, Inc (MMFHC) produced this report. Kori Schneider Peragine, Marion Ecks and Erika Sanders are the primary staff persons responsible for its contents.

Established in 1977, MMFHC is a private, non-profit organization dedicated to promoting fair housing throughout the State of Wisconsin by guaranteeing all people equal access to housing opportunities and by creating and maintaining racially and economically integrated housing patterns. Four programs support this mission:

Enforcement Program – provides direct assistance to persons alleging violations of federal, state and local fair housing laws, and conducts systemic investigations of institutional forms of discrimination

Outreach and Education Program – conducts fair housing presentations, trainings, technical assistance, and other outreach to housing consumers, housing providers, community organizations and the general public

Fair Lending Program – assists victims of mortgage rescue scams, provides fair lending education and advocacy, and works to ensure that all communities have fair access to credit

Inclusive Communities Program – provides technical assistance to community organizations, developers and local policy makers on inclusionary housing policies and the promotion of racial and economic integration, and conducts analysis of fair housing and affordable housing opportunities and impediments.

MMFHC provides services throughout the State of Wisconsin through three offices. Its main office is located in the City of Milwaukee and satellite offices are located in Madison (Fair Housing Center of Greater Madison) and Appleton (Fair Housing Center of Northeast Wisconsin).

About the Report: General Purpose, Format and Methodology

Purpose

The Analysis of Impediments to Fair Housing (AI) is a report required of communities that receive federal housing funds such as Community Development Block Grant and HOME. This AI requirement is described in Section 808(e)(5) of the federal Fair Housing Act. The report includes recommendations to remove or address the impediments to fair housing. The recommendations will be included in the Consolidated Plan and Annual Action Plans for continued receipt of federal housing funds.

Format

This document contains eight major components:

1. The *Demographic Summary* provides the most updated data on Beloit, Janesville and Rock County population by race, ethnicity, national origin, disability, income, and poverty. This section also describes the communities' education opportunities, employment opportunities, transportation opportunities, housing tenure, housing cost burden and publicly supported housing inventory.
2. *Status of Previous AI Recommendations* includes the recommendations made in the most recent AIs, and a summary of which recommendations have been addressed, and which have not.
3. The *Community Participation* section summarizes stakeholder interviews and survey results.
4. The *Fair Housing Analysis* section evaluates the data presented in the *Demographic Summary* to assess its housing implications. Issues analyzed include racial and ethnic segregation; location of rental housing; supply of housing accessible for persons with disabilities; segregation of persons with disabilities; housing cost burden by race and ethnicity; and private market impediments in mortgage lending, rental housing, housing sales and homeowners insurance.
5. *The Fair Housing Enforcement* section summarizes local fair housing ordinances and identifies deficiencies in their coverage, enforcement mechanisms and remedies. Additionally, it describes local fair housing complaints made to MMFHC or the US Department of Housing and Urban Development in Rock County.
6. The *Impediments to Fair Housing* section delineates barriers to equal housing, as identified through analysis of previous sections of this report.
7. The *Fair Housing Goals and Strategies* section details recommendations, including goals, strategies and a timeframe for implementation. This section also includes measurement of the progress of each, and which entities are responsible for implementation of recommended activities.
8. Finally, the *Appendices* includes more detailed data from the US Department of Housing and Urban Development (HUD) Affirmatively Furthering Fair Housing (AFFH) tables and maps, the Lending Analysis, the Housing Survey, and other materials.

Methodology

In its simplest form, the AI process consists of gathering data from a variety of sources, analysis of that data, identification of fair housing impediments based on the data analysis, and the creation of goals and strategies, or recommendations, to overcome the impediments.

The authors are mindful that quantitative data can only paint a partial picture, and the lived experiences of marginalized groups in Rock County and throughout our state and

nation are never fully described by these resources. Therefore, both quantitative data and qualitative data are used in this report to identify impediments.

Early in the process of developing this AI, MMFHC met with City and County staff to accomplish the following:

- Identify a pool of stakeholders in the community, which would include individuals in the public and private housing markets, as well as a cross section of local housing consumers, who would also represent groups that have historically and currently faced impediments to fair housing choice;
- request and obtain copies of relevant ordinances and policies that may have fair housing implications;
- review and assess the jurisdictions' fair housing efforts to date; and
- obtain existing local reports and plans that are relevant to housing and locational choice.

As noted above, community participation is an essential component of the AI process. MMFHC gathered input from public and private entities and community organizations that have knowledge of, and/or responsibility for, furthering fair housing practices. MMFHC staff also conducted one-on-one interviews with community members to identify fair housing impediments from a variety of perspectives. Additionally, housing surveys were administered to renters, homeowners, homeless persons and housing service providers to gather their assessments of housing conditions and needs in Rock County.

The Rock County Hazard Mitigation Plan and Rock County's Broadband Service Maps were reviewed to ascertain whether fair housing impediments were apparent in either the risk of hazards or access to broadband internet.

Further, a demographic analysis of Beloit, Janesville and Rock County was conducted. Much of the demographic data for this report is compiled from the American Community Survey (ACS), which is conducted by the US Census Bureau. Each year, the ACS samples communities throughout the United States and produces estimates based on the results. Because of the amount and complexity of the data, the most recent data available from the ACS is from 2016 and 2017.

The data also includes a margin of error, which indicates the degree of accuracy for each data set such as race or disability. Because the population of some communities of color is numerically small, some groups within the community are difficult to estimate accurately, such as Asian Americans and Native Americans.

Other sources of data include, but are not limited to: the Bureau of Labor Statistics, the Department of Public Instruction of the State of Wisconsin, Federal Reserve Economic

Data, and the Department of Housing and Urban Development's *Affirmatively Furthering Fair Housing* geospatial tool[1].

To identify fair housing impediments, data was analyzed to determine impacts on Beloit, Janesville and Rock County residents based upon their protected class memberships. With both quantitative information gathered in relevant reports and demographic analyses, and qualitative information gathered in interviews, surveys and a review of ordinances and policies, MMFHC identified impediments to fair housing and explained the impact of these impediments on the jurisdictions' and their residents.

Recommendations to overcome identified impediments are in the final section of the AI, *Fair Housing Goals and Strategies*. These recommendations, formulated with relevant Beloit, Janesville and Rock County staff and department leaders, form the basis of a meaningful action plan for the City of Beloit, City of Janesville and Rock County.

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[1] https://egis.hud.gov/affht/

Demographic Summary

Rock County is home to 161,226 people and is the ninth-most populous county in the State of Wisconsin. Almost two-thirds of County residents reside in either the City of Janesville or the City of Beloit. Although these two cities are fewer than 15 miles apart, there are significant demographic differences between them. As will be explored in other sections of this document, these differences impact the housing choices available to Rock County residents.

FIGURE 1: Rock County, Beloit, and Janesville Demographics, 2017

2017	Rock County	Janesville	Beloit	Balance of County
Total Population	161,226	63,957	36,733	60,536
% Population		39.7%	22.8%	37.5%
Median Age	39.3	39	33.8	
Median Income	$53,410	$52,617	$38,930	
Poverty Rate	14.30%	13.30%	24.80%	
Education - HS or Higher	90.20%	92.20%	82.90%	
Percent with a Disability	14.40%	14.40%	15.40%	
Born in US	95.40%	95.70%	91.30%	
Language other than English at home	8.10%	5.30%	17.70%	
Households (#)	64,482	26,470	13,934	24,078
Tenure - Own	68.7%	66.8%	57.6%	77.1%
Tenure - Rent	31.3%	33.2%	42.4%	22.9%

As detailed in the table above, Beloit is quite different from the rest of Rock County in several respects: in Beloit, the median age is younger by about 5 years; its median income, high school graduation rate and homeownership rate are lower; and the percentage of households speaking a language other than English at home is over two times higher.

Further, it is notable that Rock County's poverty rate (14.3 percent) is lower than the national rate of 15 percent, and Janesville's poverty rate is only 13.3 percent. Beloit's poverty rate is considerably higher, at 24.8 percent.

Race and Ethnicity

The table below makes clear that Rock County is a predominantly white, non-Hispanic community (83.3 percent); and Janesville's population is 89 percent white.

In contrast, Beloit's population is 61.3 percent white.

FIGURE 2: Rock County Race and Ethnicity 1990 – 2017[2]

	Rock County		Janesville		Beloit		Balance	
	Estimate	%	Estimate	%	Estimate	%	Estimate	%
Total population	161,226		63,957		36,733		60,536	
RACE								
White alone	134,345	83.3	56,902	89.0	22,528	61.3	54,915	90.7
Black or African American alone	7,017	4.4	1,185	1.9	4,825	13.1	1,007	1.7
American Indian and Alaska Native alone	182	0.1	72	0.1	82	0.2	28	0.0
Asian alone	1,899	1.2	941	1.5	452	1.2	506	0.8
Hawaiian and PI alone	6	0.0	6	0.0	0	0.0	0	0.0
Some other race alone	52	0.0	0	0.0	38	0.1	14	0.0
2 or more races	4,152	2.6	1,486	2.3	1,549	4.2	1,117	1.8
Hispanic/Latino	13,573	8.4	3,365	5.3	7,259	19.8	2,949	4.9
Mexican	11,724	7.3	2,625	4.1	6,544	17.8	2,555	4.2
Puerto Rican	837	0.5	402	0.6	338	0.9	97	0.2
Cuban	127	0.1	11	0.0	53	0.1	63	0.1
Other Hispanic/Latino	885	0.5	327	0.5	324	0.9	234	0.4

The local population of people of color has increased markedly since 1990, and is largely responsible for Rock County's growth in recent decades. Total population increased by a net 21,716 residents between 1990 and 2017; non-white residents account for 79 percent of that growth. Growth in white (3.5 percent) and Black (6.4 percent) populations have been moderate, but the Asian American population has

[2] 2017 ACS 5-Year Estimates

increased by 104.4 percent, the population that identifies as “two or more races” increased 159.5 percent, and the Latino population increased from 1,754 to 13,583, or 674.4 percent.

National Origin and Language

Key data about Rock County residents’ national origin and language usage include:

- 4.6 percent of Rock County residents were born outside of the United States
- Among residents born outside the U.S., about 58 percent are from Mexico.
- Persons born in Vietnam or China each account for about 3.4 percent of residents born outside the U.S.
- People who speak only English make up 91.9 percent of Rock County residents.
- Following Mexico, Vietnam and China, the most common nations of origin of foreign-born residents are Germany, the Philippines, Canada, Cambodia, India, Guatemala and Korea.

Ability

In Rock County, 23,394 people (14.5 percent of the population) report having one or more disabilities. Details regarding these disabilities can be found in the figure below.

FIGURE 3: Rock County Disability by Type[3]

	Rock County	%	Beloit	%	Janesville	%	Balance	%
People with a disability:	23,394	14.5	5,495	15.0	10,459	16.4	7,440	12.2
Types of difficulties*:								
Hearing difficulty	6,409	27.4	1,106	20.1	2,801	26.8	2,502	33.6
Vision difficulty	3,255	13.9	932	17.0	1,504	14.4	819	11.0
Cognitive difficulty	9,089	38.9	2,788	50.7	3,832	36.6	2,469	33.2
Ambulatory difficulty	10,686	45.7	2,383	43.4	4,363	41.7	3,940	53.0
Self-care difficulty	3,958	16.9	1,043	19.0	1,700	16.3	1,215	16.3
Independent living difficulty	7,287	31.1	1,552	28.2	3,642	34.8	2,093	28.1

**individuals may have more than one disability*

[3] 2017 ACS 5-Year Estimates

It is challenging to assess availability of housing stock that is physically accessible for persons with disabilities. Beloit, Janesville and Rock County do not maintain lists of housing with accessibility features.

However, for clues about availability of physically accessible housing, we can consider the age of local housing stock. The federal Fair Housing Act requires basic accessibility features for many multifamily housing developments built for first occupancy on and after March 31, 1991. Housing developed prior to that time is less likely to be accessible to persons with disabilities. In Beloit, only 16.3 percent of housing stock was built since 1990. Janesville has a significantly larger proportion of newer housing; in Janesville, 37.7 percent of housing units were built since 1990.

Income and Poverty

Key data about income in Rock County include**:**

- Median household income in Rock County was $53,410 in 2017, lower than the U.S. median of $54,610. Janesville's median income was just below that of the County, at $52,617, and Beloit's was significantly lower, at $38,930.
- Median income varies by race and ethnicity. For example, white residents earned slightly more than the median, while the median income among Black residents in Rock County was $25,810, less *than half* of the County median.
- Black households have the lowest median income of the racial categories used by the American Community Survey. Latino household median income is also significantly lower than the County median, at $33,158.
- U.S. Poverty rates: For a single parent home with two minor children, this represented an annual income of $21,330 in 2019.
- The poverty rate for Rock County was 14.3 percent in 2017, lower than the national rate of 15 percent. While only 12.1 percent of Rock County white households fall below the poverty threshold, 38.7 percent of Black families and almost 33 percent of Latino families are poor. By contrast, throughout the United States, only 26.2 percent of Black households and 18.3 percent of Latino families are below the poverty threshold, while 12.4 percent of white people are below poverty. In short, the disparity in poverty between white, Black and Latino households is much greater in Rock County than in the nation.
- Beloit's poverty rate is greater than Rock County and Janesville (24.8 percent). The poverty rate for Latino households (42.1 percent) in Beloit is greater than any other group. Black (37 percent) and white (21 percent) households also have high rates of poverty.
- Black households in Janesville have the highest poverty rate (43.3 percent) of any group in Rock County.

FIGURE 4: Rock County, Beloit, and Janesville Household Median Income by Race and Ethnicity[4]

	Rock County	Beloit	Janesville
All Households	$53,410	$38,930	$52,617
White	$55,276	$41,954	$53,731
Black	$25,810	$23,618	$27,036
Latino	$33,158	$30,550	$39,583

FIGURE 5: Rock County, Beloit, and Janesville Poverty[5]

	Rock County		Beloit		Janesville		Balance	
	In Poverty	%	In Poverty	%	In Poverty	%	In Poverty	%
Total	22,550	14.3	8,673	24.8	8,374	13.3	5,503	9.2
White	16,918	12.1	5,421	21.0	6,809	11.6	4,688	8.4
Black or African American	2,666	38.7	1,790	37.0	469	43.3	407	41.4
Hispanic or Latino	4,395	32.9	3,010	42.1	935	28.5	450	15.4

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[4] 2017 ACS 5-year estimates
[5] Ibid

Education is fundamental to assessments of equity. The location of affordable housing and the existence of segregated housing patterns can reduce some populations' access to high performing schools that successfully serve diverse student populations.

There are multiple school districts in Rock County: Beloit, Beloit Turner, Brodhead, Clinton Community, Edgerton, Evansville Community, Janesville, Milton, Parkview, and Whitewater Unified. See Map 1.

Racial and ethnic demographics vary widely by school district. The population of white students in the School District of Beloit is 36 percent, whereas the white student populations in Brodhead, Milton, and Parkview all exceed 90 percent. Detailed information about each district's populations, as well as overall educational achievement, can be found in the figures below.

There has been an increase in the proportion of non-white children in Rock County from 2012 to 2017. The Beloit School District student body was 40.8 percent white in 2012; in 2017 the percentage of white students was 36.0 percent. The Janesville School District student body was 76.7 percent white in 2012; in 2017 the percentage of white students was 72.8 percent.[6]

Racially and economically segregated neighborhoods are inherently linked to racial and economic educational achievement disparity.[7] Figure 6 shows that the school districts with the highest proportions of students of color, Beloit and Janesville, also score lower in school district proficiency.

[6] WiseDash, 2017

[7] Rothstein, Richard, Economic Policy Institute; *The Racial Achievement Gap, Segregated Schools, and Segregated Neighborhoods – A Constitutional Insult*, 2014

MAP 1: Rock County School Districts

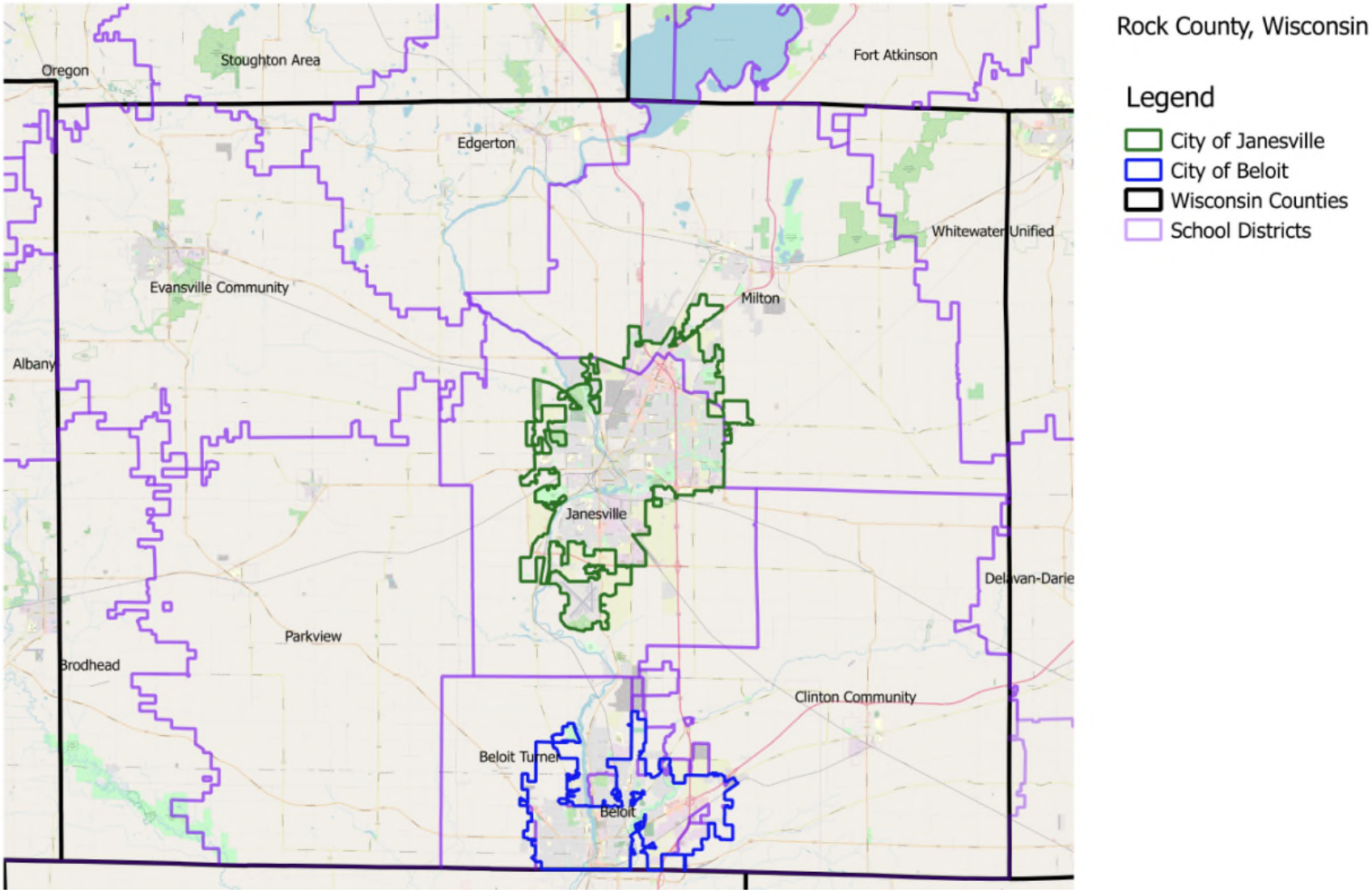

FIGURE 6: Rock County School District - Race and Ethnicity [8]

District Name	DPI score[9]	# Enrolled	Asian	Black	Latino	White	Two or More Races
Beloit	60.1 Meets few expectations	6,823	0.7%	23.3%	32.4%	36.0%	6.7%
Beloit Turner	78.4 Exceeds Expectations	1,538	1.0%	3.5%	11.6%	77.8%	6.0%
Brodhead	76.6 Exceeds Expectations	1,004	0.3%	1.9%	6.2%	90.5%	1.0%
Clinton Community	73.6 Exceeds Expectations	1,105	0.3%	2.2%	14.6%	81.1%	1.7%
Edgerton	74.6 Exceeds Expectations	1,826	0.3%	1.3%	8.5%	86.5%	3.3%
Evansville Community	76.7 Exceeds Expectations	1,808	0.4%	1.9%	6.3%	89.7%	1.6%
Janesville	68.4 Meets Expectations	10,182	2.1%	5.4%	12.8%	72.8%	6.6%
Milton	74.7 Exceeds Expectations	3,497	2.1%	0.9%	4.2%	90.2%	2.6%
Parkview	78.5 Exceeds Expectations	746	0.1%	1.1%	4.7%	91.4%	2.3%
Whitewater Unified	72.3 Meets Expectations	1,927	1.3%	2.3%	29.1%	64.1%	2.6%

[8] Wisconsin Department of Public Instruction

[9] WI Department of Public Instruction District Scorecard; Scores 0-52.9 Fails to Meet Expectations; Scores 53-62.9 Meets Few Expectations; Scores 63-72.9 Meets Expectations; Scores 70-82.9 Exceeds Expectations; Scores 83-100 Significantly Exceeds Expectations

In the City of Beloit:

- The City of Beloit population is most reflected in the data from the School District of Beloit (SDB), not Beloit Turner. Beloit Turner, a school district with considerably smaller student enrollment, consists primarily of students from the township surrounding the City of Beloit.
- Local stakeholders indicated that a separate school district, Beloit Turner, was created decades ago with racial motivations
- 63 percent of SDB students are non-white. This is significantly higher than all other Rock County school districts.
- Similarly, the percentage of students who are "economically disadvantaged"[10] in SDB (71.6 percent) is much greater than any other district in the County.
- 15.6 percent of SDB students have limited English proficiency (LEP). This is the highest proportion of students with LEP in the County.[11]
- Asian residents of Beloit are most likely to have a high school diploma and bachelor's degree, followed by white residents and Black residents, respectively. Hispanic residents have the lowest educational attainment. This may be due to the high number of Mexican-born residents in Beloit.
- The larger disparities are in measuring school proficiency between jurisdictions. School proficiency in Janesville is more than 3 times greater than that of Beloit. (See Figure 9.)
- Data from the Wisconsin Department of Public Instruction indicates that 19.7 percent of all students tested in English Language Arts (ELA) in the Beloit School District (2017-18) scored advanced or proficient. 30.1 percent of white students tested advanced or proficient, while the same is true for only 9.0 percent of Black children, and 14.9 percent of Hispanic children. Of the 28 Asian students, 52 percent scored advanced or proficient.
- 6.1 percent of students with disabilities scored as advanced or proficient in English Language Arts (ELA).
- 15.3 percent of economically disadvantaged students scored advanced or proficient.
- Of children with limited English proficiency, 12.5 percent scored advanced or proficient.
- Beloit Turner District shows significantly higher proficiency levels: 45.2 percent of all students tested in ELA scored advanced or proficient; 47.8 percent of white students tested advanced or proficient, as did 25.9 percent of Black children and 33.7 percent of Latino children.

In the City of Janesville:

[10] A member of a household that meets the income eligibility guidelines for free or reduced-price meals (less than or equal to 185 percent of Federal Poverty Guidelines) is considered economically disadvantaged

[11] Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can have limited English proficiency.

- The School District of Janesville (SDJ) is the largest enrollment of any district in the County, at 10,182.
- 27.2 percent of SDJ students are non-white.
- 7 percent of SDJ students have LEP.
- 46.3 percent of SDJ students are economically disadvantaged.
- As in Beloit, Asian residents of Janesville are most likely to have a high school diploma and bachelor's degree, followed by white residents and Black residents, respectively. Hispanic residents have the lowest educational attainment.
- Data from the Wisconsin Department of Public Instruction indicates that 42.5 percent of all students tested in English Language Arts in the Janesville School District (2017-18) scored advanced or proficient. This varies across race: 46.3 percent of white students tested advanced or proficient, while only 21.8 percent of Black students, 33 percent of Latino students, scored advanced or proficient. 51.2 percent Asian students scored advanced or proficient.
- Additionally, 11.5 percent of students with disabilities scored as advanced or proficient; 32.4 percent of economically disadvantaged students scored advanced or proficient.
- Of children with limited English proficiency, 33.2 percent scored advanced or proficient.

FIGURE 7: Rock County School District - Other Demographics[12]

District Name	District Enrollment	Students with Disabilities	Economically Disadvantaged	Limited English Proficient
Beloit	6,823	13.1%	71.6%	15.6%
Beloit Turner	1,538	10.9%	39.9%	2.9%
Brodhead	1,004	11.5%	40.2%	2.9%
Clinton Community	1,105	13.1%	34.2%	6.0%
Edgerton	1,826	15.4%	28.6%	3.3%
Evansville Community	1,808	11.8%	22.2%	1.8%
Janesville	10,182	12.9%	46.3%	7.0%
Milton	3,497	12.2%	18.0%	1.3%
Parkview	746	12.7%	35.4%	0.1%
Whitewater Unified	1,927	17.7%	38.3%	14.6%

FIGURE 8: Rock County, Beloit, and Janesville Educational Attainment by Race and Ethnicity[13]

[12] Ibid.

	White (Non-Hispanic) %		Black %		Asian %		Hispanic %	
	High School	Bachelor Degree/ Higher	High School	Bachelor Degree/ Higher	High School	Bachelor Degree/ Higher	High School	Bachelor Degree/ Higher
Rock County	92.3	22.7	79.6	10.9	91.6	39.5	65.3	6.8
Beloit	88.2	19.7	77.7	10	93.8	66.1	60.6	4.3
Janesville	93.2	23.7	79.3	15.8	93.6	32.1	72	11.7

Maps 2 and 3 show Beloit's and Janesville's census tracts overlaid with race and ethnicity data. The census tracts with the highest performing schools are the darkest shade, the lowest performing schools are lightest shade of gray.

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[13] 2017 ACS 5-year Estimates

FIGURE 9: Student Achievement by Race/Ethnicity, Disability - Economic Disadvantage and English Learners for Beloit, Beloit Turner and Janesville School Districts

2017-2018	Percent of Students Advanced or Proficient	
	English Language Arts	Math
Beloit		
All Students (3,270)	19.7	18.5
Asian (28)	52	53.9
Black (717)	9.0	8.6
Latino (1,090)	14.9	14.3
White (1,221)	30.1	27.5
Students with Disabilities (404)	6.1	3.6
Economically Disadvantaged (2,461)	15.3	14.5
English Language Learners (820)	12.5	11.8

Beloit Turner		
All Students (784)	45.2	44.8
Asian	**	**
Black (43)	25.9	14.8
Latino (99)	33.7	33.7
White (593)	47.8	48.2
Students with Disabilities (99)	13.3	11.8
Economically Disadvantaged (317)	35.3	34.4
English Language Learners (41)		

Janesville		
All Students (4,814)	42.5	39.3
Asian (110)	51.2	47.7
Black (233)	21.8	16.7
Latino (594)	33.0	27.4
White (3,600)	46.3	43.4
Students with Disabilities (581)	11.5	10.4
Economically Disadvantaged (2,565)	32.4	29.3
English Language Learners (498)	33.2	27.8

** No data available if less than 20 students

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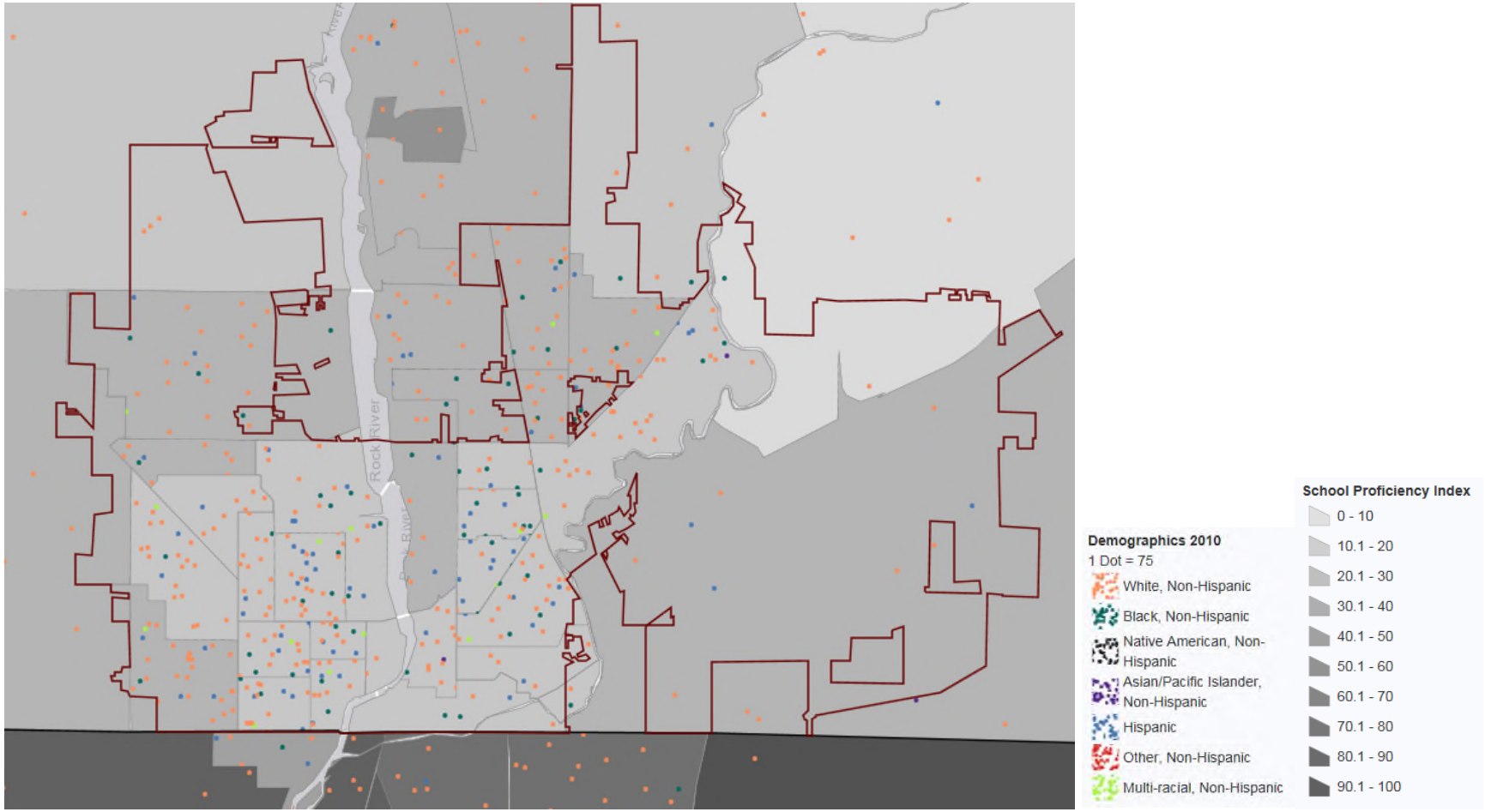
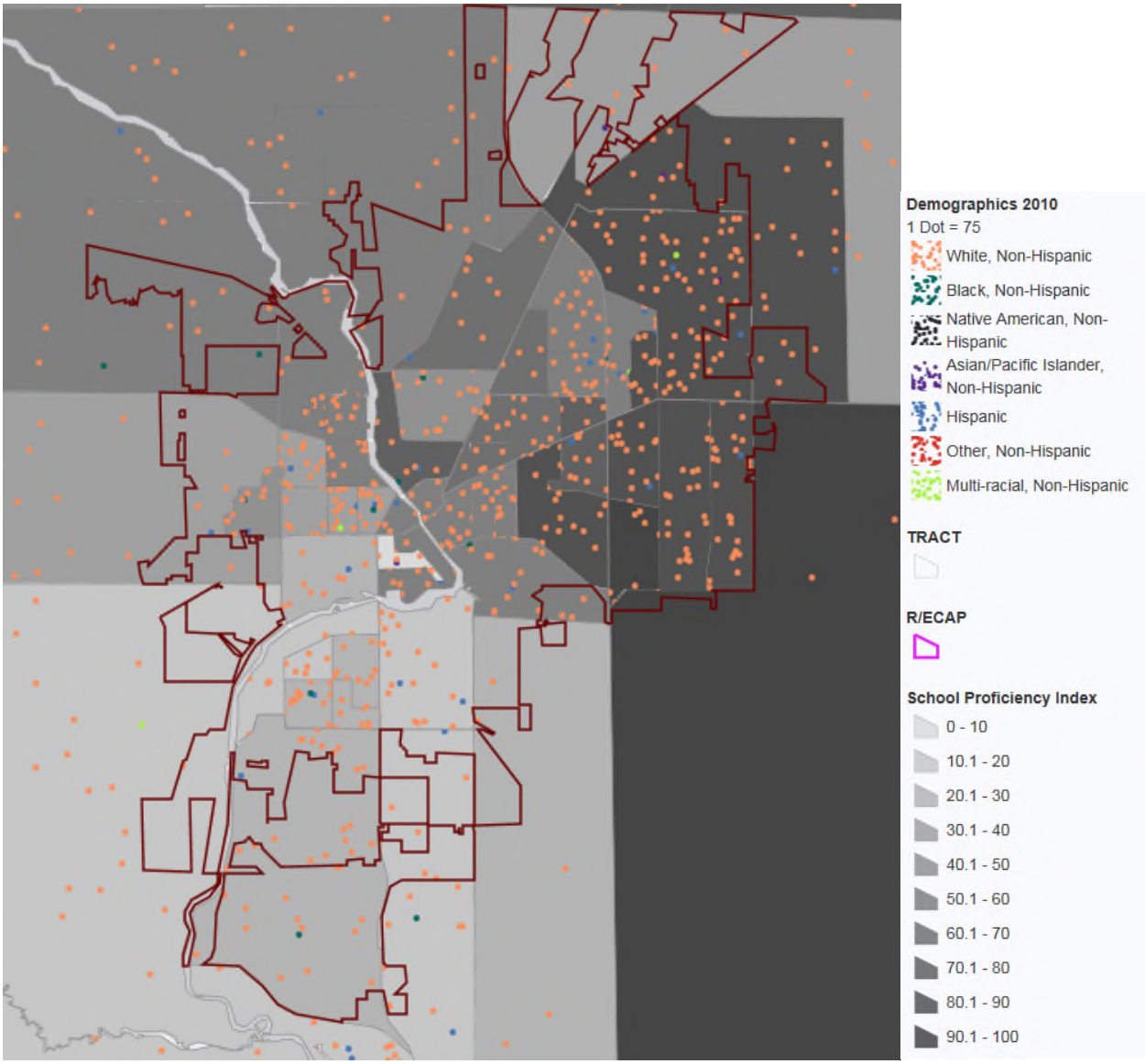
MAP 2: Beloit School Proficiency with Race and Ethnicity[14] by Census Tract



[14] Ibid.

MAP 3: Janesville School Proficiency - Race and Ethnicity[15] by Census Tract



[15] U.S. Department of Housing and Urban Development Affirmatively Furthering Fair Housing Map

FIGURE 10: Rock County Area Child Poverty Rate (Source: Diversity Data Kids)

Children in Poverty (Rate)		Percent
2012-2016	2007-2011	1999
23.3%	19.1%	9.5%

Definition: The percent of children below the federal poverty level.

Source: U.S., states, metro areas, cities and counties: U.S. Census Bureau, 2000 Decennial Census, Summary File 1; U.S. Census Bureau, 2007-2011 American Community Survey, 2012-2016 American Community Survey. School districts: U.S. Census Bureau, 2000 Decennial Census, School District Tabulation (STP2); U.S. Census Bureau, 2007-2011 American Community Survey, 2012-2016 American Community Survey. | Show Notes

- Figure 10, above, from Diversity Data Kids, illustrates a significant increase of children living in poverty. The poverty rate increased from 9.5 percent to 23.3 percent between 1999 and 2016.
- Wisconsin's Department of Public Instruction report shows that by 2017, 71.6 percent of the Beloit School District's students are economically disadvantaged.[16]
- 39.9 percent of the Beloit Turner School District's students are economically disadvantaged.
- 46.3 percent of the Janesville School District's students are economically disadvantaged.
- According to Rock County's Broadband Service Map (see Appendix), Beloit and Janesville have access to broadband internet, but some of the unincorporated areas of the County do not have access. Children without internet access don't perform as well in school[17] and adults without internet access don't have access to as many employment opportunities.

[16] An "economically disadvantaged" student is a student who is a member of a household that meets the income eligibility guidelines for free or reduced-price meals (less than or equal to 185 percent of Federal Poverty Guidelines) under the National School Lunch Program.

[17] *Home Computers and Educational Outcomes,* Board of Governors of the Federal Reserve System, 2008

Key information about employment in Rock County includes:

In the City of Beloit:

- According to the Bureau of Labor Statistics, Beloit's unemployment rate was 4.3 percent in January 2019. This is part of a downward trend in unemployment since February 2010, when the unemployment rate peaked at 19 percent.
- Among people of color, rates are as high as 18.6 percent in the Black community and 12.3 percent for the Latino community, according to the 2017 ACS.[18]
- White unemployment is 8 percent[19].
- According to the 2017 ACS, Beloit had a higher unemployment rate for all races and ethnicities than Rock County and Janesville.

In the City of Janesville:

- Janesville's unemployment rate stood at 3.5 percent in January 2019;[20] this rate has been decreasing since peaking at 15.2 percent in March 2009.[21]
- Among people of color, rates are as high as 16.7 percent in the Black community.
- The Latino community has the lowest unemployment rate at 4.9% according to the 2017 ACS.[22]
- White unemployment is 5.8 percent.[23]

In Rock County:

- Black residents have the highest unemployment rates in Rock County, Beloit and Janesville.
- Major employers in Rock County include public agencies, the health care sector and educational institutions. Additional detail about Rock County employers can be found in the tables below.

[18] The most recent statistics that break down unemployment rates by race and ethnicity are found in the 2017 ACS. Even though the rates are not current, they illustrate racial and ethnic disparities.
[19] Ibid
[20] US Department of Labor, Bureau of Labor Statistics, Local Area Unemployment Statistics, 2019
[21] Ibid.
[22] The most recent statistics that break down unemployment rates by race and ethnicity are found in the 2017 ACS. Even though the rates are not current, they illustrate racial and ethnic disparities.
[23] Ibid.

- Among people of color, rates are as high as 17 percent in the Black community and 10.3 percent for the Latino community, according to the 2017 ACS. [24]
- White unemployment is 5.5 percent.[25]

Figure 11: Unemployment rates by Race and Ethnicity[26]

	Rock County	Beloit	Janesville
White (not Hispanic)	5.5	8.0	5.8
Black	17.0	18.6	16.7
Asian	0	0	0
Hispanic	10.3	12.3	4.9

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Disparities in Access to Opportunities: Commuting and Transit

Key data about commuting and transportation in Rock County include:

- Most Rock County commuters drive alone.
- Users of public transit are disproportionately non-white. For instance, only 1.9 percent of Janesville's population is Black, but 10.5 percent of transit users are Black.

The tables below provide additional detail.

[24] The most recent statistics that break down unemployment rates by race and ethnicity are found in the 2017 ACS. Even though the rates are not current, they illustrate racial and ethnic disparities.
[25] 2017 American Community Survey – 5 Year Estimates
[26] Ibid

FIGURE 12: Methods of Getting to Work[27]

	Rock County	Beloit	Janesville
Drove Alone	63,761	11,838	26,663
Carpooled	6,936	1,584	2,902
Public Transit	754	78	332

FIGURE 13: Users of Transit by Race and Ethnicity[28]

	Rock County	Beloit	Janesville
White	68.5	59.0	69.9
Black	13.2	32.1	10.5
Asian	4.0	0	0
Hispanic	10.8	0	14.8

FIGURE 14: Transportation by Race and Ethnicity

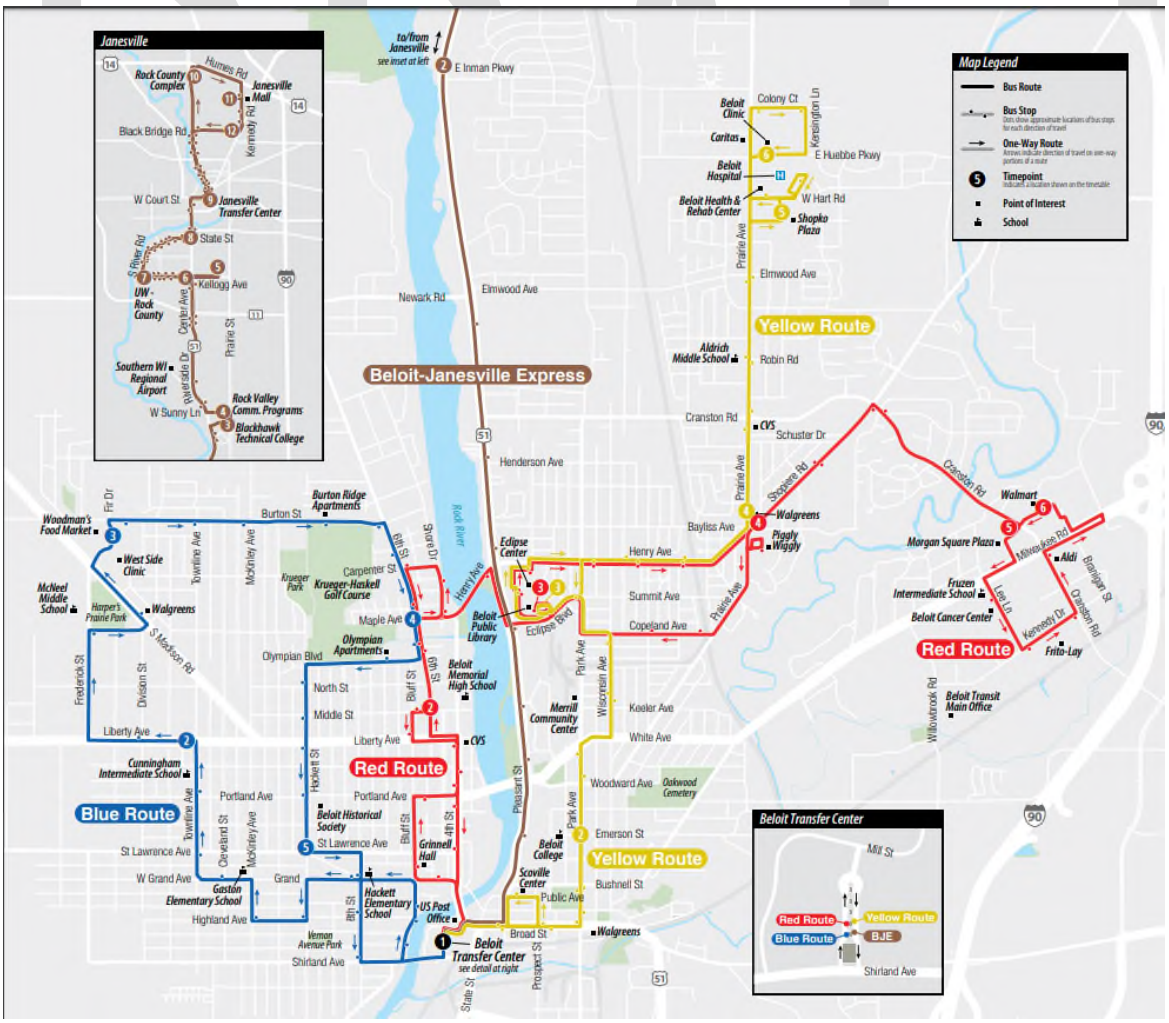
		Who drives a car alone?	**Who carpools?**	**Transit, walk, bicycle, taxi?**
Rock County	White (69,908)	84.0%	8.6%	3.8%
	Black (2,577)	82.0%	11.4%	4.4%
	Hispanic (5,123)	69.7%	23.1%	5.1%
Beloit	White (11,880)	79.3%	10.1%	7.4%
	Black (1,762)	83.9%	10.3%	2.8%
	Hispanic (2,445)	71.0%	22.3%	5.2%
Janesville	White (29,478)	85.7%	8.8%	3.0%
	Black (408)	77.5%	12.7%	9.8%
	Hispanic (1,443)	72.3%	21.3%	6.1%

[27] 2017 ACS 5-year Estimates
[28] Ibid.

In the City of Beloit:

- Beloit Transit Services (BTS) operates the bus system for the City of Beloit.
- BTS has three routes; they operate Monday through Friday from 6 a.m. to 7 p.m., and Saturday 8:30 a.m. to 4:00 p.m.
- Beloit contracts with Rock County Specialized Transit to provide paratransit service for qualifying individuals unable to use the Beloit Transit System due to a disability.
- A bus service, the Beloit Janesville Express (BJE), provides transportation between the two cities.
- <u>Bus routes in Beloit do little to connect low- and moderate-income neighborhoods and affordable housing with employers and other amenities in the area.</u>

MAP 4: Beloit Transit Services Coverage



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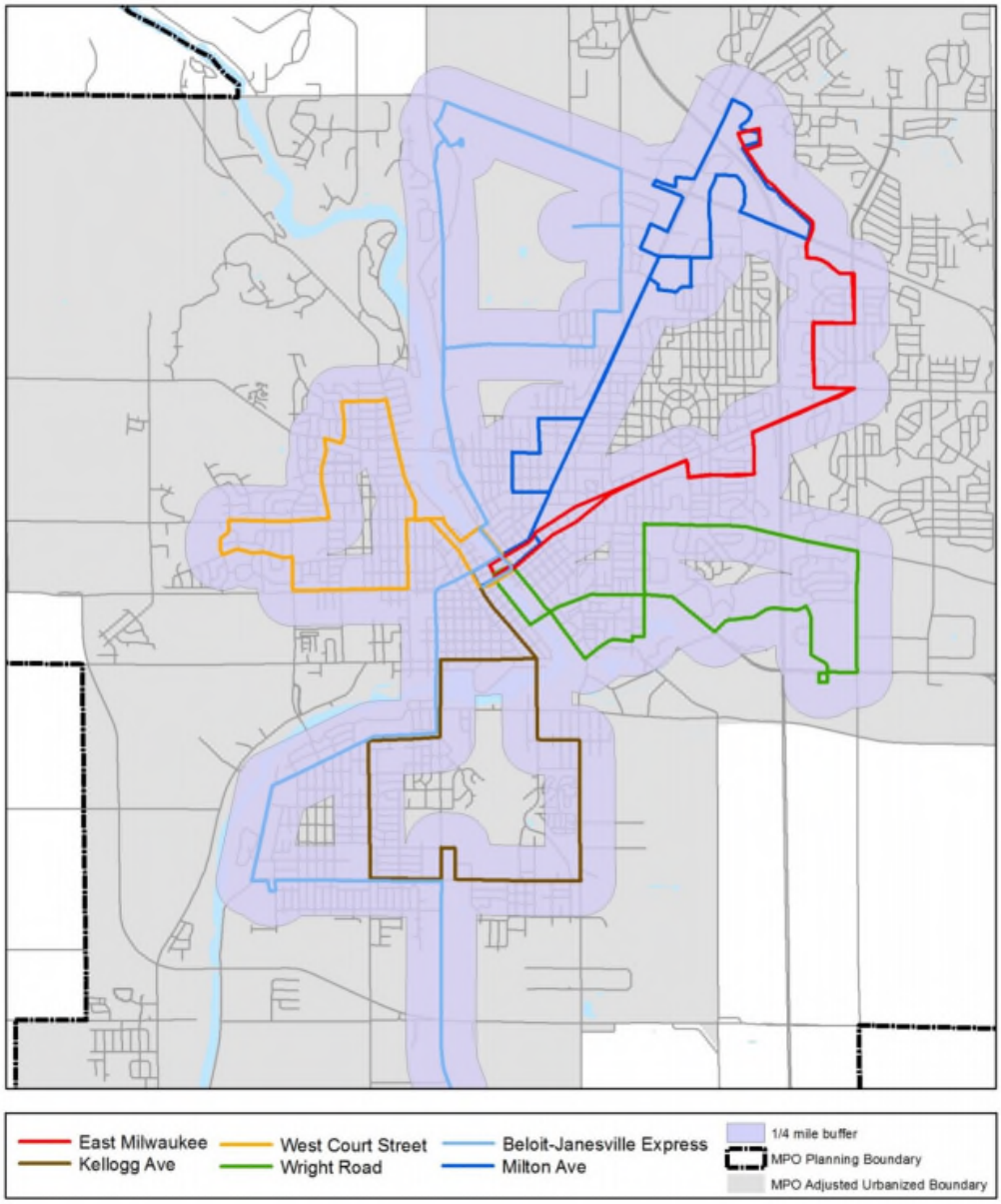
In the City of Janesville:

- Janesville Transit System (JTS) operates buses for the City of Janesville.
- There are 5 routes; they operate each weekday between 6:15 am and 6:15 pm. On Saturdays, buses run from 8:45 am to 6:15 pm.
- Nightside Service is offered by 3 routes from 6:15 pm to 10:15 pm
- The City of Janesville offers paratransit service for qualifying individuals unable to use the Janesville Transit System due to a disability. JTS contracts with Rock County Transit for paratransit service.
- Publicly subsidized housing in Janesville is connected to employers and amenities through its bus routes.

MAP 5: Janesville Transit Services Coverage



In Rock County:

- Rock County Transit, a shared ride system, is a program of the Rock County Council on Aging.
- Services are available to residents 55 and over and to residents with a disability, regardless of age.
- Rock County Transit operates Monday through Friday 7:00 am to 5:00 pm and is available by appointment.
- Janesville and Beloit contract with Rock County Specialized Transit to provide door-to-door transportation for persons with disabilities who cannot use the buses of the JTS or BTS. Special certification is required to use Rock County Specialized Transit, and those who wish to use it must submit an application to be considered.

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Publicly Supported Housing Inventory

Some households with very low income may have opportunities to obtain publicly subsidized housing. Various types of subsidized housing include:

- Privately owned apartment buildings and developments financed with Low Income Housing Tax Credits (LIHTC), which must set aside some or all of their units for income-qualified residents.
- City-owned public housing for income-qualified residents.
- Project -based Section 8 housing has a subsidy that stays with the building.
- Housing Choice Vouchers (HCV) or Portable Vouchers are given to income-qualified households and families, allowing them to find their own housing in the neighborhood and type of home they choose.

Rock County, Beloit and Janesville have some of each type of these resources. See Figure 16

FIGURE 15: Publicly Supported Housing in Rock County[29]

	Beloit	Janesville	Rock County
Public Housing	131	NA	235
Project-based Section 8 – Total	312	414	849
Housing Choice Voucher (HCV) Program	621	543[30]	1318
Low Income Housing Tax Credit (LIHTC) units[31]	821	517	182

Subsidies for affordable housing are limited, and demand for subsidized housing opportunities nearly always exceeds supply. Waiting lists for such housing, or for housing choice vouchers, are common. Of note:

- As of April 2019, there were approximately 239 families on Beloit's HCV waiting list and 117 on Janesville's HCV waiting list.[32]
- When Janesville's HCV waiting list opened in May 31, 2019, over 500 families applied the first day.
- Unit sizes that have the highest demand in Janesville are one- (43 percent of all requested units) and two-bedrooms (41 percent of all requested units).

[29] U.S. Department of Housing and Urban Development Affirmatively Furthering Fair Housing data tables

[30] Janesville is authorized to have up to 543 Housing Choice Vouchers; there was an average of 473 vouchers being used in 2018.

[31] Source of LIHTC units is WHEDA's LIHTC Data Library

[32] This includes 63 families on the primary waiting list (with incomes 30% and below Area Median Income), and 57 families on the secondary waiting list (with incomes from 30-50% Area Median Income)

In the City of Beloit:

- There are 131 public housing units operated by the Beloit Housing Authority: 40 one-bedrooms, 33 two-bedrooms, 38 three-bedrooms, 17 four-bedrooms, and 3 five-bedrooms.
- There are 598 Housing Choice Vouchers administered by the Beloit Housing Authority, 540 of which are currently being used.
- Only 401 Low Income Housing Tax Credit (LIHTC) units have been developed since 2000. Some of these units are part of Beloit's public housing stock.

White residents are slightly overrepresented in project-based Section 8 housing. They comprise 61.3 percent of Beloit's population, but 72.2 of project-based Section 8 housing. The Latino population is underrepresented in every type of publicly subsidized housing.

In the City of Janesville:

- The City of Janesville does not have any public housing units.
- There are 536 Housing Choice Vouchers administered in Janesville by the Janesville Housing Authority.
- Only 110 LIHTC units have been developed since 2000 in Janesville.

White residents are overrepresented in the project-based Section 8 housing. They comprise 89 percent of Janesville's population, but 93.5 of project-based Section 8 housing. The Latino population is underrepresented in every type of publicly subsidized housing.

In the balance of Rock County:

- There are 104 public housing units operated outside Beloit and Janesville.
- There are 161 Housing Choice Vouchers allocated outside Beloit and Janesville administered by a variety of housing authorities, including the Edgerton and the Evansville Housing Authorities.
- Only 44 LIHTC units have been developed since 2000 in Rock County outside of Beloit and Janesville.

The Latino population is underrepresented in every type of publicly subsidized housing in Rock County as it is in Beloit and Janesville.

FIGURE 16: Rock County, Beloit and Janesville Publicly Supported Housing with Race and Ethnicity

		# of Units	White %	Black %	Latino %
Rock County (Balance)	*Rock County Total*	*69,348*	*83.3*	*4.4*	*8.4*
	Public Housing	235	68.1	27.5	3.4
	Project-based Section 8	849	86.1	10.8	2.0
	HCV Program	1318	55.0	39.3	4.3
Beloit	*Beloit Total*	*15,123*	*61.3*	*13.1*	*19.8*
	Public Housing	131	39.3	53.3	6.5
	Project-based Section 8	312	72.2	23.8	3.4
	HCV Program	621	34.4	60.9	4.6
Janesville	*JanesvilleTotal*	*28,268*	*89.0*	*1.9*	*5.3*
	Public Housing	NA	NA	NA	NA
	Project-based Section 8	414	93.5	3.7	1.5
	HCV Program	536	73.4	19.2	4.0

Maps 6-8 show where publicly supported housing is located as well as where persons of color reside. Most of the supported housing is located in the densest parts of the County which also coincide with where a vast majority of persons of color reside. Darker shades of gray indicate a census tract with a higher proportion of households with Housing Choice Vouchers.

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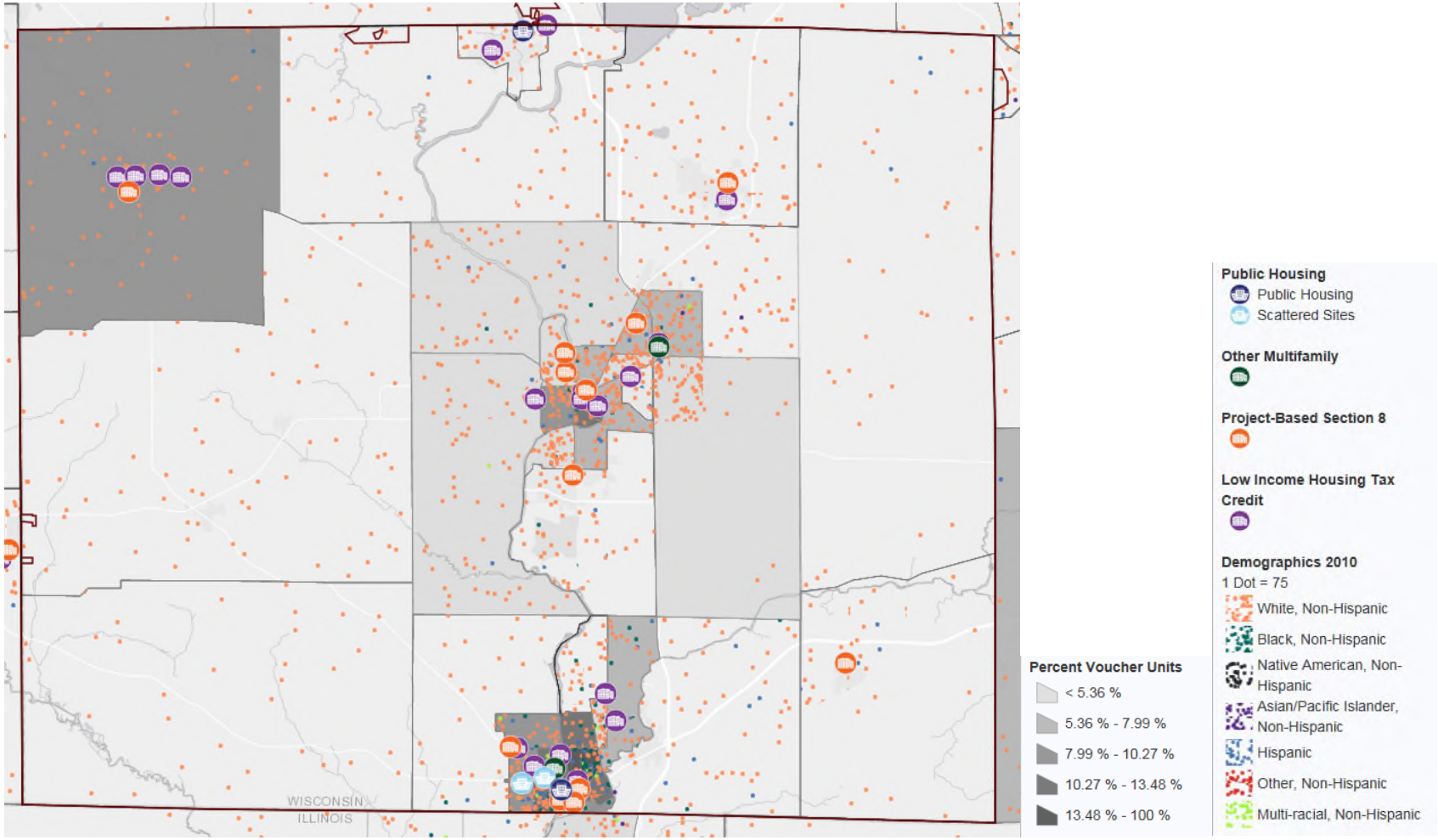
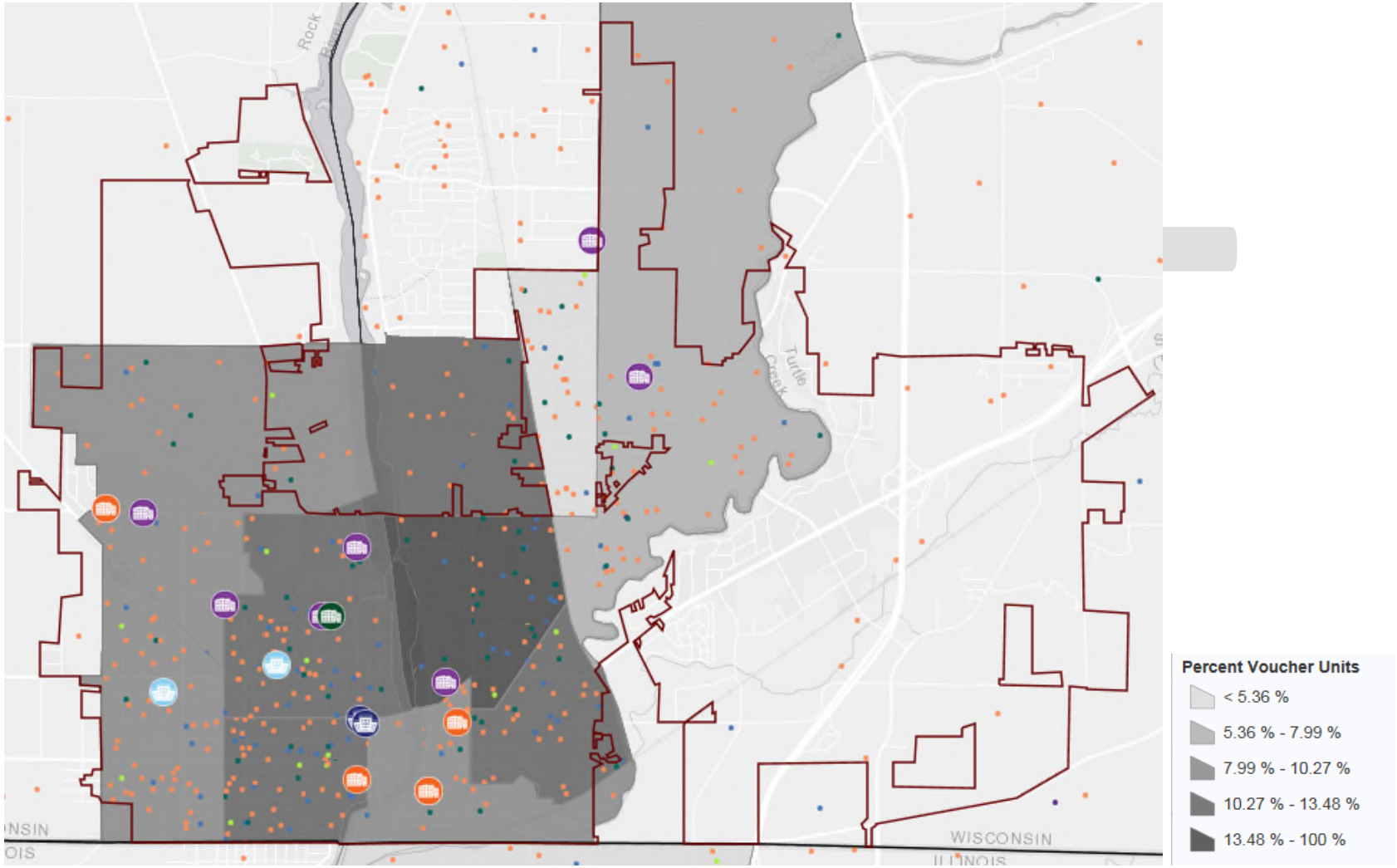
MAP 6: Rock County Publicly Supported Housing with Race and Ethnicity by Census Tract



MAP 7: Beloit Publicly Supported Housing with Race and Ethnicity by Census Tract



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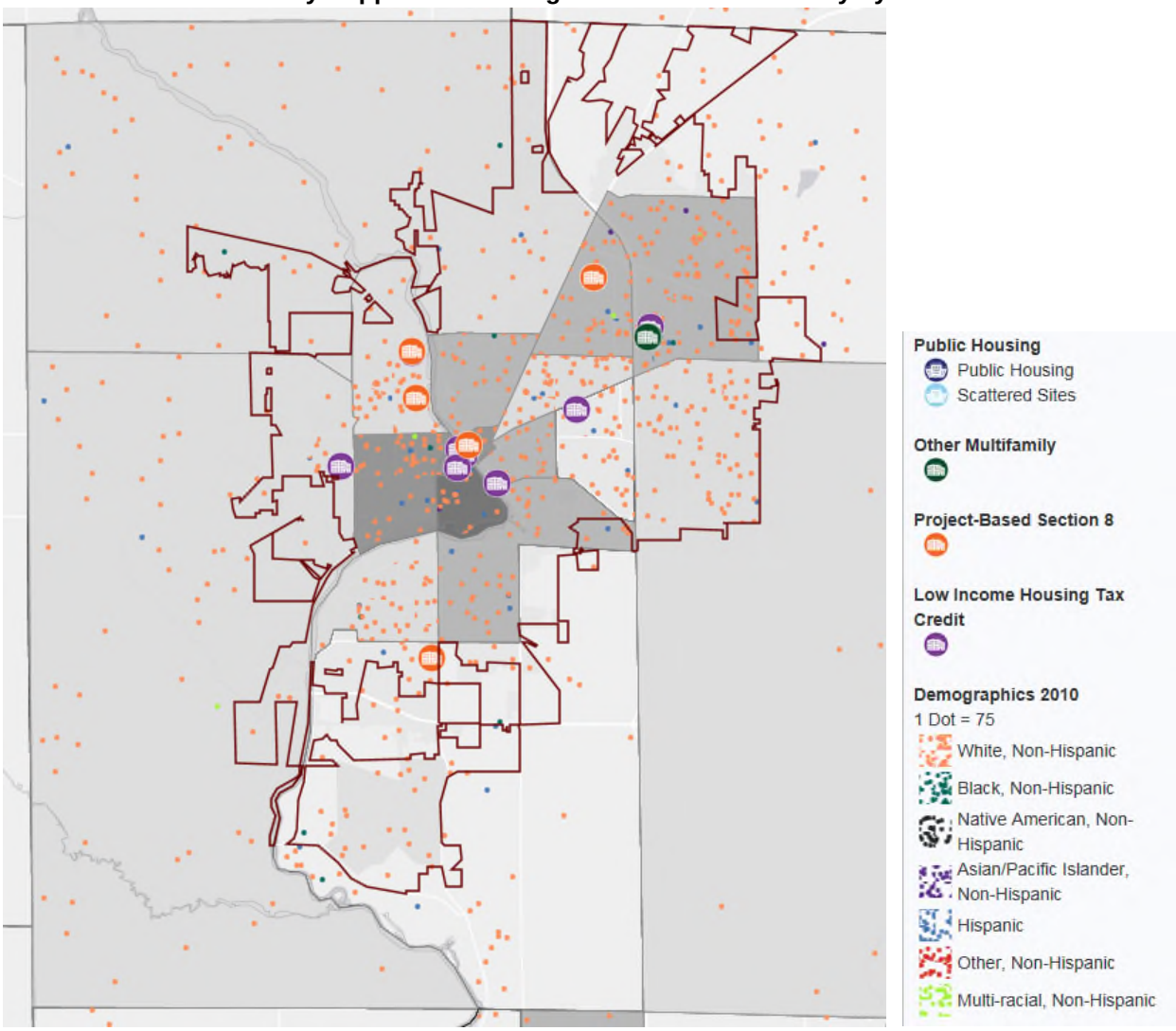
MAP 8: Janesville Publicly Supported Housing with Race and Ethnicity by Census Tract



Housing Problems: Cost Burden, Evictions, Homeownership Disparities and Low Vacancy Rates

Cost Burden

One third (33.3 percent) of Rock County households are currently experiencing housing problems. *Housing problems*, as defined by the U.S. Department of Housing and Urban Development (HUD), include:

- incomplete kitchen facilities,
- incomplete plumbing facilities,
- crowding,[33] and/or
- cost burden.[34]

According to HUD's Affirmatively Furthering Fair Housing data Table 9 in the Appendix, racial disparities in housing problems exist throughout Rock County. In particular, Black and Latino households are far more likely to experience severe cost burden than their white counterparts.[35]

In the City of Beloit:

- 35.7 percent of white households, 44.5 percent of Latino households, and 62.0 percent of Black households experience housing problems.[36]
- 39.0 percent of Black households, 24.8 percent of Latino households, and 16 percent of white households have a severe cost burden.[37]
- Median mortgage costs in Beloit were $1030 a month in 2017.[38]
- Median rental housing costs were $764 a month in 2017.
- 52.8 percent of renter households have a housing cost burden.
- 30.4 percent of homeowners have a housing cost burden.

In the City of Janesville:

- 31.1 percent of white households, 57.7 percent of Latino households, and 37.3 percent of Black households experience housing problems.[39]
- 21.9 percent of Black households, 39.1 percent of Latino households, 13.9 percent of white households have a severe cost burden.[40]

[33] Housing is defined as crowded when a dwelling is occupied by more than one resident per room.
[34] A household has a "cost burden" when more than 30 percent its income is used to pay housing costs.
[35] A household has a "severe cost burden" when it uses more than 50 percent of its income toward housing costs.
[36] Ibid.
[37] Ibid.
[38] 2017 American Community Survey, 5-Year Estimates
[39] U.S. Department of Housing and Urban Development's Affirmatively Furthering Fair Housing data Table 9

- Median mortgage costs in Janesville were $1175 a month in 2017.[41]
- Median rental housing costs were $782 a month in 2017.
- 45.0 percent of renter households have a housing cost burden.
- 23.9 percent of homeowners have a housing cost burden.

In Rock County overall:

- 31.3 percent of white households, 47.3 percent of Latino households, and 58.3 percent of Black households experience housing problems.[42]
- 35.1 percent of Black households, 28.5 percent of Latino, 14 percent of white households are severely cost burdened. [43]

FIGURE 17: Rent Burden – Race and Ethnicity[44]

		% with Housing Problems	% with Severe Cost Burden
Rock County	White	31.3	14.0
	Black	58.3	35.1
	Latino	47.3	28.5
	Total	33.3	15.8
Beloit	White	35.7	16.0
	Black	62.0	39.0
	Latino	44.5	24.8
	Total	39.5	19.7
Janesville	White	31.1	13.9
	Black	37.3	21.9
	Latino	57.7	39.1
	Total	32.5	15.4

When households experience any of the types of housing problems listed above, numerous repercussions may result. For example, lack of functional plumbing and kitchen facilities can make it difficult for a household to maintain hygiene and produce nutritious meals. Crowding can have similar effects; recent research reveals that children who live in crowded homes are in poorer health than peers who live in

[40] Ibid
[41] Ibid.
[42] U.S. Department of Housing and Urban Development's Affirmatively Furthering Fair Housing data Table 9
[43] Ibid.
[44] U.S. Department of Housing and Urban Development's Affirmatively Furthering Fair Housing data Table 9

uncrowded conditions.[45] Further, households experiencing cost burdens may be forced to choose between paying housing costs and other basic necessities, such as food, health care and medicines, and clothing. Given the racial disparities in housing problems in Rock County, these consequences are disproportionately experienced by racial and ethnic minorities, hindering the ability of minority households to achieve a high quality of life in Rock County.

Maps 9-11 illustrate the geography of cost burden along with race and ethnicity in Rock County, Beloit and Janesville. The darkest shaded areas show census tracts in which a higher proportion of households are cost burdened. Areas of Edgerton, Janesville and Beloit show the greatest cost burdened households in Rock County.

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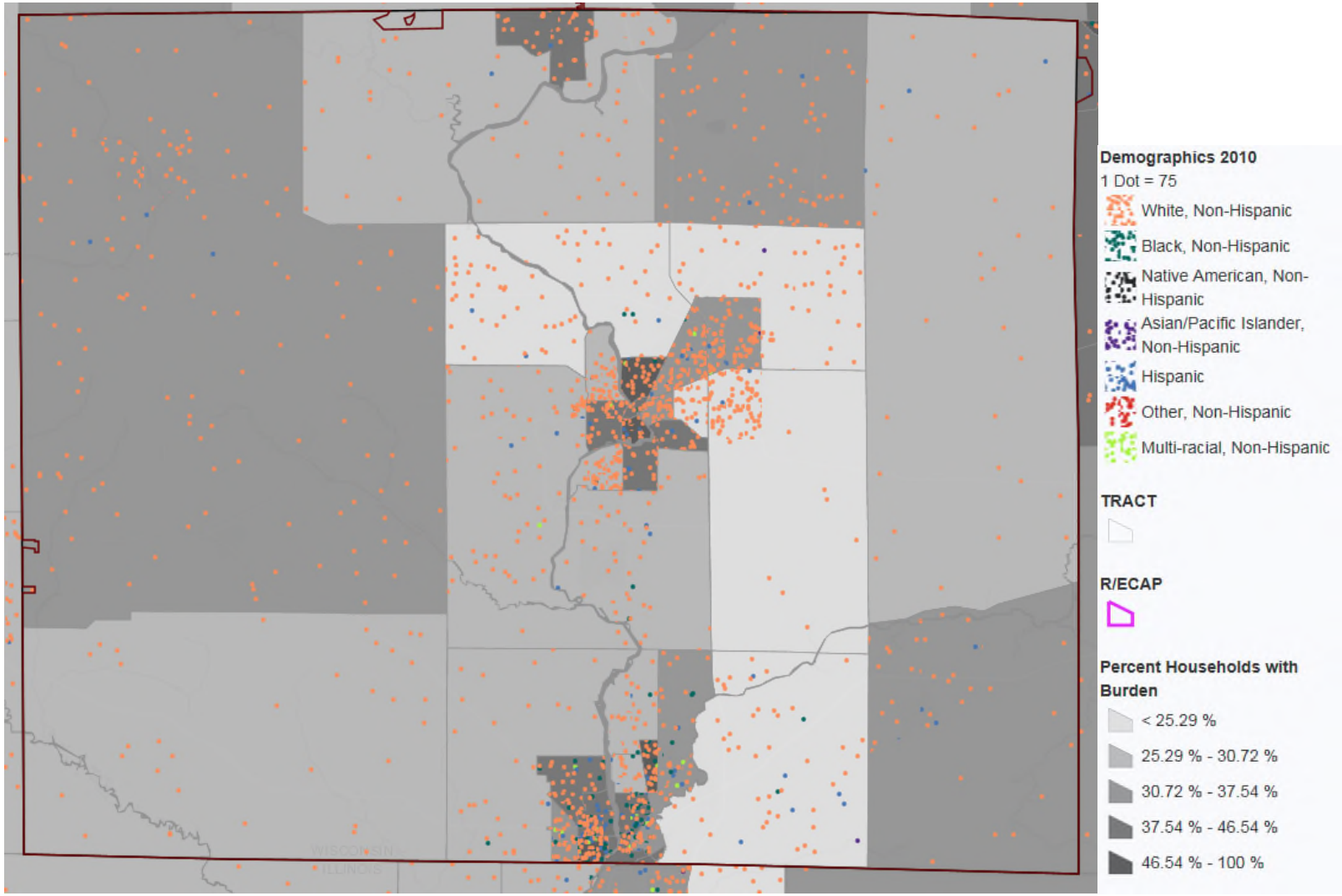
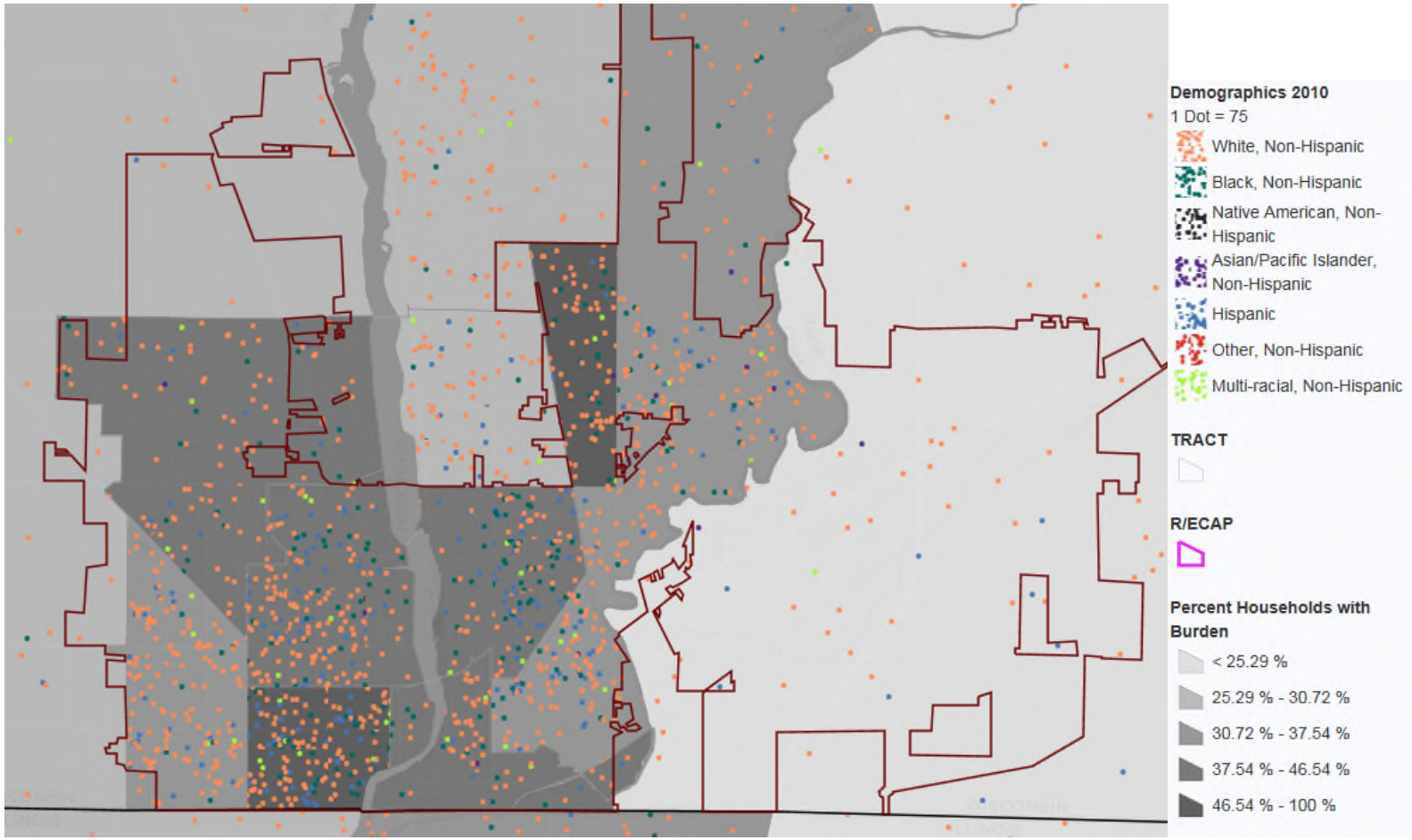
[45] https://www.governing.com/topics/urban/gov-children-overcrowding-housing-cities-lc.html

Map 9: Rock County Housing Cost Burden by Census Tract

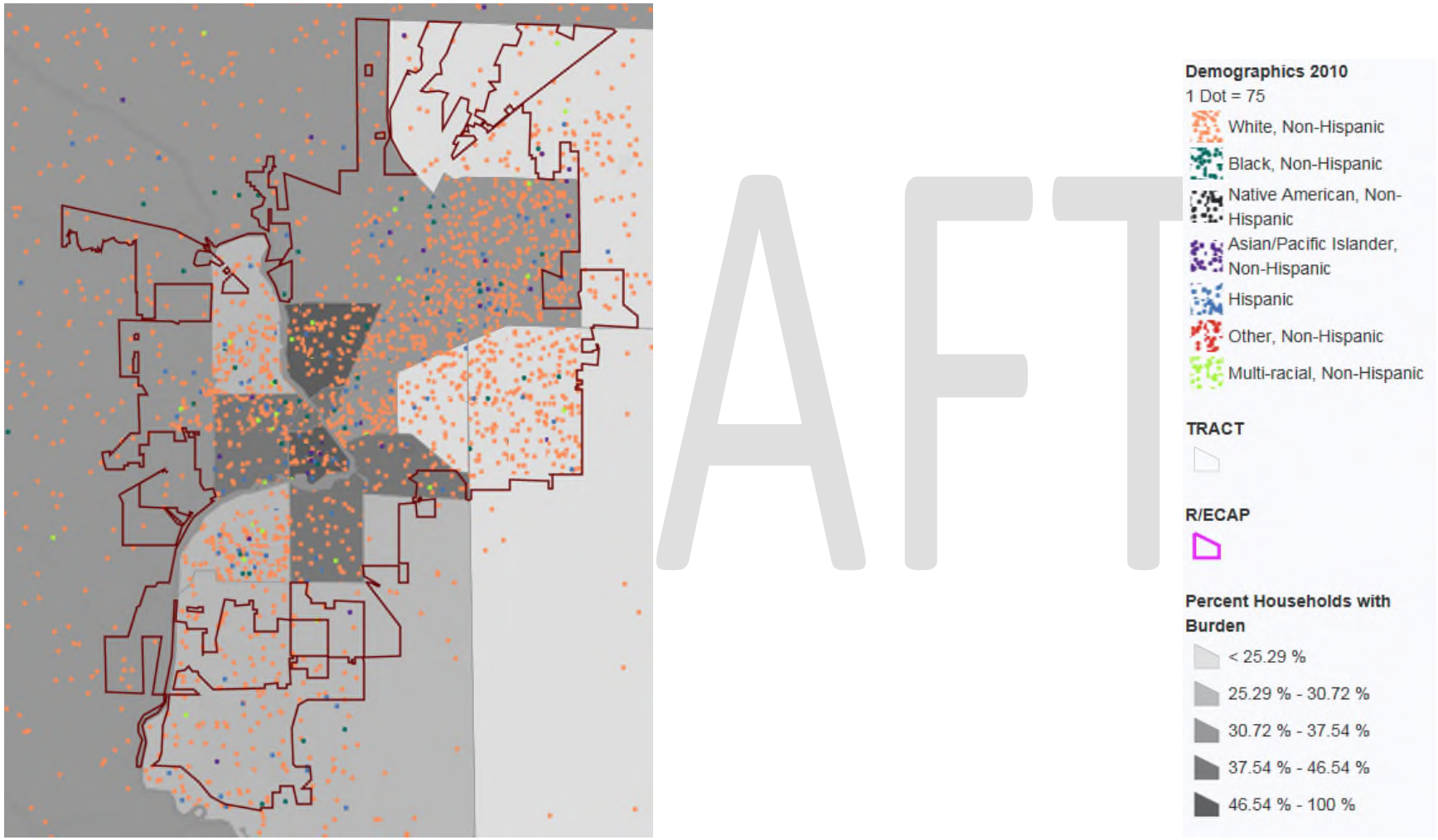


Map 10: Beloit Housing Cost Burden by Census Tract [46]



[46] U.S. Department of Housing and Urban Development's Affirmatively Furthering Fair Housing data

Map 11: Janesville Housing Cost Burden by Census Tract [47]



[47] U.S. Department of Housing and Urban Development's Affirmatively Furthering Fair Housing data

The National Low Income Housing Coalition (NLIHC), which produces reports on housing affordability for households with low income, provides information about housing affordability in the Janesville-Beloit Metropolitan Statistical Area (MSA). For example, a household must have an income of $31,760 in order to afford a two-bedroom apartment at the local fair market rent of $794 without experiencing a cost burden. However, as noted above, Black households in Rock County have a median income of only $25,810, well below that income level. A single person earning the minimum wage can only afford a monthly rent of $377 without a cost burden, significantly less than the $596 fair market rent of an efficiency unit in the Janesville-Beloit MSA.

FIGURE 18: National Low Income Housing Coalition's 2018 *Out of Reach* Report for Janesville-Beloit MSA

Number of Households	*Janesville-Beloit MSA*
TOTAL	63,941
RENTER	19,913
PERCENT RENTERS	31%

Housing Wage	*Janesville-Beloit MSA*
ZERO-BEDROOM	$11.46
ONE-BEDROOM	$11.83
TWO-BEDROOM	$15.27
THREE-BEDROOM	$20.02
FOUR-BEDROOM	$20.79

Fair Market Rent	*Janesville-Beloit MSA*
ZERO-BEDROOM	$596
ONE-BEDROOM	$615
TWO-BEDROOM	$794
THREE-BEDROOM	$1,041
FOUR-BEDROOM	$1,081

Annual Income Needed to Afford	*Janesville-Beloit MSA*
ZERO-BEDROOM	$23,840
ONE-BEDROOM	$24,600
TWO-BEDROOM	$31,760
THREE-BEDROOM	$41,640
FOUR-BEDROOM	$43,240

FIGURE 18 (continued)

Minimum Wage	*Janesville-Beloit MSA*
MINIMUM WAGE	$7.25
RENT AFFORDABLE AT MINIMUM WAGE	$377

Work Hours/Week at Minimum Wage	*Janesville-Beloit MSA*
ZERO-BEDROOM	63
ONE-BEDROOM	65
TWO-BEDROOM	84
THREE-BEDROOM	110
FOUR-BEDROOM	115

Renter Wage	*Janesville-Beloit MSA*
ESTIMATED MEAN RENTER WAGE	$12.50
RENT AFFORDABLE AT MEAN RENTER WAGE	$650

Work Hours/Week at Mean Renter Wage	*Janesville-Beloit MSA*
ZERO-BEDROOM	37
ONE-BEDROOM	38
TWO-BEDROOM	49
THREE-BEDROOM	64
FOUR-BEDROOM	67

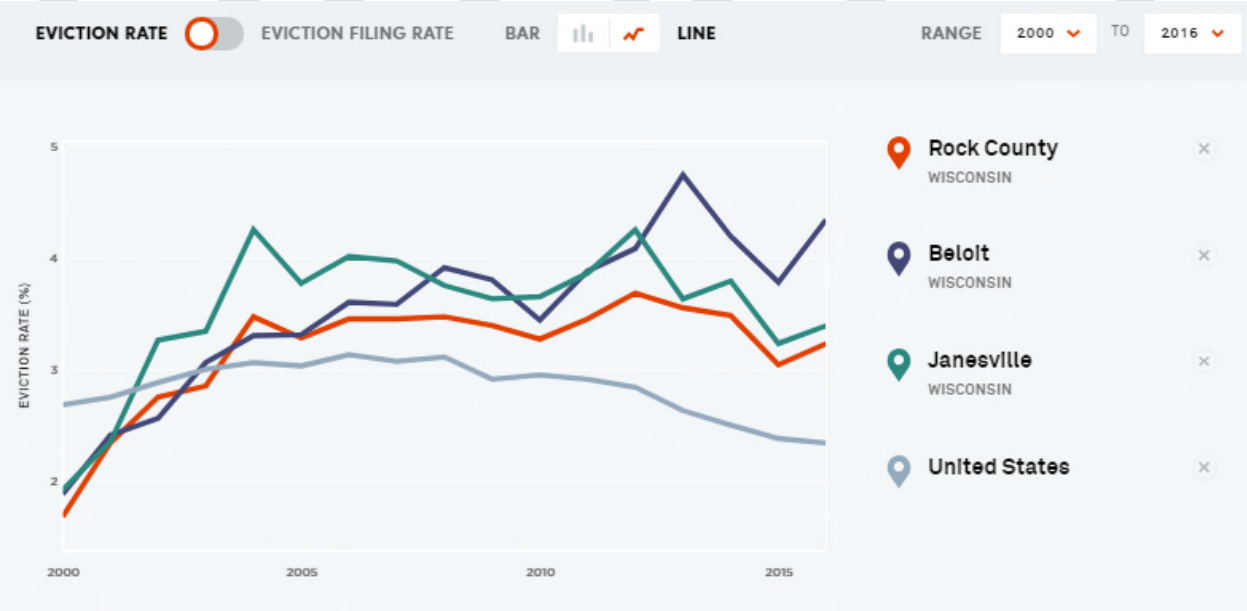
Supplemental Security Income (SSI) Payment	*Janesville-Beloit MSA*
SSI MONTHLY PAYMENT	$834
RENT AFFORDABLE TO SSI RECIPIENT	$250

Evictions

Several community stakeholders interviewed stated a perception that frequent and unfair evictions are a problem in Rock County. Key points about evictions include:

- In 2016, there were 645 evictions in Rock County, including 249 in Beloit and 301 in Janesville.
- Evictions have increased significantly since 2000. In 2000, Rock County had 285 evictions, fewer than half the number in 2016.[48]
- Evictions rates in Beloit (4.34%), Janesville (3.39%) and Rock County (3.23%) are all higher than the Wisconsin average (1.89%) and the U.S. average (2.34%).[49]
- The eviction data from 2016 does not break down evictions by race and ethnicity.

FIGURE 19: Eviction Lab's Rock County, Beloit and Janesville Evictions 2000-2016[50]



Homeownership Disparities

[48] https://evictionlab.org/
[49] Ibíd.
[50] Ibíd.

In Rock County, most households own their homes; 31.3 percent of households are renters. Homeownership, and home equity, is the greatest generator of wealth in this country. Therefore, disparities in homeownership are barriers to fair housing in any community. Homeownership and rental rates vary significantly by race. Map 12 shows the greatest density of renters in Rock County are in Edgerton, Janesville and Beloit. These areas also coincide with the census tracts with the greatest cost burdened households.

In the City of Beloit:

- White households have the highest homeownership rate (62.7 percent), followed by Hispanic (42.7), and Black households (33.1).
- The homeownership rate in Beloit (57.6 percent) is lower than Janesville (66.8 percent) and Rock County (68.7 percent) as a whole.
- Map 13 shows the density of renters in Beloit.

In the City of Janesville:

- Janesville's racial disparities in the homeownership rates are greater than in Beloit. White residents have the highest homeownership rates (68.4 percent), followed by Hispanic (42.7), and Black households (22.2).
- The homeownership rate in Janesville is 66.8 percent, slightly lower than Rock County (68.7 percent) as a whole.
- Map 14 shows the density of renters in Janesville.

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FIGURE 20: Homeownership Tenure by Race and Ethnicity[51]

	Rock County	Beloit	Janesville	Balance of County
Households:				
Owner	68.7%	57.6%	66.8%	77.1%
Renter	31.3%	42.4%	33.2%	22.9%
White Alone				
Owner	70.9%	62.7%	68.4%	77.6%
Renter	29.1%	37.3%	31.6%	22.4%
Black / African American				
Owner	32.5%	33.1%	22.2%	40.9%
Renter	67.5%	66.9%	77.8%	59.1%
Hispanic / Latino				
Owner	50.2%	42.7%	42.7%	70.9%
Renter	49.8%	57.3%	57.3%	29.1%

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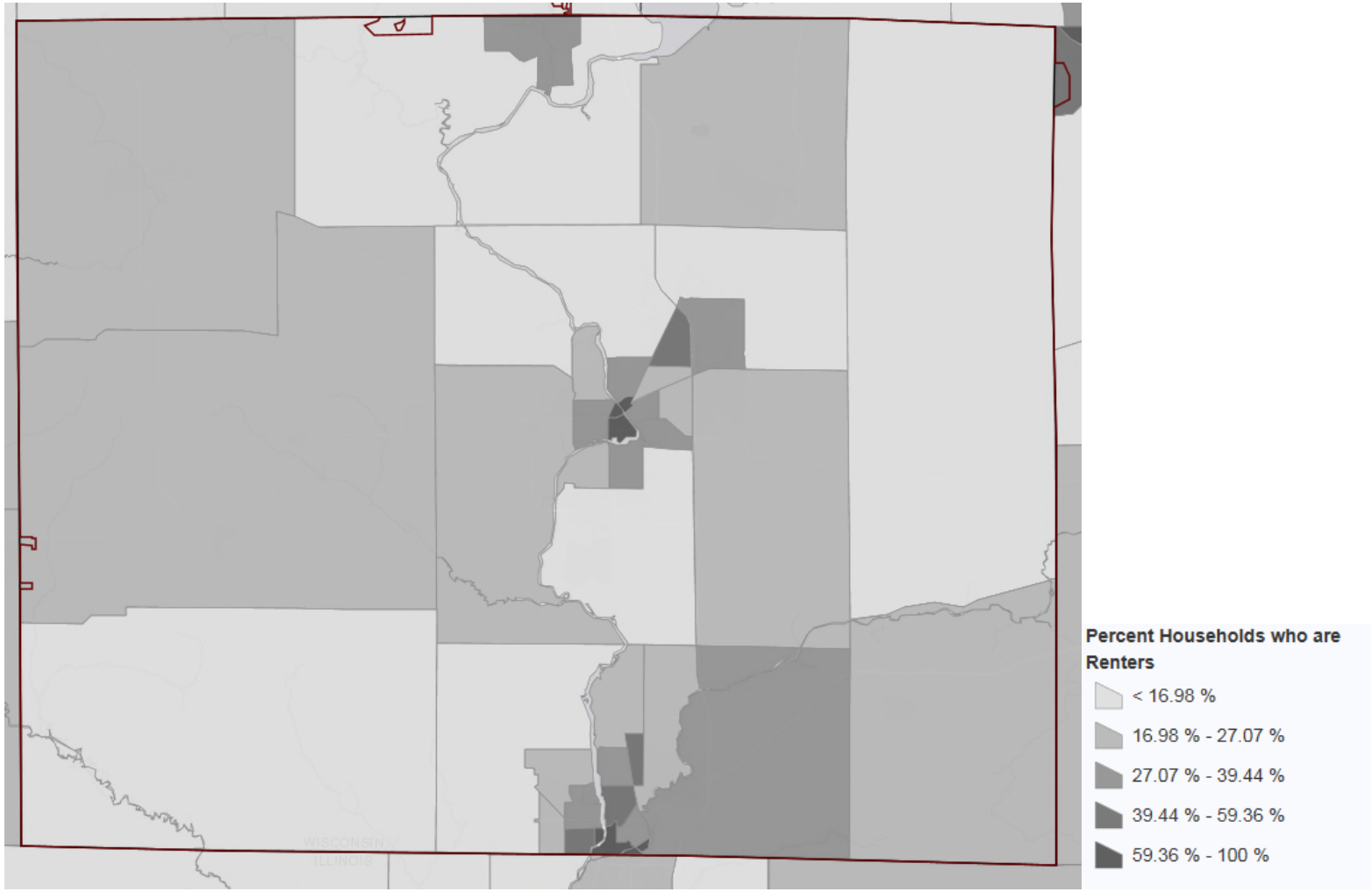
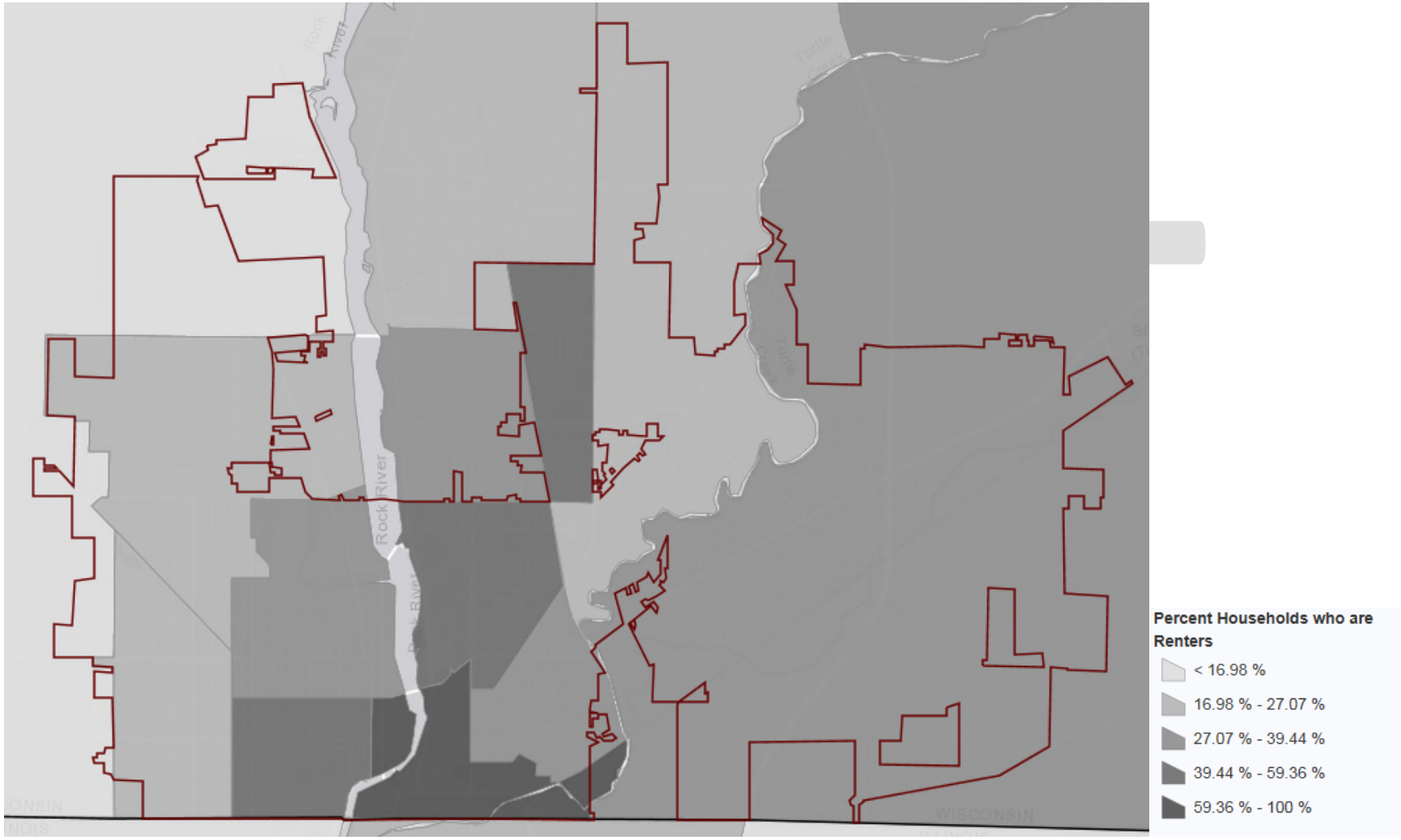
[51] 2017 ACS 5-Year Estimates

Map 12: Rock County Percent Renters by Census Tract [52]



[52] U.S. Department of Housing and Urban Development's Affirmatively Furthering Fair Housing data

Map 13: Beloit County Percent Renters by Census Tract



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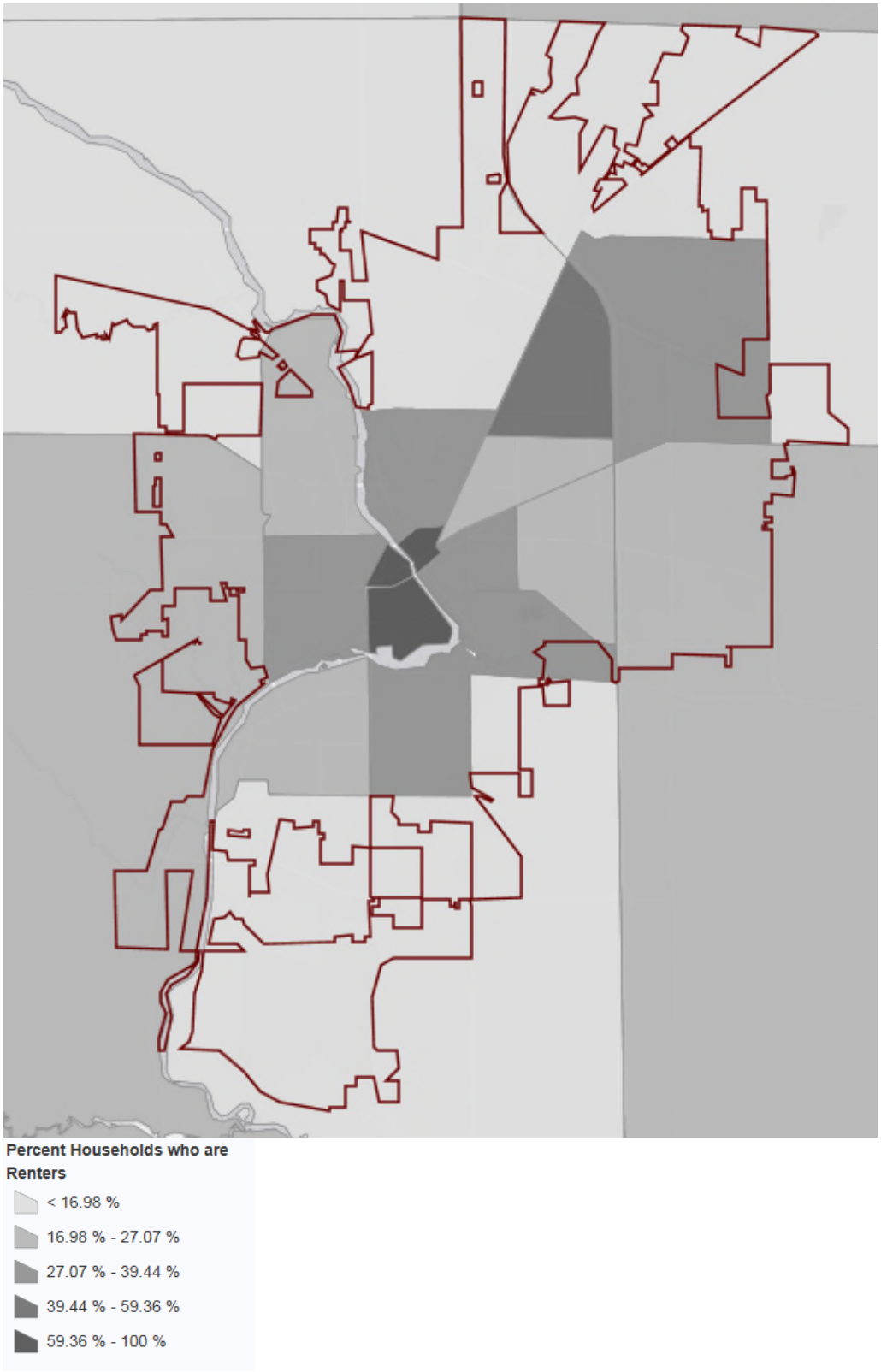
Map 14: Janesville County Percent Renters by Census Tract



Very Low Vacancy Rates

Housing markets are generally considered balanced or "healthy" with a rental vacancy rate of 7 to 8 percent. A healthy homeowner vacancy rate is 2 percent or below.[53] Rental vacancy rates in Rock County are very low, at just 2.92 percent. Low vacancy rates have likely been the cause behind housing providers setting higher rents and using more stringent eligibility criteria, and in fewer quality housing choices available to consumers.

According to the 2017 American Community Survey, Beloit's rental vacancy rate was 4.8 percent and homeowner vacancy rate was 1.4 percent. Janesville's vacancy rates are even more concerning; its rental vacancy rate is 2.4 percent and homeowner vacancy rate is 0.6 percent.

FIGURE 21: Vacancy Rates[54]

Rental Vacancy Rates

Rock County		Beloit		Janesville		Balance	
# vacant units	# total units	# vacant units	# total units	# vacant units	# total units	# vacant units	# total units
608	20,817	296	6,208	216	9,001	96	5,608
2.92%		4.77%		2.40%		1.71%	

Homeowner Vacancy Rates

Rock County		Beloit		Janesville		Balance	
# vacant units	# total units	# vacant units	# total units	# vacant units	# total units	# vacant units	# total units
394	44,273	117	8,139	108	17,793	169	18,341
0.89%		1.44%		0.61%		0.92%	

Substandard housing quality is an issue that can be amplified by low vacancy rates. While no data exists about the number of substandard units in Rock County, the age of housing can be an indicator, with older housing more likely to be in disrepair. Over 70 percent of housing units in Beloit are more than 50 years old. In Janesville, 47 percent of housing units are over 50 years old. Multiple stakeholders from Beloit, Janesville and Rock County stated that poor quality housing is a problem.

[53] Florida, Richard, "Vacancy: America's Other Housing Crisis", *CityLab*, July 2018
[54] 2017 ACS 5-year estimates

Assessment of Past *Analysis of Impediments* (AI) Goals

The City of Beloit completed its most current AI in 2012. The City of Janesville and Greater Rock County completed a joint AI in 2014. Each AI identified impediments to housing choice and made recommendations for dismantling those impediments. The following tables contain:

1. a description of prior recommendations or goals from the previous AI documents,
2. an explanation of those recommendations or strategies to address each goal, as discussed in the previous AIs.
3. the implementation status of each recommendation (self-reported) and
4. the Consultant's observations about each recommendation and its implementation.

City of Beloit 2012 AI Recommendations

RECOMMENDATION	EXPLANATION	STATUS	OBSERVATIONS
Recommendation #1: Provide Consistent Responsibility for Administration of the City's Fair Housing Code	The City of Beloit should assign a single Department or Division to be responsible for the accurate administration of the City's Fair Housing Code. This Department or Division should also be responsible for ensuring that appropriate training occurs in the event of staff changes. The Department or Division Head would have the opportunity on an annual basis to review fair housing activities and outline fair housing goals during the course of annual performance reviews of staff.	• The Beloit Equal Opportunities and Human Relations Commission (BEOHRC) adopted an Annual Strategy to address impediments to fair housing • The City received and investigated housing discrimination complaints • City created a fair housing webpage • City created a lobby display for fair housing brochures and information • BEOHRC developed procedures on processing complaints and	Some progress has been made on this recommendation. However, complaint data was not made available, so extent of progress is unknown. Future emphasis should be placed on best practices for processing and investigating fair housing complaints.

		investigations	
Recommendation #2: Continue Fair Housing Outreach and Education	The City's current outreach and education consisting of flyers, brochures, and educational seminars, is critical to keeping the community informed of the fair housing rights and processes. The City has begun to reach out to landlords and property managers as well to educate landlords on the rights of their tenants. This two-pronged approach of educating both sides of the equation, will discourage discriminatory practices and provide victims the information needed to protect their rights. The City should also continue to take part in events during the Fair Housing Month of April to bring awareness to housing discrimination and garner more support for efforts to eliminate the issue.	• Fair Housing proclamation adopted each April • City hosts a fair housing poster contest • Fair housing outreach materials created • Fair housing seminars conducted • Outreach to LMI census tracts to promote Home Loan Program • Conducted homeownership education trainings in English and Spanish	While progress has been made on this recommendation, a dedicated staff person to educate the community about fair housing rights and responsibilities would benefit consumers and housing providers in Beloit, and the outcomes of this work should be evaluated on an annual basis. Referenced outreach materials contain errors and omissions that may mislead potential complainants. While HUD has previously allowed poster contests as a form of fair housing outreach, they are not

			considered a best practice.[55]
Recommendation #3: Educate Public Officials and Relevant Groups Regarding Low income Tax Credit Projects	The City should provide education to community and public officials, relevant boards, and developers as early as possible when a tax credit or low/mixed income project is moving forward. The City should involve / partner with neighborhood and other advocacy groups to educate the community regarding mixed income and low income tax credit projects. Neighborhood opposition can limit the ability to develop and can affect siting of affordable housing.	No progress to date	Continue to work toward making developers and elected officials aware of the fair housing implications of these kinds of opposition.
Recommendation #4: Provide Education Regarding Housing Contracts to Linguistically Isolated Households	The City should develop an initiative to proactively educate non-English/limited-English speaking persons about housing related contracts. This can be done with informational handouts, brochures, referrals to resources, and educational seminars. The City may want to partner with an organization that serves this demographic to provide education regarding leases and land contracts.	• Fair housing education seminar conducted in Spanish • Conducted homeownership education trainings in English and Spanish	Progress has been made on this recommendation. Continue to explore new ways to access and provide outreach to linguistically isolated households. The outcomes of this work should be evaluated on an annual basis.

[55] "It should be a source of embarrassment that fair housing poster contests or other equally benign activity were ever deemed sufficient evidence of a community's efforts to affirmatively further fair housing. The Department (HUD) believes that the principles embodied in the concept of fair housing are fundamental to healthy communities, and that communities must be encouraged and supported to include real, effective, fair housing strategies in their overall planning and development process…"; U.S. Department of Housing and Urban Development Fair Housing Planning Guide

Recommendation #5: Continue to Reach Out to the Disabled Community	The City should actively seek input from advocacy groups and agencies that provide services to persons with disabilities in order to discover fair housing concerns, find better ways to reach this demographic, and incorporate changes in education efforts specific to the disabled community.	• Fair housing seminars conducted • Outreach to LMI census tracts (with significant population with disabilities) to promote Home Loan Program	Continue to work toward this recommendation. The outcomes of this work should be evaluated on an annual basis.
Recommendation #6: Further Research the Low Number of Mortgage Applicants among African Americans	The City should encourage agencies to promote their lending and credit improvement programs at agencies serving minorities, to ensure that minorities are aware of these opportunities. Currently the City funds a number of different programs that provide financial literacy and homeownership education to low-to-moderate income individuals. Minorities represent a large portion of the low-to-moderate income population in Beloit.	• BEOHRC worked to recruit a member of the lending community. • BEOHRC had Blackhawk Bank representatives speak to the committee. • Conducted homeownership education trainings in English and Spanish • BEOHRC discussed lack of African American mortgage applications with local lenders	Continue to work toward this recommendation.

Recommendation #7: Explore Options in the Housing Choice Voucher Program to Increase the Payment Standards and the Number of Vouchers Available to the Housing Authority	The focus group and the EOHRC noted the limitations that the current Voucher program poses to its participants. The City should explore other ways to increase its capacity in Beloit. One option could be to explore obtaining specialty vouchers such as Veterans Affairs Supportive Housing (VASH) or Family Unification Program (FUP) vouchers to assist special populations.	Community Development director presented HUD's Fair Market Rent system to the BEOHRC	Continue to work toward this recommendation.

City of Janesville and Greater Rock County 2014 AI Recommendations[56]

GOAL	STRATEGIES FOR IMPLEMENTATION	STATUS	OBSERVATION
Goal #1: Address Needs of Non-English Speaking Populations Who May Need Housing Assistance or Related Services.	• Identify reliable translation assistance services that can be utilized by City staff, landlords, realtors, lenders, etc. (especially Spanish) and establish funding for providing this assistance, as necessary. • Explore the ability to translate information on the City's website into other languages. • Provide print materials in multiple languages. • Include information about translation services in all outreach efforts and materials.	• The City of Janesville uses Language Line Services for telephone translation. We have also been working with the School for the Visually Handicapped for braille translations services. • City staff is available to provide translation. • The City Managers' office is currently exploring the cost of website translation. • Some departments have printed material in languages other than English including Transit and the Public Library.	Continue to work toward this goal. The outcomes of this work should be evaluated on an annual basis.

[56] This AI used the term "goals" rather than "recommendations."

		• Translation information is included in outreach materials. • The City sponsors free homebuyer workshops.	
Goal #2: Increase the Number of Conventional Loans Secured by Janesville's Minority Population.	• Provide more credit and home-buying education to citizens, especially minority residents. • Provide education and information for local lenders on predatory lending practices, to ensure that efforts to reduce the racial disparities in loan origination do not have the unintended consequence of increased rates of default and foreclosure among minority borrowers. • The City should encourage greater efforts on the part of the lending, real estate and rental industries to hire and train minority and bilingual lenders, underwriters, real estate and rental professionals, if possible.	• NeighborWorks Blackhawk Region, encourages the use of two different online Home Buyers education classes in Spanish. • The rehabilitation program at the City of Janesville has policies and underwriting criteria in place in the extension of our program loans and review request for subordination of existing liens regarding predatory lending. • While this was identified in a goal in the 2014 Analysis of Impediments, attempting to	Continue to work toward this goal. The outcomes of this work should be evaluated on an annual basis.

		influence the hiring practices of the private sector may not reasonable, measureable, or achievable goal of this plan.	
Goal #3: Promote and Encourage the Development of For-sale Single Family Houses for Low-income Households.	• Support low-income housing and development plans that provide affordable housing options outside of areas of low-income concentration. • Support down-payment assistance and financing to assist low-income homebuyers to purchase housing outside areas of low/moderate concentration. • Support rehabilitation of existing housing stock to increase the supply of decent, safe, and sanitary housing that is affordable to low-income households. • Support homebuyer education and training programs to improve homebuyer awareness and increase the opportunities of fair housing choice for low-income households such as Home Buyers Workshop.	• The City of Janesville has recently revised our rental assistance program to allow for rent payments up to 110% of fair market rent in order to widen housing choices. • The City of Janesville down payment and closing cost assistance is available for properties city-wide. • The City of Janesville administers multiple programs to address rehab of existing homes including the Central Neighborhoods Home Renewal Program, the Home	Continue work toward this goal. The outcomes of this work should be evaluated on an annual basis.

		Improvement Plus Program, the 55-Plus Program, partnership with not for profit housing developers. • The City of Janesville offers a Down Payment and Closing Cost program that requires HUD certified Home Buyers education.	
Goal #4: Promote and Encourage the Development of Affordable Rental Housing Units, Especially for Households with Low Income.	• Support low-income housing and development plans that provide affordable housing options outside of areas of low/moderate concentration. • Provide assistance to households that are cost overburdened, particularly those households below 50% of the median county income. • Provide citywide rehabilitation assistance for affordable rental housing.	• At this time the City of Janesville has a significant housing shortage. Housing in all areas and all types are encouraged. • The City of Janesville administers the Rental Assistance Program. 75% of those assisted at below 30% of CMI. • The City of Janesville funds a citywide rental rehab program. • Support LIHTC developers in their applications. A 92-unit project received a	Progress has made toward this goal.

		2019 LIHTC award. • The City implemented a Vacant Building Program to encourage vacant residential redevelopment	
Goal #5: Ongoing Efforts Should Continue to Reduce the Cost per Rent Assistance Program Participant as well as to Utilize Available, Appropriate Financing Mechanisms to Increase the Production of Affordable Housing Units.	• Reducing the average cost per Rent Assistance (Section 8) Program participant by reducing assistance payments through negotiated annual rent increases with landlords, maintaining rent rates, or other means to assist more households. • Partner with local community development groups and affordable housing developers to explore creative ways to produce and finance affordable housing.	• The City of Janesville has a significant housing shortage currently; however, case managers often negotiate rents with property owners and managers to make them affordable for clients. • The City increased the HCV payment standard to reduce cost burden and expand housing choice. • The City of Janesville is currently working with a developer to approve a 92-unit LIHTC project; CDBG and TIF incentives will be utilized	Continue working with developers to work through development barriers in Janesville.

Goal #6: Increase the Public's Knowledge and Awareness of the Fair Housing Act, and Related Laws, Regulations, and Requirements.	• The City should continue promote fair housing outreach activities to provide educational opportunities for all persons (homeowners, renters, and landlords) to learn about their rights under the Fair Housing Act. • Continue to publish literature and informational material, including the local renter's directory to pass out concerning fair housing issues and place in prominent locations to be available for distribution throughout the City. • Include a link on the City's website for information on fair housing and who to contact in cases of suspected housing discrimination. • Consider methods of education for children and young adults such as encouraging participation in the statewide fair housing poster and essay contests and/or developing sessions for high school students on building good credit and renter	• Neighborhood and Community Services maintains a list of local landlords as well as a list of local subsidized developments. • Literature and informational material is on our website. • The City of Janesville initiated a "Fair Housing Friday" Facebook campaign this year. In addition, we have multiple Fair Housing posters in our conference room.	While progress has been made on this goal, a dedicated staff person to educate the community about fair housing rights and responsibilities would benefit consumers and housing providers in Janesville. Outcomes of this work should be evaluated on an annual basis. Website information on fair housing is limited. While HUD has previously allowed poster contests as a form of fair housing outreach, they are not considered a best practice.[57]

[57] "It should be a source of embarrassment that fair housing poster contests or other equally benign activity were ever deemed sufficient evidence of a community's efforts to affirmatively further fair housing. The Department (HUD) believes that the principles embodied in the concept of fair housing are fundamental to healthy communities, and that communities must be encouraged and supported to include real, effective, fair housing strategies in their overall planning and development process…"; U.S. Department of Housing and Urban Development Fair Housing Planning Guide

	rights.		

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Community Input and Participation

Three forms of community input helped inform this report:

1. Guidance from the Rock County Fair Housing Steering Committee
2. Interviews with stakeholders familiar with a variety of aspects of the Rock County housing market, and
3. Online surveys open to the public.

Rock County Fair Housing Steering Committee

The Rock County Fair Housing Steering Committee was formed as an ad hoc group, specifically to provide input for this report. Members of the Committee were identified and recruited by staff from Rock County and the Cities of Beloit and Janesville with feedback from the consultant.

Steering Committee members included:

- Eugene Johnson, NAACP
- Dorothy Harrell, NAACP
- Meghan Fredel, Rock County resident with expertise in visual impairment
- Lekshmi Mendez, Rock County resident with expertise in visual impairment
- Mary Beaver, Rock County Housing Authority
- Billy Bob Grahn, Rock County Housing Authority
- Dawn Gross, Beloit Equal Opportunity Commission
- Kelsey Hood, Beloit Domestic Violence Survivor Center
- Tammie King Johnson, House of Mercy, Homeless Intervention Task Force
- Jessica Locher, ECHO, Homeless Intervention Task Force
- Angela Moore, YWCA, Homeless Intervention Task Force
- Francisca Reyna, Blackhawk Bank
- Beverly Mulligan, Beloit Property Managers Association
- David Baker, Beloit Community Development Authority
- Rich Gruber, Janesville Community Development Authority and City Council
- Julie Christensen, City of Beloit Community Development Department
- Teri Downing, City of Beloit Community Development Department, Transit
- Jennifer Petruzzello, City of Janesville Neighborhood and Community Services Department
- Kelly Bedessem, City of Janesville Neighborhood and Community Services Department

- Colin Byrnes, Rock County Planning, Economic and Community Development Agency

The Steering Committee met on four occasions: December 10, 2018, February 18, 2019, March 25, 2019, and June 3, 2019.

At each meeting, MMFHC staff presented information about progress on this report and data gathered. Committee members provided feedback on the research process, analysis of the data, and assisted in identifying impediments and formulating recommendations.

Stakeholder Interviews

In order to gain a full understanding of barriers to equal housing opportunity in Rock County, MMFHC conducted one-on-one interviews and small group meetings with numerous community stakeholders. These stakeholders provided a wealth of perspectives on housing issues in the County.

Interviews were conducted with the following individuals and groups:

- Bev Mulligan, Beloit Property Managers Association
- Nancy Mandel, Blackhawk Community Credit Union
- Wendy Bumgarner, Johnson Bank
- Lizz Casey, Neighborworks
- Colin Byrnes, Rock County
- Jennifer Petruzzello and Kelly Bedessem, City of Janesville, Janesville Housing Authority
- Julie Christiansen and Teri Downing, City of Beloit
- Clint Cole, Beloit Housing Authority
- Eugene Johnson, NAACP, Pentecostal Assembly
- Francisca Reyna, Blackhawk Bank
- Kimberly Bork, Inlanta Mortgage
- Kelsey Hood, Beloit Domestic Violence Survivor Center
- Lekshmi Mendez, housing consumer with a visual impairment
- Meghan Fredel, educator for students with visual impairments
- Rich Gruber, Janesville Community Development Authority and City Council
- Beloit Community Development Authority
- NAACP - Beloit Chapter Focus Group
- Tammie King-Johnson, House of Mercy, Homeless Intervention Task Force
- Kathy Kamp, Wisconsin Partnership for Housing Development (WPHD)
- Mike Gosman, ACTS Housing
- Heidi Wegleitner, Legal Action of Wisconsin

- Janesville Landlord
- Jennifer Thompson, Rock County Aging and Disability Resource Center
- Jessica Locher, ECHO
- Stephanie Bluton, GIFTS Men's Shelter
- Edgerton Community Outreach
- Lindsey Stevens, NAMI
- Rebecca Smith, Janesville Transit System
- Yellow Brick Road representative
- Toni Coats, Evansville Housing Authority
- Janesville City Council members
- Rock County Board members

Summary of Stakeholder Interviews and Steering Committee Feedback

The following is a summary of key themes that were identified by interviewees when asked to describe barriers to housing choice and equal housing opportunity in Rock County. These statements are the opinions of the stakeholders and have not been verified by MMFHC for their accuracy.

Barriers to housing choice or opportunities in the private housing market	• There is insufficient availability of affordable housing in the sales and rental markets • The low vacancy rate in rental market means home seekers have fewer choices • The low vacancy rate in rental market means housing providers have more stringent screening criteria • The low vacancy rate in the rental market may lead to housing providers failing to maintain housing quality (substandard units) • People using Housing Choice Vouchers have difficulty finding apartments that accept Vouchers • Some housing providers require all communications and interactions to happen electronically (e.g., applications and rent payments) • Some rental housing providers are charging a fee to show a unit • Housing discrimination is occurring • There is a lack of access to mortgage loans • There are frequent and unfair evictions • The cost of building new affordable housing is too high; developers have insufficient incentive to do so • There are concerns about credit scoring algorithms unfairly penalizing people of color, and persons who reside in

predominately minority neighborhoods
- There is neighborhood resistance to development of new affordable housing, particularly in predominantly white neighborhoods (NIMBYism or Not In My Backyard)
- There are high closing costs on home purchases
- There is insufficient housing stock available for larger families
- There is segregation based on race, including perceptions about where one can and cannot live
- There is segregation based on location of affordable housing opportunities
- The substandard condition of affordable housing means it may not pass inspection for Housing Choice Voucher Programs
- Linguistically isolated residents are being harmed by predatory land contracts.

Barriers to housing access posed by public policy

- There is insufficient availability of affordable housing in the sales and rental markets
- There is a lack of trust between affordable housing developers and public policy makers
- There is inadequate public transit between residential areas and other community resources, such as grocery stores, health care facilities, and employment opportunities (in Beloit and greater Rock County)
- There are land division and zoning restrictions in Janesville and other parts of Rock County that limit the ability to create affordable housing. Zoning regulations often don't permit smaller lot and home sizes
- Duplexes and multi-family housing are not permitted uses in zoning regulations without a public review process
- Down payment assistance programs have overly stringent eligibility criteria
- Minimal case management services make it challenging for homeless individuals and individuals with drug or mental health issues to maintain stable housing*

Barriers to housing access posed by consumers' challenges*	• Some consumers have high debt-to-income ratio, particularly due to medical and student debts • Some consumers are unemployed or have poor employment histories • Some consumers have poor credit and lack of understanding of credit scores • Some consumers have eviction histories • Some consumers have lack of savings for down payments • Some consumers have lack of financial education • Some consumers have mental health conditions, particularly among the homeless population • Some consumers lack information about how to communicate effectively with prospective rental housing providers ***** Numerous historic and current government and industry-created barriers have put nonwhites, persons with disabilities, and other marginalized groups, at a disadvantage in terms of credit, accumulated wealth, education, and numerous other issues.
Barriers to housing access experienced by housing consumers based on membership in a protected class	• Latino families without Social Security numbers face barriers to accessing fair credit • The homeless population is comprised of a disproportionate number of people of color • People of color and people with children seem to have a more difficult time finding housing • People of color face barriers in accessing assistance programs, such as motel voucher programs • People with disabilities may face challenges communicating with rental housing providers about repair concerns • Nonprofit organizations in Rock County have a lack of diversity among their staff and boards of directors.

Further, MMFHC conducted online surveys to gather information from homeowners, renters, social service providers, housing developers, rental housing providers and real estate brokers[58]. Seventy-eight homeowners, 45 renters, 27 homeless individuals and 16 social service providers, housing developers, rental housing providers and/or real estate brokers responded to the survey. While survey results may not be statistically significant, they provide important data for future study. Key data include:

- A third of renters believe they have experienced unlawful housing discrimination, and 7 percent weren't sure if they had. Of those who had experienced discrimination, the most common basis for that discrimination was race. None of the respondents had filed a housing discrimination complaint. When asked why a complaint hadn't been filed, the most common reason given was that the renter "didn't think it would help," followed by "fear of retaliation" and "did not know I could file a complaint."

- Just under 7 percent of homeowners believe they have experienced unlawful housing discrimination, or weren't sure if they had. Of those who had experienced discrimination, the most common basis for that discrimination was age, followed by race, color and sex. Only one homeowner had filed a complaint of discrimination. Among those who indicated they had experienced discrimination but not complained, the most common reasons given for not pursuing a complaint were "didn't think it would help," "did not know who to contact" and "did not know I could file a complaint."

- Almost half of the homeless respondents believe they have experienced unlawful housing discrimination, or weren't sure if they had. Disability and race were the most common bases for discrimination based on those who thought they had been discriminated against.

- When asked to identify the largest barriers to fair housing in Rock County, the key themes that emerged in respondents' answers included: the presence of illegal housing discrimination; a lack of affordable housing stock; a lack of physically accessible housing; and lack of fair housing knowledge of both housing consumers and housing providers.

[58] Social service providers, housing developers, rental housing providers and/or real estate brokers survey responses were incorporated into the stakeholder comments, rather than summarized here.

Fair Housing Analysis

The Fair Housing Analysis section reviews data presented in other parts of this report in order to ascertain the fair housing implications of that data. Categories of analysis include:

1) Segregated living patterns

2) Disability and access

3) Mortgage lending access

Segregation

A powerful way to assess segregation in any geographical area is to consider its dissimilarity index. A dissimilarity index measures the relative separation or integration of racial and ethnic groups across all neighborhoods of a city or metropolitan area. If a city's white-Black dissimilarity index is 65, that would mean that 65 percent of either group would need to move to another neighborhood to make white and Black people evenly distributed across all neighborhoods. A dissimilarity value 60 or above is considered a very high level of segregation. According to researchers at Brown University, "Values of 40 or 50 are usually considered a moderate level of segregation, and values of 30 or below are considered to be fairly low."[59]

In the City of Beloit:

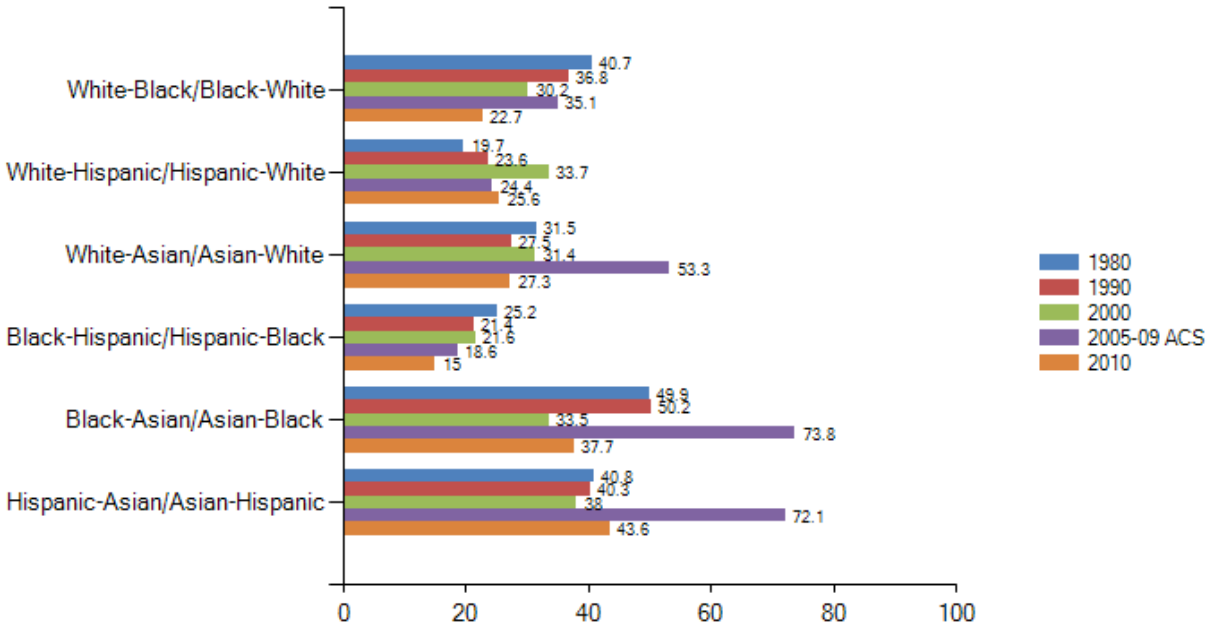
Key points about segregation in Beloit include:

- The Black-white dissimilarity index for Beloit was 22.7 in 2010, decreasing from 36.8 in 1990. This is considered a relatively low level of segregation.
- The Hispanic-white index was 25.6 in 2010, increasing from 23.6 in 1990.
- The Asian-white index was 27.3 in 2010, decreasing from 27.5 in 1990.
- As Black, Asian and Hispanic populations increased in Beloit, dissimilarity indices have decreased for Black and Asian populations, but increased slightly for Hispanic populations.

Map 13 indicates where the highest percentage of affordable rental units are (Census Tract 16 and to a lesser extent 17, 18 and 20); Map 14 illustrates where persons of color reside (Census Tracts 16 and 18).

[59] Spatial Structures in the Social Sciences, Brown University

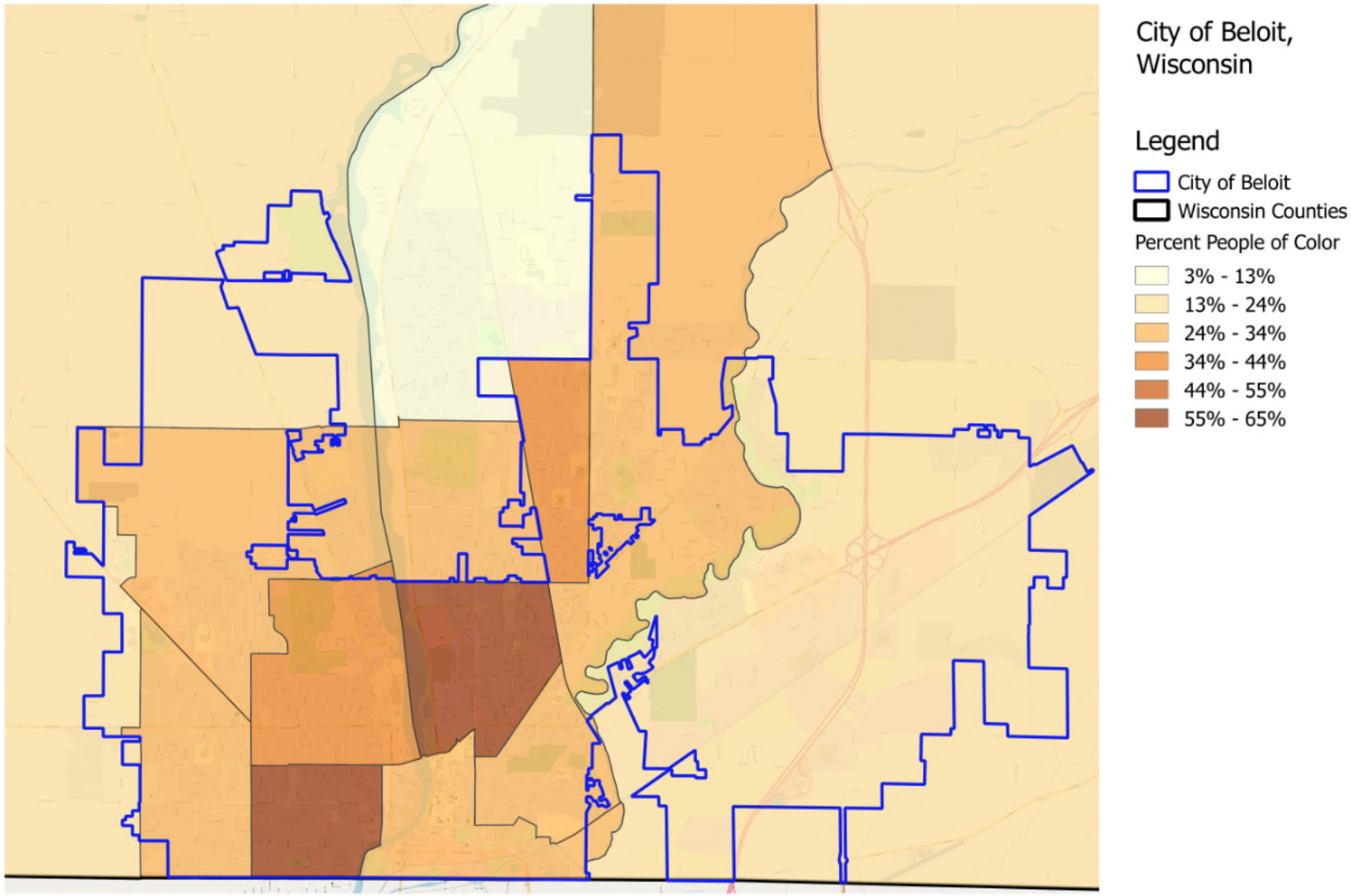
FIGURE 22: Beloit 2010 Dissimilarity Index [60],[61]



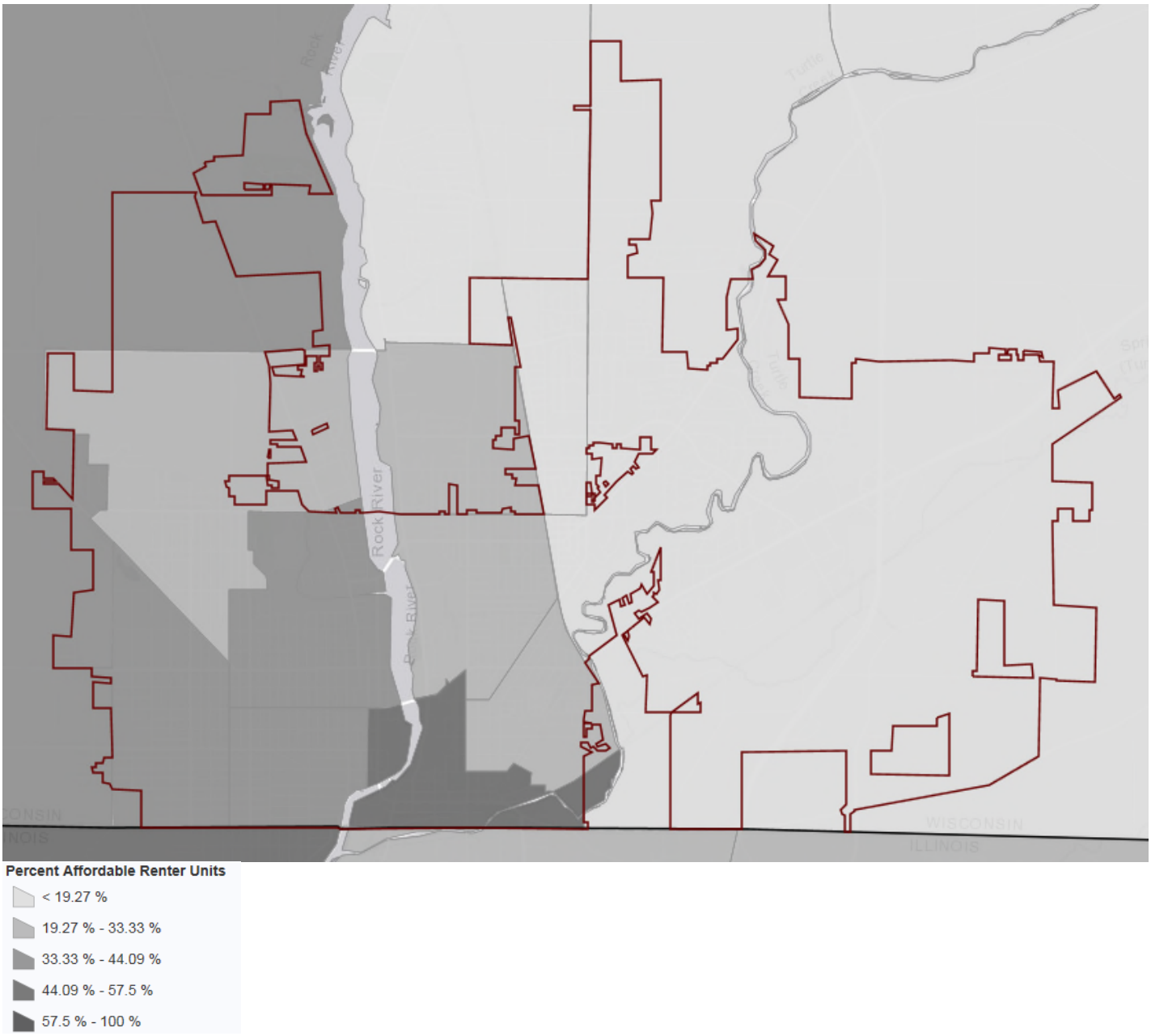
[60] Source: Spatial Structures in the Social Sciences, Brown University

[61] 2005-2009 data is from the American Community Survey, as opposed to the other years which are derived from the U.S. Census. When certain racial and ethnic populations are smaller, as they are for Asian and Hispanic groups, the ACS data becomes less reliable. This likely accounts for the inconsistent jump in dissimilarity numbers between 2000 and 2010.

MAP 15: Beloit, Non-White Residents by Census Tract



MAP 16: Beloit Affordable Renter Units by Census Tract



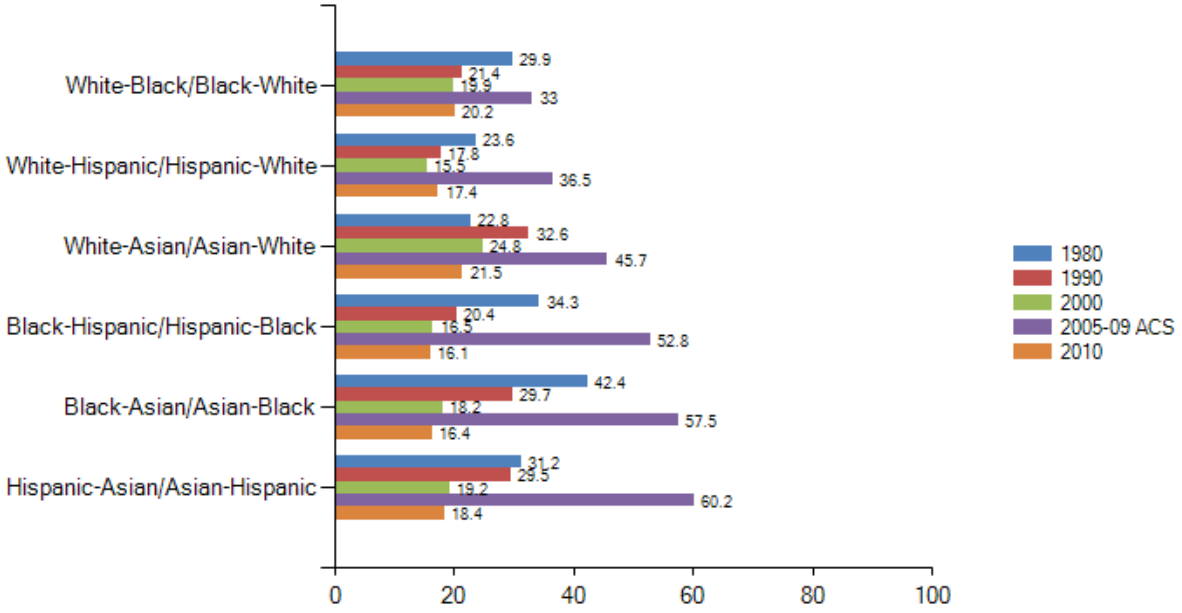
In the City of Janesville:

Key points about segregation in Janesville include:

- In Janesville, the Black-white dissimilarity index was 20.2 in 2010, overall decreasing from 21.4 in 1990. However there was a slight increase from 19.9 in 2000. This represents a relatively low level of segregation.

- The Hispanic-white index was 17.4 in 2010, overall decreasing from 17.8 in 1990. However there was a slight increase from 15.5 in 2000.
- The Asian-white index was 21.5 in 2010, decreasing from 32.6 in 1990. As Black, Asian and Hispanic populations increased in Janesville, dissimilarity indices for Black and Latino populations have decreased.
- Map 15 indicates where the highest percentage of affordable rental units are (census tracts 5 and 14); Map 16 illustrates where persons of color reside (census tract 3 and to a lesser extent 1, 7 and 10).

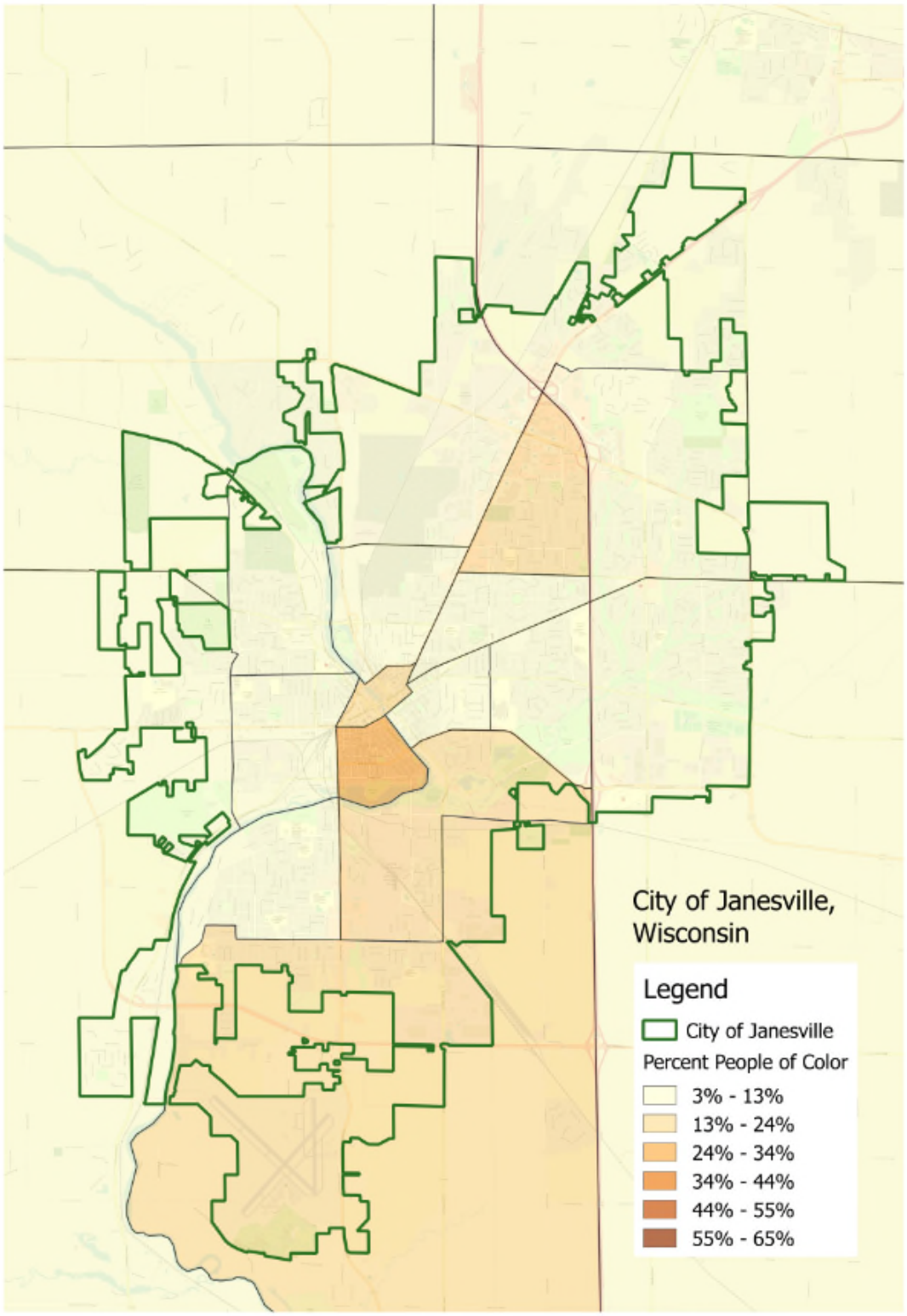
FIGURE 23: Janesville 2010 Dissimilarity Index [62], [63]



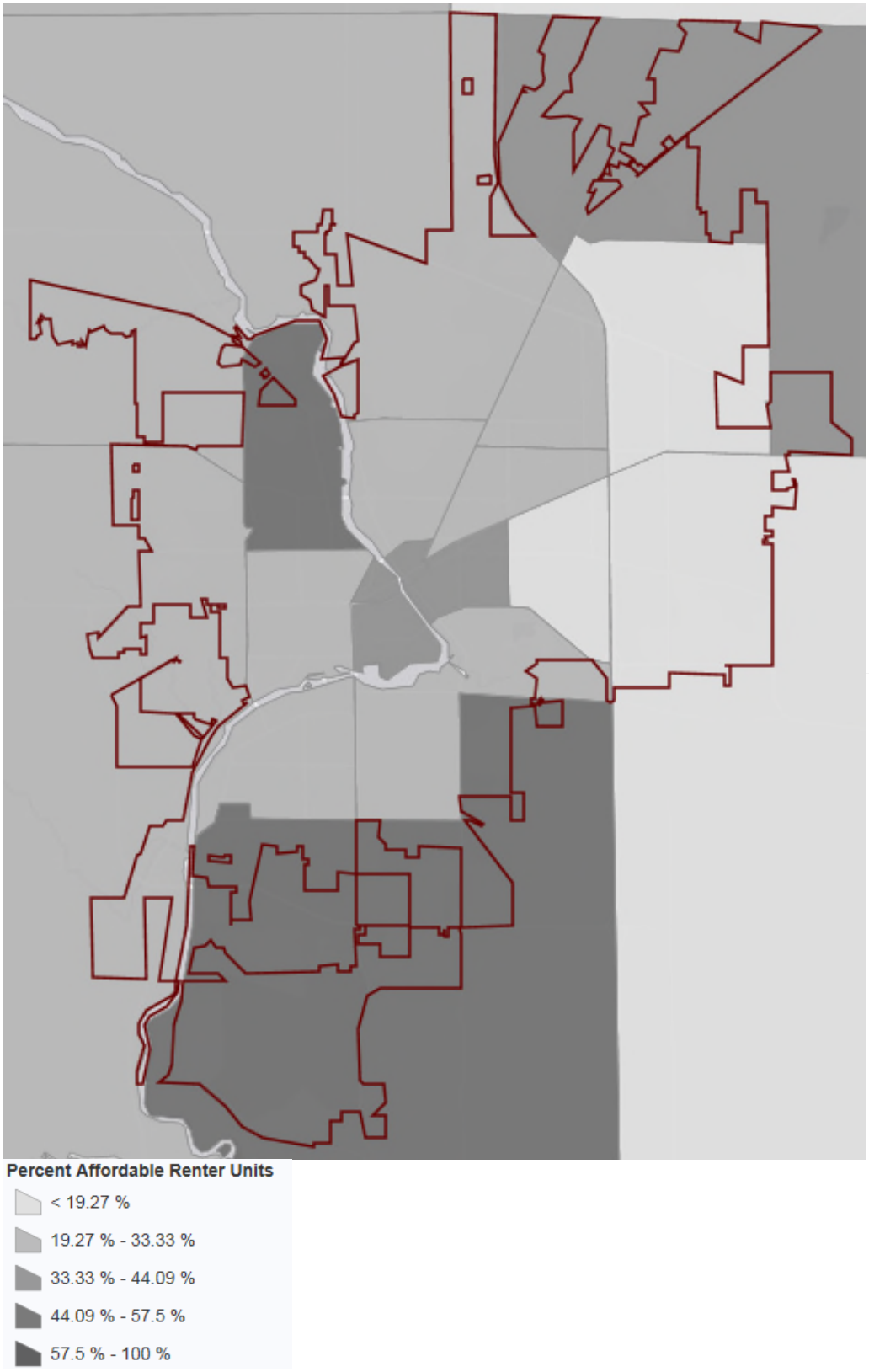
[62] Spatial Structures in the Social Sciences, Brown University

[63] 2005-2009 data is from the American Community Survey, as opposed to the other years which are derived from the U.S. Census. When certain racial and ethnic populations are smaller, as they are for Asian and Hispanic groups, the ACS data becomes less reliable. This likely accounts for the inconsistent jump in dissimilarity numbers between 2000 and 2010.

MAP 17: Janesville, Non-White Residents by Census Tract



MAP 18: Janesville, Affordable Renter Units by Census Tract

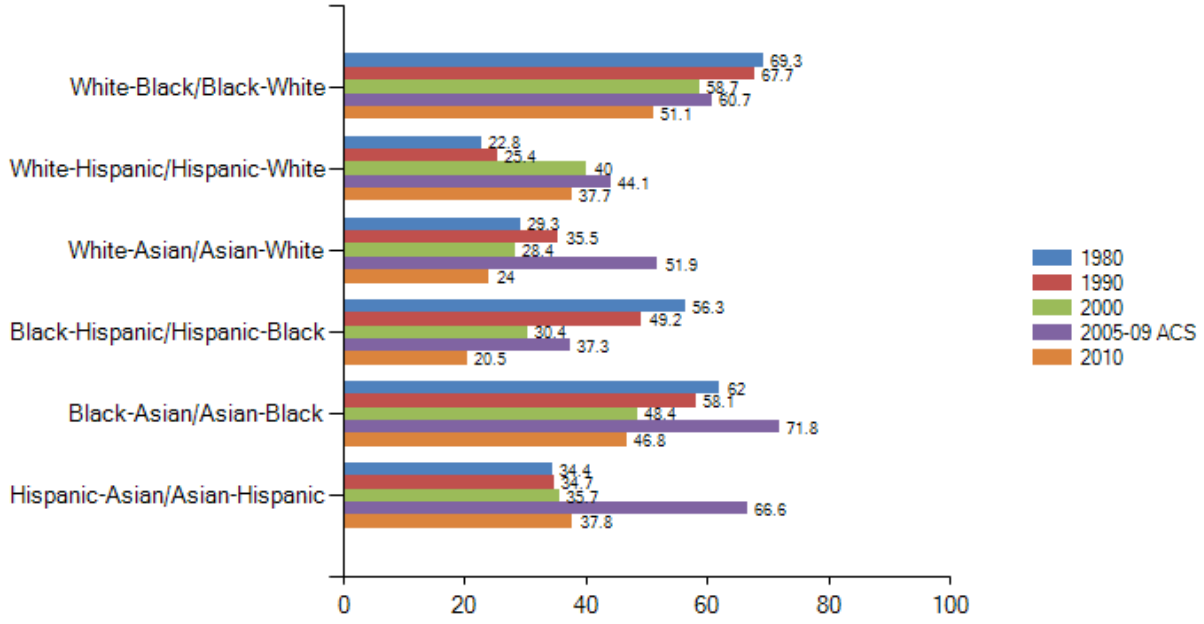


In Rock County:

Key points about segregation in Rock County include:

- When Rock County is evaluated as a Metropolitan Statistical Area, Black-white dissimilarity is considerably higher than in either Janesville or Beloit. It measured 51.1 in 2010, decreasing from 67.7 in 1990. Indices in the 40s and 50s are considered a moderate level of segregation.
- The Hispanic-white index was 37.7 in 2010, still considered low, but an increase from 25.4 in 1990.
- The Asian-white index was 24.0 in 2010, decreasing from 35.5 in 1990.
- Map 17 indicates where the highest percentage of affordable rental units are (census tracts 27, 14, and to a lesser extent 13.03,28 and 32); Map 18 illustrates where persons of color reside (census tracts 14, 22, 26.02 and 33)**.**

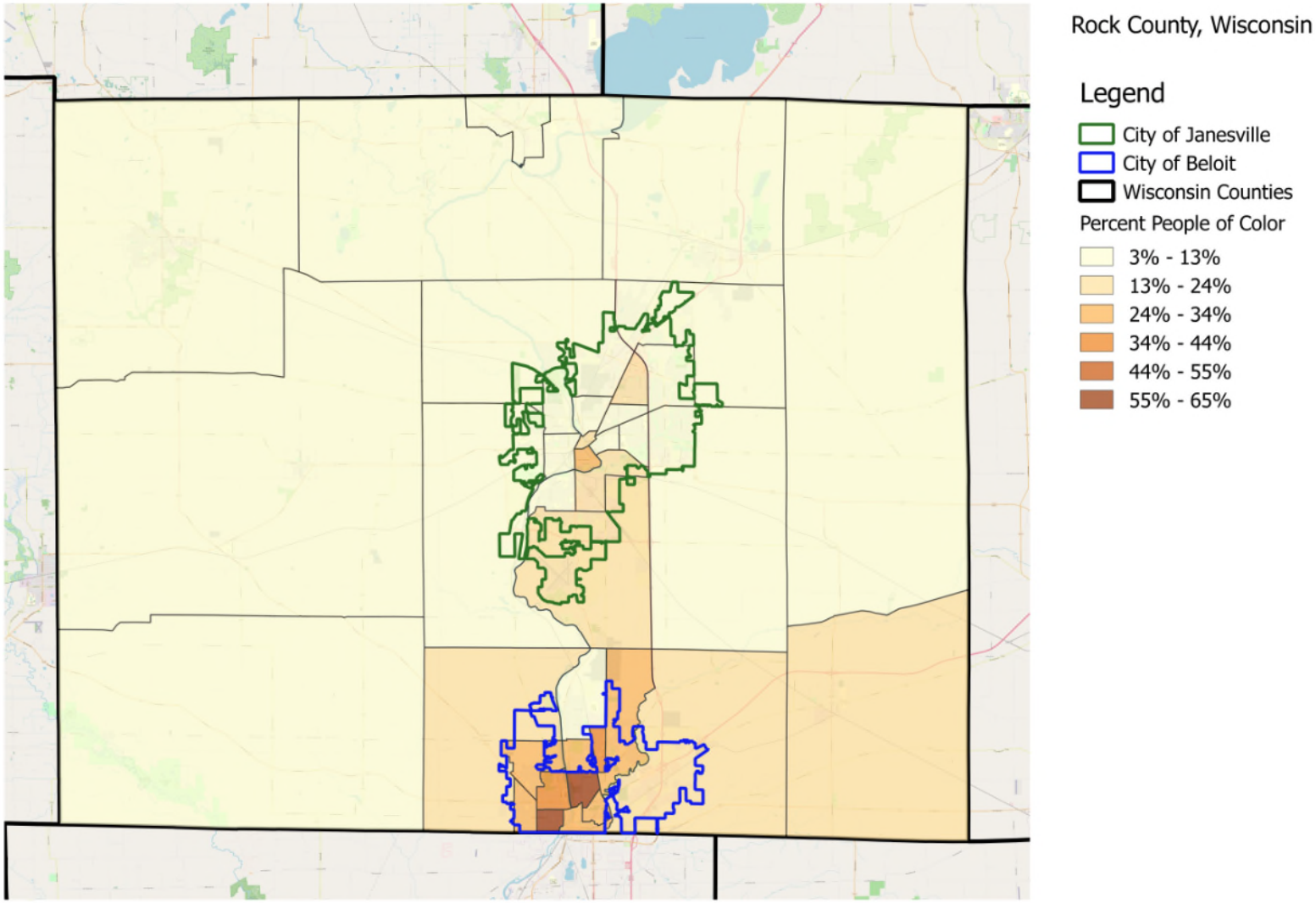
FIGURE 24: Rock County (Janesville- Beloit Metropolitan Statistical Area) 2010 Dissimilarity Index[64], [65]



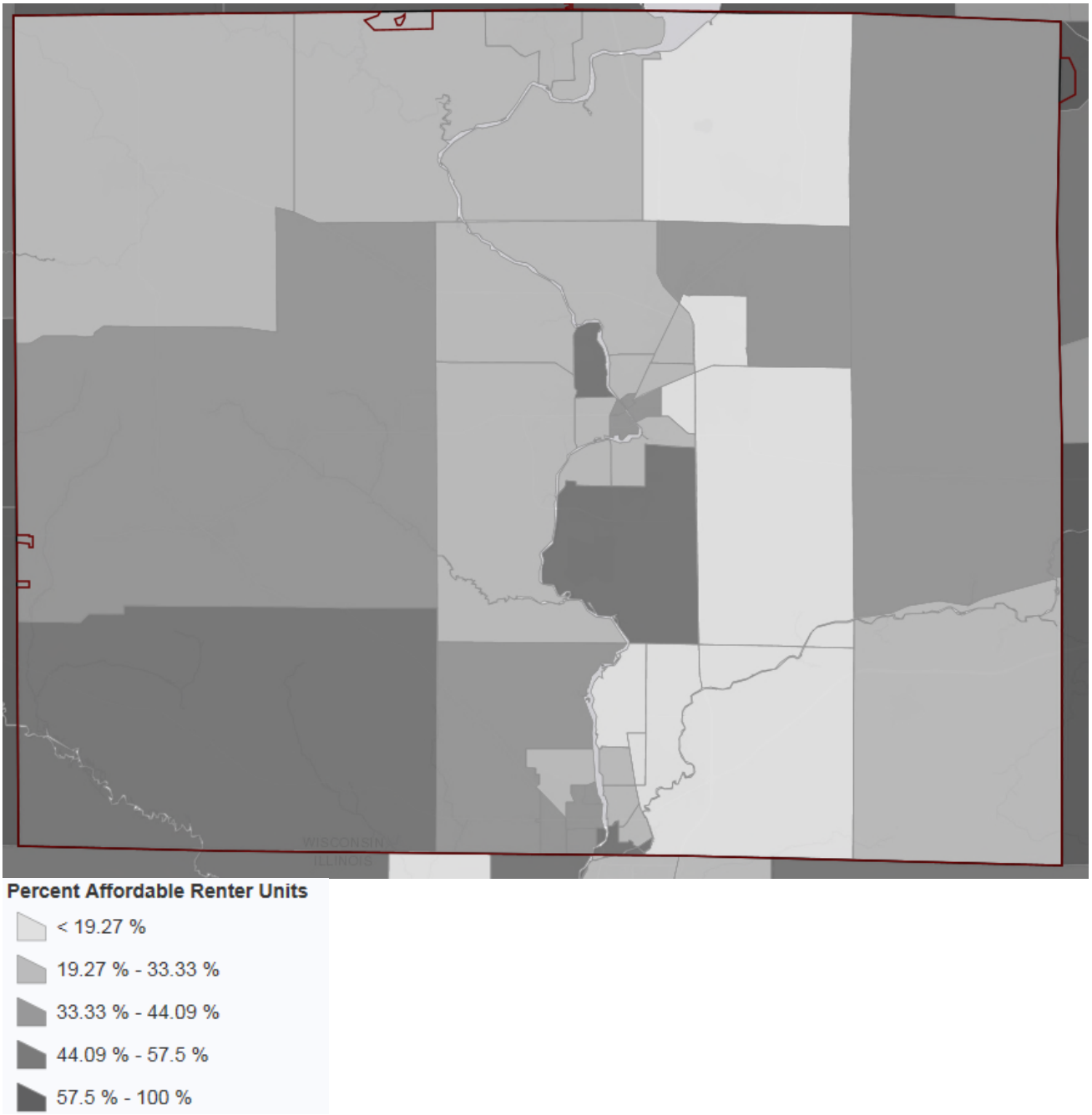
[64] Source: Spatial Structures in the Social Sciences, Brown University

[65] 2005-2009 data is from the American Community Survey, as opposed to the other years which are derived from the U.S. Census. When certain racial and ethnic populations are smaller, as they are for Asian and Hispanic groups, the ACS data becomes less reliable. This likely accounts for the inconsistent jump in dissimilarity numbers between 2000 and 2010.

MAP 19: Rock County, Non-White Residents by Census Tract by Census Tract



MAP 20: Rock County, Affordable Renter Units by Census Tract



Disability and Access Analysis

People with disabilities face multiple types of impediments to fair housing choice. These impediments include insufficient affordable and accessible housing opportunities, as well as numerous forms of illegal discrimination. Across the nation and in Wisconsin, complaints based on disability are the most commonly-filed type of housing discrimination complaint.

Many such complaints involve the rights of people with disabilities to request reasonable accommodations and modifications in housing situations. Reasonable accommodations are requested changes to a housing provider's rules, policies, practices, or services when such accommodations may "be necessary to afford persons with disabilities an equal opportunity to use and enjoy a dwelling, as well as public and common use areas."[66] (For example, a person with a disability may request an accommodation to a housing provider's "no animals" rule, in order to reside with a service animal.) Reasonable modifications are structural changes made to existing premises in order to afford housing consumers with disabilities full enjoyment of the premises. (Examples of reasonable modifications may include, but are not limited to, installation of grab bars in a bathroom, widening of doorways, changing door knobs and plumbing fixtures, and modifying smoke alarms.)[67]

Just over 14 percent (14.5) of Rock County's population aged 5 and older has a disability. In Beloit, that number is 15 percent; in Janesville, it is 16.4 percent.

People with disabilities form a diverse population, with a variety of different types of housing needs. Data make it clear, however, that people with disabilities have disproportionately low incomes, and limited options for physically accessible housing.

Housing Affordability and Accessibility

While the limited data makes it difficult to ascertain whether there is a shortage of *accessible* housing, we know there are insufficient *affordable* housing options for persons with disabilities. Key data about persons with disabilities and their income levels include:

- Persons with disabilities in Rock County are almost three times as likely (28.9 percent) to be living in poverty than persons without disabilities (10.5 percent).
- As noted previously, the demand for Housing Choice Vouchers (HCVs) is significantly higher than the supply. Persons with disabilities who have low income and are not able to obtain subsidized housing usually have a severe housing cost burden when paying market rate rent for housing.

[66] Joint Statement of the Department of Housing and Urban Development and the Department of Justice, *Reasonable Modifications Under the Fair Housing Act*
[67] (Ibid)

- Persons with disabilities are less likely to be employed than the general population. The employment rate for persons with disabilities (20 years of age and older) is 44.1 percent; the employment rate for persons without disabilities is 85.8%.

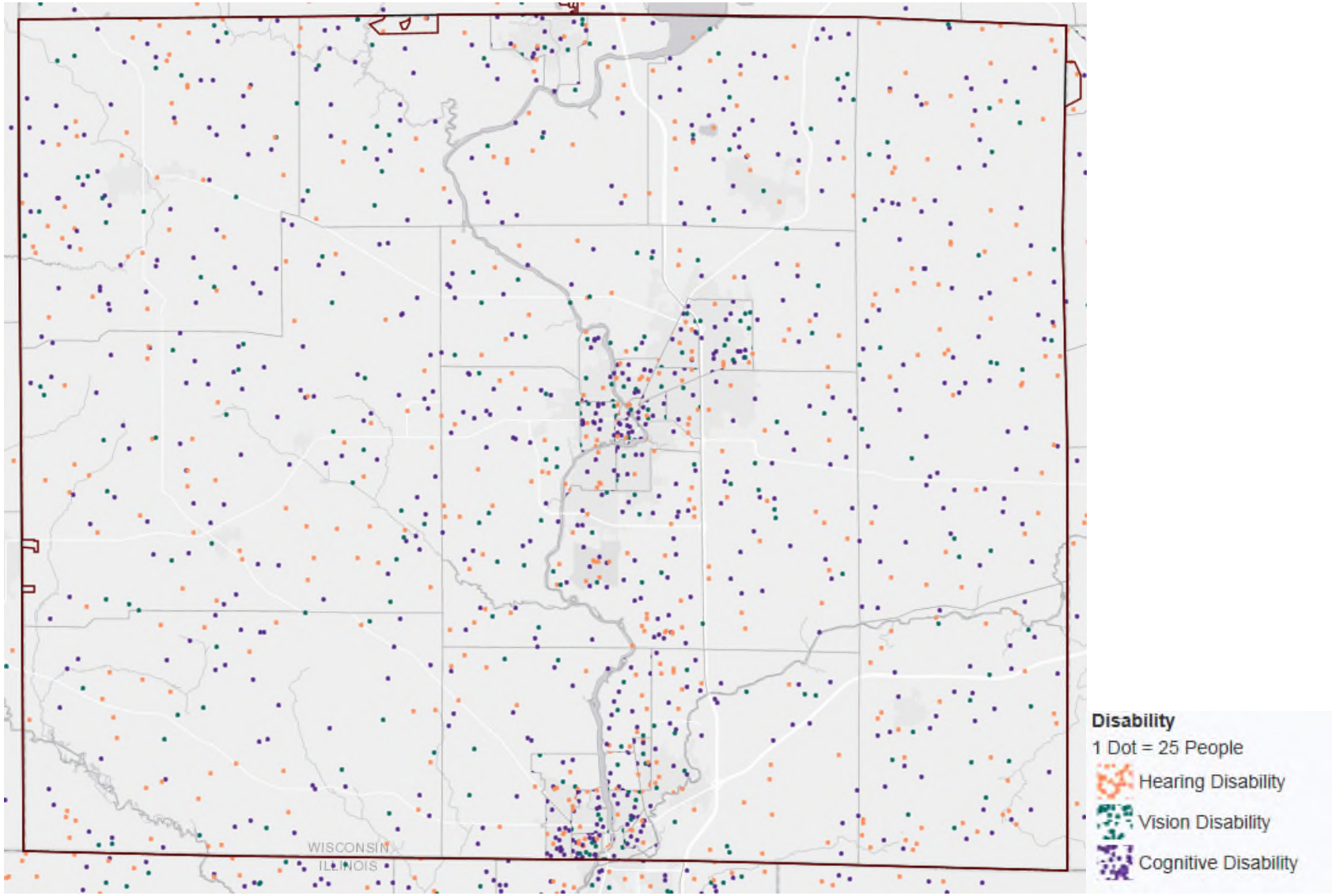
There is limited available data about the supply of accessible housing at this time. However, most accessible housing is likely to be multifamily housing built for first occupancy after March 1991, because the federal Fair Housing Act requires that most multifamily housing built for first occupancy then and afterward meet basic physical accessibility standards. Single family and multifamily housing built before this date typically lacks accessible features, unless it has undergone substantial renovation.[68]

- The City of Beloit has approximately 15,319 housing units.[69] Of these, 2498 housing units have been built since 1990. Of those housing units, 968 are in structures with four or more units, meaning they are required to meet federal accessibility standards if they were built for first occupancy on or after March 13, 1991.
- The City of Janesville has approximately 27,679 housing units.[70] Of these, 8054 housing units (29.1 percent) have been built since 1990. 1,874 of those housing units are in structures with three or more units.

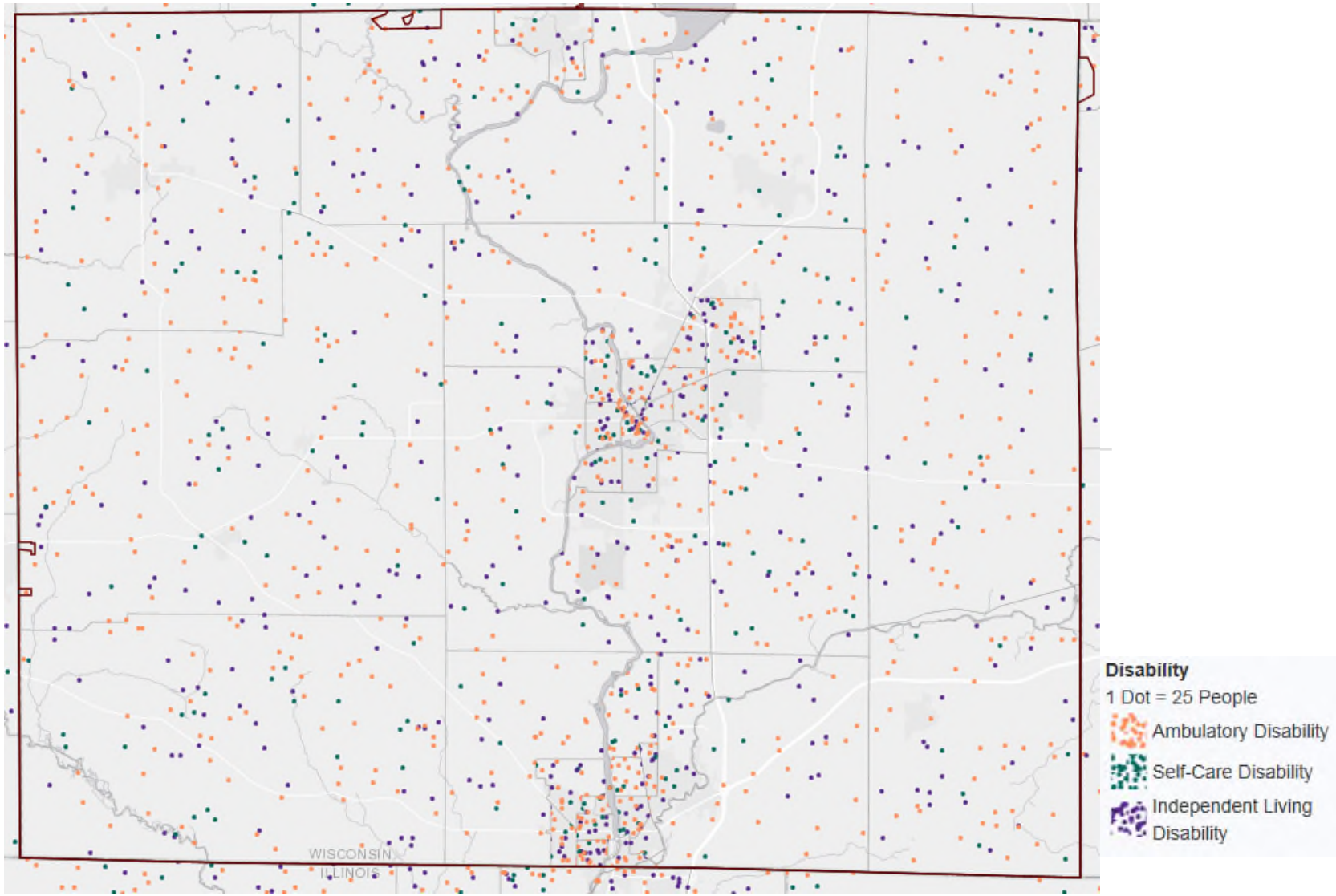
[68] WI Statutes 101.132 Physically Disabled Persons; Housing Requirements

[69] 2017 American Community Survey 5-Year Estimates
[70] Ibid

MAP 21: Rock County Persons with Disabilities by Type: Hearing, Vision, and Cognitive



MAP 22: Rock County Persons with Disabilities by Type: Ambulatory, Self-Care, and Independent Living



Publicly supported housing

- In Beloit's publicly supported housing, Section 8 project-based vouchers have the largest proportion of residents with disabilities, at 42.9 percent.
- In Janesville's publicly supported housing, Section 8 project-based vouchers also have the largest proportion of residents with disabilities, at 41.2 percent.
- Rock County's proportions are quite similar; 42.5 percent of project-based Section 8 housing is used by persons with disabilities.

See figures 26-28 below for additional detail.

FIGURE 25: Beloit Disability by Publicly Supported Housing Program[71]

	People with a Disability[72]	
	#	%
Public Housing	32	26.67%
Project-Based Section 8	130	42.90%
Other Multifamily	1	3.70%
HCV Program	135	23.20%

FIGURE 26: Janesville Disability by Publicly Supported Housing Program[73]

	People with a Disability	
	#	%
Public Housing	N/a	N/a
Project-Based Section 8	169	41.22%
Other Multifamily	7	18.92%
HCV Program	133	26.60%

FIGURE 27: Rock County Disability by Publicly Supported Housing Program[74]

	People with a Disability	
	#	%
Public Housing	74	33.48%
Project-Based Section 8	350	42.48%
Other Multifamily	8	12.50%
HCV Program	303	24.61%

[71] U.S. Department of Housing and Urban Development, Affirmatively Furthering Fair Housing data tables
[72] The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.
[73] U.S. Department of Housing and Urban Development, Affirmatively Furthering Fair Housing data tables
[74] Ibid.

Transportation for People with Disabilities

- The Cities of Beloit and Janesville contract with Rock County Specialized Transit to provide paratransit[75] service for qualifying individuals unable to use the Beloit or Janesville Transit System due to a disability.
- As noted elsewhere in this document, interviews with community stakeholders indicate that the availability and accessibility of transit has a significant impact on the quality of life for many persons with disabilities. Affordable, accessible housing must be conveniently linked to transit. The Beloit Transit System routes currently do not adequately connect low and moderate income neighborhoods with amenities and employment opportunities.

Homeownership Challenges

- As stated previously, persons with disabilities are almost three times as likely to be living in poverty as persons without disabilities.
- The median income for persons with disabilities in Rock County ($18,676) is about 61 percent of that of persons without disabilities ($30,449).
- Median mortgage costs are roughly $1030 in Beloit, and $1175 in Janesville, suggesting that homeownership is out of reach for most Rock County residents with disabilities.
- For persons with disabilities that are homeowners, costs to make the housing accessible also need to be considered.

Reasonable Modifications and Accommodations

The federal Fair Housing Act makes it unlawful for a housing provider or homeowners' association to refuse to allow a reasonable modification to the premises when such a modification may be necessary to afford persons with disabilities full enjoyment of the premises. "Additionally, the Act makes it unlawful to refuse to make reasonable accommodations to rules, policies, practices, or services when such accommodations may be necessary to afford persons with disabilities an equal opportunity to use and enjoy a dwelling and public and common use areas."[76]

Of MMFHC's 497 statewide housing discrimination complaints based on disability between 2013 and 2018, 60 percent involved a reasonable modification, a reasonable accommodation or both. This remarkably high percentage indicates that many housing

[75] Paratransit is an alternate mode of transportation, most often provided by minibuses, which provides door-to-door shared rides upon request by persons with disabilities

[76] Joint Statement of the Department of Housing and Urban Development and the Department of Justice, *Reasonable Modifications Under the Fair Housing Act*

providers do not understand their obligations under fair housing laws, or are choosing to violate the law.

Further, local government policies also need to allow for reasonable modifications and accommodations in housing. For example, a family that has a child with autism may need a fenced yard. If a municipal policy does not allow for a fence, the family may request a reasonable accommodation to that policy. The Cities of Beloit and Janesville have reasonable modification and accommodations policies.

Disparities in Mortgage Lending

Access to fair mortgage loan products is an essential component of households' ability to build wealth. If that access is limited based on race, disability, or membership in other legally protected classes, such households have experienced an unfairly decreased ability to accrue equity that, in turn, can fund small businesses, higher education, home improvements and the generational transfer of wealth. Racial disparities in lending contribute to systemic inequalities in every aspect of wellbeing in our communities.

Four reports generated by Lending Patterns, CLC Compliance Technologies, Inc. were completed for Beloit and Janesville for this analysis:

1. Lenders' Home Mortgage Disclosure Act (HMDA) Overview of Loan Originations
2. Lenders' Home Mortgage Disclosure Act (HMDA) Overview of Loan Denials and Withdrawals
3. Lender Market Share
4. Rank of Lenders by Low and Moderate Income (Borrower or Tract) Frequency

Loan Originations by Race and Ethnicity

In Beloit, 799 mortgage loans were made in 2017. As the table below details, white borrowers received a disproportionately high share of these loans, and people of color received a disproportionately low share of loans. These racial and ethnic disparities are significantly greater than those in Janesville.

FIGURE 28: Beloit Loan Originations by Race and Ethnicity

	Proportion of Beloit Population	Proportion of Loan Originations
White	61.3	79.5
Black	13.1	4.0
Asian	1.2	0.5
Native American	0.2	0.0
Hispanic/Latino	19.8	7.6

In Janesville, 1841 mortgage loans were originated in 2017. The proportion of loan originations is relatively proportionate to racial and ethnic composition of Janesville, with the exception of the Latino/Hispanic and Asian American loan originations. While Hispanic residents of Janesville make up just over 5 percent of the population, under 2 percent of loan originations were made to Hispanic households. Similarly, Asian Americans make up 1.2 percent of the population but only .5 percent of the loan originations. Discrimination based on race, national origin and ethnicity may play a role in these disparities in both Beloit and Janesville.

FIGURE 29: Janesville Loan Originations by Race and Ethnicity

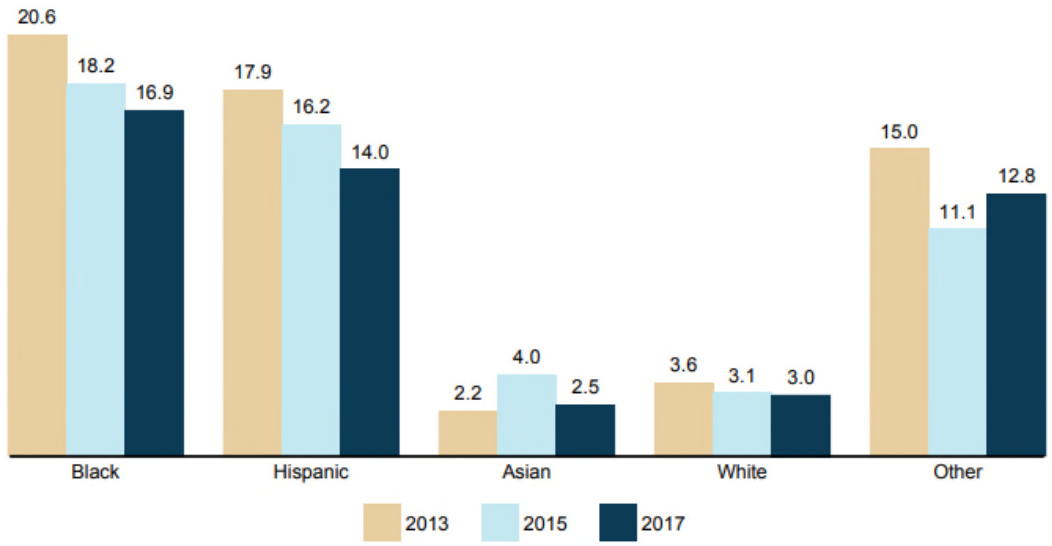
	Proportion of Janesville Population	Proportion of Loan Originations
White	89.0	91.9
Black	1.9	1.2
Asian	1.5	0.8
Native American	0.1	0.2
Hispanic/Latino	5.3	1.9

The loan origination disparity for Latinos in Beloit and Janesville is more significant than other Wisconsin communities of similar size. Persons new to this country often have not established the credit required to obtain a prime mortgage. Additionally, many persons born in other countries do not have Social Security Numbers, but many have Individual Tax Identification Numbers (ITIN) instead. The lack of lenders making ITIN[77] loans for residents without social security numbers likely plays a large role in this disparity. Many communities in Wisconsin that receive federal housing dollars have at least one or two ITIN lenders in their community. At the time of this report we were not aware of any Rock County lenders making ITIN mortgage loans.

Data in Figure 30 shows that nationally communities of color are much more likely to not have an established relationship with a conventional bank or financial institution and/or have insufficient credit histories. While this does not make this group any less likely to be able to responsibly take on a mortgage, these situations do make it difficult for conventional lenders to make loans.

[77] ITIN loans are for people without a Social Security Number looking to buy a home to live in the United States. These loans require higher down payment, but are a solid 30 year fixed mortgage.

Figure 30: Unbanked Rates (for the U.S.) by Household Race, Ethnicity and Year[78]



Lender Market Share

The top 15 mortgage lenders in Beloit made almost three-quarters (73.7 percent) of the purchase and refinance loans in 2017.[79] In Beloit, the lenders making the most loans, whether for new purchases or refinancing, are:

FIGURE 31: Beloit Lender Market Share

Rank	Lender	# of Loans
1	First National Bank and Trust	108
2	Associated Bank	81
3	Blackhawk Bank	68
4	Quicken Loans	45
5	Mortgage Center LC	45
6	Inlanta Mortgage	32
7	BMO Harris Bank	28
8	Blackhawk Community Credit Union	23
9	Advia Credit Union	20
10	Johnson Bank	13
11	First Community Credit Union	12
12	Freedom Mortgage Corp.	11
13	Parker Community Credit Union	10
14	Alpine Bank and Trust	9
15	Fairway Independent Mortgage Corp.	8

[78] 2017 FDIC National Survey of Unbanked and Underbanked Households

[79] Lending Patterns, CLC Compliance Technologies, Inc., 2018

Of these loans, only 1 was a subprime loan, made by 1st Alliance Lending. A subprime loan is a loan offered at an interest rate above prime to individuals who do not qualify for prime rate loans.

The top 15 mortgage lenders in Janesville made 71.1 percent of the purchase and refinance loans in 2017.[80] In Janesville, the lenders making the most loans, whether for new purchases or refinancing, are:

FIGURE 32: Janesville Lender Market Share

Rank	Lender	# of Loans
1	Johnson Bank	228
2	Blackhawk Community Credit Union	195
3	Inlanta Mortgage	129
4	Associated Bank	119
5	Summit Credit Union	100
6	Quicken Loans Inc.	93
7	Parker Community Credit Union	70
8	BMO Harris Bank	56
9	Fairway Independent Mortgage Corp.	51
10	Old National Bank	47
11	Freedom Mortgage Corp.	31
12	Wells Fargo Bank	28
13	Mortgage Center LC	27
14	JP Chase Bank	26
15	First National Bank and Trust	23

Lending in Low- and Moderate-Income (LMI) Census Tracts and to Low- and Moderate-Income (LMI) Borrowers

In Beloit, there were 1,097 loan applications from LMI borrowers and in LMI census tracts in 2017. The top five banks at which these applications were submitted are listed below.

[80] Lending Patterns, CLC Compliance Technologies, Inc., 2018

FIGURE 33: Beloit Top Low and Moderate Income Lenders

Rank	Lender	# of Loans
1	First National Bank and Trust	132
2	Town Bank	77
3	Blackhawk Bank	67
4	Mortgage Center LC	64
5	Inlanta Mortgage	41

In Janesville there were 1,341 loan applications from LMI borrowers and in LMI census tracts in 2017. The top five banks at which these applications were submitted are listed below.

FIGURE 34: Janesville Top Low and Moderate Income Lenders

Rank	Lender	# of Loans
1	Blackhawk Community Credit Union	147
2	Johnson Bank	91
3	Associated Bank	83
4	Inlanta Mortgage	76
5	Quicken Loans, Inc.	59

Fair Housing Enforcement

Persons wishing to file a housing discrimination complaint can either contact a public fair housing enforcement agency, like the Wisconsin Equal Rights Division, HUD or local municipalities, or a private fair housing organization such as the Metropolitan Milwaukee Fair Housing Council. Complainants can also file a complaint directly in federal or state court.

Between January 2010 and April 2019, the Metropolitan Milwaukee Fair Housing Council (MMFHC) received 23 complaints from Rock County. Since Rock County is outside of MMFHC's primary service area, outreach services are not provided in Rock County, and most residents are unlikely aware of MMFHC's services.

Consistent with state and national trends, the most complaints were based on a person's disability, followed by race, lawful source of income and age. All of the 23 complaints were in the rental market.

Protected class bases were as follows.[81]

FIGURE 35: Fair Housing Complaints by the Metropolitan Milwaukee Fair Housing Council

Protected Class	# Complaints
Disability	13
Race	6
Lawful Source of Income	3
Age	2
Familial Status	1
National Origin	1
Sex	1
Domestic Abuse, Sexual Assault, and Stalking Victims	1
Color	0
Religion	0
Ancestry	0
Marital Status	0
Sexual Orientation	0

One complaint in Rock County was successfully resolved following an MMFHC investigation, which revealed that representatives of an apartment complex in Janesville told prospective renters that they would not make reasonable accommodations to their

[81] Because of the complex nature of unlawful housing discrimination, some complaints are based on more than one protected class.

pet policies for service or assistance animals. MMFHC referred the results of this investigation to MMFHC's General Counsel, who intervened directly with the housing provider. Following this intervention, the housing provider changed their policies to comply with the fair housing laws. Other complaints were either not pursued by the complainant or referred to administrative agencies like the U.S. Department of Housing and Urban Development or the Wisconsin Equal Rights Division.

Figure 36 lists fair housing complaints filed between 2010 and March 2019 with the U.S. Department of Housing and Urban Development. Figures 37 and 38 on the following pages review Beloit and Janesville Fair Housing Ordinances and provide recommendations to improve their efficacy.

FIGURE 36: Fair Housing Complaints by the U.S. Department of Housing and Urban Development

Protected Class	# Complaints	Violation City
Disability	8	Beloit (1), Town of Beloit (1), Edgerton (2), Janesville (3), Orfordville (1)
Race	4	Beloit (2), Janesville (2)
Familial Status	1	Beloit
National Origin	1	Beloit
Sex	1	Beloit
Victim of Domestic Abuse, Sexual Assault, or Stalking	0	
Age	0	
Lawful Source of Income	0	
Color	0	
Religion	0	
Ancestry	0	
Marital Status	0	
Sexual Orientation	0	

Figure 37: Fair Housing Complaints by the Wisconsin Equal Rights Division

Protected Class	# Complaints
Disability	4
Race	10
Familial Status	2
National Origin	0
Sex	7
Victim of Domestic Abuse, Sexual Assault, or Stalking	2
Age	1
Lawful Source of Income	2
Color	1
Religion	0
Ancestry	0
Marital Status	0
Sexual Orientation	0

Figure 38: City of Beloit Ordinances, Chapter 20 - Fair Housing Code

Location	Issue	Recommendation
Throughout the ordinance	Beloit's Fair Housing Code does not include "status as a victim of domestic abuse, sexual abuse, or stalking" as a protected class, as the Wisconsin Open Housing Law does	Update the protected classes in the code to reflect all state and federal protected classes.
20.01, and everywhere this term is used	Familial status is a protected class in the ordinance, but is defined in a more narrow way than the protected class of family status in the Wisconsin Open Housing Law. It therefore excludes some familial and household situations.	Use the definition of "family status" as in the Wisconsin Open Housing Law
20.02(2)(e)	It is unclear why compensation would be subject to City Manager and City Council approval	Omit or clarify this issue
20.02(2)(f)	Description of the hearing process lacks detail and no where in the Ordinance is there a specified time for commencement of a hearing	Add language to describe how the hearing will be conducted, e.g., who will preside over the hearing, timeline of steps before, during and after hearing is conducted
20.02(2)(m)	"Actual damages" may be inadequate remedy and do not reflect state or federal fair housing laws	This section should be modified to reflect the language of the State law which states that both economic and noneconomic damages may be awarded, as well as injunctive relief and other equitable relief
20.03	This section, "Prohibited Acts," is not as comprehensive a list as that included in the Wisconsin Open Housing Law	Modify this section to include the more comprehensive list of prohibited acts in the Wisconsin Open Housing Law
20.035(2)(a)	Federal and state fair housing laws do not permit that housing providers require the restoration of the exterior of a modified home, and only permit that a provider require interior restorations when modifications may affect future use.	Modify to reflect state and federal laws and regulations
20.04(3)(a)	Definition of housing for older	Definition should be

	persons is more narrow than that used in state and federal law, in that it only describes housing for persons 62 years of age and older, not housing for persons 55 and older	modified to comport with state and federal law
20.04(3)(a)(3)(a)	The language used in this section is outdated; it has been removed from state and federal laws	Remove this language
20.04(3)(a)(3)(b)	This language does not reflect federal and state law, which indicate that 100% of units must be occupied by at least person 62 years of age or older	Modify this section to comport with state and federal law
20.05(1)(b)	The requirement that the complainant supply the name and address of the respondent may be onerous and have a chilling effect on the filing of complaints	Require the name of the respondent and the address of the property if available
20.05(7)	There is no requirement that respondents file an answer to a complaint	Revise to comport with state and federal fair housing laws, in which a respondent is required to file an answer to the complaint in writing within a defined time period
20.05(8)(e)(1)	The language “where necessary, by the complainant” is problematic – what actions could be required of a complainant?	Omit this language
20.06(1)(b)	The language “where necessary, by the complainant” is problematic; what actions could be required of a complainant?	Omit this language
20.06(2)	The amounts of forfeitures to the City are extraordinarily low and would not fulfil the purpose of such forfeitures, which is to serve as a deterrent to future similar actions	Forfeiture amounts should be modified to reflect state and federal laws
20.07		Wisconsin Open Housing Law definitions should be replicated throughout this section; further, particular attention should be paid to the definition of compensatory damages
		The addition of protected

		classes would ensure more housing opportunities. Specifically consider the protection of persons utilizing a Housing Choice Voucher and gender expression/gender identity.

Figure 39: City of Janesville Ordinances, Chapter 16.04 - Fair Housing Code

Location	Issue	Recommendation
16.04.010 (B) and (C)	Janesville's Fair Housing Code does not include "status as a victim of domestic abuse, sexual abuse, or stalking" as a protected class, as the Wisconsin Open Housing Law does	Update the protected classes in the code to reflect all state and federal protected classes.
16.04.010 (C) and (E)	The necessity and intent of these paragraphs is unclear, and they contain undefined and ambiguous terms, such as "impairing," "housing accommodations," and "applicable statutes"	Clarify and/or condense these paragraphs and the terminology used in them
16.04.030	The definition of "housing for older persons" is inconsistent with state and federal fair housing laws	Modify this definition to comport with state and federal law
16.04.030	The definition of "settlement agreement" refers only to eliminating the alleged discrimination instead of compensating the complainant and providing appropriate legal redress to victims	Modify to add the importance of providing a legal remedy and compensation to victims of unlawful discrimination
16.04.050 (A) and 16.04.050 (A)(1)	The language "if an individual's vision, hearing or mobility is impaired…" and language regarding credentials for service animals reflects outdated language from a previous version of the Wisconsin Open Housing Law	Update this language to comport with the current Wisconsin Open Housing Law
16.04.050 (B)	This exemption for owner-occupied buildings of 8 or fewer units does not comport with state and federal fair housing law and would be overly restrictive of buildings that must comply with the law	Modify this exemption to comport with state and federal law
16.04.070 (C)(4)	This section allows a Hearing Examiner only 60 days (with a possible extension	Extend the time period in which the Hearing

	to 90 days) to issue a determination of whether probable cause exists; this is a very short time frame and may not be sufficient for thorough processing of a complaint	Examiner may conduct his/her responsibilities prior to issuing a determination
16.04.080 (A) and 16.04.080 (A)(5)(a)	Requiring a complaint in affidavit form, signed under oath, is a more onerous requirement than either state or federal fair housing law, and may have a chilling effect of the filing of complaints	Modify this section to comport with state and federal procedures for filing a complaint
16.04.080 (A)	The requirement that complaints be filed within 90 days after the violation is much shorter than permitted by state and federal law, and is a severe limitation on victims' ability to seek legal redress	Change language to allow for 1 year to file a complaint, as per state and federal law
16.04.080 (A)(1)	The requirement that a complainant notify the Fair Housing Officer of any changes in contact information within 10 days is onerous	Extend this time period
16.04.080 (A)(2)	The requirement that the complainant supply the complete name, address and phone number of the respondent may be onerous and have a chilling effect on the filing of complaints	Require the name of the respondent and the address of the property if available
16.04.110 (A)	The requirement that the Fair Housing Officer appoint a Mediator within 10 days of a probable cause determination is onerous	Extend this time period
16.04.120 (A)	The language "as applicable, by the complainant" is problematic; what actions could be required of a complainant?	Omit this language
16.04.120 (B) and 16.04.120 (C)	The amounts of forfeitures to the City are extraordinarily low and would not fulfil the purpose of such forfeitures, which is to serve as a deterrent to future similar actions	Forfeiture amounts should be modified to reflect state and federal laws
		The addition of protected classes would ensure more housing opportunities. Specifically consider the protection of persons utilizing a Housing Choice Voucher and gender

		expression/gender identity.

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Impediments to Fair Housing

This section identifies barriers to equal housing access, based on the quantitative data contained in the Demographic and Fair Housing Analysis sections of this document, and based on qualitative information gleaned from community input.

A majority of the impediments described below apply to Beloit, Janesville and the balance of Rock County, except where indicated. The severity and repercussions of each impediment may vary by municipality. The impediments are not listed in order of priority.

Impediments to fair housing include:

1. **An inadequate supply of affordable housing, exacerbated by low vacancy rates**
   Previous sections of this report describe how housing cost burden, or spending more than 30 percent of income on housing costs, is a significant problem for many households in Rock County, particularly households of color. The supply of market rate, affordable housing is insufficient to meet the demand of low and moderate-income residents. Other contributing factors to this impediment include:
   a. High rents, partially as a result of low vacancy rates
   b. Excessive housing provider screening practices and eligibility requirements (based on information obtained from multiple stakeholders)[82] [83],
   c. Frequent evictions

2. **Zoning and land division restrictions (Janesville and Rock County balance only)**
   In many parts of Rock County, zoning codes don't allow for increased density of housing, multi-family and duplex developments. Minimum home and lot sizes are barriers to the construction and development of more affordable housing options, which would expand housing opportunities for persons of color and lower income households.

3. **NIMBYism, community opposition to multi-family and affordable housing units**
   Opposition both by elected officials and residents can prevent needed housing from being developed. Stakeholders indicated that opposition to affordable housing is present in Beloit, Janesville and other municipalities in Rock County.

[82] Housing providers may use tenant screening criteria, so long as they remain in compliance with all applicable laws. However, in markets such as Rock County, where vacancy rates are low, some rental housing providers are utilizing especially stringent and onerous criteria and fees, including: high security deposits, excessive fees on late rent payment, fees to view a unit, required online rent payment with added fees if paid in other forms, and high fees for credit and background checks.
[83] Screening for previous evictions may seem neutral on its face, but may, in some cases, have a disparate impact on Black women. Similarly, screening for criminal background has a disparate impact on persons of color.

4. Racially and economically segregated housing patterns

Contributing factors to this impediment include:

a. Housing provider discrimination (see more detailed description below).

b. The location of affordable housing, whether naturally occurring or publicly subsidized, can contribute to segregation or integration, as well as to residents' access to opportunities such as education and employment. Maps in earlier sections of this report show that renters are more concentrated in certain census tracts of Beloit and Janesville.

According to a number of stakeholders in Rock County, the long-term persistence of racially and economically segregated housing patterns in Rock County has resulted in people of color having distinct and strong perceptions about where they are safe and welcome and where they are not. In the twenty-first century, the signals that result in these perceptions are not blatant, such as the "whites only" signs of the past, but their current, more subtle forms may be just as limiting to housing choice. In the present day they may take the form of microaggressions.[84]

5. Lack of quality affordable housing

According to multiple stakeholders, much older, affordable rental housing in Rock County is in disrepair. Over seventy percent of housing units in Beloit are older than 50 years. In Janesville 47 percent of housing units are over 50 years old. Stakeholders throughout Rock County expressed concerns about various problems associated with poor quality housing, including health issues for residents of these housing units, retaliation (including eviction) when tenants complain to building inspection entities, as well as an overall declining housing stock and tax base.

6. Lack of consumer education for renters and homebuyers*

Community input suggests that available housing-related education is not reaching many residents of Rock County. Residents need to be connected to:

a. Tenant rights and responsibilities

b. Credit counseling

c. The home purchase process, especially for first-time homebuyers

d. Fair housing rights

* Numerous historic and current government and industry-created barriers have put nonwhites, persons with disabilities, etc., at a disadvantage in terms of credit, accumulated wealth, education, etc.

[84] "Microaggression" is a term used for brief and commonplace daily verbal, behavioral, or environmental indignities, whether intentional or unintentional, that communicate hostile, derogatory, or negative prejudicial slights and insults toward any group.

7. Transit limitations (Beloit only)

Beloit Transit System routes do not sufficiently connect many low- and moderate-income neighborhoods with major employers. Furthermore, advocates for persons with disabilities cite inadequacies in the transit system, including the infrequency of buses, and limited hours of operation. This is of particular concern for persons with disabilities, who are more reliant on transit than persons without disabilities.

8. Insufficient affordable housing accessible for persons with disabilities

As noted previously, Rock County has a shortage of affordable housing for all persons. However, persons with disabilities are more likely to have low income and need low-cost, affordable housing than the general population. Additionally, because of the average older age of housing in Beloit and Janesville and the limited stock of multi-family housing required to be accessible under the federal Fair Housing Act and the Wisconsin Open Housing Law, existing accessible housing is in short supply.

9. Lack of resources for fair housing outreach and enforcement

Given that fair housing laws exist at local, state and federal levels, and that fair housing issues reach across jurisdictional borders, the responsibility to provide and support comprehensive fair housing services rests with many entities. Funding for fair housing activities from the State of Wisconsin and the federal government have remained stagnant or even decreased over the last two decades. Without increased funding for fair housing services, the ability of public agencies and private organizations to make effective progress in eliminating unlawful discrimination and creating integrated communities will be unacceptably constrained. Further, without additional investment on the part of State of Wisconsin and the federal government, the Cities' of Beloit and Janesville ability to meet their fair housing goals will be hampered.

Additionally, fair housing outreach materials for the City of Beloit contain misinformation and omissions. The City of Janesville's fair housing information on its website is too limited to be very useful. Rock County's fair housing ordinance cannot be easily accessed online.

10. Illegal discrimination in the private housing market

It is difficult to assess the severity of private market discrimination in Rock County based on the number of complaints reported to the U.S. Department of Housing and Urban Development (HUD) and the Wisconsin Equal Rights Division. According to the National Fair Housing Alliance and HUD, illegal housing discrimination is often so subtle that it is not reported by victims, only a small fraction of instances of housing discrimination are reported. Multiple stakeholders from Beloit, Janesville and the balance of Rock County believe housing discrimination is occurring. Housing discrimination complaint data for

Rock County from the Metropolitan Milwaukee Fair Housing Council and from the U.S. Department of Housing and Urban Development (found in the Fair Housing Enforcement section) verifies that discrimination.

11. Fair Housing enforcement in Beloit, Janesville and the balance of Rock County does not include testing as a method of investigation.

While testing is allowed for in Beloit's fair housing ordinance, it is not utilized to investigate fair housing complaints. "Many victims of discrimination encounter deceptive barriers that can be hard to detect, such as false information, neighborhood steering, and the application of different standards. As a result, fair housing advocates have turned to testing as the most effective tool to investigate violations of fair housing law and gather litigation quality evidence of discriminatory practices." [85]

12. Predatory land contracts

Land contracts themselves are not inherently predatory. However, they may be predatory when the terms and conditions of a land contract make it difficult to actually convert the contract to ownership. According to community input from Rock County, persons with limited English proficiency have been targeted by predatory land contracts, and may be especially vulnerable to the negative consequences of such contracts.

13. Lack of mental health and substance abuse services

According to community stakeholders, mental health challenges and substance abuse can make maintaining stable housing difficult for Rock County residents.

14. Barriers to homeownership for Black and Latino residents

Disparities in homeownership between white residents and Black and Latino residents are indicative of significant inequities in Rock County's housing market. Further, these disparities have far-reaching consequences, especially as one of the largest benefits of homeownership is building wealth. Racial disparities in homeownership are the result of multiple factors, including:

a. Illegal discrimination: As noted previously, discrimination can be subtle and sophisticated. This is especially true in the home purchase process, where discrimination may be embedded in institutional policies (such as age and value restrictions in homeowners insurance policies), and credit scoring algorithms. These factors can make it very challenging for borrowers to recognize discriminatory experiences, which leads to underreporting of unlawful discrimination in the lending and real estate markets.
b. Lack of consumer and financial education
c. Lack of access to credit, no credit or poor credit

[85] U.S. Department of Housing and Urban Development, Office of Policy Development and Research, *Fair Housing Enforcement Organizations Use Testing to Expose Discrimination*

d. Income and employment disparities

Goals and Strategies

This section identifies goals and strategies designed to redress impediments to fair housing. Goals and strategies were developed by MMFHC, Cities of Beloit and Janesville staff, Rock County staff, and the Rock County Fair Housing Steering Committee, which was formed as a part of this analysis process.

On the following pages, the goals are listed in table format. Each goal has a number of strategies to make progress toward the goal. Each strategy contains a *timeframe for action*, a *measure of achievement*, and the *entity* at each municipality that is responsible for implementing the strategies. The *timeframe for action* refers to what period of time each community intends to implement each strategy. The *measure of achievement* refers to how each community will measure whether that strategy has been achieved.

There is considerable continuity in the goals and strategies for each community; the primary differences between each community's goals and strategies are in the timeframes, measures of achievement, and responsible entities. The goals are not listed in order of priority.

Beloit Fair Housing Goals and Strategies

Goal 1: Create and Preserve Affordable Housing (Rental and For Sale)			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Beloit will support affordable housing development incentives: reduced land costs, provide community support for LIHTC developments	2020-2024	When a proposal is submitted, the City will work with developers to create affordable units	CC, CM and CD Departments
Explore new strategies for affordable housing, i.e. tiny homes	2020-2024	Development of tiny homes regulations	CD Department
Identify YIMBY strategies for elected officials to counter opposition to affordable housing proposals	2020-2024	When a proposal is submitted, staff will prepare talking points for the City Council and Plan Commission	CD Department
Support the development of affordable housing in low poverty areas of city	2020-2024	As	CD Department

Goal 2: Create a Strong Fair Housing Enforcement and Outreach Program			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Contract with a Qualified Fair Housing Organization (QFHO) to provide fair housing training for housing providers	2020-2024	Provide 2-3 session in five years	EOC
Evaluate the recommendations in the Fair Housing Enforcement section and identify possible changes to the Fair Housing ordinance.	2020-2024	Complete any ordinance amendments by the end of 2024	CA and CD Departments
Explore contracting with a QFHO to provide testing services to investigate housing discrimination	2020-2024	Complete evaluation by the end of 2024	EOC

Update outreach materials to reflect any updates to protected classes, prohibited practices, exemptions and definitions	2020-2024	Once updates to the ordinance are made, materials will be updated	EOC
Explore contracting with a QFHO to provide fair housing training for elected officials: address fair housing implications of community opposition to affordable housing	2020-2024	Evaluation completed by the end of 2024	EOC and CD Department
Explore amending Beloit's Fair Housing Ordinance for protection of Housing Choice Vouchers/Section 8 Rent Assistance and gender identity/gender expression.	2020-2024	Fair Housing Ordinance updated by end of 2024	EOC
Increase fair housing outreach efforts	2020-2024	Provide 2-3 fair housing sessions in 5 years	EOC

Goal 3: Improve Tenant and Housing Provider Communications			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Explore the creation a *Review Board* for addressing tenant/housing provider disputes	2020-2024	Evaluation completed by the end of 2024	CDA, EOC
Support efforts to offer tenant training (similar to Rent Smart)	2020-2024	Allow using CDBG funds for this activity during 2020-2024	CDA, EOC

Goal 4: Improve Transit			
Strategies	Timeframe for Action	Measure of Achievement	Responsible Entity/s
Adapt public transportation routes to connect low and moderate income neighborhoods with employment	2021	Updated fixed routes that connect LMI neighborhoods with employment	SLATS and Transit Division
Advocate for an increase in hours and days public transportation is available	2020-2024	Information provided to Transit Division for the need for increased hours and days	EOC, Community Development Department

Goal 5: Develop an Eviction Reduction Strategy			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Support education programs that help tenants know their rights under Wisconsin Eviction laws	2020-2024	Allow using CDBG funds for this activity during 2020-2024	CDA, CC, CD Departments
Support funding for legal representation for those facing eviction in Rock County		Allow using CDBG funds for this activity during 2020-2024	CDA, CC, CD Departments

Goal 6: Address Predatory Land Contracts			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Explore contracting with a QFHO to provide outreach and education to vulnerable populations	2020-2024	Completed evaluation	EOC
Support legal advocacy for victims of predatory land contracts	2020-2024	Allow using CDBG funds for this activity during 2020-2024	CDA

Goal 7: Increase Access to Consumer Education			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Promote existing credit counseling and financial education	2020-2024	Hold 2-3 sessions with providers	EOC, CD Department
Promote homebuyer counseling with targeted efforts for Latino and Black Communities	2020-2024	Hold at least 2 sessions with providers that deal directly with the Latino population and two sessions in areas of minority concentrations	EOC, CD Department

Goal 8: Connect Black, Latino and Other Underserved Populations with Life-improving Opportunities			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Support programs that provide outreach regarding local educational resources	2020-2024	Allow using CDBG funds for this activity during 2020-2024	EOC, CDA
Support programs that provide outreach regarding local job skills resources	2020-2024	Allow using CDBG funds for this activity during 2020-2024	EOC, CDA

Abbreviations:
CA: City Attorney
CC: City Council
CD Department: Community Development Department
CDA: Community Development Authority
CM: City Manager
EOC: Equal Opportunities Commission

Janesville Fair Housing Goals and Strategies

Goal 1: Create and Preserve Affordable Housing (Rental and For Sale)			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Create affordable housing development incentives: density bonuses, TIF financing, reduced land costs, support for LIHTC developments	2020-2024	Incentivize 2-3 housing projects in 5 years	NCS/ED/CDA/Plan Commission/City Council
Explore new strategies for affordable housing, i.e. Planned Unit Development	2019-2020	Review/Approve 1-2 PUD's for affordable housing	NCS/Planning/Plan Commission/City Council
Encourage new units of affordable housing in low poverty areas of city where possible	2020-2024	Make potential multi-family site information available, including low poverty areas available to developers	NCS/ED/Planning
Removal of zoning barriers for the development of duplex and multifamily housing	2020	Ordinance revisions approved	Planning/Plan Commission/City Council
Explore dedicating 20% of City-supported multi-family units to Fair Market Rents (FMR)	2020-2021	X% of new units at FMR	ED/Planning/City Council
Review design standards that increase cost of multi-family housing construction	2021-2022	Ordinance revisions approved	Planning/Plan Commission/City Council
Evaluate creation of a Housing Choice Voucher Homeownership Program	2020-2021	Complete evaluation; roll out program (if positive evaluation); 2 successful home purchases/year	NCS
Continue to offer homeowner rehabilitation program	2020-2024	15 homes rehabilitated/year	NCS
Continue to offer rental rehabilitation program	2020-2024	4 units rehabilitated/year	NCS
Continue to offer down payment and closing cost assistance program	2020-2024	30 down payment loans provided/year	NCS

Goal 2: Create a Strong Fair Housing Enforcement and Outreach Program			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Contract with a Qualified Fair Housing Organization (QFHO) to provide Fair Housing training for housing providers: Lenders Landlords Real estate professionals Service agencies	 2020 2021 2022 2023	2 session offered/year	NCS
Contract with a QFHO to provide testing services to investigate housing discrimination	2020-2021	4 landlords or management companies tested	NCS
Update Janesville's Fair Housing Ordinance to reflect the recommendations in the ordinance's review in the Fair Housing Enforcement section.	2019	Ordinance revisions approved	NCS, City Council
Contract with a QFHO to provide fair housing training for elected/appointed officials (including NIMBY issues related to fair housing)	2019-2024	Training offered every other year	CDA, Plan Commission, City Council
Explore adding Housing Choice Voucher/Rent Assistance and gender identity/gender expression as protected classes in local fair housing ordinance	2020-2024 coordinate with Beloit and Rock County	Ordinance updated by end of 2024	NCS, City Council
Increase fair housing outreach efforts for consumers and housing providers	2020-2024	Recognize Fair Housing Month; expand topic in HCV orientation, share info with HCV participants and landlords; expand fair housing information on City's website	NCS

Goal 3: Improve Tenant and Housing Provider Relations			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Support funding for tenant resources: an entity that will provide information and referrals, education about rental rights and responsibilities			NCS
Offer tenant training (similar to Rent Smart)	2021-2024	Housing Choice Voucher orientation information expanded	NCS
Fair housing training for housing providers	(see Goal #2)		
Evaluate a potential system fair and centralized tenant screening for use by housing providers	2022	Evaluation complete, implement if desired	NCS

Goal 4: Develop an Eviction Reduction Strategy			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Support changes to Rock County's eviction hearing procedures	2020-2021	Multi-jurisdictional workgroup to investigate problem and make recommendations	Workgroup with Rock County, City of Beloit and City of Janesville
Support funding for legal representation for those facing eviction in Rock County	2020		

Goal 5: Increase Access to Consumer Education			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Promote existing credit counseling and financial education	2020-2024	Information available in office; referrals made	NCS
Promote homebuyer counseling with targeted efforts for Latino and Black communities	2020-2024	Information available in office; referrals made	NCS
Address predatory land contracts through outreach and education to vulnerable populations and access to legal advocacy.			NCS

Goal 6: Connect Black, Latino and Other Underserved Populations with Life-improving Opportunities			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Connect housing consumers with existing local educational resources			NCS
Connect housing consumers with existing local job skills resources			NCS

Abbreviations:
NCS: Neighborhood and Community Services
ED: Economic Development Department
CDA: Community Development Authority

Rock County (Balance of) Fair Housing Goals and Strategies

Goal 1: Promote the Creation and Preservation of Affordable Housing (Rental and For Sale)			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Create affordable housing development incentives: density bonuses, TIF financing, reduced land costs, provide financial and community support for LIHTC developments	2020-2024	Incentivize 2-3 housing projects in 5 years	
Explore new strategies for affordable housing, i.e. tiny homes, manufactured housing	2019-2021		County Board
Develop and implement strategies for elected officials to counter NIMBY opposition to affordable housing	2021-2022		
Encourage affordable housing development in low poverty areas of County	2020-2024	Make potential multi-family site information available to developers	
Removal of zoning barriers for the development of duplexes, multifamily, and manufactured housing	2019-2021	Zoning code amendments which allow for more density, smaller homes and manufactured housing	

Goal 2: Promote Fair Housing			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Support fair housing training for housing providers	2020-2024	Work with Cities of Beloit and Janesville to offer trainings. 1 training session/year	
Support fair housing training for elected officials, including the fair housing implications of NIMBY opposition	2020-2024	1 training session/year	
Add fair housing information, including Rock County's fair housing ordinance to the County's website	2020		
Explore adding Housing Choice Vouchers/Rent Assistances as a protected class in the fair housing ordinance	2020-2024	Ordinance updated by 2024	

Goal 3: Develop an Eviction Reduction Strategy			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Amend eviction court nearing procedures to support tenants' abilities to seek legal assistance	2020-2021	Multi-jurisdictional workgroup to investigate problem and make recommendations	Workgroup with City of Beloit, City of Janesville and Rock County
Support funding for legal representation at the Rock County Courthouse	2020		

Goal 4: Increase Access to Consumer Education			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Support existing credit counseling and financial education	2020-2024	Information available in office; referrals made	
Support existing homebuyer counseling with targeted efforts for Latino and Black communities	2020-2024	Information available in office; referrals made	

Goal 5: Support Efforts to Connect Black, Latino and Other Underserved Populations with Life-improving Opportunities			
Strategies	**Timeframe for Action**	**Measure of Achievement**	**Responsible Entity/s**
Connect housing consumers to local educational resources	2020-2024	Information available in office; referrals made	
Connect housing consumers to local job skills resources	2020-2014	Information available in office; referrals made	