



Davenport, IA | Moline, IL | Rock Island, IL

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

NOVEMBER 2024

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CHAPTER 1.

INTRODUCTION

Fair Housing Planning

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

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

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

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

- Analyzing and eliminating housing discrimination within the jurisdiction;

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

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

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

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

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

To assist grantees and housing authorities in affirmatively furthering fair housing, HUD provided publicly available data, maps, and an assessment tool to use to evaluate the state of fair housing within their communities and set locally-determined priorities and goals. HUD's final rule mandated that, beginning in 2017, most grantees would use the new tool to prepare and submit to HUD an Assessment of Fair Housing; however, a 2018 HUD notice withdrew the requirement to prepare such assessments. A subsequent notice further required that grantees instead prepare and keep on file a current Analysis of Impediments to Fair Housing Choice. In 2020, HUD further relaxed requirements to complete an AI, allowing grantees to instead simply certify that they were affirmatively furthering fair housing, without prescribing any specific method for documenting compliance.

As of the time this report was drafted, HUD had published a new proposed regulation describing yet another new process for grantees to evaluate and document compliance with their obligations to affirmatively further fair housing. Reverting to an approach similar to the Assessment of Fair Housing model that was briefly implemented in 2017, this latest regulatory proposal calls for what will be known as an

Equity Plan. Until that new regulation is finalized and phased in, grantees must still affirmatively further fair housing but are not bound to any particular guidelines for doing so. Given the uncertainty, many grantees have opted to continue using the longstanding Analysis of Impediments format that was required prior to the flurry of regulatory changes beginning in 2015.

Mosaic Community Planning partnered with the cities of Davenport, Moline, and Rock Island to develop this Analysis of Impediments to Fair Housing Choice. This AI follows HUD's *Fair Housing Planning Guide* but also incorporates elements of HUD's assessment tool established in the 2015 final rule. In some places, it uses data developed by HUD for use by grantees as part of the Affirmatively Furthering Fair Housing final rule.

Definitions

Affirmatively Further Fair Housing

In keeping with current HUD regulations, Affirmatively Furthering Fair Housing (AFFH) is defined as “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” Specifically, this means “taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.”²

Affordable Housing

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

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

Fair Housing Choice

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

² 24 CFR Part 5.151.

“Individuals and families have the information, opportunity, and options to live where they choose without unlawful discrimination and other barriers related to race, color, religion, sex, familial status, national origin, or disability. Fair housing choice encompasses:

- (1) Actual choice, which means the existence of realistic housing options;
- (2) Protected choice, which means housing that can be accessed without discrimination; and
- (3) Enabled choice, which means realistic access to sufficient information regarding options so that any choice is informed. For persons with disabilities, fair housing choice and access to opportunity include access to accessible housing and housing in the most integrated setting appropriate to an individual’s needs as required under Federal civil rights law, including disability-related services that an individual needs to live in such housing.”³

Impediments to Fair Housing Choice

As adapted from the HUD *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include:⁴

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

Protected Classes

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

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

³ 24 CFR Part 5.151.

⁴ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

Affordable

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

Data Sources

Decennial Census Data

Data collected by the Decennial Census for 2020, 2010, and 2000 is used in this study (older Census data is only used in conjunction with more recent data to illustrate trends). This study uses several Census datasets:

2020 Decennial Census Demographic and Housing Characteristics File (DHC)

The 2020 Census Demographic and Housing Characteristics File (DHC) includes detailed data tables on the following:

- Subjects: Age, sex, race, Hispanic or Latino origin, household type, family type, relationship to householder, group quarters population, housing occupancy, and housing tenure
- Lowest level of geography: Varies, with many tables at the census block level
- Many of the DHC tables are also available for ZIP Code Tabulation Areas (ZCTA) generalized representations of U.S. Postal Service ZIP Code service routes.

2010 and 2000 Census Summary File 1 (SF 1)

This dataset contains what is known as "100% data," meaning that it contains the data collected from every household that participated in the Census and is not based on a representative sample of the population. Though this dataset is broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.

American Community Survey (ACS)

The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with annually updated population and housing data throughout each of the 10 years

between censuses. ACS data is compiled from an annual sample of approximately three million addresses rather than an actual count (like the Decennial Census's data) and therefore is susceptible to sampling errors, however, the sampled ACS data involves a much more detailed questionnaire and provides data for many more demographic and housing variables than the Decennial Census. ACS data is released in two different formats: single-year estimates and multi-year estimates. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 1-year estimates. The 2018-2022 ACS 5-year estimates are used most often in this housing study.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T)

HUD's AFFH Data and Mapping Tool provides a series of online, interactive maps and data tables to assist grantees in preparing fair housing analyses. Topics covered include demographics and demographic trends; racial and ethnic segregation; housing problems, affordability, and tenure; locations of subsidized housing and Housing Choice Voucher use; and access to educational, employment, and transportation opportunities. This report uses HUD's latest data and maps, AFFHT0006, which was released in July 2020. HUD's source data includes the American Community Survey (ACS), Decennial Census / Brown Longitudinal Tract Database (BLTD), Comprehensive Housing Affordability Strategy (CHAS), Longitudinal Employer-Household Dynamics (LEHD), HUD's Inventory Management System (IMS) / Public and Indian Housing (PIH) Information Center (PIC), and others. For a complete list of data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation available online at:

<https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf>

CHAPTER 2.

COMMUNITY PARTICIPATION PROCESS

Community Engagement Overview

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

Public Meetings

Two in-person meetings open to the general public were held to inform the public about and gather information for the Analysis of Impediments to Fair Housing Choice. One additional virtual meeting was also held for those who could not attend in-person. Each meeting began with a short presentation providing an overview of the AI followed by an interactive discussion of fair housing, neighborhood conditions, and community resources in the region. Translation services and sign language interpretation were offered, however, were not requested by attendees. A total of 17 members of the public attended one of the three meetings. Meeting dates, times, and locations are shown below:

Virtual Meeting: August 8, 2024

6:00-7:00pm, via Zoom

Moline Public Meeting: August 14, 2024

5:30pm-6:30pm, Mercado on Fifth, Moline

423 12th St., Moline, IL 61265

Davenport Public Meeting: August 15, 2024

5:30-6:30pm, Davenport City Hall

226 W 4th St, Davenport, IA 52801

Focus Groups

In addition to the public meetings, four focus groups were held to collect input from groups of residents and professionals with specific backgrounds and unique perspectives on fair housing. As with the public meetings, these groups typically began with an explanation of the Analysis of Impediments to Fair Housing Choice. The focus group leader then facilitated a discussion of fair and affordable housing needs, neighborhood conditions, and community resources in the region. In most cases, the AI project team worked with local agencies and organizations to host and promote the focus groups to their respective members or clients, resulting in a total of 39 participants. A list of the focus groups with their sponsoring organizations is provided below.

- Seniors and Aging Adults – coordinated by the Center for Active Seniors, Inc.
- Service Providers for People with Disabilities – coordinated by Vera French Mental Health for Healthy Living
- Immigrants and Refugees – coordinated by World Relief Quad Cities
- Non-profit Housing Service Providers, Developers, Lenders, and other Housing Industry Professionals – coordinated by the Quad Cities Housing Cluster

Pop-Up Engagement

The planning team conducted 4 pop-up engagement activities wherein facilitators informally engaged with residents in community locations, generally coinciding with an existing event. Pop-up engagement is useful for raising awareness around the project and obtaining input from residents who may not be sufficiently tuned into fair housing issues that they would attend a meeting on the subject, but who have opinions to share nonetheless. By canvassing at high-traffic locations such as job fairs, clothing giveaways, and community festivals, the planning team engaged 92 residents in the AI.

- **Pop-Up #1: North Park Mall Success Fair**
Wednesday, August 14; 10:00 AM – 12:00 PM
- **Pop-Up #2: South Rock Island Township Giveaway**
Thursday, August 15; 9:00 – 11:00 AM
- **Pop-Up #3: Mercado on 5th**
Friday, August 16; 5:00 – 10:00 PM
- **Pop-Up #4: Rock Island Soul of the City Festival**
Saturday, August 17; 10:00 AM – 3:00 PM

Stakeholder Interviews

The planning team also engaged with stakeholders representing a variety of perspectives through in-depth individual interviews. These telephone interviews were

held during the month of September 2024. Stakeholders were identified by the local government staff and represented a variety of viewpoints including fair housing/legal advocacy, housing, affordable housing, community development and planning, education, employment, homelessness, people with disabilities, and others.

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

- Build to Suit, Inc.
- Christian Care Quad Cities
- Churches United
- City of Davenport Development and Planning
- Davenport Civil Rights Commission
- Ecumenical Housing Development Group
- Habitat for Humanity Quad Cities
- Hilltop Campus Village
- HOPE Fair Housing Center
- Humility Homes
- Quad Cities Community Foundation
- Quad Cities Housing Cluster
- Quad Cities Land Bank Authority
- The Rafferty Group, LLC

Community Survey

The fourth method for obtaining community input was an electronic and paper-based survey available to the general public, including people living or working in the region, and other stakeholders. The survey was available online and in hard copy, in English and Spanish, from June through August 2024. Paper copies were available at the public meetings and other related events held throughout the study area. A total of 706 survey responses were received, of which 492 were fully complete.

Publicity for Community Engagement Activities

A variety of approaches were used to advertise the AI planning process and related participation opportunities to as broad an audience as possible. The survey and public meeting information were shared on the project website (qchousingplans.com) and through flyers placed in public places. Flyers were also emailed to all stakeholder organizations invited to participate in interviews. In all meeting advertisements, information for anyone needing special accommodations was provided, but none were requested.

FIGURE 1. ADVERTISEMENT FOR COMMUNITY MEETINGS

CITY OF MOLINE
ILLINOIS

RI
ROCK ISLAND
ILLINOIS

THE CITY OF DAVENPORT
IOWA-USA

Moline, Rock Island, & Davenport

Let's talk Housing.

- Can't afford to buy?
- Paying too much for rent?
- Living in a unit with substandard conditions?
- Want to see different types of housing developed?

Take Our Survey!

www.surveylegend.com/s/5n7w

Survey results will help inform a housing study that will be published by Moline, Rock Island, Davenport in collaboration with Points Consulting in late Fall 2024.

Join one of our Community Meetings!

Moline: Aug 14th
5:30pm - 6:30pm at Mercado on Fifth
423 12th St., Moline, IL 61265

Rock Island: Aug 15th
9am - 11am
South Rock Island Township
4330 11th St.
Rock Island, IL, 61201

Davenport: Aug 15th
5:30pm - 6:30pm at Davenport Police Dpt. Community Room
416 N. Harrison St., Davenport, IA 52801

Virtual Zoom Meeting: Aug 8th
6pm - 7pm, Join Zoom Meeting:
<https://us02web.zoom.us/j/84671071134>
Meeting ID: 846 7107 1134

Individuals requiring accommodations should call 563-326-7765 or TTY 563-326-6145 for assistance. Interpretive Services are available at no charge.

Community Engagement Results

For the community participation process, the consulting team developed a standard question set for use in public meetings, focus groups, and interviews. Listed below are the summarized comments from interview participants and meeting/focus group attendees, as well as a summary of survey results. All input was considered in the development of this AI. Note that these comments do not necessarily reflect the views of the Cities of Moline, Davenport, or Rock Island.

Public Meetings

1. Please share some background on the work of your organization and the clients you serve. What issues and challenges do they commonly face?

- Attendees included various community representatives, city staff, and civil rights investigators who discussed pressing local issues related to housing and public resources.

2. What types of housing needs are greatest in the community (e.g. workforce housing, affordable rental housing, housing for people who are homeless, assistance for first-time homebuyers, rehab/repair programs for homeowners, housing for seniors or people with disabilities, etc.)? How important a need is affordable multifamily rental housing?

- Attendees pointed out significant challenges in housing, such as deteriorating buildings and the need for stricter oversight of landlords. There was a call for more affordable housing options that extend beyond minimal affordability to deeply supportive housing with nearby essential services. Accessibility and proximity to healthcare, social, and maintenance services were emphasized as necessary components for livable housing.
- The discussion highlighted ongoing fears related to unsafe living conditions following a past building collapse, coupled with high rental costs and limited resources for repair or mediation. Attendees mentioned the detrimental impact of criminal records on securing housing and the long-lasting consequences of evictions, which remain on records indefinitely, creating barriers for those trying to find stable housing.
- The attendees expressed significant frustration and concern during the meeting. One attendee, living in Moline since 2013 after giving up an apartment in Davenport, highlighted their long-standing experience with rental issues. Another attendee emphasized tenant advocacy, questioning why only two individuals were present to address the severe housing crisis. They described issues such as mold, pests, negligent landlords, and called for city officials to intervene and reduce profit-driven practices like house flipping. The high costs of finding new housing and the inadequacies in inspection programs were noted, along with personal accounts of poor living conditions, including apartments without basic facilities and mold. Concerns were raised about the systemic issues in Davenport and the potential repercussions for tenants flagged with evictions. It was mentioned that progress on affordable housing projects has been made by one attendee with experience in this sector.
- Attendees discussed the pressing need for safe, affordable rental housing, particularly for those earning 30-50% of the median income and for larger families requiring four or more bedrooms. The lack of accessible units for individuals with disabilities was highlighted as a significant gap. The importance of affordable housing also extends to the maintenance and repair programs, as homeowners often struggle to afford necessary repairs, risking property value loss. The conversation emphasized the necessity for more flexible financial resources to promote housing stability and prevent evictions, which can lead to costly and disruptive mass displacements. These flexible funds could assist renters facing emergencies, such as car troubles, helping them stay current on rent and avoid a downward financial spiral.
- Attendees discussed the importance of balancing homeownership programs with support for landlords to maintain rental housing, ensuring neighborhoods

remain stable and thriving. Suggestions included funding to help landlords keep units available for lower-income tenants and incentives for repairs to prevent units from becoming unoccupied or offline. Attendees emphasized the value of partnerships that enable the purchase, renovation, and resale of units for affordable homeownership. A resident shared experiences from a neighborhood with many rentals, noting the need for support for both landlords and first-time homebuyers who struggle with repair costs. Ensuring that rental units remain safe, affordable, and well-maintained was highlighted as crucial for community stability.

3. What recent community development or housing initiatives have been especially successful in the area? What made them successful? How/where can they be replicated?

- Programs that combine transitional housing with supportive services, such as those offered by Vera French and Humility Homes, were highlighted as successful examples. Attendees stressed that funding should extend beyond housing itself to include essential support services, enabling residents to maintain stable living conditions.

4. What parts of the city are generally seen as areas of opportunity (i.e. places people aspire to live, places that offer good access to schools, jobs, and other amenities)? What makes them attractive places to live? Are there barriers someone might face in moving to one of these areas?

- Attendees discussed the factors considered when purchasing a home, such as proximity to schools, workplaces, and neighborhood amenities. One attendee noted that in various cities across the Quad Cities area, certain places or neighborhoods carry distinct reputations—both positive and negative—that residents are familiar with and consider when choosing where to live. This underscores the importance of community knowledge and perception in making housing decisions.
- Attendees highlighted that cost is a significant barrier in choosing where to live, with communities in the area having widely differing house prices. One attendee mentioned moving from an expensive city to a more affordable one and finding a warmer community there. Concerns were raised about the unwelcoming nature of some neighborhoods toward people of color and the growing impact of political divisions between Iowa and Illinois, which may affect how certain groups, such as the LGBTQ population, perceive their safety and acceptance. Factors that make a place attractive include unique, character-filled houses, the presence of sidewalks, and natural elements like trees and parks.

5. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices? Are you aware of any housing discrimination?

- The attendees voiced deep frustration over the ongoing affordable housing crisis, highlighting the poor conditions in many rental properties and the systemic issues contributing to it. One attendee pointed out the outdated nature of current research and expressed concern over the potential for homelessness and fatalities due to the lack of housing. The conversation stressed the power imbalance between landlords and tenants, with corporate landlords primarily focused on raising rents and ignoring other responsibilities.

Renters face challenges such as background check fees, stagnant wages, rising living costs, and the risk of eviction for complaints. The meeting underscored the disparities in property affordability and the economic divide between Iowa and Illinois. Attendees called for city officials to take action, create protective measures for tenants, and invest in programs like those run by Habitat for Humanity. The need for better competition, infrastructure, and quicker development of affordable housing projects was emphasized, alongside personal accounts of discrimination against renters and struggles with predatory practices by landlords.

6. Are people in the area segregated in where they live? What causes this segregation to occur?

- Attendees confirmed that redlining continues to affect local communities, perpetuating racial and economic segregation. They noted instances of nimbyism where neighbors and sellers obstruct efforts to create supportive housing. Discrimination based on race, physical and mental disabilities, and gender, particularly through harassment by landlords, was acknowledged as pervasive.
- Attendees discussed the tendency for refugees to settle in areas with communities that share their language and cultural practices, with one attendee highlighting the work of World Relief in assisting refugees. Many newcomers prefer to live near people from their own culture, as it helps them adjust and feel more at home. Some have even requested relocation to cities with larger populations from their cultural background. This phenomenon, while sometimes seen as segregation, is often driven by personal choice, as it provides comfort and a sense of familiarity for individuals adjusting to a new environment.
- Attendees discussed various forms of housing discrimination in the Quad Cities. One attendee highlighted challenges faced by single mothers, who often struggle to secure housing due to disruptive behaviors from their children, requiring professional assistance to work with landlords. Another attendee noted issues related to language barriers and immigration status, with some tenants fearing retaliation from landlords, including threats to call immigration authorities. Discrimination based on past criminal records or evictions, even if dismissed, was also raised as a concern. The topic of "white flight" and its impact on property values and neighborhood diversity was also discussed, with one attendee observing that as more minorities moved into their neighborhood, some expressed fears about declining property values. Another shared frustration over receiving complaints about neighbors that were often racially motivated, such as complaints about property conditions that were actually unfounded. Additionally, a personal account was shared of harassment from neighbors, which was addressed fairly by the city when reported.

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

- Efforts to educate tenants on their rights were noted, including seminars and advocacy by local organizations like Quad Cities Interfaith. Attendees acknowledged that existing legal aid and civil rights resources are

overwhelmed, limiting their ability to assist all complaints. The need for more local civil rights commissions to handle cases effectively was emphasized.

- Attendees discussed the challenges and efforts related to housing discrimination and tenant advocacy in the Quad Cities. One attendee, representing the NAACP, mentioned the housing subcommittee's role in addressing complaints. Another highlighted the work of the MLK Center and the tenants association, acknowledging the ongoing challenges in meeting community needs. The director of the Davenport Civil Rights Commission shared that their office handles a significant number of housing discrimination complaints, far exceeding the expected workload, with many complaints going unresolved due to limited resources. She emphasized the prevalence of housing discrimination in Davenport and the lack of awareness among tenants about their rights or available agencies. Despite these efforts, tenants often fear retaliation and do not follow through with complaints. This fear of eviction is so strong that many continue to live in substandard conditions, such as housing with caved-in ceilings, due to the risk of becoming homeless. The need for a more reliable system that tenants can trust to address these issues was also discussed.

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

- There was consensus that public resources are unevenly distributed, with areas like West Davenport often neglected. Attendees cited a need for better sidewalk and street infrastructure, consistent snow removal, and increased police presence. An ADA coordinator and more resource coordinators were recommended to bridge service gaps across the city.
- Attendees discussed the growing diversity of grocery stores in the Quad Cities, particularly in Rock Island and Moline, where efforts have been made to open stores offering food from various cultures. One attendee noted the significant immigrant and refugee populations in Rock Island, with more ethnic food stores emerging in response. While not as familiar with Davenport, they observed that Moline also has seen an increase in such businesses, highlighting the push on the Illinois side to establish stores catering to diverse communities.
- Attendees discussed disparities in community investment and resource distribution. One attendee noted that West Davenport, being one of the oldest parts of the city, has received less investment in parks compared to newer areas, though an alderman has been advocating for improvement. Another attendee observed that while essential resources like police and fire services are well distributed, there are challenges in Rock Island, particularly in Ward 1, where the roads are in the worst condition. The city has created a five-year plan to address the issue, with 60% of the worst roads set to be fixed in the first year. The attendee shared that despite initial campaign promises to fix all roads, the cost proved prohibitive, leading to a more focused approach on addressing the most urgent needs.

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

- Attendees discussed the challenges cities face in implementing regulations to protect housing sales, such as restrictions on all-cash offers, noting that it requires strong political will but is often opposed by high-profit interests. Differences in state laws between Iowa and Illinois were mentioned as potential obstacles. There was a call for stronger policies to hold landlords accountable, emphasizing the lack of options for displaced tenants if apartment complexes close. Concerns were raised about renters being dehumanized to benefit landlords and the complex issues surrounding tenant rights. The difficulty smaller communities face in establishing rent control was highlighted, with economic effects on property values and homeowner financial stress outlined. The conversation pointed out that while the community is often regarded as “generally affordable,” rising costs, increasing property values, and tracking developers are becoming significant challenges. Attendees noted that modest homes in Moline, once valued at \$30-40k, now sell for \$100k-200k, posing a financial strain for local residents compared to larger cities like Chicago.

Focus Groups

1. What do you believe are the area’s greatest community development needs (e.g. job training, homeless prevention, parks/playgrounds, youth activities, senior centers, sidewalks, etc.)?

- Participants expressed a range of concerns, primarily focusing on transportation and housing issues. One attendee working in Iowa noted difficulties with commuting, relying on a friend’s carpool due to not having a driver’s license, which impacts punctuality and job security. Concerns were also raised about neighborhood maintenance, such as uncollected tree debris causing safety and hygiene issues. Other housing challenges included repair needs and unresolved landlord responses despite involving World Relief. Infrastructure issues like leaking roofs and outdated plumbing were also highlighted.
- Some participants were employed, while three were still searching for work. Although World Relief assists in job placement, finding stable employment in Illinois can be challenging. Participants mentioned the uncertainty of job callbacks, particularly from Amazon. Community support was acknowledged in accessing grocery stores and services, with attendees stating that local support is beneficial for meeting basic needs.
- Participants confirmed that their children are in good schools that provide after-school homework assistance. There were no major complaints about educational access, implying general satisfaction with school programs and transportation options for children.

2. What types of housing needs are greatest in the community (e.g. workforce housing, affordable rental housing, housing for people who are homeless, assistance for first-time homebuyers, rehab/repair programs for homeowners, housing for seniors or people with disabilities, etc.)? How important a need is affordable multifamily rental housing?

- The responses highlight several key concerns about housing in the area, with an emphasis on the need for accessible, affordable, and private living spaces. One participant stressed the importance of handicap-accessible housing,

mentioning that many buildings lack essential features like accessible bathrooms and stairs. Another participant advocates for more affordable housing options, particularly duplexes and townhouses, as they offer more privacy and space compared to high-rise apartments. Participants criticized the trend of building luxury apartments that are unaffordable for many residents. Many agreed with the preference for duplexes, and all the respondents express concern over the impact of Palmer College's expansion, which has driven up rents and displaced residents in the area, leaving many without access to affordable housing.

- The greatest housing needs in the community include affordable housing, particularly in Moline, where zoning restrictions hinder development. There's a significant lack of affordable housing options due to the high cost of construction and low profitability for investors, as building affordable units often doesn't provide a return on investment. There is also a demand for supportive housing, as many households, especially those experiencing homelessness, require permanent supportive housing solutions. The state's housing analysis indicates a severe shortage, with a need for 120,000 units statewide and many renters paying more than half of their income on housing. The vacancy rate is low, particularly for units at affordable rents, making it difficult for people to find housing. The increase in homelessness, evictions, and housing instability, particularly post-pandemic, highlights the urgent need for better support systems and more affordable units. Additionally, the community faces challenges in developing luxury retirement homes and supportive living options due to opposition from local neighborhoods and zoning conflicts. Effective models for assisted living and permanent supportive housing need adequate staffing and scattered-site solutions to meet demand.
- Participants expressed a need for quality, affordable housing and raised issues like rising costs for homeowners and renters alike. Suggestions included transitional housing with flexible financial assistance and subsidies. Some participants recounted the difficulties of losing belongings due to homelessness and the need for government support when unable to cover rent. They also noted the repurposing of unused buildings as potential housing solutions.
- Accessibility features such as handicap accommodations and allowance for support animals were emphasized. Participants also discussed credit score and background check requirements as barriers to housing, proposing a fairer system where older records wouldn't heavily impact current applications. The importance of nuanced screening and support for individuals with past legal issues or disabilities was stressed.

3. How big an issue is homelessness in your community? What does homelessness look like? What steps could be taken to address needs related to homelessness?

- The responses emphasized the significant impact homelessness has on both individuals and the broader community, highlighting a range of challenges faced by unhoused people. One participant noted that homelessness often leads to crime, either as victims or perpetrators, while another pointed out the specific struggles faced by veterans and others with trauma-related conditions, like PTSD. Staff highlights mental health issues, substance abuse, and the difficulty

of securing stable housing and employment as key factors contributing to homelessness. Another participant added that the stress of not having a permanent address makes it nearly impossible to maintain a job. Two participants criticized the bureaucratic red tape and discriminatory processes that make it harder for people, especially those with past criminal records, to secure housing. One participant suggests looking into models like the one in LA, where the city temporarily housed homeless people in hotels to provide stability while they addressed their issues. The overall sentiment is that the system criminalizes homelessness and fails to address the root causes, with a call for more supportive housing options and less emphasis on parks or other non-essential developments.

- Participants highlight the several challenges that contribute to housing instability, including eviction records and mental illness. People with eviction marks on their record often find it nearly impossible to rent a place, despite having the financial means, due to landlords' reluctance to accept tenants with past evictions. Advocates suggest appealing to landlords to consider individuals with eviction histories. Additionally, mental health issues are a significant barrier to stable housing, as individuals struggling with mental illness may be unable to work or afford necessary medication, leading to situations like couch surfing or prolonged instability. Case managers, particularly at organizations like Humility, often witness this cycle, where individuals who were doing well face setbacks that result in eviction, forcing them to navigate a lengthy and difficult process of rebuilding their housing stability.
- Participants highlighted struggles with housing stability and the slow processing of social security disability claims, which left some uncertainty about temporary housing solutions. One attendee shared concern about safety at shelters due to personal conflicts, emphasizing the preference for staying at the center. The discussion set the tone for broader challenges related to housing, support, and safety.
- Attendees discussed the growing homeless population and the need for the city to repurpose vacant buildings for temporary shelters. Frustration was voiced over the prioritization of luxury housing while basic needs were unmet. Participants called for more housing developments specifically for the homeless and suggested better coordination of services to assist individuals in transition.

4. What recent community development or housing initiatives have been especially successful in the area? What made them successful? How/where can they be replicated?

- There are several aspects of housing in the cities that are working, but challenges remain. Participants acknowledge the rise in new housing developments, though they are mostly unaffordable, with rents exceeding \$1700 a month. There is a strong call for more affordable options, like duplexes, and for the renovation of outdated buildings. Programs like CARY and services such as social workers and service coordinators in buildings are seen as vital for helping people navigate the housing system. Organizations like CASI and Humility Homes are praised for their efforts in providing affordable housing and supporting the homeless population, with the suggestion that if they were given more funding, they could significantly reduce homelessness. The HUD voucher

program has also been expanding, helping more people access housing, though there is recognition that more help is needed. There is a push for better-maintained housing and less bureaucratic red tape, as participants believe that when people live in quality, well-maintained homes, they are more likely to take care of their living spaces, which can reduce crime. Additionally, Rock Island is mentioned as making positive strides in housing.

- Several housing initiatives are showing potential but still face limitations due to insufficient funding. Programs like CDBG (Community Development Block Grant), IDHA, and the Attorney General’s grant have provided small amounts of financial support, but they are not enough to make a significant, lasting impact on housing needs. While older neighborhoods contribute heavily through taxes, they are often left behind in terms of infrastructure, such as waterlines and street repairs. Neighborhood revitalization grants are available, but the \$2 million allocated is seen as inadequate for the scale of the problem. Some hope is seen in utilizing cannabis tax revenue for housing, similar to how Colorado funds education and infrastructure, with the belief that this model could bring more substantial funding to housing initiatives.

5. What parts of the city are generally seen as areas of opportunity (i.e. places people aspire to live, places that offer good access to schools, jobs, and other amenities)? What makes them attractive places to live? Are there barriers someone might face in moving to one of these areas?

- The discussion highlighted several key barriers to finding housing, primarily centered around affordability, access to stable jobs, and housing maintenance issues. One participant mentioned that a lack of education or a degree can limit housing options, with some landlords unwilling to rent to individuals without higher qualifications. Other participants stress the rising cost of living, with rent prices increasing and wages not keeping up, making it difficult for many to afford housing. One participant also points out that, despite paying high rents, basic living expenses like food become secondary. Staff discusses how the revolving door of corporate ownership in housing complexes leads to poor maintenance and neglect, especially in senior housing, where corporations often sell properties after a few years and stop investing in upkeep. Participants also mention how some properties remain vacant or underutilized, suggesting that more effort should be made to renovate and repurpose these spaces into affordable housing options like duplexes.
- The main issue with finding housing in the cities revolves around a lack of affordable housing and bureaucratic hurdles. There is not enough available housing to meet the demand, and the process to secure a place is often complicated by red tape, making it difficult for people, especially those with children, to find stable housing and employment. Additionally, while many unhoused individuals don’t want handouts, they are seeking support and assistance to get back on their feet, underscoring the need for more proactive help.

6. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices? Are you aware of any housing discrimination?

- The responses indicated strong agreement that new housing is not affordable, with a focus on the struggles faced by low-income individuals. One participant pointed out that much of the new housing is targeted at higher-income groups, such as John Deere employees and Palmer College students, leaving others behind. Another participant expressed frustration at the difficulty many people face in securing affordable housing, citing the suffering of an elderly woman as an example. Other personal perspectives were shared, mentioning the loss of friends to homelessness. Participants highlighted the visible reality of poverty, referencing people begging for money as a sign of the growing disparity in housing accessibility.
- Residents face numerous challenges when trying to find housing, primarily due to high costs and limited availability. Homeownership is increasingly out of reach for many, with astronomical prices and interest rates, and renting is similarly difficult, especially for those with poor rental histories or a series of evictions. Many landlords are no longer conducting credit checks, and even those with stable income struggle to secure a place. Additionally, the issue of vacant or abandoned properties remains a significant barrier, with absentee owners often unwilling to sell or repair their homes, creating further housing shortages. Policies and bureaucratic delays, such as lengthy title clearance processes and the lack of vacant property registration, exacerbate the situation. The demand for affordable housing is particularly high for larger families, with limited availability of 4-bedroom homes or apartments, and refugees face additional hurdles due to language barriers and limited resources for large family housing. Environmental concerns, such as mold, asbestos, and radon, add significant costs to rehabilitation efforts, often making demolition a more feasible option. Overall, the combination of rising costs, regulatory inefficiencies, and scarcity of suitable housing options is creating severe difficulties for residents in securing affordable and stable living arrangements.
- Participants reported issues in securing housing after World Relief leases ended, particularly due to income requirements by landlords despite having sufficient savings. Some experienced delays in repair responses from landlords, though not everyone faced this issue. The group did not report any significant discrimination experiences when seeking housing.
- While personal discrimination among residents was less of an issue, class- and history-based discrimination in housing was notable. Landlords' subjective decisions based on appearance or perceived background were highlighted as unjust practices. Participants with disabilities shared experiences of being marginalized, underlining the systemic barriers they face in securing housing and resources.

7. Are people in the area segregated in where they live? What causes this segregation to occur?

- The responses suggest that while some areas are segregated based on income, people largely live where they can afford to, and the primary issue is providing opportunities for all. One participant notes that some neighborhoods are more segregated than others, but overall, people live within their means. Another participant adds that wealthier individuals tend to live farther out, and he highlights the challenge of accessing 55-and-older housing. Another participant

points out that the growing unhoused population is becoming more visible, with people sleeping in public spaces, but he feels the system fails to offer hope or support to those struggling. Another participant reflects on how society has shifted from caring about community to focusing on money and power, noting that without stable housing, it's nearly impossible for people to focus on improving their lives. He also shares his experience working with homeless individuals, many of whom had once been highly capable but fell into hardship due to factors like addiction and loss of family, emphasizing that homelessness is not a choice but a consequence of financial instability.

- The community experiences significant segregation, largely driven by socioeconomic factors. In areas like Moline, neighborhoods are divided by income, with low- to moderate-income schools clustered in certain districts and wealthier schools in others. This creates a cycle of disadvantage, where children from poorer neighborhoods often lack exposure to opportunities that could change their circumstances. The closure of parks and schools, as well as the absence of basic services like grocery stores, exacerbates these disparities. The lack of investment in older neighborhoods, where many residents are "house poor" and struggle to afford basic home repairs, further entrenches inequality. The pandemic has accelerated these issues, and there is a noticeable shift towards disinvestment in certain areas, with more attention given to new developments in wealthier parts of town. Programs to stabilize neighborhoods, such as forgivable loans for home repairs, could help, but bureaucratic hurdles and insufficient resources continue to prevent meaningful change. The result is a community where access to resources and opportunities is often dictated by where you live.

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

- Participants are not aware of many specific fair housing resources, although one mentions the Director at the Center of Albany as someone who might have knowledge of such resources. Social security income has been helpful for some in covering rent, and one participant was able to quickly secure housing at Edgewater with the help of the Mayor. However, there are challenges, such as longer waitlists for handicap-accessible units and issues with landlords not maintaining their properties. One participant highlights their involvement in the homeless network, suggesting it is well-connected and informed about available resources for those in need.
- Participants mentioned receiving information on tenant rights through pamphlets or brochures when signing leases. This indicated an awareness of basic rights among tenants, even though practical issues with landlords persisted.

9. Are public resources (e.g. parks, schools, roads, police & fire services, etc.) available evenly throughout all neighborhoods in your community?

- Transportation support was praised, with attendees highlighting the helpful nature of buses and community cooperation.

- Challenges included delays in receiving SNAP benefits and IDHS assistance.
- Participants called for more thoughtful urban planning, including grocery stores and parks within walkable distances, while noting high crime rates and poor public transportation. The lack of nearby amenities in some areas forced residents to rely on buses or long commutes. Concerns were raised about school closures and unequal distribution of resources within the city, further complicating daily life for residents.
- The Carol Center was praised for providing a sense of belonging and mental health support. Participants suggested expanding such centers to more locations for better access to assistance. They advocated for integrated housing with on-site support for those with mental health challenges, enabling quick access to help during episodes and assistance with practical tasks like paperwork.

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

- There is uncertainty about the future availability of homes, as current data on housing is outdated and unreliable. Efforts are being made, such as the Transformation Grant's data task, which will work on creating a framework for annual reports on affordable housing. However, much of the existing data, such as Fair Market Rent (FMR) figures and home values, comes from sources like the Census and community surveys that are five years old and have large margins of error. The pandemic has further disrupted the accuracy of this data, making pre-2020 figures nearly obsolete. HUD is attempting to address these issues by contracting companies to gather more up-to-date information, but budget constraints and outdated figures for programs like Section 8 mean fewer people are being served, even as rents and housing costs continue to rise.
- Children with intermittent trauma or explosive behavioral disorders often face significant challenges in housing, as a single incident can lead to eviction, making it difficult for families to maintain stable living situations. Parents find it hard to navigate these situations, as there's little tolerance for such behaviors in housing settings, even when the child's actions stem from their condition. For example, a 15-year-old exhibiting a tantrum may function like a younger child, creating uncomfortable and disruptive situations for other residents. There is a strong need for more support for both parents and children with these needs, including understanding and tolerance from housing providers to help prevent evictions and provide a stable environment for families facing these challenges.
- A significant concern was the slow process of reuniting with families still in Afghanistan, which takes several years despite federal funding. Some participants, who held professional occupations/skills in their home country, struggled to find comparable jobs and expressed a desire for career development and respect for their skills. They questioned why they were often pushed into low-skilled positions, calling for trade programs and city support to match their expertise.
- More educational programs and literacy support were recommended for those struggling with understanding documents or lacking reading skills. Participants

underscored the importance of supportive environments where individuals could access help, learn, and build trust within the community.

Stakeholder Interviews

1. What do you believe are the area's greatest community development needs (e.g. job training, homeless prevention, parks/playgrounds, youth activities, senior centers, sidewalks, etc.)?

- The community's housing challenges are deeply intertwined with economic growth, as a lack of housing stifles job opportunities and overall neighborhood quality of life. Lower-income areas, particularly in Davenport and Rock Island, lack essential infrastructure and amenities, contributing to these difficulties. Zoning restrictions also play a significant role, with most areas designated for single-family homes, limiting multifamily developments and driving up prices. Although efforts to relax these restrictions are underway, barriers like high parking requirements and limited unit numbers deter developers. Compounding these issues are absentee landlords who often maintain rental properties at minimal standards, despite recent ordinances aimed at improving conditions.
- Solutions discussed include targeted homeownership programs to make better use of city investments, exploring innovative options like tiny homes for affordable housing, and providing mortgages through traditional lenders. Workforce housing is especially crucial to ease market pressure and create opportunities for people to move into more affordable units. The community currently faces a shortage of about 6,600 affordable rental units for low-income residents, underscoring the need for accessible, reasonably priced housing to support individuals across various income levels and alleviate systemic strain.

2. What types of housing needs are greatest in the community (e.g. workforce housing, affordable rental housing, housing for people who are homeless, assistance for first-time homebuyers, rehab/repair programs for homeowners, housing for seniors or people with disabilities, etc.)?

How important a need is affordable multifamily rental housing?

- Insufficient Affordable Housing: There is a severe lack of housing units for individuals earning at or below 50% of the area median income. The need for affordable rental units has increased, particularly after the pandemic, which exacerbated housing instability.
- Substandard and Aging Housing Stock: A significant portion of the existing housing is in poor condition, often due to absentee landlords who fail to maintain their properties. This contributes to unsafe living conditions and deteriorating neighborhoods.
- Weak Code Enforcement: Many properties suffer from inadequate enforcement of housing codes, leading to persistent issues such as malfunctioning elevators and general disrepair. This particularly impacts residents using housing vouchers, who face challenges when landlords neglect upkeep.
- Housing Instability and Eviction Risks: Many residents live with the constant threat of eviction, unable to afford their housing or recover from financial crises.

The community's safety net has not been robust enough post-pandemic to mitigate these issues.

- **Barriers for Special Populations:** There is a noted need for housing tailored to people with disabilities, larger families, and returning citizens (individuals exiting prison). The existing shelters, especially for domestic violence survivors, often do not provide sufficient long-term support for comprehensive recovery.
- **Absentee Landlords:** Properties are frequently purchased and neglected or transformed for non-residential purposes, which reduces the stock of affordable housing. This practice is sometimes seen with stakeholders such as colleges, which prioritize campus development.
- **Need for Homeownership and Transitional Housing:** There's a shortage of affordable homes for purchase that would allow residents to build wealth. Nonprofits are attempting to renovate and convert rental units into single-family homes but face funding challenges.
- **Concentration of Shelters and Services:** Homeless shelters are often grouped in specific areas while supportive services are spread across the region, causing inefficiencies and issues like loitering.
- **Funding Gaps for Nonprofits:** Nonprofit landlords who provide quality, affordable housing often struggle to access funding that could help them maintain and expand their properties.
- **Importance of Renovation and Repair:** Many once-viable affordable units have fallen into such disrepair that they are no longer habitable, underscoring the need for renovation programs.

3. How big an issue is homelessness in your community? What does homelessness look like? What steps could be taken to address needs related to homelessness?

- Homelessness and housing instability have become increasingly visible issues in the Quad Cities, affecting more families and individuals who are struggling to stay housed. The rise in evictions, particularly for those with eviction records, and the challenge of paying high rent is making many households one crisis away from homelessness. Organizations like QC Air and World Relief, which support refugees and immigrants, and community groups that hear directly from residents, are key in addressing these challenges. Municipalities are urged to go beyond passive communication methods like websites and engage more directly with residents to ensure they receive the help they need. There is also a growing concern about homelessness among veterans and the need for greater access to healthcare and supportive services.
- Local shelters, such as Christian Care, are operating at full capacity, and many properties in cities like Moline and Rock Island could be renovated to provide housing for the unhoused or victims of domestic violence. However, there is resistance from some property owners and neighborhoods, especially when new shelters or supportive housing initiatives are proposed. Despite this, there is a consensus that more needs to be done, with some advocates pushing for the spread of housing support and resources more evenly across the

community, rather than concentrated in a few areas. The region's approach to housing, particularly in Davenport, is seen as a model, but more support from neighboring cities is needed to address the issue comprehensively.

- The rise in family homelessness, with a significant number of families in shelters like the Salvation Army, highlights the need for more affordable housing for families, particularly larger units. Many local organizations, including those providing rapid rehousing services, are overwhelmed by the demand. The lack of affordable housing for very low-income households (30% AMI and below) remains a pressing issue, and current funding often falls short by targeting higher-income brackets (50-80% AMI). Housing strategies need to focus more on the most vulnerable populations, especially families and those who are in housing situations that do not meet the federal definition of homelessness but still experience significant instability. Collaborative efforts between organizations are key, with some groups stepping in to provide services like furnishing apartments for those transitioning out of homelessness, helping to stabilize individuals and families once they have a place to live.

4. What recent community development or housing initiatives have been especially successful in the area? What made them successful? How/where can they be replicated?

- In the Quad Cities, significant strides have been made in addressing housing issues, particularly through the use of low-income housing tax credits. Agencies like the Rock Island and Moline Housing Authorities, along with smaller organizations on the Iowa side, are spearheading various initiatives. These include projects like the HG development, which is bringing more affordable units back online, and a new affordable housing development in Moline set to break ground soon. While there has been notable development on the Iowa side, the Illinois side has seen less progress, though there are efforts underway, such as Moline's project-based housing for homeless individuals and veterans. The Rock Island community is also collaborating with health and housing partners to address these challenges.
- Efforts to prevent homelessness, such as eviction diversion programs, have proven effective, particularly on the Illinois side where collaboration with the court system has been stronger. These programs, which coordinate legal representation and financial assistance, have been vital in preventing evictions, but the cessation of COVID relief funds has created funding challenges. The Housing Council, along with organizations like Prairie State Legal, Project Now, and the Salvation Army, plays a crucial role in addressing housing needs through a comprehensive approach. This includes the preservation of existing units, the development of new ones, and the provision of services aimed at preventing homelessness. Continued collaboration and increased funding are essential to ensuring that these efforts can have a lasting impact.

5. What parts of the city are generally seen as areas of opportunity (i.e. places people aspire to live, places that offer good access to schools, jobs, and other amenities)? What makes them attractive places to live? Are there barriers someone might face in moving to one of these areas?

- People I work with prioritize locations with easy access to public transportation, schools, and job opportunities, with a focus on practical needs like proximity to

bus routes, grocery stores, and essential services. The LINK bus system is generally well-regarded, and access to transportation isn't a major issue for most, as long as buses run nearby. While schools are important, they are just one aspect of the bigger picture. Many residents tend to stay in Illinois, though some prefer living in Iowa due to access to specific services available only to Iowans. However, most individuals are flexible about location as long as they can access the services they need.

6. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices? Are you aware of any housing discrimination?

- Issues like prison records, eviction histories, and the inability to provide good references or rental history significantly impact tenants' ability to secure housing. Additionally, restrictions related to income qualifications for tax credit-funded housing can further limit options. Some people are disqualified for making too much money, while others are unable to meet the minimum requirements. This creates confusion, as many renters are unaware of housing laws and tenant protections, and there's limited information available to help them navigate the system. This lack of knowledge, especially among low-income and migrant communities, leads to further difficulties when trying to access housing.
- Another significant challenge is the shortage of accessible housing, particularly for individuals with disabilities. Approximately 60% of those served by local shelters have physical or mental health disabilities and finding ADA-compliant housing or units without stairs is a constant struggle. Many landlords fail to honor accommodation requests, ignoring tenants' needs and not providing necessary adjustments. While maintenance of rental properties is a concern, particularly for those with vouchers or low incomes, the more pressing issue is that many rental units are substandard or not suited to individuals with disabilities. This problem is especially prevalent in Davenport, where neglected buildings are worsening the housing crisis. The lack of resources, alongside these structural and regulatory barriers, makes securing stable housing even more difficult for those most in need.

7. Are people in the area segregated in where they live? What causes this segregation to occur?

- Food deserts and neighborhood segregation continue to impact communities, particularly in downtown areas where there is limited access to grocery stores offering healthy food options. While some areas have improved with new developments, historical redlining persists in certain parts of Davenport, where Black and Hispanic communities still face economic disparities despite educational achievements. These patterns are often tied to a lack of investment in certain neighborhoods, creating clear distinctions between more affluent areas and lower-income ones. In neighborhoods like Kirkwood Boulevard, there is a stark contrast between well-maintained homes and areas that feel neglected. The level of investment, rather than race or ethnicity, plays a significant role in the condition and appeal of a neighborhood.

- Although there is no active segregation, some areas of Davenport remain disinvested and predominantly low-income, while others have seen more diversity and economic growth. For example, the east side of Davenport, historically known for its challenges, has undergone improvements with investment in downtown areas. Despite the changes, there is still a noticeable divide between neighborhoods, with certain areas still carrying reputations of being less desirable. However, it is more difficult to pinpoint clear racial or cultural divisions in Davenport compared to other cities, as transitions between neighborhoods aren't as pronounced. In general, the disparities between neighborhoods are driven by investment and property conditions rather than racial or ethnic segregation.

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

- There are a few organizations, like the Salvation Army, Humility Homes, and the Housing Council, that act as resources for individuals seeking housing assistance, but people often struggle to find them. Many individuals in need, including those referred to by community leaders, lack knowledge of where to begin the process of securing housing. While federal law mandates fair housing practices, there is a general lack of specific programs or education on housing rights and responsibilities. Moline has started offering rental assistance programs and tenant education through the Community Development Corporation, while Davenport lacks similar initiatives. There is also a critical need for larger family housing, especially for families dealing with disabilities, as these families face increasing financial pressures. Despite these challenges, the availability of information and resources seems sufficient, though there is room for greater education on tenant rights, especially in addressing issues like landlord noncompliance.

9. Are public resources (e.g. parks, schools, roads, police & fire services, etc.) available evenly throughout all neighborhoods in your community?

- Transportation continues to be a significant issue in the area, especially for seniors and individuals with disabilities who have limited access to reliable transportation. The local bus system lacks frequent service, runs only during daytime hours, and has limited routes that do not always serve areas where people need them. Accessibility is also a concern, with routes not being clear or safe for people using mobility devices. While healthcare services are available and major bus routes pass by healthcare centers, affordability remains a challenge for many. Additionally, there are complaints about street maintenance, flooding issues, and uneven access to city resources, with some neighborhoods, particularly those in lower-income areas, facing inadequate city support during adverse conditions like floods.
- Food deserts are another concern, particularly in the west end of Davenport, where residents have limited access to grocery stores, relying on small convenience stores or Dollar General for basic food needs. New development has been focused on the eastern and northern parts of the city, leaving parts of the west side underdeveloped. The closure of schools has also created a burden,

as students from the affected areas are now bussed to distant locations. While transportation options are better on the Illinois side of the Quad Cities, they still fall short in addressing the needs of people trying to access work, healthcare, and essential services across the region.

10. Are there uses of CDBG funds you wish the City would consider (e.g., public facilities and/ or improvements, public services, rehabilitation of housing, job creation/ retention, addressing blight)?

Concerns:

- **CDBG Funding Process:** The application process for Community Development Block Grant (CDBG) funding is seen as overly complex, requiring burdensome documentation, particularly for shelter providers. Many agencies report that the process is discouraging, especially when they lack the staff to handle the paperwork or assist those in need of housing.
- **Limited Access to Funds:** Agencies are often unable to access CDBG funds due to competitive processes and strict regulations. Even when eligible, many report that their applications are discouraged or rejected. There is also a perception that the funds are often redirected for other city projects, like road improvements, rather than addressing housing and community needs.
- **Insufficient Affordable Housing:** There is a shortage of affordable rental units, and existing funding options, like HOME dollars and IFA (Iowa Finance Authority) funding, are difficult to access and do not address the pressing demand. Developers and agencies struggle to cobble together resources for housing projects, particularly with limited state funding and competition from larger cities.
- **Regional Imbalance:** The region, particularly Rock Island, faces an inequitable distribution of resources for housing and social services. Rock Island has a food desert, lacks adequate housing support, and struggles with projects being sidelined in favor of other priorities. Cities in the region are not investing enough in housing and infrastructure, leading to gaps in services and resources.

Recommendations:

- **Simplify CDBG Application Process:** Streamline the paperwork and documentation requirements for CDBG funding to make it more accessible for smaller agencies and shelters. Reducing the burden on providers could encourage more agencies to apply and use the funds effectively.
- **Increase Funding for Housing Development:** Allocate more funding for building affordable housing, particularly rental properties, through partnerships with local agencies. Providing more resources for rehabbing existing properties could be a viable solution for increasing the housing stock.
- **Focus CDBG Funds on Housing:** Ensure that CDBG funds are used strictly for housing and housing-related services, rather than being redirected to unrelated city projects. This would ensure that the funds are being utilized as originally intended to support low-income communities.

- **Regional Collaboration and Fair Housing Investment:** Address the homelessness and housing crisis more regionally, ensuring that Davenport does not shoulder the entire burden. Cities like Rock Island should prioritize community needs, including food security and affordable housing, and collaborate with agencies to support development projects like senior housing and grocery stores.
- **Improve Housing Repair Programs:** Expand the scope and timeframes for programs like the Dream program to include rental properties and larger areas. This would help address the affordability and quality of housing in more areas of the city, benefiting a larger number of residents.

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

- About six years ago, Kings Harvest, which had been running a local overflow shelter for people facing homelessness, could no longer continue its operations. With just six weeks' notice, the housing cluster scrambled to take over the shelter, raising \$75,000 to keep it running. Humility Homes and Services took charge, and a five-year plan to eliminate the need for overflow shelters was developed. However, the COVID-19 pandemic complicated the timeline, though it did reduce the number of people needing the shelter. This was achieved by year-round outreach workers who helped individuals before winter, addressing their needs such as bus tickets to reunite with family. The program showed that targeted, individualized support was effective, but the lack of community financial support made it unsustainable.
- The housing cluster's experience highlighted the need for both more housing units and sustainable support to ensure people maintain housing once they find it. While this model helped reduce homelessness during winter, it relied heavily on funding from limited municipal contributions, with some cities contributing as little as \$3,500. This meant that significant portions of the funding came from other sources, and Humility ended up losing money. The goal is to replicate this model, but sustainable support from municipalities is critical. Effective collaboration among cities is also essential to address housing challenges, which often require a coordinated approach to create long-term solutions.
- The development of new housing also faces challenges, especially when public opposition or zoning restrictions delay projects. In one instance, a housing development faced 13 public hearings before receiving approval, delaying the project by several months. This can be discouraging for developers, particularly when the local community resists projects that could potentially help address housing shortages. Public buy-in remains a major hurdle, as residents often organize to oppose new housing developments, especially in neighborhoods already experiencing poverty or with a concentration of social services. Many communities, particularly Davenport, need to shift their mindset and work together to address these issues equitably across the region.
- Funders such as community foundations play a crucial role in supporting housing projects. Many local foundations are supported by endowments that provide long-term, reliable funding for nonprofits, including those focused on housing and homelessness. These foundations also offer competitive grants to organizations working on housing solutions, though demand far outstrips the

available funds. In addition to funding local nonprofits directly, community foundations can help leverage larger federal funds by providing local matching grants. This strategy helps organizations demonstrate success and become eligible for larger investments. However, the ongoing gap in funding and competition for limited resources remains a significant challenge for addressing the region's affordable housing crisis.

CHAPTER 3.

SOCIOECONOMIC PROFILE

Demographic Profile

The three-city study area is home to an estimated 181,164 residents according to the 2018-2022 5-Year American Community Survey (ACS). The most populous of the three communities, Davenport accounts for 55.9% of that population, or 101,448 residents. Moline and Rock Island are somewhat similar in size, with populations of 42,452 and 37,264, respectively.

Since 2000, both Moline and Rock Island have lost about 3% of their population. In contrast, Davenport added residents, growing by about 4%. Population in the Davenport-Moline-Rock Island Metropolitan Statistical Area (MSA), which includes Scott County in Iowa and Rock Island, Henry, and Mercer Counties in Illinois, grew by about 2% since 2000 to reach 382,983 residents per the most recent ACS estimate. This section more closely examines population characteristics and trends in Moline, Davenport, Rock Island, and the region using Census and ACS data provided in Tables 1 and 2.

Race/Ethnicity

About three quarters of residents in the Davenport-Moline-Rock Island MSA are non-Hispanic White (76.9%). Latino/Hispanic residents make up the second largest population share at 9.3%, followed by Black/African American residents at 7.3%. Other racial groups account for less than 4% of the population, such as residents of two or more races (3.8%), and residents who identify as Asian or Pacific Islander (2.4%). No other population segment comprises more than 2% of the population in the region. Moline, Davenport, and Rock Island, however, are somewhat more diverse than the region as a whole.

In Moline, White residents make up more than two-thirds of the population (67.3%), Hispanic/Latino residents comprise 17.4%, and Black/African American residents constitute 9.3%. Davenport has a slightly higher White population share at 72.3%, and Black/African American residents make up the second largest population segment there at 10.8%, followed by Hispanic/Latino residents at 9.1%. Of the three cities, Rock Island is the most diverse. About two-thirds of its population is White (62.3%), 16.0% is Black/African American, and 13.6% is Hispanic/Latino.

In all three cities, Asian, Native American, other races, and people of multiple races make up relatively small population shares. The Asian population share ranges from 4.4% in Rock Island to 2.3% in Moline, and 1.9% in Davenport. Multiple race residents range from 5.2% of the population in Davenport to 3.4% in Rock Island and 3.3% of the

population in Moline. No other racial or ethnic group comprises more than 0.4% of the population in any of the three cities.

From 1990 to 2022, all three cities and the region became more diverse. The MSA lost about 21,000 White residents during the 30-year period, and each city saw a decline in its White population, both numerically and as a share of the population. Between 1990-2022, declines in the White population share were 22.9 percentage points in Moline, 16.1 percentage points in Rock Island, and 14.9 percentage points in Davenport. Within the last decade alone, between 2010 and 2022, the White population in Moline has declined by 8.1 percentage points, 5.5 percentage points in Rock Island, and 4.4 percentage points in Davenport.

Certain population segments also saw an increase in population and population share from 1990 to 2022 in the three cities and the region. The number of Hispanic/Latino residents more than doubled in each city; increases in population share were 10.6 percentage points in Moline, 9.8 percentage points in Rock Island, and 5.7 percentage points in Davenport. However, certain groups have slightly decreased within the last decade. For example, in Moline, between 2010 and 2022, the Asian or Pacific Islander population decreased by -13.9% and the Native American population decreased by -85.6%. In Davenport, between 2010 and 2022, every racial group saw a decrease in population, except for the Hispanic/Latino population. For example, the Black/African American population decreased by -12.9%, the Asian or Pacific Islander decreased by -22.8%, and the Native American population decreased by -66.1%. In Rock Island, the Black/African American population decreased by -20%, and the Asian/Pacific Islander population decreased by -66.9%.

African American population growth rates varied more by geography. Black residents make up a larger share of Rock Island's population (16%) compared to the other cities, but Rock Island's Black population also declined by -12.5% from 1990 to 2022. Davenport's Black population saw a substantial increase of 48.3%, comprising 10.8% of the city's total residents by 2022. Moline's Black/African American population grew more rapidly than that of the other cities between 1990 and 2022, increasing by 393% however, by 2022, it makes up only 9.3% of the city's population, the smallest share of all three cities.

With the exception of the Asian/Pacific Islander population in Rock Island, Asian and Native American populations have declined in each geography within the last decade and continue to remain low as overall shares of the population.

National Origin

Foreign-born residents make up a small but significant share (5.2%) of the Davenport-Moline-Rock Island MSA. Looking by city, shares vary considerably. In Moline, 8.9% of residents are foreign-born. This figure is slightly higher in Rock Island (9.3%) and lower still in Davenport (4.7%). However, within the last decade, the foreign-born population

increased in both Davenport and Rock Island by 11.7% and 57.3%, respectively, while slightly decreasing by -7.2% in Moline.

In each city, the largest group of foreign-born residents were from Mexico (53.1% of all foreign-born residents in Moline, 39.7% in Davenport, and 30.3% in Rock Island). In the MSA, the three largest groups of foreign-born residents are from Mexico, India, and the Philippines.

LEP

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

Shares of residents with limited English proficiency are 5.3% in Moline, 2.1% in Davenport, and 3.9% in Rock Island. In all three cities, the most common language for the LEP population is Spanish. While the rank of other languages varies by city, African, Serbo-Croatian, Polish, French, Arabic, Vietnamese, Korean, Thai, and other Asian language are common in all three.

Disability

According to the most recent ACS, there are 48,979 people with a disability in the Davenport-Moline-Rock Island MSA (12.8% of total population). A higher share of Moline and Davenport residents have a disability (13.6% or 5,772 residents in Moline and 13.5% or 13,670 residents in Davenport). The rate is slightly higher in Rock Island, where 5,518 people with a disability comprise 14.8% of the city's population.

While precise shares of the population in each geography impacted varies by type of disability, general patterns are similar. In all three cities, the most common disability type was ambulatory difficulty, which impacts 6.2% of people with disabilities in Davenport, and 7.6% in Rock Island. In Moline, the most common disability type was cognitive difficulty, which impacts 5.6% of the total population with a disability. Cognitive difficulties were the second-most-common disability type in the other two cities as well, affecting about 5.6% of residents in Davenport and 6.7% in Rock Island.

Hearing difficulties affect about 3.5% of the population in the MSA, and vision difficulties impact 1.8%. Disabilities that require extensive assistance, such as difficulties with independent living or self-care, make up 4.3% and 2.1% of the population in the MSA, respectively.

Age

The population in the Davenport-Moline-Rock Island MSA and each city is relatively normally distributed regarding age. In each area, the largest segment of the population is between the ages of 18 and 64. This age group's population share is 57.3% in Moline,

61.8% in Davenport, and 59.9% in Rock Island. Youth (under age 18) comprise just under one-quarter of residents in each area, with the lowest share of the population in Davenport. Seniors make up about 15-18% of the population in the cities and the region, with the lowest share in Davenport as well.

Since 1990, the most notable change in age distribution in the MSA is a decrease of residents under the age of 18 as well as those between 18 and 64 years of age, meanwhile, the share of residents over 65 years old has grown. However, since 2010, the share of residents under 18 in Moline has grown by 0.4 percentage points and has also increased by 0.02 percentage points in Rock Island.

Sex

In each geography, women make up slightly larger shares of the population than men (49.8-50.0% compared to 48.5-49.2%). These shares have not changed appreciably since 1990, when women comprised 52-53% of the population in each geography and men made up 47-48%.

Family Type

Regionally, about 45.5% of families have children. The shares of families with children in Moline and Davenport are nearly identical to that of the region at 45.8% and 45.5%, respectively. In Rock Island, the figure is slightly higher - 47.6% of families have children.

Between 2010 and 2022, shares grew by 2.4 percentage points in Moline and 4.8 percentage points in Rock Island. However, shares declined by 0.2 percentage points in Davenport. In comparison, the trends in the previous AI indicated there was an overall decline in families with children in the region which indicating families with children were leaving the MSA and/or that families are not having children at the same rate as they did 20 years ago. Current figures indicate that more families with children may be joining the MSA or there has been an increase in families having children.

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

Demographic Indicator	City of Moline			Davenport-Moline-Rock Island MSA		
		#	%		#	%
Race/Ethnicity						
Non-Hispanic		35,084	82.6%		347,335	90.7%
White		28,588	67.3%		294,524	76.9%
Black		3,959	9.3%		27,796	7.3%
Asian or Pacific Islander		978	2.3%		9,084	2.4%
Native American		26	0.1%		432	0.1%
Two or More Races		1,383	3.3%		4,399	3.8%
Other		150	0.4%		1,100	0.3%
Hispanic		7,368	17.4%		35,648	9.3%
Total Population		42,452	100.0%		382,983	100.0%
National Origin						
#1 country of origin	Mexico	2,001	4.7%	Mexico	6,639	1.7%
#2 country of origin	India	288	0.7%	India	1,460	0.4%
#3 country of origin	Philippines	211	0.5%	Philippines	838	0.2%
#4 country of origin	Togo	132	0.3%	Togo	835	0.2%
#5 country of origin	Burma (Myanmar)	73	0.2%	Burma (Myanmar)	786	0.2%
#6 country of origin	Morocco	41	0.1%	Vietnam	780	0.2%

#7 country of origin	Venezuela	38	0.1%	China:	647	0.2%
#8 country of origin	Vietnam	36	0.1%	Pakistan	426	0.1%
#9 country of origin	Germany	33	0.1%	Germany	355	0.1%
#10 country of origin	Syria	30	0.1%	Canada	319	0.1%
Total Foreign-Born Population		3,768	8.9%		19,934	5.2%
Limited English Proficiency (LEP) Language						
#1 LEP Language	Spanish	1,747	9.6%	Spanish	8,905	5.4%
#2 LEP Language	Other Indo-European	257	1.4%	Other Indo-European	1,641	1.0%
#3 LEP Language	French, Haitian, or Cajun	240	1.3%	French, Haitian, or Cajun	1,445	0.9%

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

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>. American Community Survey, 5-Year 2018-2022 Data.

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

Demographic Indicator	City of Moline			Davenport-Moline-Rock Island MSA		
		#	%		#	%
Disability Type						
Hearing difficulty		1,288	3.0%		13,546	3.5%
Vision difficulty		734	1.7%		6,884	1.8%
Cognitive difficulty		2,383	5.6%		19,309	5.0%
Ambulatory difficulty		2,349	5.5%		22,320	5.8%
Self-care difficulty		885	2.1%		7,885	2.1%
Independent living difficulty		1,881	4.4%		16,282	4.3%
Total Population with a Disability		5,772	13.6%		48,979	12.8%
Sex						
Male		20,896	49.2%		186,611	48.7%
Female		21,242	50.0%		191,234	49.9%
Age						
Under 18		9,832	23.2%		86,914	22.7%
18-64		24,306	57.3%		221,711	57.9%
65+		8,000	18.8%		69,220	18.1%

Family Type						
Households with one or more people under 18 years						
Married-couple with children		3,128	17.1%		30,295	18.4%
Female householder with children, no spouse present		1,517	8.3%		11,389	6.9%
Male householder with children, no spouse present		529	2.9%		4,645	2.8%
Households with no people under 18 years						
Married couple with no children		4,994	27.3%		46,513	28.3%
Female householder with no children, no spouse present		776	4.2%		5,159	3.1%
Male householder with no children, no spouse present		360	2.0%		2,785	1.7%
Total Households		18,267	100.0%		164,230	100.0%

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

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>. American Community Survey, 5-Year 2018-2022 Data.

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

Demographic Indicator	City of Davenport			Davenport-Moline-Rock Island MSA		
		#	%		#	%
Race/Ethnicity						
Non-Hispanic		92,248	90.9%		347,335	90.7%
White		73,396	72.3%		294,524	76.9%
Black		10,994	10.8%		27,796	7.3%
Asian or Pacific Islander		1,960	1.9%		9,084	2.4%
Native American		236	0.2%		432	0.1%
Two or More Races		5,251	5.2%		14,399	3.8%
Other		411	0.4%		1,100	0.3%
Hispanic		9,200	9.1%		35,648	9.3%
Total Population		101,448	100.0%		382,983	100.0%
National Origin						
#1 country of origin	Mexico	1,881	1.9%	Mexico	6,639	1.7%
#2 country of origin	Vietnam	638	0.6%	India	1,460	0.4%
#3 country of origin	Haiti	235	0.2%	Philippines	838	0.2%
#4 country of origin	Philippines	190	0.2%	Togo	835	0.2%
#5 country of origin	Bosnia and Herzegovina	175	0.2%	Burma (Myanmar)	786	0.2%
#6 country of origin	Togo	157	0.2%	Vietnam	780	0.2%
#7 country of origin	Korea	131	0.1%	China:	647	0.2%

#8 country of origin	Canada	121	0.1%	Pakistan	426	0.1%
#9 country of origin	Nepal	107	0.1%	Germany	355	0.1%
#10 country of origin	China:	101	0.1%	Canada	319	0.1%
Total Foreign-Born Population		4,732	4.7%		19,934	5.2%
Limited English Proficiency (LEP) Language Households						
#1 LEP Language	Spanish	1,597	3.7%	Spanish	8,905	5.4%
#2 LEP Language	Other Asian and Pacific Island Languages	275	0.6%	Other Indo-European	1,641	1.0%
#3 LEP Language	German or other West Germanic Languages	222	0.5%	French, Haitian, or Cajun	1,445	0.9%
<p>Note: All % represent a share of the total population within the jurisdiction or region. The most populous places of birth and languages at the city and regional levels may not be the same, and are thus labeled separately.</p> <p>Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, https://egis.hud.gov/affht/. American Community Survey, 5-Year 2018-2022 Data.</p>						

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

Demographic Indicator	City of Davenport			Davenport-Moline-Rock Island MSA		
		#	%		#	%
Disability Type						
Hearing difficulty		3,443	3.4%		13,546	3.5%
Vision difficulty		2,138	2.1%		6,884	1.8%
Cognitive difficulty		5,675	5.6%		19,309	5.0%
Ambulatory difficulty		6,336	6.2%		22,320	5.8%
Self-care difficulty		2,094	2.1%		7,885	2.1%
Independent living difficulty		4,539	4.5%		16,282	4.3%
Total Population with a Disability		13,670	13.5%		48,979	12.8%
Sex						
Male		49,516	48.8%		186,611	48.7%
Female		50,571	49.8%		191,234	49.9%
Age						
Under 18		21,631	21.3%		86,914	22.7%
18-64		62,691	61.8%		221,711	57.9%
65+		15,765	15.5%		69,220	18.1%
Family Type						

Households with one or more people under 18 years						
Married couple with children		6,228	14.6%		30,295	18.4%
Female householder with children, no spouse present		3,615	8.5%		11,389	6.9%
Male householder with children, no spouse present		1,122	2.6%		4,645	2.8%
Households with no people under 18 years						
Married couple with no children		10,745	25.2%		46,513	28.3%
Female householder with no children, no spouse present		1,761	4.1%		5,159	3.1%
Male householder with no children, no spouse present		633	1.5%		2,785	1.7%
Total Households		42,667	100.0%		164,230	100.0%

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

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>. American Community Survey, 5-Year 2018-2022 Data.

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

Demographic Indicator	City of Rock Island			Davenport-Moline-Rock Island MSA		
		#	%		#	%
Race/Ethnicity						
Non-Hispanic		32,186	86.4%		47,335	90.7%
White		23,211	62.3%		94,524	76.9%
Black		5,964	16.0%		27,796	7.3%
Asian or Pacific Islander		1,638	4.4%		9,084	2.4%
Native American		76	0.2%		432	0.1%
Two or More Races		1,265	3.4%		14,399	3.8%
Other		32	0.1%		1,100	0.3%
Hispanic		5,078	13.6%		35,648	9.3%
Total Population		37,264	100.0%		82,983	100.0%
National Origin						
#1 country of origin	Mexico	1,050	2.8%	Mexico	6,639	1.7%
#2 country of origin	China, excluding Hong Kong and Taiwan	156	0.4%	India	1,460	0.4%
#3 country of origin	Tanzania	150	0.4%	Philippines	838	0.2%
#4 country of origin	Thailand	122	0.3%	Togo	835	0.2%
#5 country of origin	Philippines	102	0.3%	Burma (Myanmar)	786	0.2%
#6 country of origin	Pakistan	83	0.2%	Vietnam	780	0.2%

#7 country of origin	India	74	0.2%	China:	647	0.2%
#8 country of origin	Vietnam	70	0.2%	Pakistan	426	0.1%
#9 country of origin	Ethiopia	55	0.1%	Germany	355	0.1%
#10 country of origin	Guyana	51	0.1%	Canada	319	0.1%
Total Foreign-Born Population		3,466	9.3%		19,934	5.2%
Limited English Proficiency (LEP) Language Households						
#1 LEP Language	Spanish	1,047	2.8%	Spanish	8,905	5.4%
#2 LEP Language	Other and unspecified languages	238	0.6%	Other Indo-European	1,641	1.0%
#3 LEP Language	French, Haitian, or Cajun	202	0.5%	French, Haitian, or Cajun	1,445	0.9%
<p>Note: All % represent a share of the total population within the jurisdiction or region. The most populous places of birth and languages at the city and regional levels may not be the same, and are thus labeled separately.</p> <p>Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, https://egis.hud.gov/affht/. American Community Survey, 5-Year 2018-2022 Data.</p>						

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

Demographic Indicator	City of Rock Island			Davenport-Moline-Rock Island MSA		
		#	%		#	%
Disability Type						
Hearing difficulty		1,177	3.2%		13,546	3.5%
Vision difficulty		591	1.6%		6,884	1.8%
Cognitive difficulty		2,499	6.7%		19,309	5.0%
Ambulatory difficulty		2,845	7.6%		22,320	5.8%
Self-care difficulty		1,053	2.8%		7,885	2.1%
Independent living difficulty		1,869	5.0%		16,282	4.3%
Total Population with a Disability		5,518	14.8%		48,979	12.8%
Sex						
Male		18,085	48.5%		186,611	48.7%
Female		18,605	49.9%		191,234	49.9%
Age						
Under 18		8,281	22.2%		86,914	22.7%
18-64		22,304	59.9%		221,711	57.9%
65+		6,105	16.4%		69,220	18.1%
Family Type						

Households with one or more people under 18 years						
Married couple with children		1,908	12.5%		30,295	18.4%
Female householder with children, no spouse present		1,494	9.8%		11,389	6.9%
Male householder with children, no spouse present		392	2.6%		4,645	2.8%
Households with no people under 18 years						
Married couple with no children		3,268	21.4%		46,513	28.3%
Female householder with no children, no spouse present		642	4.2%		5,159	3.1%
Male householder with no children, no spouse present		270	1.8%		2,785	1.7%
Total Households		15,247	100.0%		164,230	100.0%

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

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>. American Community Survey, 5-Year 2018-2022 Data.

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

Demographic Indicator	City of Moline							
	1990		2000		2010		Current (2022)	
	#	%	#	%	#	%	#	%
Race/Ethnicity								
White, Non-Hispanic	39,025	90.20%	35,667	82.40%	32,797	75.40%	28,588	67.34%
Black, Non-Hispanic	803	1.90%	1,479	3.40%	2,566	5.90%	3,959	9.33%
Hispanic	2,936	6.80%	5,189	12.00%	6,760	15.60%	7,368	17.36%
Asian or Pacific Islander, Non-Hispanic	333	0.80%	660	1.50%	1,137	2.60%	978	2.30%
Native American, Non-Hispanic	83	0.20%	170	0.40%	181	0.40%	26	0.06%
National Origin								
Foreign-born	1,534	3.50%	3,047	7.00%	4,062	9.30%	3,768	8.88%
LEP								
Limited English proficiency	1,011	2.30%	2,204	5.10%	2,822	6.50%	2,244	5.29%
Sex								
Male	20,440	47.20%	20,567	47.50%	20,962	48.20%	20,896	49.22%
Female	22,846	52.80%	22,742	52.50%	22,521	51.80%	21,242	50.04%
Age								
Under 18	10,814	25.00%	10,865	25.10%	9,903	22.80%	9,832	23.16%

18-64	25,510	58.90%	25,868	59.70%	26,386	60.70%	24,306	57.26%
65+	6,961	16.10%	6,576	15.20%	7,194	16.50%	8,000	18.84%
Family Type								
Families with children	5,692	47.60%	5,036	45.90%	4,902	43.40%	5,174	45.8%
Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.								
Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, https://egis.hud.gov/affht/ . American Community Survey, 5-Year 2018-2022 Data.								

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

Demographic Indicator	City of Davenport							
	1990		2000		2010		Current (2022)	
	#	%	#	%	#	%	#	%
Race/Ethnicity								
White, Non-Hispanic	83,627	87.20%	79,949	81.30%	76,414	76.70%	73,396	72.35%
Black, Non-Hispanic	7,411	7.70%	9,938	10.10%	12,626	12.70%	10,994	10.84%
Hispanic	3,293	3.40%	5,267	5.40%	7,253	7.30%	9,200	9.07%
Asian or Pacific Islander, Non-Hispanic	965	1.00%	2,247	2.30%	2,539	2.60%	1,960	1.93%
Native American, Non-Hispanic	330	0.30%	679	0.70%	697	0.70%	236	0.23%

National Origin								
Foreign-born	2,356	2.50%	3,671	3.70%	4,237	4.30%	4,732	4.66%
LEP								
Limited English proficiency	1,739	1.80%	2,705	2.80%	3,038	3.10%	2,094	2.06%
Sex								
Male	45,784	47.70%	47,773	48.60%	48,553	48.70%	49,516	48.81%
Female	50,123	52.30%	50,571	51.40%	51,132	51.30%	50,571	49.85%
Age								
Under 18	26,287	27.40%	26,229	26.70%	23,946	24.00%	21,631	21.32%
18-64	57,490	59.90%	59,999	61.00%	63,216	63.40%	62,691	61.80%
65+	12,130	12.70%	12,115	12.30%	12,523	12.60%	15,765	15.54%
Family Type								
Families with children	12,688	51.10%	12,427	50.10%	11,185	45.70%	10,965	45.5%

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

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>. American Community Survey, 5-Year 2018-2022 Data.

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

Demographic Indicator	City of Rock Island							
	1990		2000		2010		Current (2022)	
	#	%	#	%	#	%	#	%
Race/Ethnicity								
White, Non-Hispanic	31,560	78.40%	29,139	74.10%	26,061	67.80%	23,211	62.29%
Black, Non-Hispanic	6,813	16.90%	7,247	18.40%	7,672	20.00%	5,964	16.00%
Hispanic	1,530	3.80%	2,296	5.80%	3,601	9.40%	5,078	13.63%
Asian or Pacific Islander, Non-Hispanic	237	0.60%	384	1.00%	820	2.10%	1,638	4.40%
Native American, Non-Hispanic	78	0.20%	181	0.50%	230	0.60%	76	0.20%
National Origin								
Foreign-born	962	2.40%	1,267	3.20%	2,203	5.70%	3,466	9.30%
LEP								
Limited English proficiency	634	1.60%	803	2.00%	1,620	4.20%	1,487	3.99%
Sex								
Male	18,905	46.90%	18,776	47.70%	18,487	48.10%	18,085	48.53%
Female	21,385	53.10%	20,572	52.30%	19,970	51.90%	18,605	49.93%
Age								

Under 18	9,818	24.40%	9,250	23.50%	8,551	22.20%	8,281	22.22%
18-64	23,368	58.00%	23,666	60.20%	23,991	62.40%	22,304	59.85%
65+	7,104	17.60%	6,431	16.30%	5,915	15.40%	6,105	16.38%
Family Type								
Families with children	4,530	45.20%	3,791	45.70%	3,867	42.80%	3,794	47.6%

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

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>. American Community Survey, 5-Year 2018-2022 Data.

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

Demographic Indicator	Davenport-Moline-Rock Island MSA							
	1990		2000		2010		Current (2022)	
	#	%	#	%	#	%	#	%
Race/Ethnicity								
White, Non-Hispanic	332,490	90.30%	324,058	86.20%	311,053	81.90%	294,524	76.90%
Black, Non-Hispanic	18,776	5.10%	23,551	6.30%	29,904	7.90%	27,796	7.26%
Hispanic	13,196	3.60%	20,914	5.60%	29,024	7.60%	35,648	9.31%
Asian or Pacific Islander, Non-Hispanic	2,407	0.70%	4,925	1.30%	7,179	1.90%	9,084	2.37%

Native American, Non-Hispanic	778	0.20%	1,869	0.50%	2,092	0.60%	432	0.11%
National Origin								
Foreign-born	7,577	2.10%	12,733	3.40%	16,133	4.30%	19,934	5.20%
LEP								
Limited English proficiency	5,758	1.60%	9,142	2.40%	10,982	2.90%	11,991	3.13%
Sex								
Male	177,861	48.30%	183,403	48.80%	186,589	49.10%	186,611	48.73%
Female	190,290	51.70%	192,616	51.20%	193,101	50.90%	191,234	49.93%
Age								
Under 18	98,550	26.80%	97,174	25.80%	89,568	23.60%	86,914	22.69%
18-64	218,889	59.50%	226,523	60.20%	233,011	61.40%	221,711	57.89%
65+	50,712	13.80%	52,322	13.90%	57,111	15.00%	69,220	18.07%
Family Type								
Families with children	49,083	49.10%	42,772	46.90%	43,014	42.80%	45,119	45.5%

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

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>. American Community Survey, 5-Year 2018-2022 Data.

CHAPTER 4.

SEGREGATION AND INTEGRATION

Communities experience varying levels of segregation between different racial, ethnic, and socioeconomic groups. High levels of residential segregation often lead to conditions that exacerbate inequalities among population groups within a community. Increased concentrations of poverty and unequal access to jobs, education, and other services are some of the consequences of high residential segregation.⁵

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

Race and Ethnicity

As of 2022, the spatial distribution patterns of all racial and ethnic groups are relatively uniform and proportionate with population density throughout the cities of Moline, Rock Island, and Davenport. Although, all three cities tend to have more density along their intersection with the Mississippi River.

While the overall population in the city of Moline is evenly distributed with no significant differences in density among neighborhoods throughout the city, there is a higher concentration of Hispanic/Latino residents within its northwestern tracts. Black/African American residents also appear to concentrate in the city's northwestern and north-eastern tracts in comparison to their sparse distribution throughout the rest of the city. The interspersed spatial distribution of racial and ethnic minority populations with certain concentrations of some groups indicates residential segregation is occurring. The other southern neighborhoods in Moline have less density while also containing fewer concentrations of minority groups. Similar to the residential patterns from 2010, the spatial data shown in Figure 2 indicates the Hispanic population as the largest minority group in the city. There is also a noticeable concentration of Asian residents in the southeast quadrant despite the southern half of the city being less racially and ethnically diverse.

⁵ Massey, D. (1990). American Apartheid: Segregation and the Making of the Underclass. *American Journal of Sociology*, 96(2), 329-357. Retrieved from <http://www.jstor.org/stable/2781105>

Since 2000, all three cities have experienced a significant influx of non-White residents similar to other cities in the Davenport-Moline-Rock Island MSA. The residential patterns of racial and ethnic minority groups since 2000 show less geographic concentration and segregation of specific groups. Although there is still some degree of residential segregation, there is less of a spatial divide between the groups, and the population as a whole is now more diverse and mixed.

The overall population distribution in the city of Davenport in 2022 is similar to residential patterns in Moline. Since 2000, the population has become less centralized and spread evenly to neighborhoods throughout the city. Racial and ethnic minority groups were mostly concentrated in dense, central neighborhoods and the south-west quadrant of the city, but have since moved progressively outwards following the residential patterns of the overall population. In addition to an overall population increase of non-White residents, the city of Davenport also experienced a noticeable growth in diversity among racial and ethnic minority populations. In 2000, the largest concentration of minority groups, particularly Black/African American and Hispanic/Latino residents, were mostly within the south-western tracts along the Mississippi River. As of 2022, as density has disbursed throughout the rest of the city, other neighborhoods have also become more diverse. However, the largest concentration of minority residents still remains within the same south-western tracts of the city where density is highest.

Compared to the cities of Davenport and Moline, the spatial distribution of the population by race and ethnicity in the city of Rock Island is similar, with higher concentration of minority groups in the north-west tracts at which the city meets the Mississippi River. Similar to residential patterns from 2000, the residential population in the northwest quadrant of the city is predominantly Black/African American and Hispanic/Latino. The northern half of the city is more densely populated and racially and ethnically diverse compared to the southern half.

Although the cities have become significantly more diverse over the last 20 years, racial and ethnic minority communities still tend to live in the most densely populated areas of the cities along the Mississippi River and are less prevalent in the less densely populated areas on the outer limits of the region.

FIGURE 2. POPULATION BY RACE AND ETHNICITY IN THE CITIES OF MOLINE, DAVENPORT, AND ROCK ISLAND, 2022

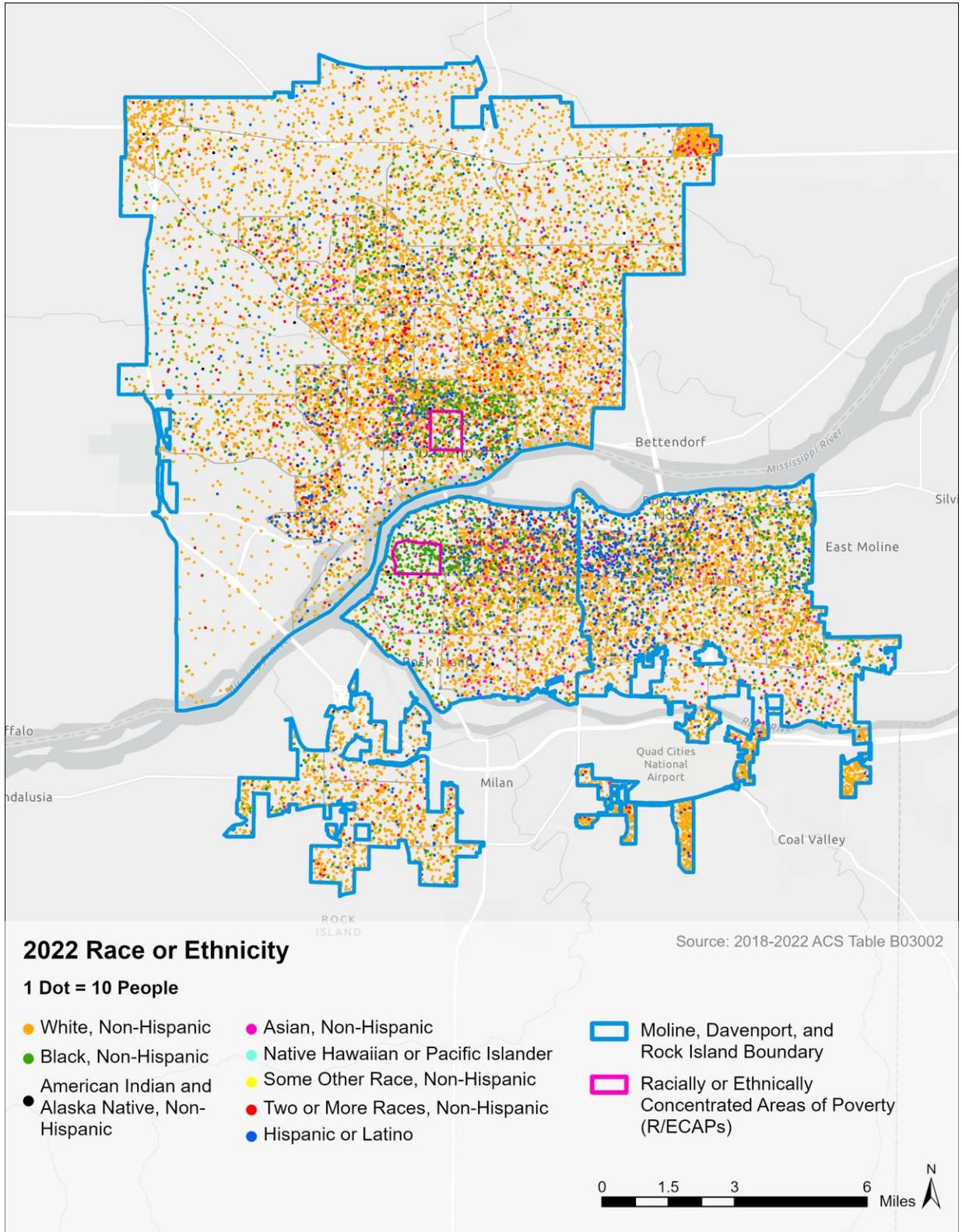


FIGURE 3. POPULATION BY RACE AND ETHNICITY IN THE CITIES OF MOLINE, DAVENPORT, AND ROCK ISLAND, 2010

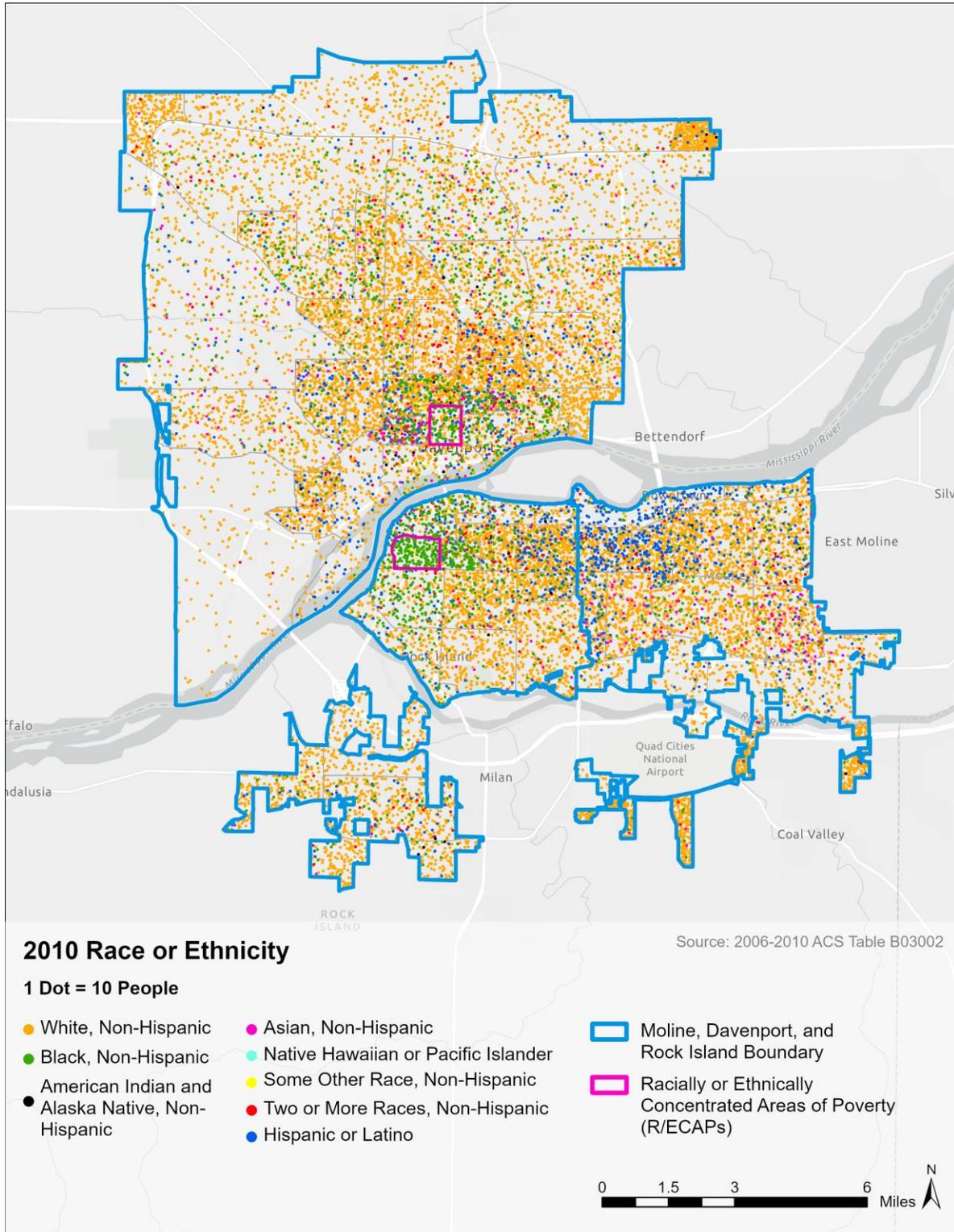
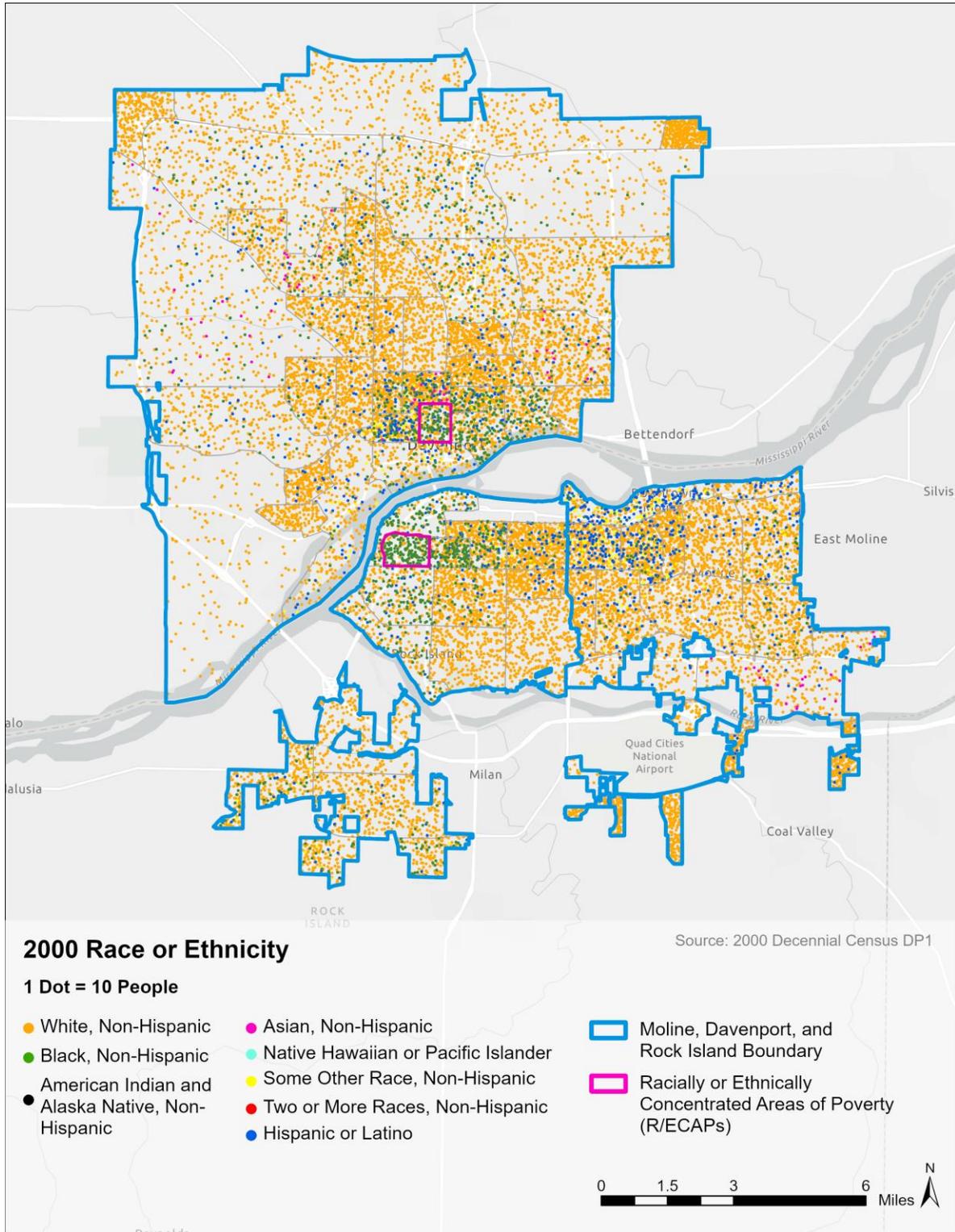


FIGURE 4. POPULATION BY RACE AND ETHNICITY IN THE CITIES OF MOLINE, DAVENPORT, AND ROCK ISLAND, 2000



Segregation Levels

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

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

The table on the following page shares the dissimilarity indices for four pairings in the cities of Davenport, Moline, Rock Island, and the region. This table presents values for 1990, 2000, and 2010, all calculated using census tracts as the area of measurement. The “current” figure is calculated using block groups. Because block groups are typically smaller geographies, they measure segregation at a finer grain than analyses that use census tracts and, as a result, often indicate slightly higher levels of segregation than tract-level calculations.⁶ This assessment begins with a discussion of segregation at the tract-level from 1990 through 2010, and then examines the “current” figures calculated using block groups based on ACS 2018-2022 data.

The 2010 dissimilarity indices calculated for each pairing in the city of Davenport show low levels of segregation. The highest DI value of 33.93 was for the Black/White pairing. The Hispanic/White pairing resulted in the lowest DI of 21.29. DI for all pairings declined from 1990, however, the Black/White pairing experienced the most

⁶ Iceland, John and Erika Steinmetz. 2003. *The Effects of Using Block Groups Instead of Census Tracts When Examining Residential Housing Patterns*. U.S. Census Bureau, Washington DC: US. Accessed via https://www.census.gov/hhes/www/housing/resseg/pdf/unit_of_analysis.pdf.

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

significant decrease moving from moderate to low segregation. DI for Hispanic/White and Asian or Pacific Islander/White pairings have remained in low segregation levels since 1990.

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

Race/Ethnicity	Trends			Current (2022)
	1990	2000	2010	
City of Moline				
Non-White/White	28.7	29.3	23.7	30.7
Black/White	14.6	23.3	23.5	39.2
Hispanic/White	38.1	41.5	35.6	34.7
Asian or Pacific Islander/White	19.3	36.7	33.3	44.0
City of Davenport				
Non-White/White	33.3	31.2	25.7	32.8
Black/White	42.6	39.3	33.9	35.3
Hispanic/White	26.3	26.0	21.3	29.2
Asian or Pacific Islander/White	27.7	26.8	21.6	41.6
City of Rock Island				
Non-White/White	53.9	46.2	43.1	44.1
Black/White	60.8	54.8	51.1	50.3
Hispanic/White	35.4	31.4	31.6	31.3
Asian or Pacific Islander/White	23.4	14.8	34.4	32.8
Davenport-Moline-Rock Island MSA				
Non-White/White	44.1	40.4	37.5	43.8
Black/White	58.5	52.9	47.8	49.9
Hispanic/White	37.8	39.6	37.8	36.7
Asian or Pacific Islander/White	33.0	39.4	36.6	51.7

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0006, Released November 2020, <https://egis.hud.gov/affht/>. ACS 2018-2022 5-Year Data.

DI calculations in the city of Moline in 2010 also indicate low levels of segregation. However, DI for two pairings have increased since 1990. The Black/White pairing increased by nearly 9 points while the Asian or Pacific Islander/White pairing experienced the greatest of 14 points. The DI for the Hispanic/White decreased slightly

from moderate to low segregation levels in 2000 but remained the highest of all groups in 2010. In contrast to DI calculations in Davenport and Rock Island, the Black/White pairing in Moline had the lowest DI of 23.53 in 2010.

The dissimilarity indices calculated for each pairing in the city of Rock Island show moderate segregation among Black and White populations. Although the DI for the Black/White pairing decreased by nearly 10 points since 1990, the DI is significantly higher than the Hispanic/White and Asian or Pacific Islander/White pairing. The DI of 43.06 for non-White/White pairing also indicates moderate segregation between the two populations. Contrary to the overall decreases in DI for other pairings, the Asian or Pacific Islander/White pairing yielded a DI of 34.41 in 2010, 11 points higher than the calculated DI in 1990.

The “current” figures for dissimilarity indices show slightly higher levels of segregation compared to 2010 data, however, most of the pairings in all three cities are at low segregation levels. The Asian or Pacific Islander/White pairing has the highest DI (44.0) in the city of Moline slightly crossing the threshold of moderate segregation. The most significant difference in DI also occurs with the Asian or Pacific Islander/White pairing where there is a 11-point discrepancy between “current” and 2010 figures.

“Current” figures in the city of Davenport indicate moderate segregation among Asian or Pacific Islander and White populations as well. Since 2010, calculations for all Non-White groups and White pairings yielded higher DI measurements but remained in low segregation levels. The most significant difference in DI also occurs with the Asian or Pacific Islander/White pairing where there is a 20-point discrepancy between “current” and 2010 figures.

Among the three cities, the city of Rock Island experiences the highest levels of segregation between Non-White and White residents according to “current” DI figures. The highest DI value of 50.3 was for the Black/White pairing which indicates moderate segregation. The DI calculated for both the Hispanic/White and Asian or Pacific Islander/White pairings indicate low levels of segregation between these populations. The most significant difference in DI also occurs with the Asian or Pacific Islander/White pairing, however, in this case there was a decrease of 1.6 percentage points between “current” and 2010 figures.

Overall, in the Davenport-Moline-Rock Island MSA, the dissimilarity indices show slightly moderate levels of segregation between Non-White and White residents, with a DI measurement of 43.8. The highest level of segregation is occurring between Asian or Pacific Islander/White residents, which scored at a high level of segregation at 51.7. The level of segregation between Black and White residents also increased since 2010 and is currently slightly below the threshold of moderate level segregation with a score of 49.9. While 2010 data showed an overall decrease in segregation levels compared

to previous decades, the current measurements indicate that levels of segregation have increased since 2010 and are also reaching higher levels of segregation again.

National Origin and Limited English Proficiency Population

Settlement patterns of immigrants significantly impact the composition and landscape of communities across the United States. Large central cities have the largest population of foreign-born residents, but suburban areas are experiencing rapid growth of foreign-born populations recently.⁷ Clusters of immigrants of the same ethnicity form for a variety of reasons. Social capital in the form of kinship ties, social network connections, and shared cultural experiences often draw new immigrants to existing communities. Settling in neighborhoods with an abundance of social capital is less financially burdensome for immigrants and provides opportunities to accumulate financial capital through employment and other resources that would otherwise be unattainable.⁸

Populations with limited English proficiency (LEP) are typically composed of foreign-born residents that originate from countries where English is not the primary language, however, a substantial portion (19%) of the national LEP population is born in the United States. Nationally, the LEP population has lower levels of education and is more likely to live in poverty compared to the English proficient population.⁹ Recent studies have also found that areas with high concentrations of LEP residents have lower rates of homeownership.¹⁰

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

Figure 5 shows foreign-born residents are somewhat dispersed throughout the entirety of Moline and Rock Island. In Moline, there is a higher concentration of foreign-born residents within the northern half of the city. There is also some residential segregation occurring between residents born in Mexico who are concentrated on the west side of the city and residents from Vietnam, who are concentrated on the east

⁷ James, F., Romine, J., & Zwanzig, P. (1998). The Effects of Immigration on Urban Communities. *Cityscape*, 3(3), 171-192.

⁸ Massey, D. (1999). Why Does Immigration Occur?: A Theoretical Synthesis. In Hirschman C., Kasinitz P., & DeWind J. (Eds.), *Handbook of International Migration, The: The American Experience* (pp. 34-52). Russell Sage Foundation.

⁹ Zong, J. & Batalova, J. (2015). "The Limited English Proficient Population in the United States" *Migration Information Source*. Retrieved: <http://www.migrationpolicy.org/article/limited-english-proficient-population-united-states>

¹⁰ Golding, E., Goodman, L., & Strochack, S. (2018). "Is Limited English Proficiency a Barrier to Homeownership." Urban Institute. Retrieved: <https://www.urban.org/research/publication/limited-english-proficiency-barrier-homeownership>

side. Residents originating from Mexico and Vietnam comprise the two largest groups among the foreign-born population in Moline. There is a slightly stronger residential pattern of Vietnamese residents in central Davenport compared to the other two cities. In Rock Island, there is a larger presence of residents originating from India and also appears to have the lowest levels of residential segregation amongst the foreign-born population.

Figure 6 shows the geographic distribution of residents with limited English proficiency (LEP) coincide with the locations of the foreign-born population in all three cities. The residential patterns of the Spanish-speaking and Vietnamese-speaking LEP populations closely mirror that of foreign-born residents originating from Mexico and Vietnam, respectively. LEP populations that speak French are concentrated in neighborhoods where residents from West African countries reside in the city of Moline. There is also some concentration of residents who speak Indo-European languages in the south-east quadrants of Moline and Davenport.

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

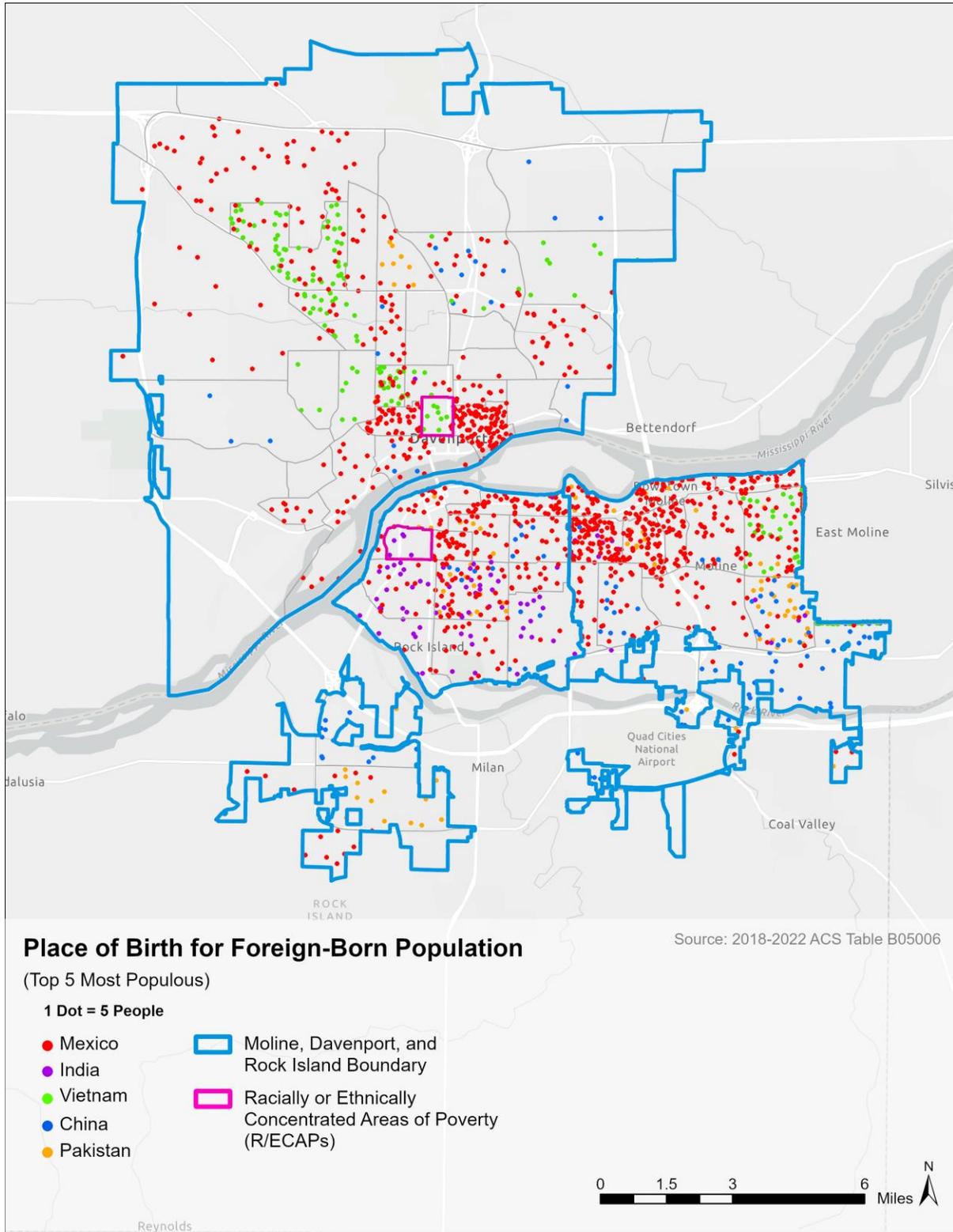
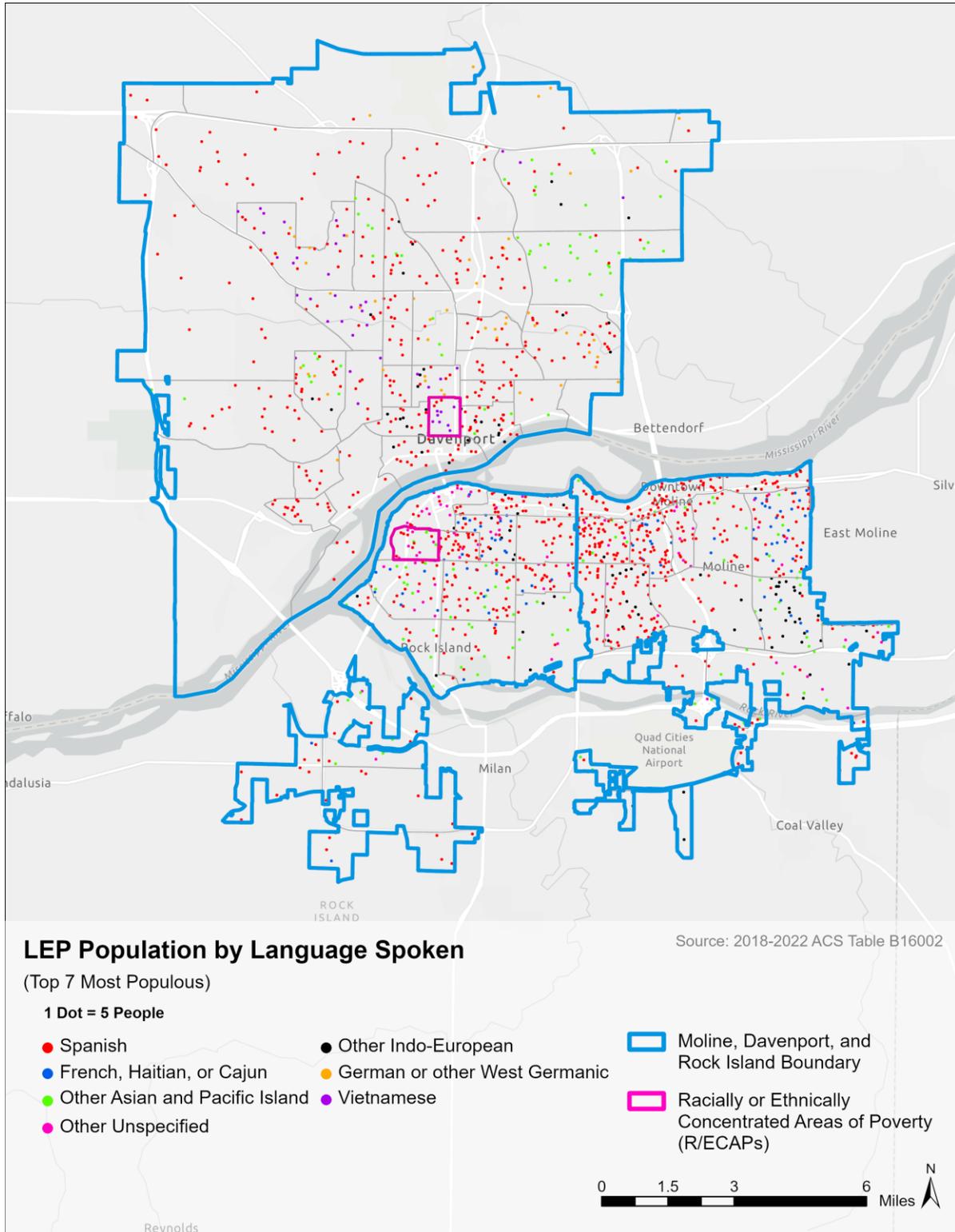


FIGURE 6. POPULATION WITH LIMITED ENGLISH PROFICIENCY IN THE CITIES OF MOLINE, DAVENPORT, AND ROCK ISLAND



CHAPTER 5.

ACCESS TO OPPORTUNITY

Where people live shapes prospects for economic mobility, as well as access to quality education, affordable transportation, a healthy environment, and fresh, affordable food. For protected classes, such as people of color or with disabilities, neighborhood or housing choices are often limited by factors such as discrimination in housing markets or public policies that result in concentrated poverty, disinvestment, and a lack of affordable housing in neighborhoods with access to proficient schools and jobs that pay a living wage. In this way, limited housing choice reduces access to opportunity for many protected classes.

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

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

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

Overview of HUD-Defined Opportunity Factors

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

Average index values by race and ethnicity for the city and region are provided in Table 4 for the total population and the population living below the federal poverty line. These values can be used to assess whether some population subgroups tend to live in higher opportunity areas than others, and will be discussed in more detail by opportunity dimension throughout the remainder of this chapter. The Opportunity Index Disparity measures the difference between the scores for the White non-Hispanic group and other groups. A negative score indicates that the particular subgroup has a lower score on that dimension than the White non-Hispanic group. A positive score indicates that the subgroup has a higher score than the White non-Hispanic Group. Significant disparities of 10 points or more are denoted in yellow, while the most extreme disparities of 20 points or more are denoted in red.

TABLE 4. DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic Population and Other Groups			
	White	Black	Hispanic	Asian/Pacific Islander	Native American	Black	Hispanic	Asian/Pacific Islander	Native American
	City of Moline – Total Population								
Low Poverty Index	56.14	50.81	49.66	64.25	52.99	-5.33	-6.48	8.11	-3.15
School Proficiency Index	37.82	41.54	24.17	51.97	39.02	3.72	-13.65	14.15	1.2
Labor Market Index	58.84	56.44	46.40	64.21	54.96	-2.4	-12.44	5.37	-3.88
Transit Index	71.22	69.71	75.44	69.31	72.05	-1.51	4.22	-1.91	0.83
Low Transportation Cost Index	49.55	51.18	52.15	51.05	51.14	1.63	2.6	1.5	1.59
Jobs Proximity Index	46.72	43.51	48.24	45.26	43.95	-3.21	1.52	-1.46	-2.77
Environmental Health Index	54.33	53.45	51.57	56.73	53.54	-0.88	-2.76	2.4	-0.79
City of Moline – Population below the Poverty Line									
Low Poverty Index	49.33	46.54	50.23	77.00	34.09	-2.79	0.9	27.67	-15.24
School Proficiency Index	26.93	35.18	31.95	56.34	43.84	8.25	5.02	29.41	16.91
Labor Market Index	49.37	54.85	47.33	75.00	67.03	5.48	-2.04	25.63	17.66
Transit Index	75.60	68.13	71.55	67.00	62.98	-7.47	-4.05	-8.6	-12.62
Low Transportation Cost Index	51.17	52.69	51.88	53.00	50.96	1.52	0.71	1.83	-0.21
Jobs Proximity Index	48.03	43.10	48.52	37.94	27.90	-4.93	0.49	-10.09	-20.13
Environmental Health Index	52.39	51.91	53.04	59.00	49.04	-0.48	0.65	6.61	-3.35
Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released July 2020, https://egis.hud.gov/affht/									

TABLE 4. DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA (CONTINUED)

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic Population and Other Groups			
	White	Black	Hispanic	Asian/Pacific Islander	Native American	Black	Hispanic	Asian/Pacific Islander	Native American
	City of Davenport - Total Population								
Low Poverty Index	46.90	35.24	38.64	43.91	40.23	-11.66	-8.26	-2.99	-6.67
School Proficiency Index	16.59	12.56	11.64	14.47	11.76	-4.03	-4.95	-2.12	-4.83
Labor Market Index	58.56	47.58	48.66	58.47	48.50	-10.98	-9.9	-0.09	-10.06
Transit Index	72.03	75.12	76.34	70.65	75.34	3.09	4.31	-1.38	3.31
Low Transportation Cost Index	53.64	56.65	56.24	53.40	55.51	3.01	2.6	-0.24	1.87
Jobs Proximity Index	68.48	73.07	70.31	65.89	69.17	4.59	1.83	-2.59	0.69
Environmental Health Index	64.63	63.34	63.37	65.73	63.83	-1.29	-1.26	1.1	-0.8
City of Davenport - Population below the Poverty Line									
Low Poverty Index	38.84	29.27	35.01	21.34	17.31	-9.57	-3.83	-17.5	-21.53
School Proficiency Index	11.79	8.45	8.72	3.92	1.40	-3.34	-3.07	-7.87	-10.39
Labor Market Index	50.06	42.21	44.73	29.71	19.07	-7.85	-5.33	-20.35	-30.99
Transit Index	74.35	75.35	79.58	81.02	87.56	1	5.23	6.67	13.21
Low Transportation Cost Index	55.06	56.30	59.68	61.74	61.07	1.24	4.62	6.68	6.01
Jobs Proximity Index	68.36	70.24	73.32	78.23	79.20	1.88	4.96	9.87	10.84
Environmental Health Index	63.89	63.72	61.51	58.33	62.47	-0.17	-2.38	-5.56	-1.42
Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released July 2020, https://egis.hud.gov/affht/									

TABLE 4. DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA (CONTINUED)

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic Population and Other Groups			
	White	Black	Hispanic	Asian/Pacific Islander	Native American	Black	Hispanic	Asian/Pacific Islander	Native American
	City of Rock Island – Total Population								
Low Poverty Index	43.83	19.00	28.10	28.07	34.77	-24.83	-15.73	-15.76	-9.06
School Proficiency Index	14.71	6.28	9.28	10.63	11.05	-8.43	-5.43	-4.08	-3.66
Labor Market Index	54.23	24.00	38.86	32.52	39.11	-30.23	-15.37	-21.71	-15.12
Transit Index	76.71	81.02	81.11	80.78	78.43	4.31	4.4	4.07	1.72
Low Transportation Cost Index	46.44	53.26	50.53	50.51	49.91	6.82	4.09	4.07	3.47
Jobs Proximity Index	61.87	77.55	69.52	73.17	70.01	15.68	7.65	11.3	8.14
Environmental Health Index	59.26	59.31	57.86	60.11	59.50	0.05	-1.4	0.85	0.24
City of Rock Island – Population below the Poverty Line									
Low Poverty Index	27.86	13.86	23.50	N/a	N/a	-14	-4.36	N/a	N/a
School Proficiency Index	9.30	5.25	7.37	N/a	N/a	-4.05	-1.93	N/a	N/a
Labor Market Index	44.32	15.42	28.38	N/a	N/a	-28.9	-15.94	N/a	N/a
Transit Index	81.12	82.56	81.59	N/a	N/a	1.44	0.47	N/a	N/a
Low Transportation Cost Index	51.33	55.79	51.07	N/a	N/a	4.46	-0.26	N/a	N/a
Jobs Proximity Index	71.62	81.85	74.82	N/a	N/a	10.23	3.2	N/a	N/a
Environmental Health Index	58.95	59.72	58.79	N/a	N/a	0.77	-0.16	N/a	N/a
Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released July 2020, https://egis.hud.gov/affht/									

TABLE 4. DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA (CONTINUED)

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic Population and Other Groups			
	Non-Hispanic White	Black	Hispanic	Asian/Pacific Islander	Native American	Black	Hispanic	Asian/Pacific Islander	Native American
	Davenport-Moline-Rock Island MSA – Total Population								
Low Poverty Index	58.45	34.42	44.36	53.60	49.18	-24.03	-14.09	-4.85	-9.27
School Proficiency Index	42.91	20.07	25.56	36.58	31.09	-22.84	-17.35	-6.33	-11.82
Labor Market Index	60.99	41.31	47.23	61.02	52.67	-19.68	-13.76	0.03	-8.32
Transit Index	56.23	71.96	66.94	66.77	64.28	15.73	10.71	10.54	8.05
Low Transportation Cost Index	40.72	51.79	47.85	48.34	46.66	11.07	7.13	7.62	5.94
Jobs Proximity Index	48.72	66.40	55.22	58.21	56.74	17.68	6.5	9.49	8.02
Environmental Health Index	67.53	60.79	58.83	61.60	63.26	-6.74	-8.7	-5.93	-4.27
Davenport-Moline-Rock Island MSA – Population below the Poverty Line									
Low Poverty Index	47.32	28.82	38.42	32.70	36.98	-18.5	-8.9	-14.62	-10.34
School Proficiency Index	30.00	14.45	20.45	17.96	23.48	-15.55	-9.55	-12.04	-6.52
Labor Market Index	51.70	36.53	41.86	36.75	49.86	-15.17	-9.84	-14.95	-1.84
Transit Index	59.81	72.66	70.07	74.68	51.07	12.85	10.26	14.87	-8.74
Low Transportation Cost Index	45.10	52.97	50.99	56.07	47.36	7.87	5.89	10.97	2.26
Jobs Proximity Index	53.46	66.20	59.75	67.65	35.17	12.74	6.29	14.19	-18.29
Environmental Health Index	65.46	62.68	57.72	60.28	68.18	-2.78	-7.74	-5.18	2.72
Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released July 2020, https://egis.hud.gov/affht/									

Education

School proficiency is an indication of the quality of education that is available to residents of an area. High quality education is a vital community resource that can lead to more opportunities and improve quality of life. HUD's school proficiency index is calculated based on the performance of 4th grade students on state reading and math exams. For each block group, the index is calculated using test results in up to the three closest schools within 1.5 miles. Results are then standardized on a scale of 0 to 100 based on relative ranking within the state. A higher index score indicates greater access to high-performing elementary schools.¹¹



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

The map on the following page shows HUD-provided opportunity scores related to education for census tracts within the cities of Davenport, Moline, and Rock Island. Follow-up maps display the percentage of residents with completed high school and college educations by location, as well as the number of residents over age 3 enrolled in school by location (this includes college enrollment).

There are significant discrepancies in the levels of access to proficient schools among census tracts within all three cities, but most notably within the City of Davenport. Some tracts in the northern portion of the city score above the 75th percentile, while many tracts in the central and southern portions of the City score in the bottom 10th percentile. These discrepancies are also present in Moline and Rock Island, where no tracts score in the top 75th percentile but many tracts, especially those adjacent to Davenport, score in the bottom 10th percentile.

Table 4 displays significant disparities in access to proficient schools by race and ethnicity, with the most severe disparities noted among Hispanic students in the city of Moline. Disparities also exist by income level, with students living below the poverty line in all three Cities as well as in the MSA experiencing lower school proficiency index scores than their peers as a whole, with the exception of low-income Asian, Hispanic, and Native American students in Moline, who score slightly higher than their peers as a whole. The students with the lowest school proficiency index ratings are low-income

¹¹ HUD's data sources for its school proficiency index include attendance area zones from School Attendance Boundary Information System (SABINS) and MaPonics, school proficiency data from Great Schools, and school addresses and attendance from Common Core of Data. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

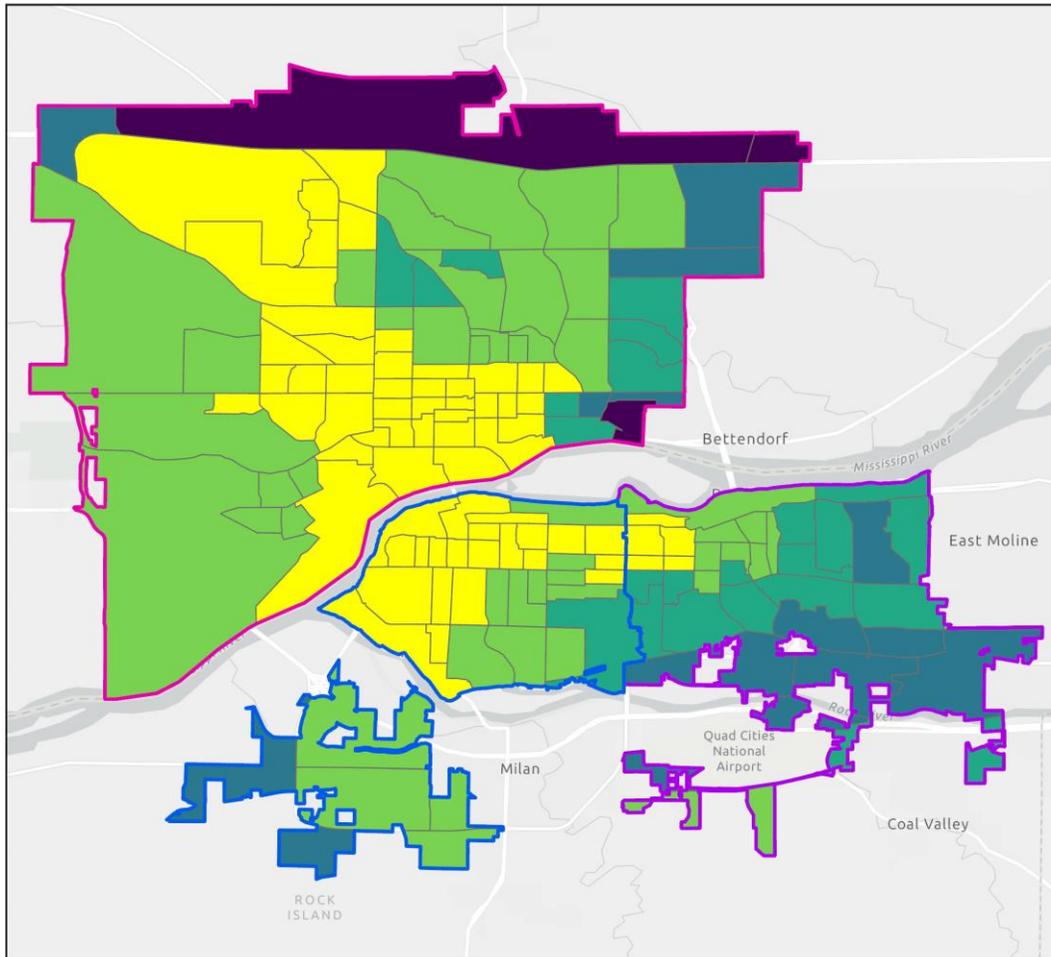
non-white students within the cities of Davenport and Rock Island, where all have scores of less than 10.

Image 9 depicts geographically the number of residents over age 3 enrolled in school in all three Cities, including college enrollment. Trends here coincide somewhat with school proficiency indices, with areas with higher scores generally seeing a higher student enrollment. Notable exceptions include small areas in central Davenport and eastern Rock Island, which have low proficiency indices but high student enrollment. This may be due to the location of high school or higher education facilities in these areas, as the school proficiency index is based on 4th grade performance.

Figure 10 depicts geographically the percentage of residents in all three Cities who hold a high school diploma or equivalent. This map also has significant overlap with the trends shown in Figure 7, with areas of higher school proficiency producing more high school graduates. This is a significant factor in access to opportunity, as residents without a completed high school education are often severely limited in employment and other economic opportunities. The Cities of Davenport and Rock Island have several areas where more than 95% of residents have a high school diploma, while the City of Moline has no areas where more than 95% of residents have a high school diploma. The lowest rates of a completed high school education are found in areas adjacent to the Mississippi River, where Rock Island has one neighborhood where less than 70% of residents have a high school education.

Finally, figure 11 depicts geographically the percentage of residents in all three Cities who hold a bachelor's degree or greater (including residents with Master's Degrees, Doctorates, and Law Degrees). Residents who have completed at least this level of higher education typically have significantly greater access to employment and economic opportunities than residents who have not, especially in comparison to residents without a completed high school education. Davenport has the highest concentration of residents with at least a bachelor's degree, with multiple neighborhoods where more than 50% of residents hold a degree. In contrast, Moline and Rock Island have no neighborhoods where more than 40% of residents hold such a degree.

FIGURE 7. SCHOOL PROFICIENCY INDEX IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



School Proficiency Rating
out of a total possible score of 100

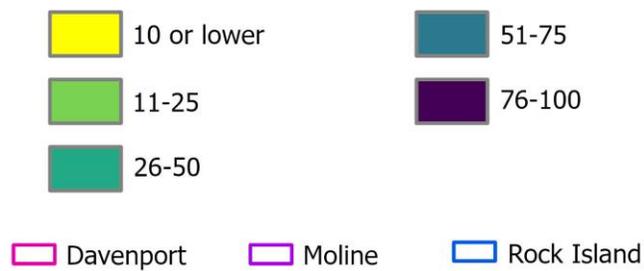
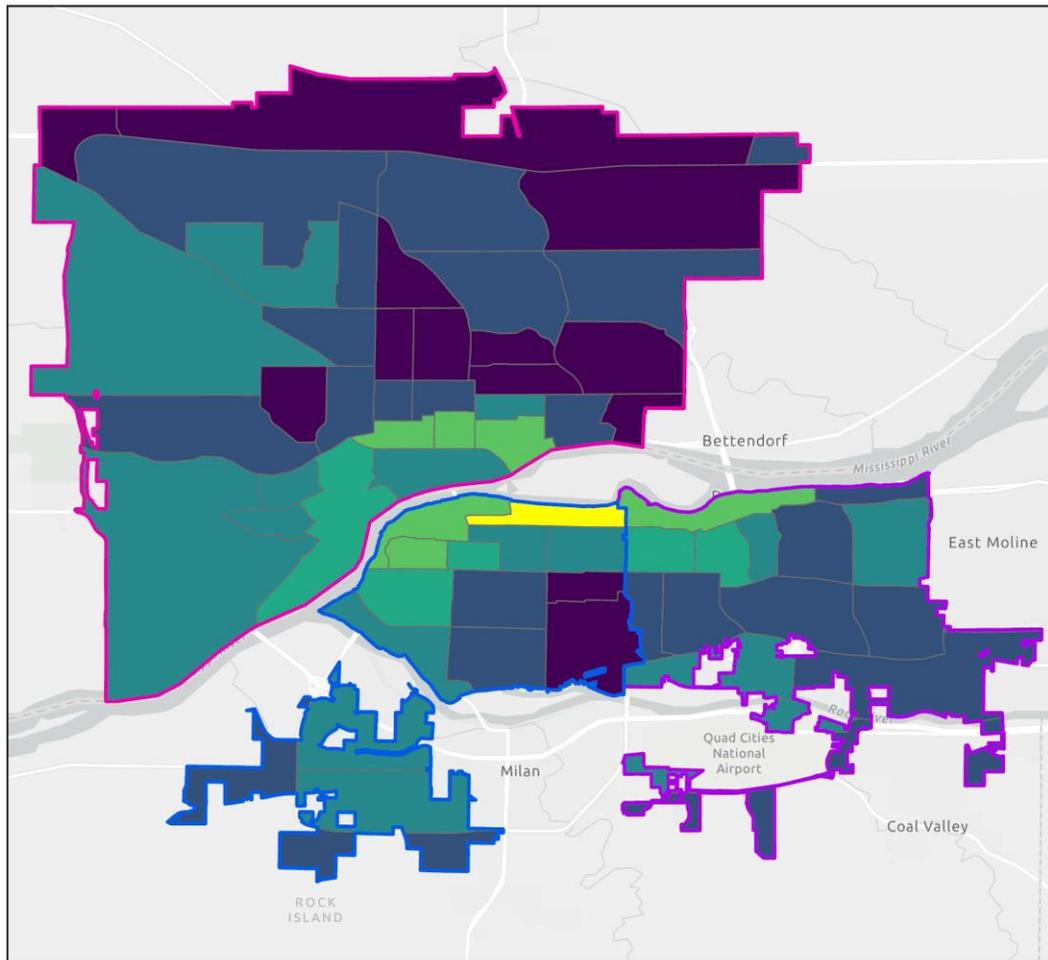


FIGURE 9. SCHOOL ENROLLMENT IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Educational Attainment: High School Diploma or Greater

by percentage of population aged 25 and over

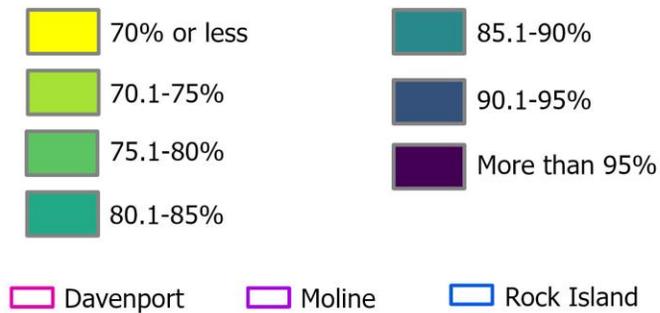
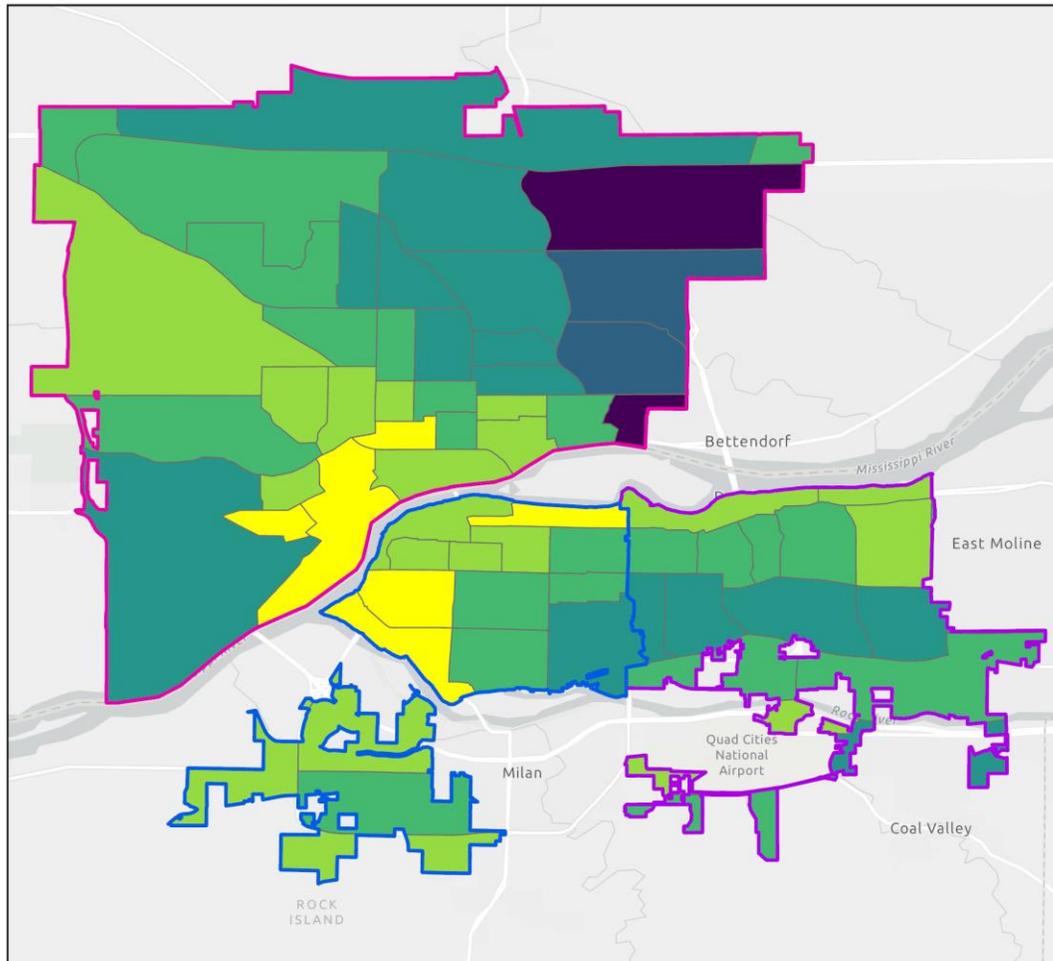


FIGURE 10. RESIDENTS WITH HIGH SCHOOL EDUCATIONS IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND

Map Source: 2018-2022 American Community Survey

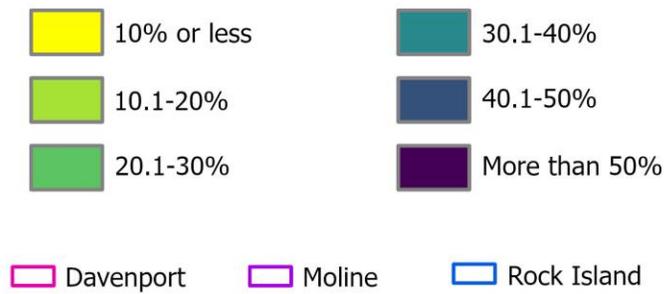
Map Source: 2018-2022 American Community Survey

FIGURE 11. RESIDENTS WITH COLLEGE EDUCATIONS IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Educational Attainment: Bachelor's Degree or Greater

by percentage of population aged 25 and over



Map Source: 2018-2022 American Community Survey

Employment

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



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

The Jobs Proximity Index measures the physical distance between place of residence and job locations, with employment centers weighted more heavily. It also takes into account the local labor supply (i.e., competition for jobs) near such employment centers. Block group results are then standardized on a scale of 0 to 100 based on relative ranking within the metro area. A higher index score indicates greater access to job locations.¹²

The Jobs Proximity Index scores of block groups in the cities of Davenport, Moline, and Rock Island are mapped in Figure 12. Census tracts adjacent to the Mississippi River tend to have a higher concentration of jobs in all three Cities, as do tracts in northern Davenport and southern Moline and Rock Island. The lowest job concentrations are found in west Davenport and east Moline.

The Labor Market Engagement Index is based on unemployment rate, labor force participation rate, and the percentage of the population age 25 and over with a bachelor's degree or higher.



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

¹² HUD's data source for its jobs proximity index includes the Longitudinal Employer-Household Dynamics (LEHD) database. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

Block group results are standardized on a scale of 0 to 100 based on relative ranking nationally. A higher index score indicates greater labor market engagement.¹³

Figure 13 maps Labor Market Engagement Index scores in Davenport, Moline, and Rock Island. The lowest scoring block groups are located along the Mississippi River in all three cities, with the highest labor market engagement found in northeast Davenport and southern Rock Island. Unemployment trends mirror this, as depicted in figure 14 – the areas with the highest unemployment rates are located along the Mississippi river and coincide with the areas of lowest labor market engagement.

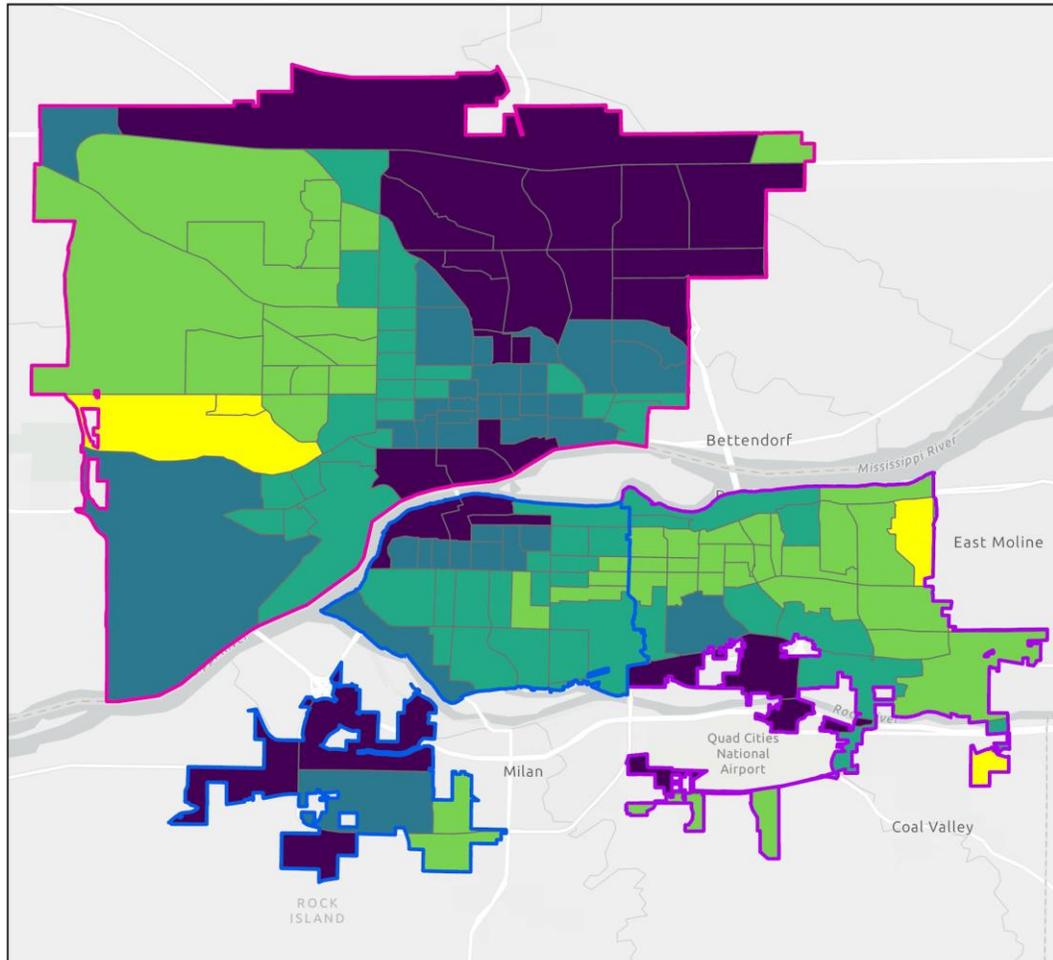
Table 4 depicts Labor Market and Job Proximity Index scores by race and ethnicity for all three Cities. White and Asian residents have the highest Labor Market scores in all areas except for Rock Island, where Asian residents have a significantly lower score than white residents. Significant disparities in labor market scores exist among Hispanic residents in Moline, Black, Hispanic, and Native American residents in Davenport, and all non-white residents in Rock Island. The most severe discrepancy is between Black and white residents of Rock Island, with Black residents having a Labor Market score 30 points lower than white residents.

Labor Market scores are also impacted by income, with residents of all three cities who live below the poverty line generally having scores of 5-10 points lower than their peer group as a whole. Larger discrepancies exist among Asian and Native American residents in Davenport, where those living below the poverty line have Labor Market scores of around 30 points below their groups as a whole, and among Hispanic, Asian, and Native American residents of Moline, where those living above the poverty line have higher Labor Market scores than their groups as a whole.

Job Proximity scores also vary by race and ethnicity, although somewhat less significantly and in different ways than Labor Market scores. Most non-white residents have Job Proximity scores equal to or higher than those of white residents, and residents of all races and ethnicities living below the poverty line tend to have higher Job Proximity scores than their group as a whole with the exception of Asian and Native American residents in Moline. While a higher Job Proximity score may seem on the surface to be a positive factor, it is complicated by the fact that low-income residents are often limited in the neighborhoods they can live in by a lack of transit options that may be available to higher-income residents and are therefore restricted to living near their place of work. This factor is examined in detail in the next chapter.

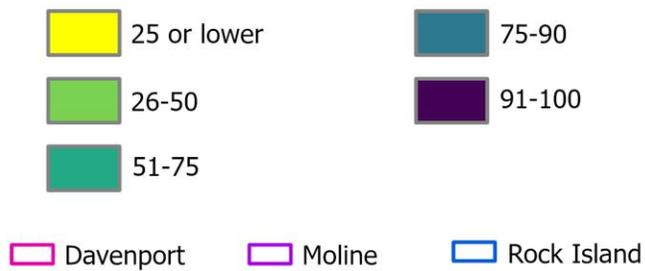
¹³ HUD's data source for its labor market engagement index is the American Community Survey. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

FIGURE 12. JOBS PROXIMITY INDEX IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



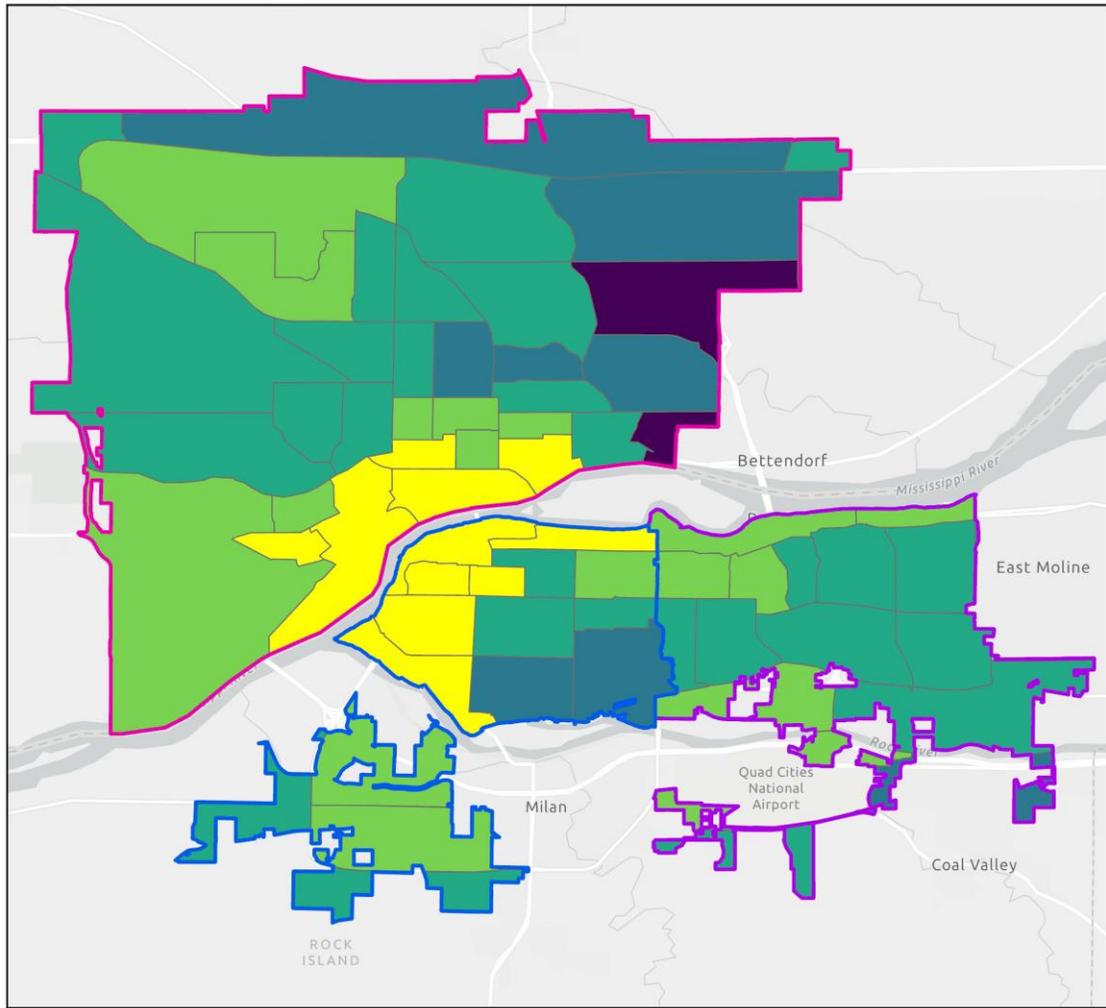
Jobs Proximity Rating

out of a total possible score of 100



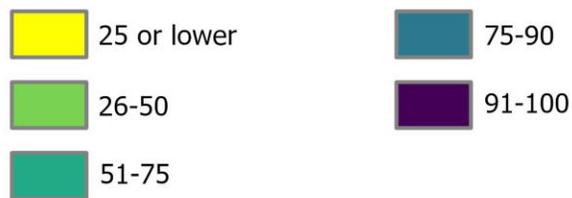
Map Source: HUD Jobs Proximity Index, updated August 2024, accessed via <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::jobs-proximity-index/about>

FIGURE 13. LABOR MARKET INDEX IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



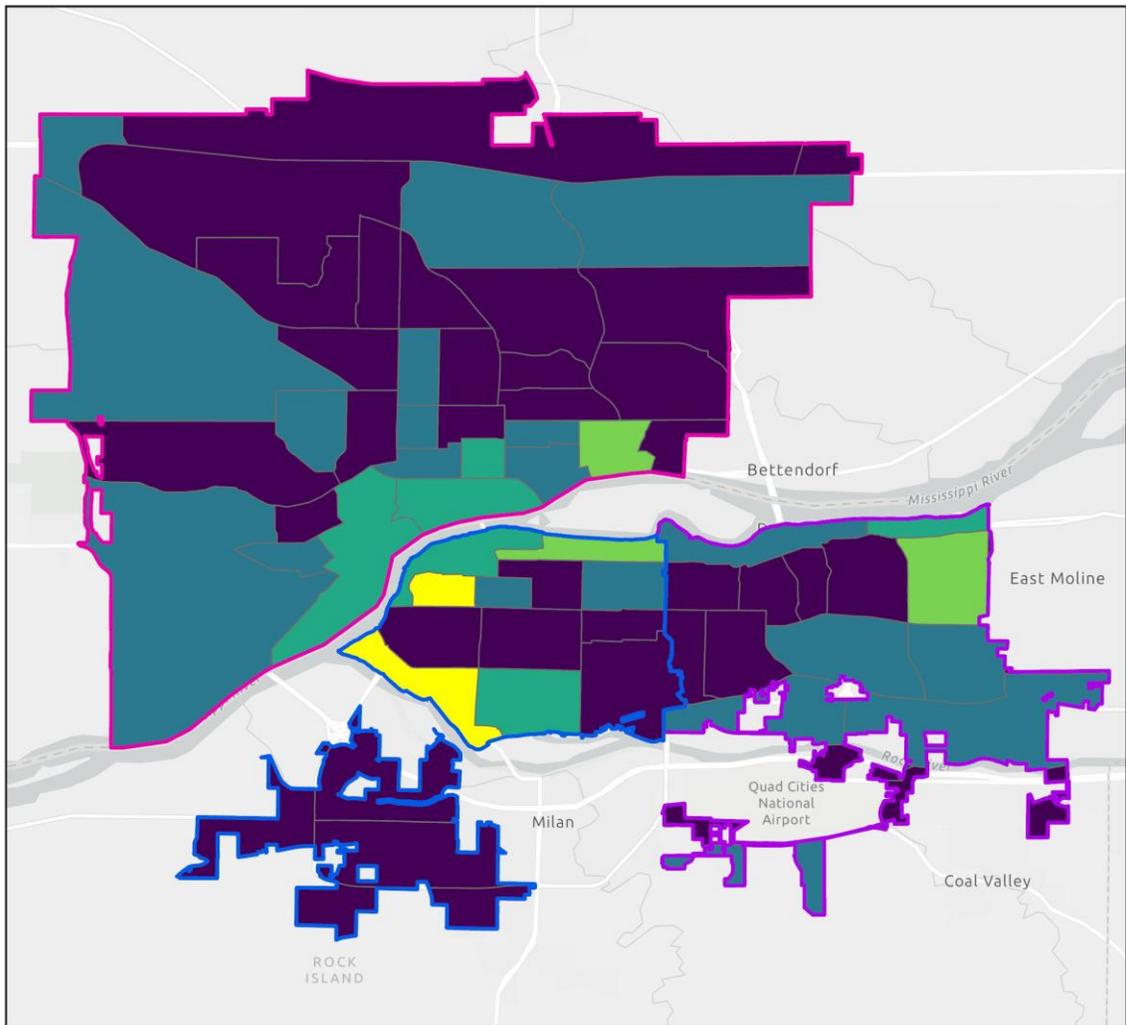
Labor Market Engagement Rating

out of a total possible score of 100



Map Source: HUD Labor Market Engagement Index, updated July 2023, accessed via <https://hudgis-hud.org/arcgis/rest/services/LaborMarketEngagementIndex/MapServer>

FIGURE 14. UNEMPLOYMENT RATE IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Unemployment Rate



Map Source: 2018-2022 American Community Survey

Transportation

The Low Transportation Cost Index is based on estimates of transportation costs as a percentage of income for low-income renter families in a given neighborhood. Results are standardized on a scale of 0 to 100 based on relative ranking nationally. The higher the Low Transportation Cost Index, the lower the cost of transportation in that neighborhood.¹⁴ For clarity, this score will be referred to as a Transportation Affordability Score for the remainder of this section. Figure 16 maps Transportation Affordability Scores for Davenport, Moline, and Rock Island, while Figure 17 maps car access in all three cities by average number of cars per household.

Figure 16 depicts that, in general areas with more affordable transit are located nearer to the Mississippi River, while areas with higher transportation costs are located on the outskirts of Davenport and Moline. Notably, affordability ratings are low to moderate in all three cities, with no census tract in any city having an affordability rating of 75 or higher.

Table 4 depicts the Low Transportation Cost Index by race and ethnicity in all three cities. There are less significant disparities by race and ethnicity for this index than for others discussed, with most racial and ethnic groups having scores within 5 points of other groups and no groups having a discrepancy greater than 7 points in comparison to white residents. Residents living below the poverty line typically show slightly higher affordability scores than their racial or ethnic group as a whole. This is likely explained by the fact that low-income households are less likely to own a car, which is typically a more expensive mode of transportation than walking or using public transit services.

Table 4 also depicts the Transit Trip Index by race and ethnicity in all three cities. This index measures how often low-income renter families in a neighborhood use public transit. Values are then standardized on a scale of 0 to 100 based on relative ranking nationally. The higher the index value, the more likely residents in that neighborhood

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

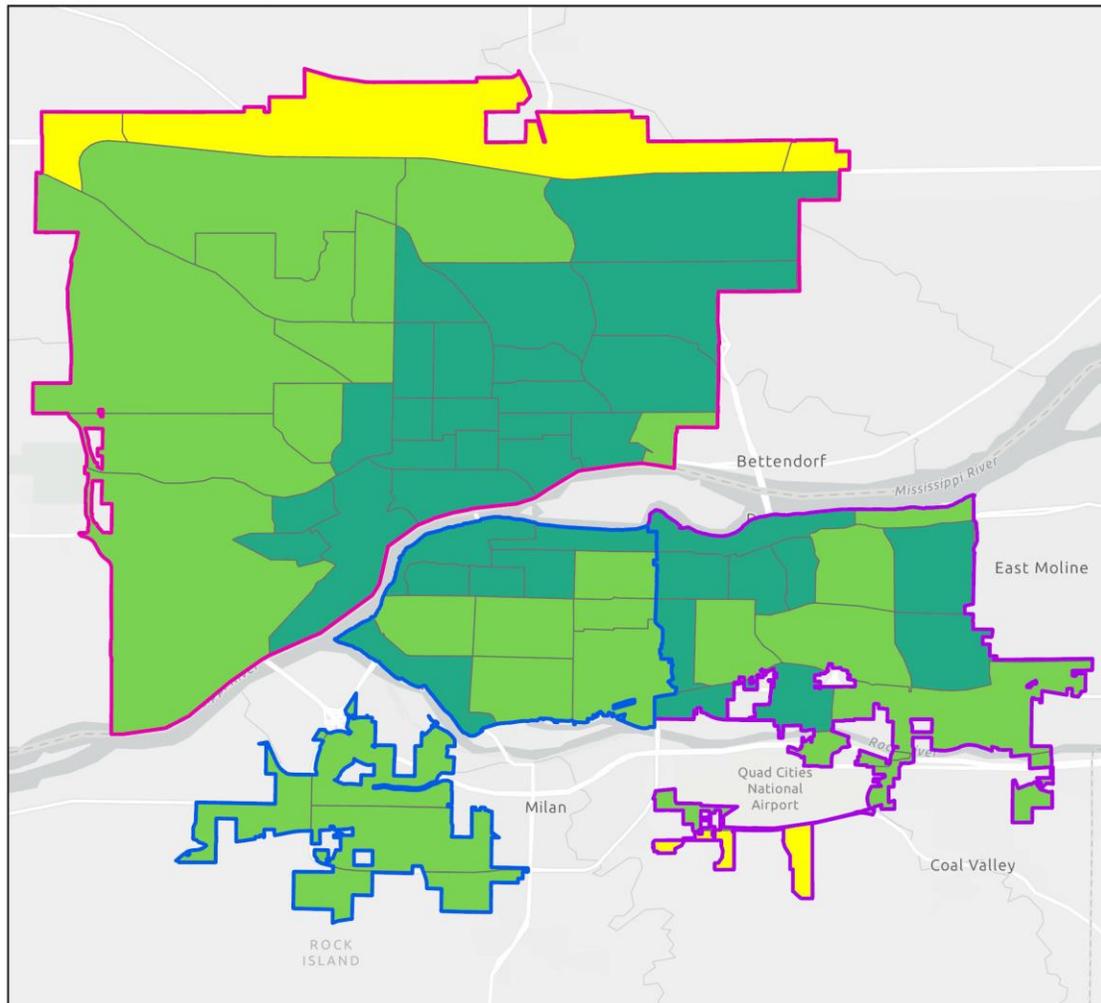
TRANSIT TRIP INDEX: BASED ON ESTIMATED NUMBER OF TRANSIT TRIPS TAKEN BY FAMILIES WITH INCOMES AT 50% OF MEDIAN INCOME FOR RENTERS IN THE REGION

¹⁴ HUD's data source for its transit trip and low transportation costs indices is Location Affordability Index (LAI) data. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

use public transit. Because of this, it would be expected that residents living below the poverty line would have Transit Trip scores equal to or higher than residents as a whole. While this is true for Davenport and Rock Island, non-white residents of Moline living below the poverty line actually have lower scores than their peer groups as a whole. This may indicate an inaccessibility to transit for Moline's low-income households due to factors such as price or location.

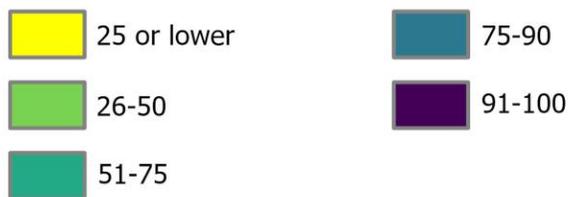
Finally, figure 17 maps vehicle access in all three cities by average number of cars per household. If the number is less than 1, this means that a significant number of households in the area do not have a vehicle. The lowest rates of vehicle access are seen adjacent to the Mississippi River, which correlates with areas of lower labor market engagement, lower educational attainment, and higher poverty rates. In contrast, the northernmost parts of Davenport have significantly higher vehicle access than the rest of the region.

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



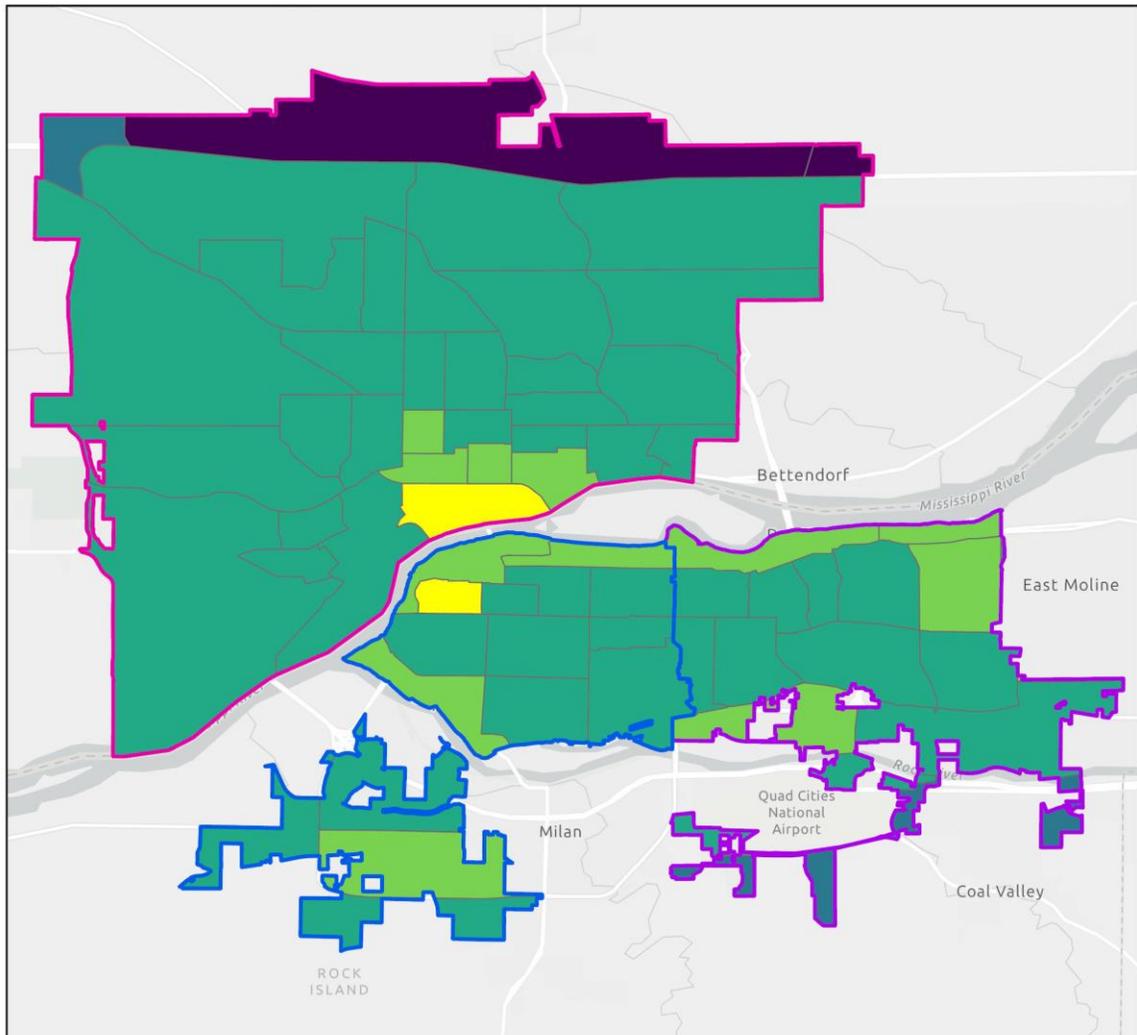
Transportation Affordability Rating

out of a total possible score of 100

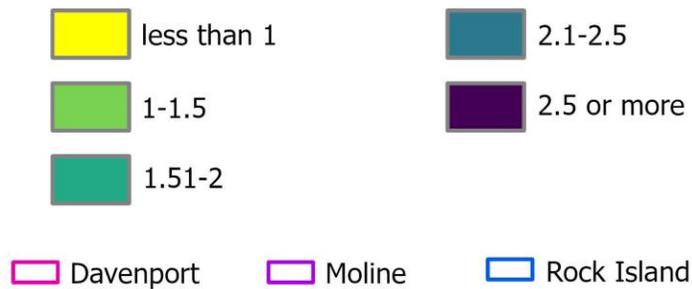


Map Source: HUD Low Transportation Cost Index, updated August 2024, accessed via <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::low-transportation-cost-index/about>

FIGURE 17. AVERAGE NUMBER OF CARS PER HOUSEHOLD IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Average Number of Vehicles per Household



Map Source: HUD Location Affordability Index, updated June 2024, accessed via <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::location-affordability-index-v-3/about>

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

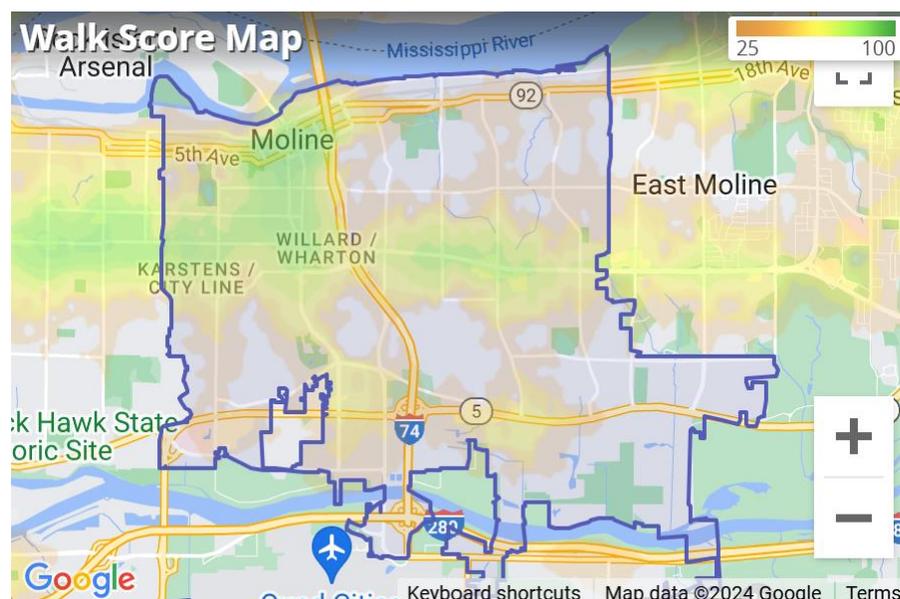
Points are awarded based on the distance to amenities in several categories including grocery stores, parks, restaurants, schools, and shopping. Not only is the measure useful for showing walkability but also access in general to critical facilities. Moline, Davenport, and Rock Island all received a Walk Score of 44, meaning that most errands require a car.

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

The most walkable neighborhoods in the city of Davenport are in or around Downtown. Major thoroughfares throughout the city are also shown as somewhat conducive to walking. The block groups in the most walkable areas are also the most densely populated.

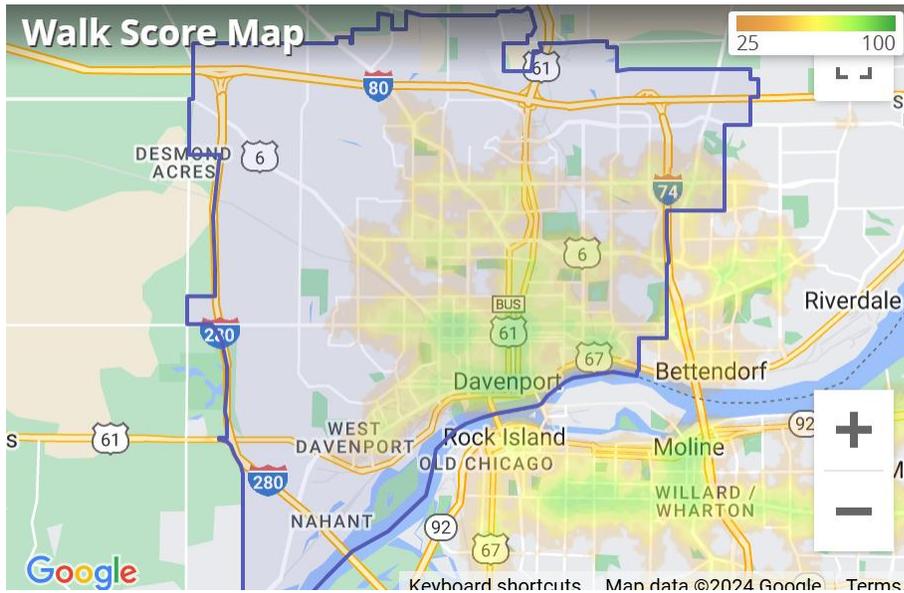
Walkable neighborhoods in the city of Rock Island are located along the Mississippi River between Centennial Bridge and 24th Street. Walk scores are also high in the areas surrounding the intersection of 18th Avenue and 30th Street.

FIGURE 18. WALKABILITY IN THE CITY OF MOLINE



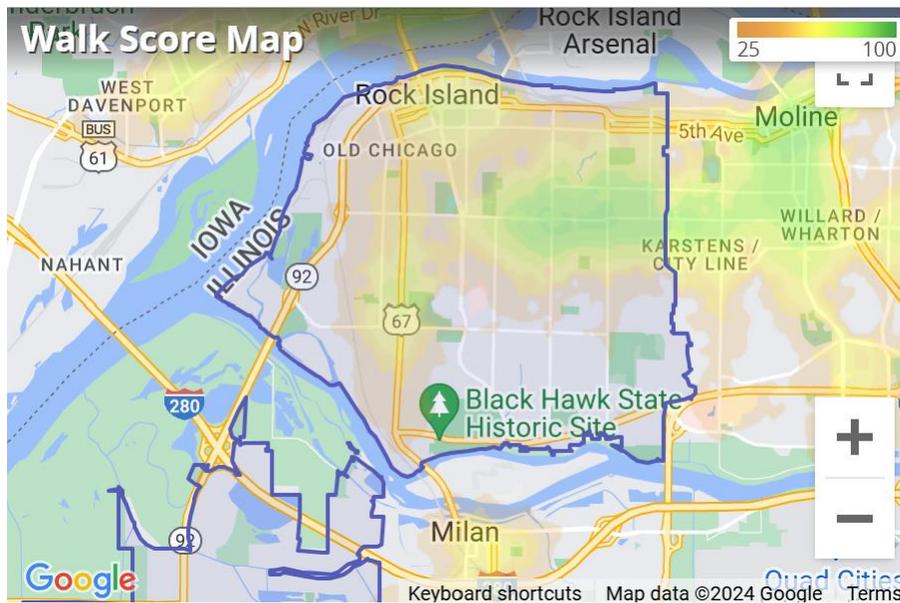
Map Source: Walkscore, Retrieved from: <https://www.walkscore.com/IL/Moline>

FIGURE 19. WALKABILITY IN THE CITY OF DAVENPORT



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

FIGURE 20. WALKABILITY IN THE CITY OF ROCK ISLAND



Map Source: Walkscore, Retrieved from: https://www.walkscore.com/IL/Rock_island

Poverty

Residents in high poverty areas tend to have lower levels of access to opportunity due to the absence of critical resources and disinvestment in their communities. As poverty increases, disparities in access to opportunities often increase among population groups and disadvantaged communities become even more isolated. HUD's Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure

exposure to poverty by neighborhood. Values are standardized based on national ranking to produce scores ranging from 0 to 100 where a higher score indicates less exposure to poverty.¹⁵ Table 4 depicts the Low Poverty Index scores for racial and ethnic groups in Moline, Davenport, and Rock Island, while Figure 21 maps poverty rates by depicting the number of households who had incomes below the poverty line in the last 12 months.

Figure 21 shows that the highest poverty areas are those adjacent to the Mississippi River in Davenport and Rock Island, with one tract in each City where more than 50% of households had an income below poverty level in the last 12 months. In contrast, Moline had no tracts where more than 50% of households experienced this. The lowest levels of poverty are found in northern Davenport and in southeastern Moline and Rock Island, where 10% of households or less earned an income below the poverty line in the last 12 months.

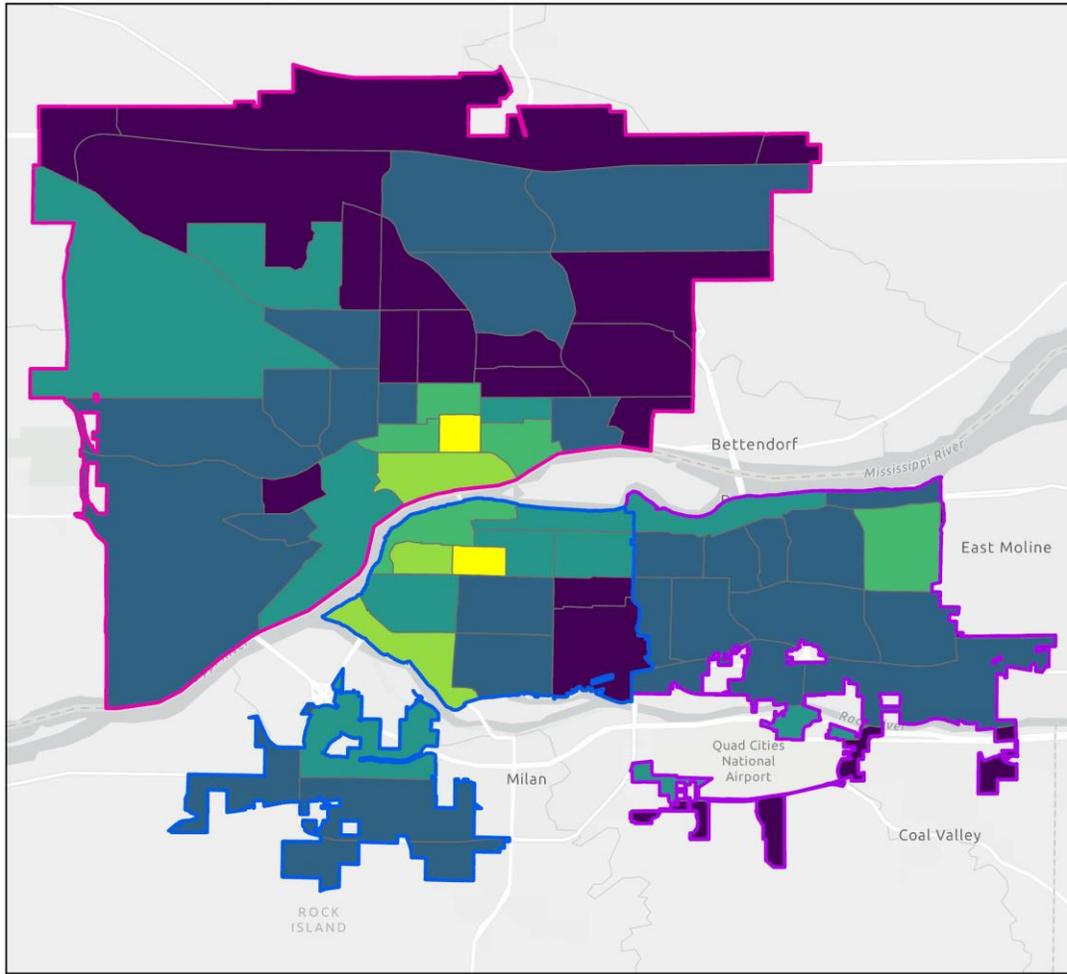
Low Poverty Index scores in Table 4 show the levels of exposure to poverty for each racial and ethnic population group in all three cities. In all three cities non-white residents had more exposure to poverty than white residents, with the exception of Asian residents in Moline. The largest discrepancies were present in Rock Island, where Black residents had a score nearly 25 points lower than white residents, Hispanic and Asian residents 15 points lower, and Native American residents 9 points lower. The lowest overall discrepancies between racial and ethnic groups were seen in Moline.



LOW POVERTY INDEX: BASED ON NEIGHBORHOOD POVERTY RATES

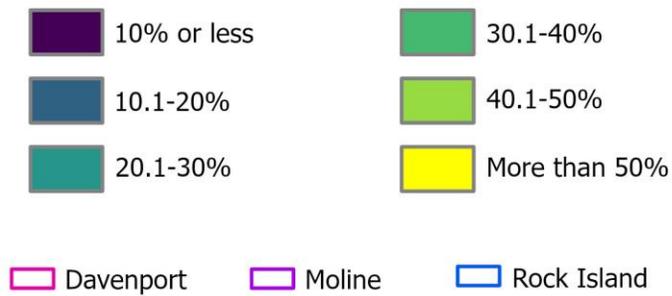
¹⁵ HUD's data source for its low poverty index is the American Community Survey. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

FIGURE 21. PERCENT OF HOUSEHOLDS WITH INCOMES BELOW THE POVERTY LINE IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Poverty rate

by percentage of residents whose income in the last 12 months was below the poverty line



Map Source: 2018-2022 American Community Survey

Environmental Health

HUD's Environmental Health Index measures exposure based on EPA estimates of air quality (considering carcinogenic, respiratory, and neurological toxins) by neighborhood. The index only measures issues related to air quality and not other factors impacting environmental health. Values are standardized based on national ranking to produce scores ranging from 0 to 100 where a higher score indicates less exposure to environmental hazards.¹⁶

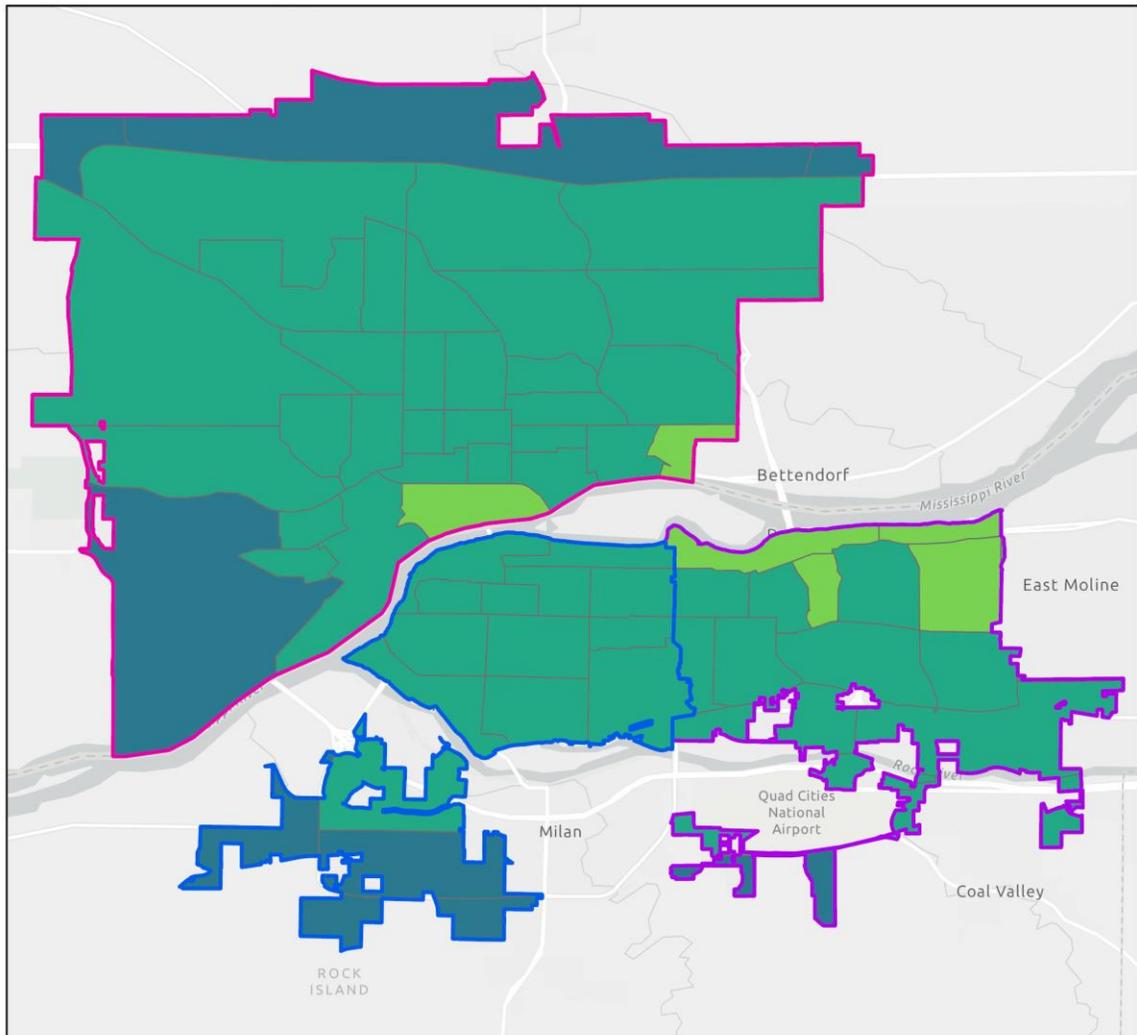
ENVIRONMENTAL HEALTH INDEX: BASED ON STANDARDIZED EPA ESTIMATES OF AIR QUALITY HAZARDS

Figure 22 maps Environmental Health Index scores for Moline, Davenport, and Rock Island. As depicted, areas with the lowest Environmental Health scores are located along the Mississippi River, coinciding with areas of higher poverty and lower educational attainment. Areas with higher environmental attainment scores are located along the outskirts of all three cities. No area in any city had a score below 25 or above 90, and Davenport has the largest area with scores above 75.

Table 4 depicts Environmental Health Index scores for all three cities by race and ethnicity. This is one of the lowest areas of disparity among all opportunity indices, with most racial and ethnic groups having scores within 4 points of each other. Outliers include low-income Asian residents in Moline, who have a score 6 points higher than white residents, and low-income Asian residents in Rock Island, who have a score 5 points lower than white residents. Notably, Rock Island, which has some of the highest score discrepancies in other areas, has the smallest discrepancies between racial and ethnic groups in the area of environmental health.

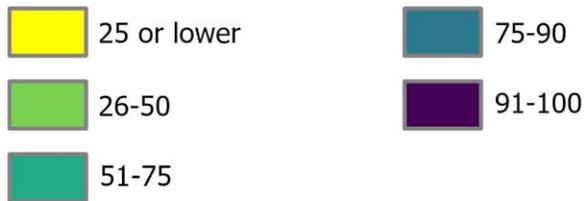
¹⁶ HUD's data source for its environmental health index is the EPA's National Air Toxins Assessment (NATA) data. For a more detailed description of HUD's methodology and data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report.

FIGURE 22. ENVIRONMENTAL HEALTH INDEX IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Environmental Health Rating

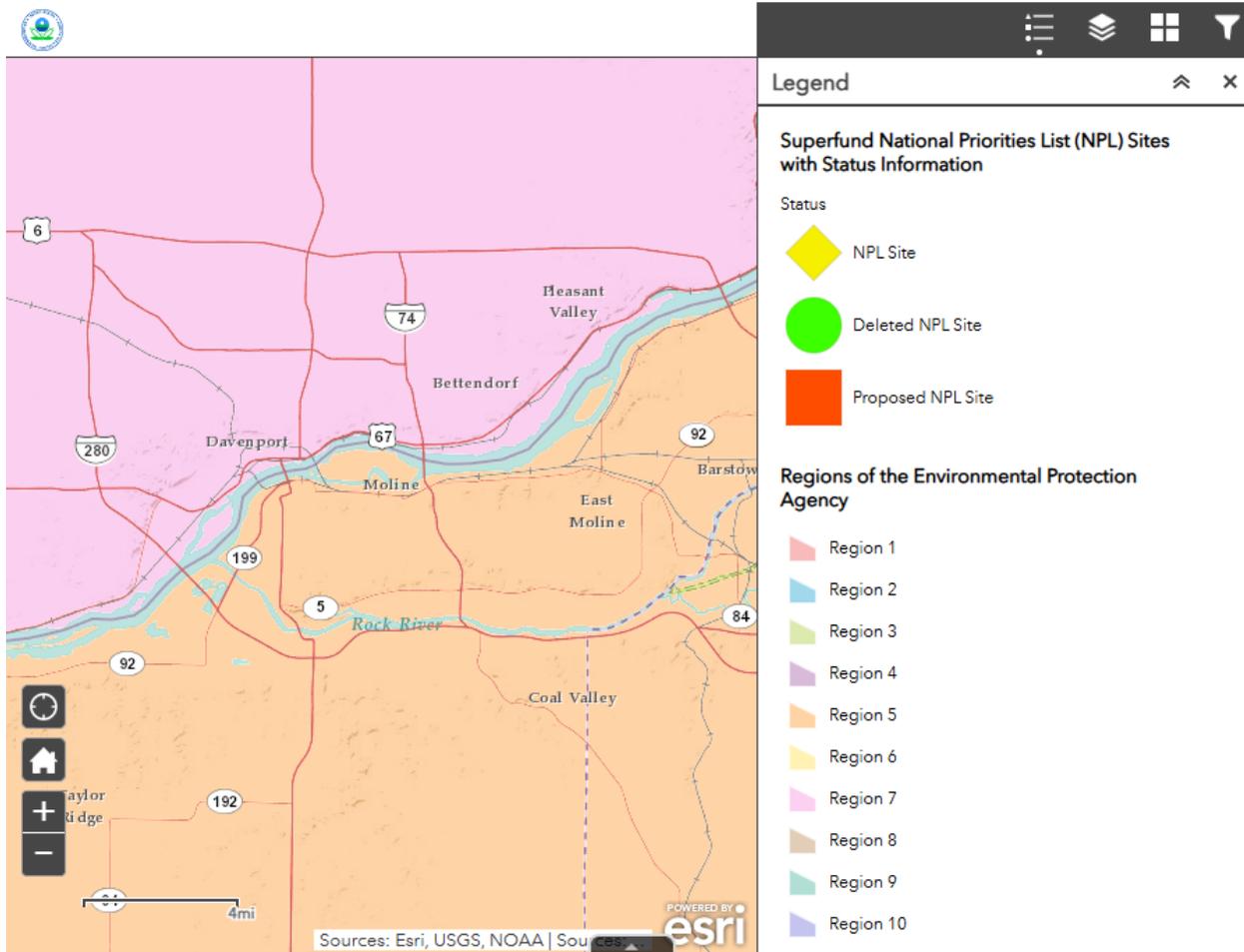
out of a total possible score of 100



Map Source: HUD Environmental Health Hazard Index, updated August 2024, accessed via <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::environmental-health-hazard-index/about>

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

FIGURE 23. SUPERFUND NATIONAL PRIORITIES LIST (NPL) SITES IN THE DAVENPORT-MOLINE-ROCK ISLAND AREA

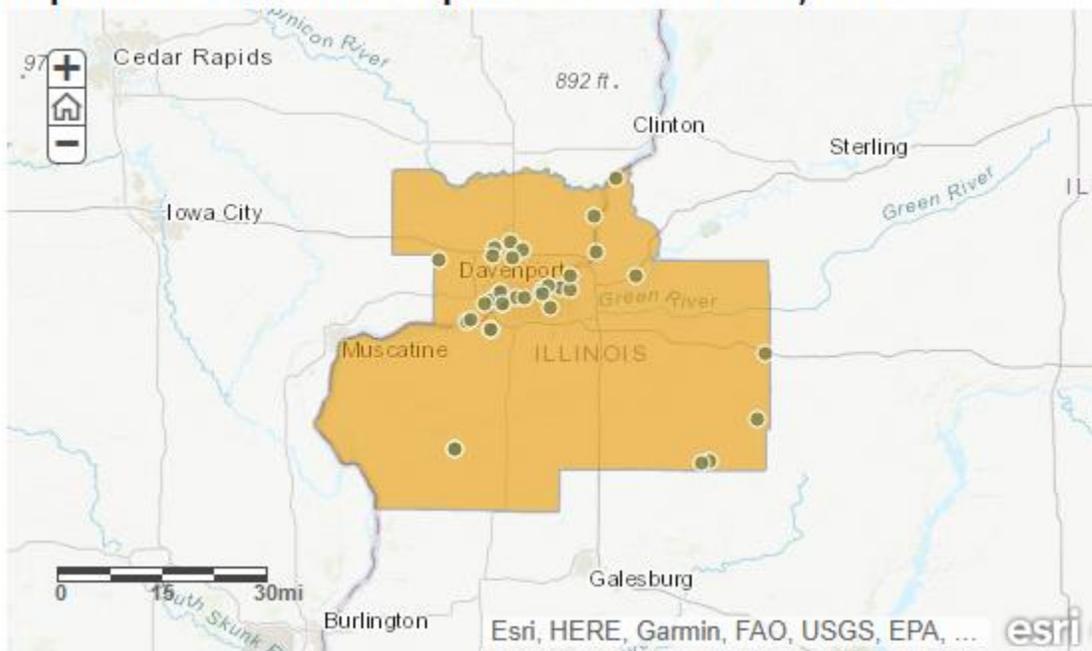


Map Source: Environmental Protection Agency GIS Data, Retrieved from: <https://www.epa.gov/superfund/search-superfund-sites-where-you-live>

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

FIGURE 24. TOXIC RELEASE INVENTORY (TRI) IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND

Map of TRI Facilities in Davenport-Moline-Rock Island, IA-IL



Map Source: Environmental Protection Agency GIS Data, Retrieved from:
<https://enviro.epa.gov/triexplorer/msa.html?pYear=2022&pLoc=19340&pParent=NAT>

CHAPTER 6.

HOUSING PROFILE

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

Beyond providing fair housing options, the social, economic, and health benefits of providing quality affordable housing are well-documented. National studies have shown that affordable housing encourages diverse, mixed-income communities, which result in many social benefits. Affordable housing also increases job accessibility for low- and middle-income populations and attracts a diverse labor force critical for industries that provide basic services for the community. Affordable housing is linked to improvements in mental health, reduction of stress, and decreased cases of illnesses caused by poor-quality housing.¹⁷ Developing affordable housing is a strategy used to prevent displacement of existing residents when housing costs increase due to economic or migratory shifts.

Conversely, a lack of affordable housing eliminates many of these benefits and increases socioeconomic segregation. High housing costs are linked to displacement of low-income households and an increased risk of homelessness.¹⁸ Often lacking the capital to relocate to better neighborhoods, displaced residents tend to move to socioeconomically disadvantaged neighborhoods where housing costs are most affordable.¹⁹

This section discusses the existing supply of housing in the study area. It also reviews housing costs, including affordability and other housing needs by householder income.

¹⁷ Maqbool, Nabihah, et al. "The Impacts of Affordable Housing on Health: A Research Summary." *Insights from Housing Policy Research*, Center for Housing Policy, www.rupco.org/wp-content/uploads/pdfs/The-Impacts-of-Affordable-Housing-on-Health-CenterforHousingPolicy-Maqbool.etal.pdf.

¹⁸ "State of the Nation's Housing 2015." Joint Center for Housing Studies of Harvard University, <http://www.jchs.harvard.edu/sites/default/files/jchs-sonhr-2015-full.pdf>

¹⁹ Deirdre Oakley & Keri Burchfield (2009) Out of the Projects, Still in the Hood: The Spatial Constraints on Public-Housing Residents' Relocation in Chicago." *Journal of Urban Affairs*, 31:5, 589-614.

Homeownership rates and access to lending for home purchases and mortgage refinancing are also assessed.

Housing Supply Summary

The Davenport-Moline-Rock Island, IA-IL metropolitan area has approximately 173,868 housing units, of which an estimated 46,830 are in Davenport, 19,795 are in Moline, and 16,985 are in Rock Island. While Davenport and the metro area have expanded their housing stock in recent years, the cities of Moline and Rock Island have not experienced the same growth in housing units. During the time period covered by the 2008-2012 American Community Survey five-year estimates (centered in 2010) to the 2018-2022 estimates (centered in 2020), Davenport experienced the largest increase in total housing units (5.5%), followed by the metro area (4.1%), while Moline and Rock Island experienced little growth or slight declines in housing units (0.1% and -1.0%, respectively).

The American Community Survey's definition of vacancy includes housing that is available for sale or rent, housing that has been rented or sold but not yet occupied, seasonal housing, and other vacant units. Using this definition, the vacancy rates in the tri-cities were 8.9% in Davenport, 7.7% in Moline, and 10.2% in Rock Island as of the 2018-2022 American Community Survey. These rates are similar to those of the MSA, Illinois, Iowa, and the United States overall (8.5%, 8.4%, 9.0%, and 10.8% as of the 2018-2022 ACS). Vacancy rates are up slightly in Davenport, Rock Island, and the metro area and slightly lower in Moline since the 2008-2012 estimates.

Shares of for-sale homeowner units are low, pointing to tight housing markets and high demand for homeownership. The share of owner units that are vacant and for sale (homeowner vacancy rate) is 1.7% in Davenport, 1.3% in Moline, 0.6% in Rock Island, and 1.0% in the MSA. These shares are similar to those of Illinois, Iowa, and the United States (1.0%, 1.3%, and 1.1%, respectively), indicating high demand for homeowner housing units.

The share of renter units that are vacant and for rent (renter vacancy rate) is 7.2% in Davenport, 4.7% in Moline, 7.4% in Rock Island, and 6.2% in the MSA. With the exception of Moline's low renter vacancy rate, these rates are slightly higher than those of Illinois, Iowa, and the United States (5.6%, 6.0%, and 5.5%, respectively), indicating lower demand for and greater availability of rental housing, particularly in Davenport and Rock Island.

About 4% to 5% of units in Davenport, Moline, and the MSA and 6.5% of units in Rock Island are vacant for reasons other than being available for sale or rent, being rented or sold but not yet occupied, or use as seasonal housing. These reasons include need for rehabilitation or repair, foreclosure, legal proceedings, abandonment, and other reasons. These rates are similar to those of Illinois and Iowa (about 4%) and slightly higher than that of the United States (3.9%).

The following analysis examines several features of housing supply, including structure type, size, tenure, and age of housing.

TABLE 5 – HOUSING UNITS BY OCCUPANCY STATUS

	2008-2012	2018-2022	2012-2022 % Change
Davenport			
Total Housing Units	44,394	46,830	5.5%
Occupied Housing Units	40,957	42,667	4.2%
Vacant Housing Units	3,437	4,163	21.1%
Vacancy Rate	7.7%	8.9%	+1.1
Moline			
Total Housing Units	19,778	19,795	0.1%
Occupied Housing Units	18,096	18,267	0.9%
Vacant Housing Units	1,682	1,528	-9.2%
Vacancy Rate	8.5%	7.7%	-0.8
Rock Island			
Total Housing Units	17,157	16,985	-1.0%
Occupied Housing Units	15,519	15,247	-1.8%
Vacant Housing Units	1,638	1,738	6.1%
Vacancy Rate	9.5%	10.2%	+0.7%
Davenport-Moline-Rock Island, IA-IL Metro Area			
Total Housing Units	167,099	173,868	4.1%
Occupied Housing Units	154,862	159,072	2.7%
Vacant Housing Units	12,237	14,796	20.9%
Vacancy Rate	7.3%	8.5%	+1.2

Data Source: 2008-2012 and 2018-2022 5-Year American Community Survey Table B25002

Housing Structure

Jurisdictions with a variety of housing structure types are better able to meet the needs of all residents, including different members of protected classes. Multifamily housing, including rental apartments, are often more affordable rental options than single-family homes for low- and moderate-income households, who are disproportionately likely to be non-white households. Multifamily units may also be the preference of some elderly and disabled householders who are unable or do not desire to maintain a single-family home.

Table 6 shows housing units by structure types in Davenport, Moline, Rock Island, and the Davenport-Moline-Rock Island, IA-IL metropolitan area. Single family detached homes are the predominant housing type, making up about 66% to 74% of housing units in all four areas. Single-family detached units make up the greatest share of housing in the MSA and Moline (73.5% and 70.1%), while Davenport and Rock Island have slightly lower shares (65.7% and 68.5%, respectively). Davenport has the largest share of units that are not single-family detached (34.5%), followed by Rock Island (31.4%).

After single-family detached homes, units in large multifamily buildings of 10 or more units are the next most common housing type (about 10% to 15% of units across the four areas). Units in small multifamily buildings of five to nine units make up about 5% to 6% of units across Davenport, Moline, and Rock Island, while making up a slightly smaller share in the MSA as a whole (3.9%). Single-family attached homes, duplexes, and triplexes/quadruplexes each make up about 3% to 5% of units across the four areas, while mobile homes or other types of housing make up about 1% to 3% of housing units. Relative to the MSA, the tri-cities each have a slightly larger share of units in 'missing middle' housing types of two to nine units (about 12% to 13% compared to 9.5% in the MSA).

The high shares of single family-detached structures in the area may pose limitations on residents in obtaining housing in units of other housing types, including 'missing middle' housing, such as duplexes, triplexes, quadruplexes, units in small apartment buildings, or other housing types that may provide opportunities for increased affordability, variety in housing unit size, or specific amenities or opportunities for social connection. When neighborhoods contain a concentration of similar housing types, residents may find it difficult to obtain housing that meets their needs or to remain in their neighborhoods of choice as they experience life changes.

TABLE 6 – HOUSING UNITS BY STRUCTURE TYPE

Structure Type	Davenport		Moline		Rock Island		Davenport-Moline-Rock Island, IA-IL Metro Area	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Occupied housing units	42,667	100%	18,267	100%	15,247	100%	159,072	100%
1 unit, detached	28,014	65.7%	12,800	70.1%	10,448	68.5%	116,913	73.5%
1 unit, attached	1,825	4.3%	991	5.4%	608	4.0%	6,995	4.4%
2 units	1,479	3.5%	615	3.4%	738	4.8%	4,406	2.8%
3 or 4 units	1,141	2.7%	716	3.9%	462	3.0%	4,488	2.8%
5-9 units	2,723	6.4%	938	5.1%	768	5.0%	6,208	3.9%
10 or more units	6,426	15.1%	2,027	11.1%	2,039	13.4%	16,440	10.3%
Mobile home or other type of housing	1,059	2.5%	180	1.0%	184	1.2%	3,622	2.3%

Source: American Community Survey, 2018-2022 5-Year Estimates, Table S2504

Housing Tenure and Size (by Number of Bedrooms)

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

Table 7 details housing units by the number of bedrooms and resident tenure (renters or homeowners). In Davenport, Moline, Rock Island, and the MSA, the majority (about 66% to 77%) of owner-occupied units have three or more bedrooms. Another 21% to 26% of owner-occupied units have two bedrooms. Studio and one-bedroom units are the least common owner-occupied units in all four areas, together comprising about 2% to 4% of units.

Compared to owner-occupied units, rental units tend to have fewer bedrooms. Two-bedroom units are the most common renter-occupied housing size, comprising about 40% to 47% of unit. One-bedroom units are the next most common, comprising about 25% to 32% of renter-occupied units across the four areas. Three-bedroom units are significantly less common among renter-occupied units than homeowner units, making up about 16% to 20% of renter-occupied units. Studios and units with four or more bedrooms each make up about 4% to 8% of all rented units in the three areas.

The low shares of owner-occupied units with zero to two bedrooms across the Tri-Cities points to challenges for homebuyers seeking smaller housing units that may provide increased levels of affordability and have lower maintenance costs. Renter households with large families, to the contrary, may experience challenges securing housing with more than three bedrooms.

TABLE 7 – HOUSING UNITS BY SIZE AND TENURE

Number of Bedrooms	Davenport		Moline		Rock Island		Davenport-Moline-Rock Island, IA-IL Metro Area	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Owner-Occupied Housing Units								
Zero	11	0.0%	54	0.4%	0	0.0%	241	0.2%
One	566	2.1%	286	2.4%	350	3.7%	2,292	2.0%
Two	5,863	22.1%	3,137	25.9%	2,933	30.8%	23,934	21.3%
Three	13,084	49.3%	6,095	50.3%	4,469	47.0%	55,049	49.0%
Four or more	7,012	26.4%	2,548	21.0%	1,758	18.5%	30,918	27.5%
Total	26,536	100%	12,120	100%	9,510	100%	112,434	100%
Renter-Occupied Housing Units								
Zero	795	4.9%	445	7.2%	343	6.0%	2,439	5.2%
One	4,641	28.8%	1,515	24.6%	1,838	32.0%	12,581	27.0%
Two	6,966	43.2%	2,825	46.0%	2,225	38.8%	19,497	41.8%
Three	2,932	18.2%	1,089	17.7%	893	15.6%	9,159	19.6%
Four or more	797	4.9%	273	4.4%	438	7.6%	2,962	6.4%
Total	16,131	100%	6,147	100.0%	5,737	100%	46,638	100%

Note: Unoccupied units are not included in this table because tenure data is not available for these units.

Data Source: 2018-2022 5-Year American Community Survey, Table B25042

Age of Housing

An assessment of the region's housing conditions can provide a basis for developing policies and programs to maintain and preserve the quality of the housing stock. The age of housing can have a substantial impact on housing conditions and costs. As housing ages, maintenance costs rise, which can present significant affordability issues for low- and moderate-income homeowners. Aging rental stock can lead to rental rate increases to address physical issues or deteriorating conditions if building owners defer or ignore maintenance needs. Deteriorating housing can also depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. Homes built prior to 1950 have a high likelihood of containing lead-based paint. However, the use of lead-based paint did not end until 1978 and may affect an even larger number of area households.

Development of new market-rate and subsidized housing units can support housing affordability and reduce displacement of lower-income residents. In contrast, areas with growing populations in which few new housing units are built tend to experience housing shortages and reduced affordability. Subsidized units, such as those built with low-income housing tax credits and other federal and state subsidies, have been found to be particularly protective in reducing displacement.

Data on age of housing points to an older housing stock in Moline and Rock Island relative to Davenport and the MSA and a decline in construction of new units since 2010 across the Tri-Cities and the region. An estimated 48.1% and 41.2% of units in Rock Island and Moline, respectively, are in structures built in 1949 or earlier, while in Davenport and the MSA these shares are much lower (about 30% to 31%). About 38% to 41% of units in the four areas were built between 1950 and 1979. Davenport and the MSA contain a greater share of newer housing, with about 29% of units built in 1980 and later, compared to just 13.7% in Rock Island and 17.8% in Moline. Slightly higher shares of units in Davenport and the region were built in 2010 or later (4.4% and 5.4%, or 2,051 and 9,355 units, respectively), than in Moline and Rock Island (2.4% in both areas, or 484 and 402 units, respectively). The older housing stock in the Tri-Cities, and in Rock Island and Moline in particular, may pose both economic and public health challenges, particularly for individuals and families living in older housing units.

TABLE 8 – AGE OF HOUSING STOCK

Year Structure Built	Davenport		Moline		Rock Island		Davenport-Moline-Rock Island, IA-IL Metro Area	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
2010 to 2022	2,051	4.4%	484	2.4%	402	2.4%	9,355	5.4%
2000 to 2009	3,801	8.1%	633	3.2%	631	3.7%	13,455	7.7%
1990 to 1999	4,257	9.1%	884	4.5%	495	2.9%	14,641	8.4%
1980 to 1989	3,435	7.3%	1,513	7.6%	793	4.7%	12,485	7.2%
1970 to 1979	7,413	15.8%	2,519	12.7%	1,657	9.8%	27,763	16.0%
1960 to 1969	5,997	12.8%	2,649	13.4%	1,987	11.7%	23,315	13.4%
1950 1959	5,151	11.0%	2,965	15.0%	2,850	16.8%	20,886	12.0%
1949 or earlier	14,725	31.4%	8,148	41.2%	8,170	48.1%	51,968	29.9%
TOTAL	46,830	100%	19,795	100%	16,985	100%	173,868	100%

Data Source: 2018-2022 5-Year American Community Survey, Table B25034

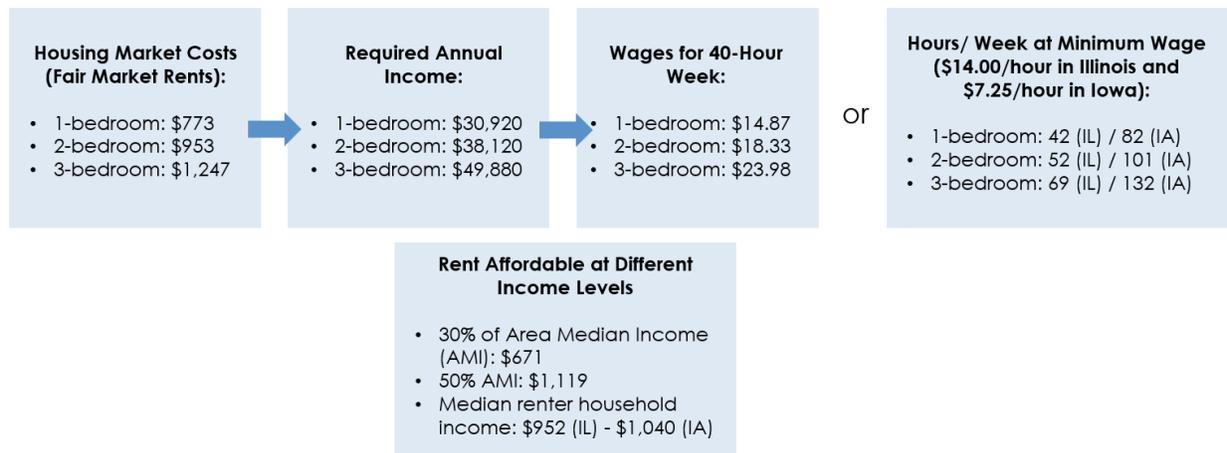
Housing Costs and Affordability

The most common housing needs identified by stakeholders are related to affordability, particularly for low- and moderate-income households. Many residents who participated in the community engagement process noted that housing costs frequently rise faster than wages, which creates affordability issues for households who already have tight budgets. A lack of affordable housing options frequently leads to cost burden, as described in the next section titled Housing Needs.

Housing Cost by Unit Size

The National Low Income Housing Coalition’s annual *Out of Reach* report examines rental housing rates relative to income levels for counties throughout the U.S. Figure 25 below shows annual household income and hourly wages needed to afford Fair Market Rents (FMRs) in the Davenport-Moline-Rock Island MSA for one-, two-, and three-bedroom rental units in 2024.

FIGURE 25– REQUIRED INCOME, WAGES, AND HOURS TO AFFORD FAIR MARKET RENTS IN BLACK HAWK COUNTY, IOWA



Housing Coalition Out of Reach 2024, Accessed from <https://nlihc.org/oor/state/il>

Fair Market Rent (FMR) is a standard set by HUD at the county or regional level for use in administering its Section 8 rental voucher program. FMRs are typically the 40th percentile gross rent (i.e., rent plus utility costs) for typical, non-substandard rental units in the local housing market.

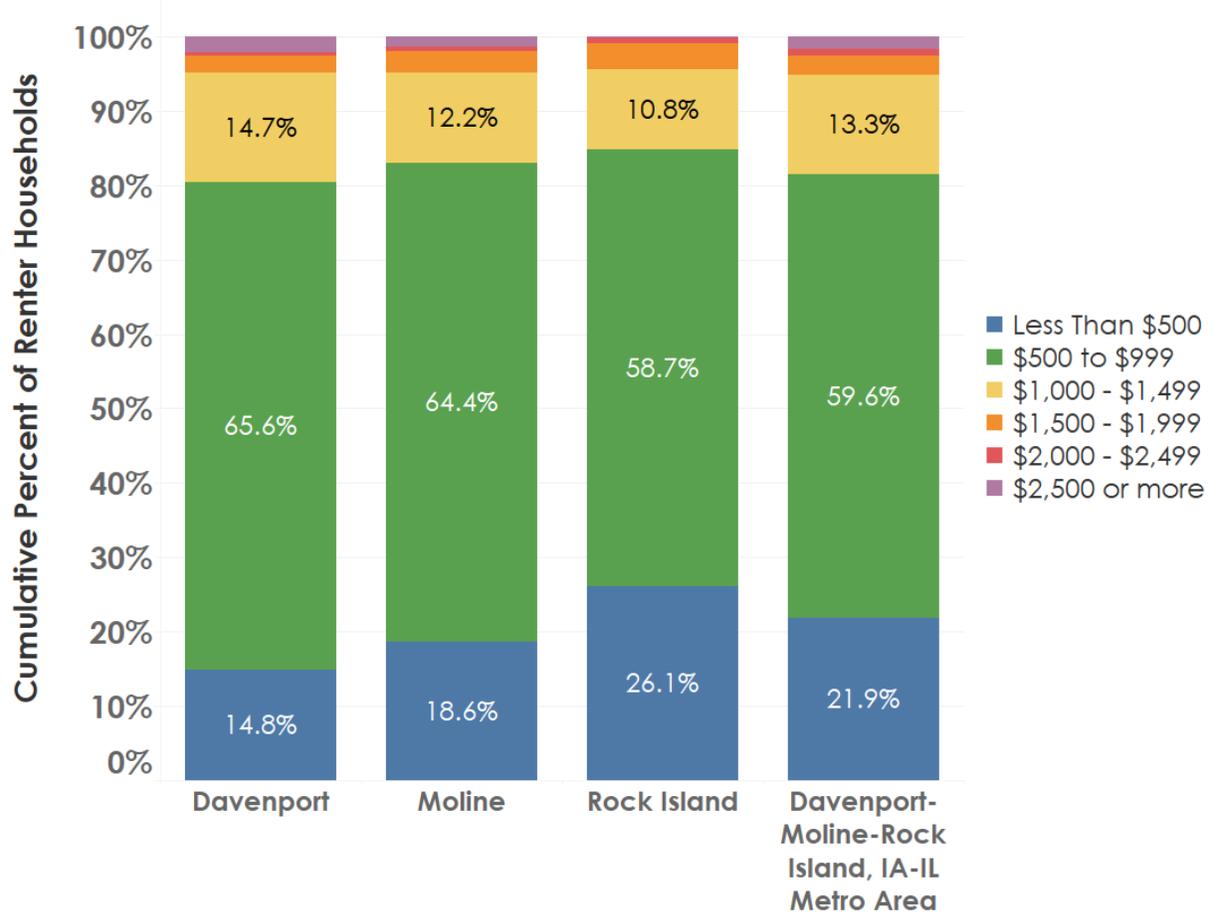
As shown in Table 7, the most common rental unit size in the Tri-Cities is a two-bedroom unit. In the Davenport-Moline-Rock Island MSA, the average rental cost for a two-bed unit was \$953 per month in 2024. To afford this rent without being cost burdened (i.e. spending more than 30% of income on housing), a household would require an annual income of \$38,120. This amount translates to a 52-hour work week

at a wage of \$14 per hour (the minimum wage in Illinois) or 101-hour work week at a wage of \$7.25 per hour (the minimum wage in Iowa). A household earning the median renter household income could afford a two-bedroom unit if available at the fair market rent of \$953 but would have difficulty affording a three-bedroom unit at the fair market rent of \$1,247.

Overall, this data indicates that low incomes make housing at fair market rents unaffordable to individuals earning the minimum wage and, in some cases, the average renter wage in the Davenport-Moline-Rock Island MSA. Individuals earning the median renter household income and working a 40-hour work week are unable to afford a three-bedroom housing unit at fair market rent, which has implications for families of all sizes, but especially larger families and single-parent families.

The American Community Survey also provides estimates on monthly renter and homeowner costs. This data indicates that rental housing in Rock Island and the MSA tends to be slightly more affordable relative to that in Davenport and Moline. As of the 2018-2022 American Community Survey five-year estimates, about 80% to 85% of renter households in the Tri-Cities and the MSA spend less than \$1,000 per month on rent, with slightly greater shares of households in Rock Island and the MSA spending under \$500 per month (26.1% and 21.9%, respectively, compared to 18.6% and 14.8% in Moline and Davenport, respectively). Across the four areas, about 14% to 17% of households spend \$1,000 to \$1,999 on rent, while only about 1% to 3% of households spend \$2,000 or more. More recent data from the Zumper database shows average rents in Davenport at \$875 to \$1,066 for a two-bedroom unit and \$1,252 to \$1,580 for a three-bedroom unit as of November 2024, indicating sharp increases in rental costs in recent years. Renters earning the median renter household income may thus find it difficult to find housing in the Tri-Cities at an affordable rate for their income level.

FIGURE 26. CONTRACT RENT, 2018-2022

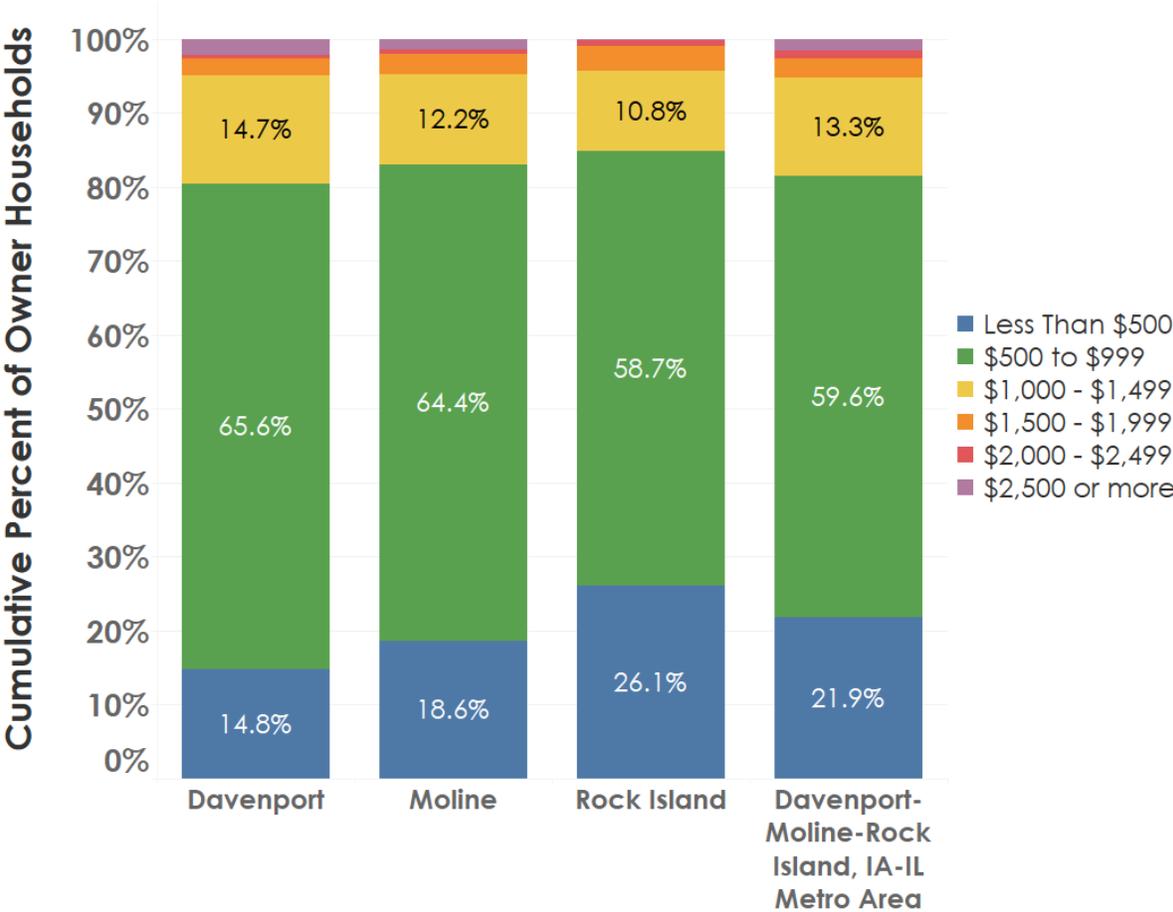


For many households in the area, homeownership is more expensive than renting. As of the American Community Survey five-year estimates for 2018-2022, the share of homeowners spending \$1,500 or more per month on housing ranges from 17.7% in Rock Island to 26.5% in the MSA—larger shares than the estimated 4% to 5% of renter households spending within this same range. Owner households are also significantly more likely to spend \$2,000 or more per month on housing costs than renters (about 8% to 13% of homeowner households, compared to about 1% to 3% of renter households).

More recent data from Zillow’s Home Value Index (ZHVI) estimates the typical home value in Davenport as \$172,876 as of September 2024, a 26.7% increase over the typical value of \$136,466 in September 2019. Home values in the metro increased at a similar rate of 24.0%, from \$141,400 in 2019 to \$175,266 in 2024. Housing values in Moline and Rock Island started lower in 2019 and increased at slightly lower rates over the time period: Home values in Moline increased by 18.4%, from \$119,589 in 2019 to \$141,616 in 2024, and home values in Rock Island increased 22.3%, from \$100,397 in 2019 to \$122,770 in 2024.

While these values indicate greater affordability in Moline and Rock Island relative to Davenport and the metro area, they indicate steep increases in home prices in recent years that may serve as barriers to homeownership for lower-income residents. As home values and interest rates have increased, renting is generally more accessible to low-to-moderate income families than homeownership in the Tri-Cities.

FIGURE 27. MONTHLY OWNER COSTS, 2018-2022



Housing Needs

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

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

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

To assess housing need, HUD receives a special tabulation of data from the U. S. Census Bureau's American Community Survey (ACS) that is largely not available through standard Census products. This data, known as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combinations of HUD-specified criteria, such as housing needs by race and ethnicity. CHAS data for Davenport, Moline, and Rock Island is shown below in Tables 9 through 11. Table 9 shows overall likelihood of housing problems by race or ethnicity regardless of income, while Tables 10 and 11 show rates of housing problems and severe housing problems by race, ethnicity, and income band up to 100% HAMFI.

White, non-Hispanic households account for the majority of households across the Tri-Cities (about 71% to 81% of households in each area), followed by Black households (about 8% to 18%) and Hispanic households (about 7% to 13%). Other races and ethnicities make up much smaller shares of households across the cities (see Table 9).

Black and Native American households in Davenport, Moline, and Rock Island experience housing problems at disproportionate rates:²⁰ about 41% to 43% of Black

²⁰ HUD defines a group as having a disproportionate need if its members experience housing needs at a rate that is ten percentage points or more above that of the entire population at that income level.

households have at least one of the four housing problems, and 53% to 90% of Native American households have a housing problem. In Rock Island, Asian and Hispanic households also experience housing problems at disproportionate rates (52.7% and 39.6%, respectively). While the total numbers of households are small, the 20 Pacific Islander households in Moline and Rock Island all experience housing problems (100% of the 10 Pacific Islander households in each city).

Housing problems are more prevalent for households with lower incomes than for those with higher incomes. Across the three cities, about 75% to 78% of households with incomes of 30% HAMFI or below have one or more housing problems, while the same is true for only about 11% to 16% of households with incomes of 81% to 100% HAMFI. Table 10 shows that the subgroups most likely to have a housing problem when accounting for income, race, and ethnicity are Native American households with incomes of 80% HAMFI or less and Asian, Pacific Islander, and Hispanic households with incomes of 30% HAMFI or less.

Severe housing problems are also significantly more common for households with lower incomes. Across the three cities, about 58% to 72% of households with incomes of 30% HAMFI or below have one or more housing problems, while the same is true for only about 3% to 6% of households with incomes of 81% to 100% HAMFI. Table 11 shows that the subgroups most likely to have a severe housing problem are Pacific Islander households and Hispanic households with incomes of 30% HAMFI or less.

TABLE 9 – HOUSING PROBLEMS BY RACE OR ETHNICITY

Household Demographics	Davenport			Moline			Rock Island		
	Total Households	# with Housing Problems	% with Housing Problems	Total Households	# with Housing Problems	% with Housing Problems	Total Households	# with Housing Problems	% with Housing Problems
Housing Problems									
White, non-Hispanic	32,830	7,990	24.3%	13,785	3,445	25.0%	10,645	2,465	23.2%
Black, non-Hispanic	4,219	1,800	42.7%	1,297	527	40.6%	2,689	1,154	42.9%
Asian, non-Hispanic	825	275	33.3%	358	48	13.4%	370	195	52.7%
American Indian or Alaska Native, non-Hispanic	94	50	53.2%	12	8	66.7%	40	36	90.0%
Pacific Islander, non-Hispanic	25	0	0.0%	10	10	100.0%	10	10	100.0%
Hispanic, any race	2,744	759	27.7%	2,389	810	33.9%	1,300	515	39.6%
Total	40,737	10,874	26.7%	17,851	4,848	27.2%	15,054	4,375	29.1%

Source: 2017-2021 CHAS Data

TABLE 10 –HOUSING PROBLEMS BY RACE AND ETHNICITY AND INCOME UP TO 100% HAMFI

Household Demographics	Davenport			Moline			Rock Island		
	Total Households	# with Housing Problems	% with Housing Problems	Total Households	# with Housing Problems	% with Housing Problems	Total Households	# with Housing Problems	% with Housing Problems
0-30% HAMFI									
White, non-Hispanic	3,775	2,880	76.3%	1,740	1,430	82.2%	1,440	1,090	75.7%
Black, non-Hispanic	1,205	945	78.4%	350	140	40.0%	1,045	715	68.4%
Asian, non-Hispanic	165	140	84.8%	50	40	80.0%	75	75	100.0%
American Indian or Alaska Native, non-Hispanic	30	20	66.7%	4	4	100.0%	14	14	100.0%
Pacific Islander, non-Hispanic	0	0	--	10	10	100.0%	10	10	100.0%
Hispanic, any race	350	220	62.9%	314	300	95.5%	170	170	100.0%
Total	5,525	4,205	76.1%	2,468	1,924	78.0%	2,754	2,074	75.3%
31-50% HAMFI									
White, non-Hispanic	3,840	2,605	67.8%	1,585	1,020	64.4%	1,290	775	60.1%
Black, non-Hispanic	684	360	52.6%	465	285	61.3%	440	320	72.7%
Asian, non-Hispanic	65	35	53.8%	20	0	0.0%	55	25	45.5%
American Indian or Alaska Native, non-Hispanic	0	0	--	4	4	100.0%	10	10	100.0%
Pacific Islander, non-Hispanic	0	0	--	0	0	--	0	0	--
Hispanic, any race	620	350	56.5%	545	255	46.8%	240	155	64.6%
Total	5,209	3,350	64.3%	2,619	1,564	59.7%	2,035	1,285	63.1%

Household Demographics	Davenport			Moline			Rock Island		
	Total Households	# with Housing Problems	% with Housing Problems	Total Households	# with Housing Problems	% with Housing Problems	Total Households	# with Housing Problems	% with Housing Problems
51-80% HAMFI									
White, non-Hispanic	5,800	1,640	28.3%	2,070	615	29.7%	2,135	360	16.9%
Black, non-Hispanic	825	240	29.1%	144	64	44.4%	480	85	17.7%
Asian, non-Hispanic	230	70	30.4%	59	4	6.8%	115	80	69.6%
American Indian or Alaska Native, non-Hispanic	0	0	--	0	0	--	8	8	100.0%
Pacific Islander, non-Hispanic	25	0	0.0%	0	0	--	0	0	--
Hispanic, any race	370	125	33.8%	395	115	29.1%	295	70	23.7%
Total	7,250	2,075	28.6%	2,668	798	29.9%	3,033	603	19.9%
81-100% HAMFI									
White, non-Hispanic	4,060	495	12.2%	1,290	120	9.3%	1,055	65	6.2%
Black, non-Hispanic	520	230	44.2%	124	34	27.4%	260	0	0.0%
Asian, non-Hispanic	30	0	0.0%	0	0	--	40	0	0.0%
American Indian or Alaska Native, non-Hispanic	34	30	88.2%	0	0	--	0	0	--
Pacific Islander, non-Hispanic	0	0	--	0	0	--	0	0	--
Hispanic, any race	239	4	1.7%	375	55	14.7%	250	110	44.0%
Total	4,883	759	15.5%	1,789	209	11.7%	1,605	175	10.9%

Source: 2017-2021 CHAS Data

TABLE 11 –SEVERE HOUSING PROBLEMS BY RACE AND ETHNICITY AND INCOME UP TO 100% HAMFI

Household Demographics	Davenport			Moline			Rock Island		
	Total Households	# with Severe Housing Problems	% with Housing Problems	Total Households	# with Severe Housing Problems	% with Housing Problems	Total Households	# with Severe Housing Problems	% with Housing Problems
0-30% HAMFI									
White, non-Hispanic	3,775	2,490	66.0%	1,745	1,305	74.8%	1,440	840	58.3%
Black, non-Hispanic	12,05	790	65.6%	350	140	40.0%	1,045	550	52.6%
Asian, non-Hispanic	165	90	54.5%	50	40	80.0%	80	65	81.3%
American Indian or Alaska Native, non-Hispanic	29	4	13.8%	4	4	100.0%	14	14	100.0%
Pacific Islander, non-Hispanic	0	0	--	10	10	100.0%	10	10	100.0%
Hispanic, any race	350	205	58.6%	315	275	87.3%	170	125	73.5%
Total	5,524	3,579	64.8%	2,474	1,774	71.7%	2,759	1,604	58.1%
31-50% HAMFI									
White, non-Hispanic	3,845	840	21.8%	1,590	265	16.7%	1,285	355	27.6%
Black, non-Hispanic	679	44	6.5%	460	125	27.2%	450	215	47.8%
Asian, non-Hispanic	65	0	0.0%	20	0	0.0%	55	10	18.2%
American Indian or Alaska Native, non-Hispanic	0	0	--	4	0	0.0%	10	0	0.0%
Pacific Islander, non-Hispanic	0	0	--	0	0	--	0	0	--
Hispanic, any race	615	80	13.0%	540	85	15.7%	240	50	20.8%
Total	5,204	964	18.5%	2,614	475	18.2%	2,040	630	30.9%
51-80% HAMFI									
White, non-Hispanic	5,795	305	5.3%	2,070	65	3.1%	2,130	30	1.4%

Household Demographics	Davenport			Moline			Rock Island		
	Total Households	# with Severe Housing Problems	% with Housing Problems	Total Households	# with Severe Housing Problems	% with Housing Problems	Total Households	# with Severe Housing Problems	% with Housing Problems
Black, non-Hispanic	830	110	13.3%	145	45	31.0%	480	40	8.3%
Asian, non-Hispanic	230	40	17.4%	59	0	0.0%	115	55	47.8%
American Indian or Alaska Native, non-Hispanic	0	0	--	0	0	--	8	0	0.0%
Pacific Islander, non-Hispanic	25	0	0.0%	0	0	--	0	0	--
Hispanic, any race	370	45	12.2%	395	35	8.9%	294	4	1.4%
Total	7,250	500	6.9%	2,669	145	5.4%	3,027	129	4.3%
81-100% HAMFI									
White, non-Hispanic	4,055	225	5.5%	1,290	65	5.0%	1,055	35	3.3%
Black, non-Hispanic	515	0	0.0%	119	4	3.4%	260	0	0.0%
Asian, non-Hispanic	30	0	0.0%	0	0	--	40	0	0.0%
American Indian or Alaska Native, non-Hispanic	34	30	88.2%	0	0	--	0	0	--
Pacific Islander, non-Hispanic	0	0	--	0	0	--	0	0	--
Hispanic, any race	235	0	0.0%	375	30	8.0%	250	10	4.0%
Total	4,869	255	5.2%	1,784	99	5.5%	1,605	45	2.8%

Source: 2017-2021 CHAS Data

Homeownership and Lending

Homeownership is vital to a community's economic well-being. It provides the opportunity to build wealth, is generally associated with higher levels of civic engagement,²¹ and is correlated with positive cognitive and behavioral outcomes among children.²²

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968, along with continuing impediments to access, have had significant impacts on the homeownership rates of racial and ethnic minorities, particularly Black and Hispanic populations. The gap between the white and Black homeownership rate is the largest among racial and ethnic groups. In 2022, the U.S. Census Bureau reported a 25.4 percentage point gap in homeownership rate between white and Black households, representing a slight widening of the gap since 2002 (24.3 percentage points). Over the same period, the gap in the homeownership rate between white and Hispanic households narrowed from 24.7 to 21.8 percentage points.²³

Homeownership trends have changed in recent years because of significant events in the housing market and labor force. The homeownership rate for Millennials (the generation born between 1981 and 1997) is eight percentage points lower than the two previous generations, controlling for age. This discrepancy can be attributed to a multitude of factors ranging from preference for urban areas, cost of education and associated debt, changes in marriage and childbearing patterns, rising housing costs, and the current supply of affordable housing.²⁴

Homeownership rates across Davenport, Moline, and Rock Island are highest among white households and households identifying as 'some other race' (about 65% to 75% across the three cities), and lowest among Black households (about 28% to 34%).

The map that follows shows the homeownership rate by census tract in Davenport, Moline, and Rock Island. Homeownership rates are highest in parts of east Davenport, west Moline, and central Rock Island, where they top 90% in five census tracts. Rates

²¹ Manturuk K, Lindblad M, Quercia R. "Homeownership and civic engagement in low-income urban neighborhoods: a longitudinal analysis." *Urban Affairs Review*. 2012;48(5):731-60.

²² Haurin, Donald R. et al. "The Impact of Homeownership on Child Outcomes." *Low-Income Homeownership Working Paper Series*. Joint Center for Housing Studies of Harvard University. October 2001, <http://www.jchs.harvard.edu/sites/default/files/liho01-14.pdf>.

²³ U.S. Census Bureau. *Homeownership Rates by Race and Ethnicity of Householder: 1994 to 2017*.

²⁴ Choi, Jung et al. "Millennial Homeownership: Why Is It So Low, and How Can We Increase It?" *The Urban Institute*. July 2018. www.urban.org/sites/default/files/publication/98729/millennial_homeownership_0.pdf.

are lowest in south Davenport, north Moline, and north Rock Island along the Mississippi River, where they fall below 25% in four census tracts.

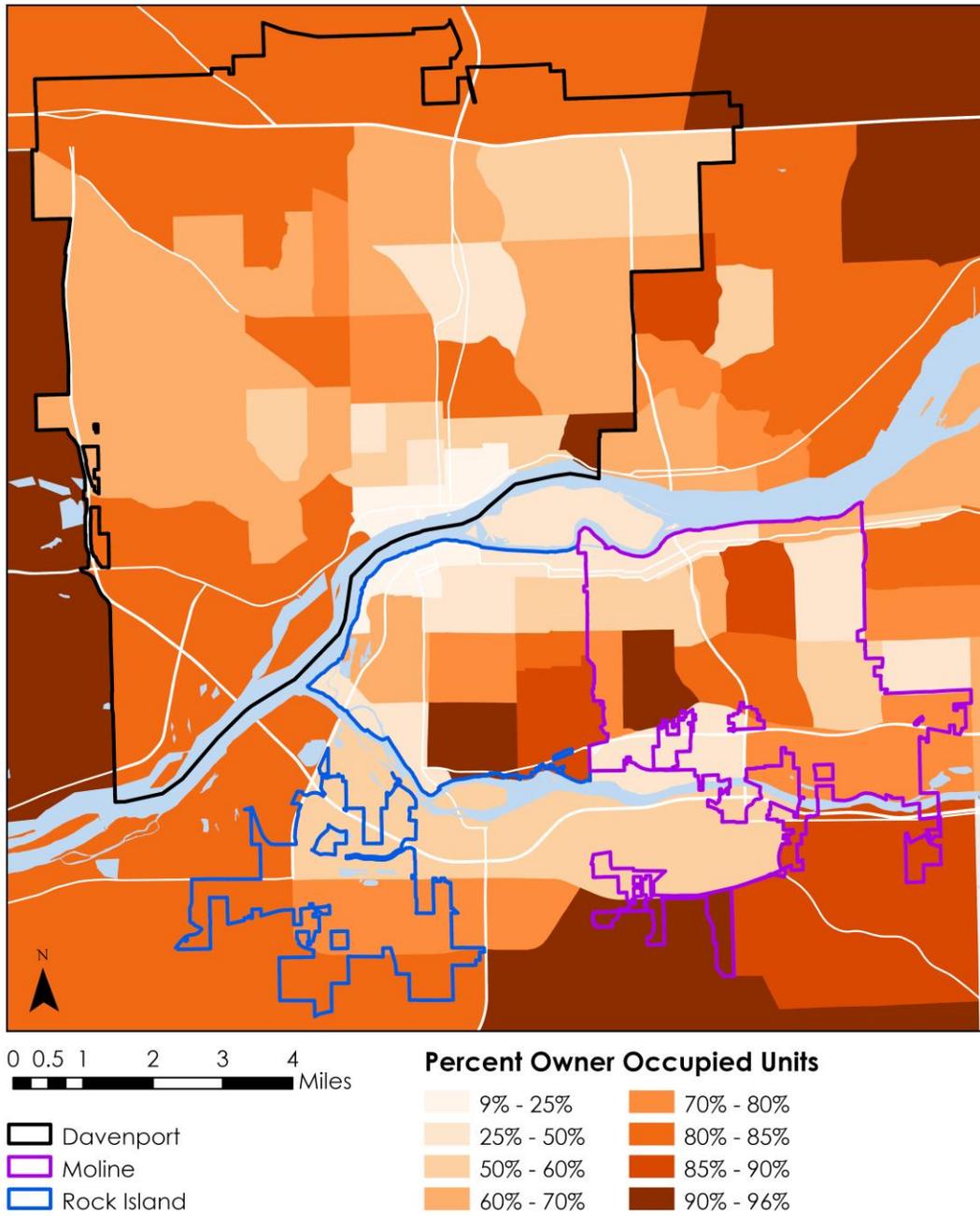
TABLE 12 – HOMEOWNERSHIP AND RENTAL RATES BY RACE AND ETHNICITY

Householder Race/Ethnicity	Davenport			Moline			Rock Island		
	Owner Households	Renter Households	Home-ownership Rate	Owner Households	Renter Households	Home-ownership Rate	Owner Households	Renter Households	Home-ownership Rate
Non-Hispanic									
White	23,449	11,629	66.8%	10,319	4,378	70.2%	7,806	3,527	68.9%
Black	1,191	3,095	27.8%	458	958	32.3%	875	1,677	34.3%
Asian/ Pacific Islander	392	379	50.8%	155	231	40.2%	220	171	56.3%
Native American	95	104	47.7%	15	0	100.0%	27	22	55.1%
2+ Races	986	779	55.9%	587	265	68.9%	348	228	60.4%
Other	423	145	74.5%	586	315	65.0%	234	112	67.6%
Hispanic	1,583	1,239	56.1%	1,538	776	66.5%	813	484	62.7%
Total	26,536	16,131	62.2%	12,120	6,147	66.3%	9,510	5,737	62.4%

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

Source: 2018-2022 American Community Survey, Table S2502

FIGURE 28 – HOMEOWNERSHIP RATE BY CENSUS TRACT IN DAVENPORT, MOLINE, AND ROCK ISLAND, 2018-2022



Source: 2018-2022 American Community Survey, Table DP05

Mortgage Lending

Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The proceeding data and analysis assesses the degree to which the housing needs of residents are being met by home loan lenders.

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

The national 2023 HMDA data consists of information for 10 million home loan applications reported by 5,113 home lenders including banks, savings associations, credit unions, and mortgage companies.²⁵ HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and information about loan applicants such as sex, race, ethnicity, and income. 300 financial institutions reported HMDA data for Scott County, IA and Rock Island County, IL in 2023.

Applicants in the two counties submitted a total of 10,394 home purchase loan applications in 2023. The following analysis looks at 3,912 applications in the counties in which the mortgage was applied for as a first lien, including conventional, FHA-insured, VA-guaranteed, and FSA / RHS-guaranteed loans for single-family homes. Within each record, some data variables are 100% reported— “Loan Type,” “Loan Amount,” and “Action Taken,” for example—but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, Internet, or phone in which the applicant may have declined to identify their sex, race, and/or ethnicity. Records for applications with missing race and ethnicity data are included in a separate category entitled “No Race or Ethnicity Given.” This data does not include seller-financed loans.

Looking at first-lien applications for single-family homes completed in 2023, about two-thirds of applications in the counties were completed by white applicants (2,578 applications, or 65.9%). Hispanic, Black, and Asian applicants each submitted about 3% to 9% of applications (360, 193, and 117 applications, respectively). 16.7% of applications were submitted jointly by applicants of different races, by applicants of two or more minority races, or by applicants who did not provide race or ethnicity

²⁵ Federal Financial Institutions Examination Council. “FFIEC Publishes 2023 Data on Mortgage Lending.” July 11, 2024. <https://www.ffiec.gov/press/pr071124.htm>

data (653 applications). Native American applicants submitted 0.3% of all applications (11 applications).

The tables that follow show loan approval rates for completed loan applications by race and ethnicity at various income levels in Scott County and Rock Island County.²⁶ The Median Family Income in the Davenport-Moline-Rock Island, IA-IL HUD Metro FMR Area is \$88,400, according to HUD's FY 2023 Income Limits. The income tiers below represent low-income applicants earning up to 80% AMI (\$70,720), middle-income applicants earning 80% to 120% AMI (\$70,720 to \$106,080), and high-income applicants earning more than 120% AMI (over \$106,080). In 2023, there were 297 applications for which income was not reported. These applications are included in the totals under "all applicants." Excluded from these figures are applications that were withdrawn or closed due to incompleteness such that no decision was made regarding approval or denial.

Mortgage Denials

HMDA data indicates that 6.4% of first-lien mortgage applications for single-family homes in the county were denied in 2023. 9.8% of all applications from low-income earners were denied. Among middle-income earners, 5.9% of applicants were denied a loan, and 3.2% of applications from high-income earners were denied.

Looking at these figures by race and ethnicity, Asian, Black, and Hispanic applicants were denied mortgages at significantly higher rates (about 11% to 12%) than the counties' average rate of 6.4%. Native American applicants also experienced a higher rate of mortgage denial (9.1%), although total numbers of applicants were low (11). White applicants in the county experienced the lowest rates of denial (4.8%). Overall, Asian, Black, and Hispanic applicants in the counties were about 2.3 to 2.5 times as likely to be denied a loan as white applicants.

Low-Income Applicants

9.8% of low-income mortgage loan applicants were denied a mortgage loan. Low-income applicants identifying as Native American, Asian, and Hispanic experienced the highest rates of mortgage denial (25.0%, 16.2%, and 14.1%, respectively). White applicants were denied a mortgage at the lowest rates of all low-income applicants (7.4%).

²⁶ The low-income category includes applicants with a household income at or below 80% of area median family income (MFI). The middle-income range includes applicants with household incomes from 81% to 120% MFI, and the upper income category consists of applicants with a household income above 120% MFI.

Middle-Income Applicants

Middle-income applicants, earning between 80% to 120% MFI, were denied mortgages at a rate of 5.9%. At this income level, Black applicants were denied at the highest rates (13.0%), while white and Native American households were least likely to be denied (4.3% and 0.0%, respectively).

High-Income Applicants

At high incomes, 3.2% of applicants experienced a mortgage loan denial. At this income level, Asian/ Pacific Islander and Hispanic/ Latino applicants experienced denials at the highest rates (11.7.% and 7.0%), while Black, Native American, and white applicants had the lowest rates of denial (0.0%, 0.0%, and 2.3%, respectively).

Reasons for Denial

Reasons for denial are shown in Table 14. White applicants had the largest number of denials (124), followed by Hispanic/Latino and Black applicants (39 and 21, respectively). The primary reason for mortgage loan denial was debt-to-income ratio (81 applicants). Other frequent reasons for loan denial include credit history (44 applicants), collateral (26 applicants), and insufficient cash (23 applicants).

These findings indicate disparities in access to mortgage loans in the service area, particularly for Asian/Pacific Islander, Black, and Hispanic/Latino applicants. Denials based on a high debt-to-income ratio and credit history indicate that many applicants struggle with long-term financial instability, which creates additional barriers to accessing a mortgage. Denials based on collateral indicate that the value of a requested loan is high relative to the appraised value of a home, creating loan-to-value ratios that fall above lenders' thresholds. The data suggests that additional resources are needed to stabilize the path to homeownership, including support for homebuyer readiness classes or other pre-application assistance, down payment assistance programs, and wider-ranging social support for households to improve their chances of securing mortgage loans.

TABLE 13 – HOME PURCHASE LOAN APPROVAL RATES IN SCOTT COUNTY AND ROCK ISLAND COUNTY BY RACE AND ETHNICITY, 2023

Applicant Income		Applicant Race and Ethnicity						All Applicants
		Non-Latino					Latino/ Hispanic	
		White	Black	Asian/ Pacific Islander	Native American	Other/ Race Not Available		
Low Income	Completed Applications	1,061	116	37	4	143	184	1,545
	Denial Rate	7.4%	12.1%	16.2%	25.0%	17.5%	14.1%	9.8%
Middle Income	Completed Applications	630	54	18	2	108	102	914
	Denial Rate	4.3%	13.0%	5.6%	0.0%	10.2%	7.8%	5.9%
High Income	Completed Applications	862	22	60	5	136	71	1,156
	Denial Rate	2.0%	0.0%	11.7%	0.0%	5.9%	7.0%	3.2%
All Applicants	Completed Applications	2,578	193	117	11	653	360	3,912
	Denial Rate	4.8%	10.9%	12.0%	9.1%	7.8%	10.8%	6.4%

Note: Applications in which no income information was listed were excluded.

Data Source: FFIEC 2023 Home Mortgage Disclosure Act Data, Accessed via <https://ffiec.cfpb.gov/data-browser/data/2023?category=counties&items=19163,17161>

TABLE 14 – HOME PURCHASE LOAN DENIAL REASONS IN SCOTT COUNTY AND ROCK ISLAND COUNTY BY RACE AND ETHNICITY, 2023

Applicant Income	Applicant Race and Ethnicity								All Applicants
	Non-Latino						Latino/ Hispanic		
	White	Black	Asian	Native American	Other/ Race Not Available				
Denial Reason Provided									
Debt-to-income ratio	38	9	3	1	19			11	81
Employment History	1	1	1	0	2			0	5
Credit history	26	1	3	0	5			9	44
Collateral	16	3	0	0	4			3	26
Insufficient cash (down payment, closing costs)	7	2	1	0	7			6	23
Unverifiable information	5	2	2	0	2			1	12
Credit application incomplete	11	0	2	0	2			1	16
Mortgage insurance denied	0	0	0	0	0			0	0
Other	9	2	0	0	4			3	18
Reason not reported	11	1	2	0	6			5	25
Total denials	124	21	14	1	51			39	250

Note: Applications in which no income information was listed were excluded.

Data Source: FFIEC 2022 Home Mortgage Disclosure Act Data, Accessed via <https://ffiec.cfpb.gov/data-browser/data/2022?category=counties&items=19013>

Zoning, Affordability, and Housing Choice

Comprehensive land use planning is a critical process by which communities address a myriad of public policy issues such as housing, transportation, health, recreation, environmental protection, commercial and retail services, and land values, and address how the interconnection and complexity of these issues can ultimately impact the entire municipality. “The land use decisions made by a community shape its very character – what it’s like to walk through, what it’s like to drive through, who lives in it, what kinds of jobs and businesses exist in it, how well the natural environment survives, and whether the community is an attractive one or an ugly one.”²⁷ Likewise, decisions regarding land use and zoning have a direct and profound impact on affordable housing and fair housing choice, shaping a community or region’s potential diversity, growth, and opportunity for all. Zoning determines where housing can be built, the type of housing that is allowed, and the amount and density of housing that can be provided. Zoning also can directly or indirectly affect the cost of developing housing, making it harder or easier to accommodate affordable housing.

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

Intersection of Local Zoning with Federal and State Fair Housing Laws

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

While local governments have the power to enact zoning and land use regulations, that power is limited by state and federal fair housing laws (e.g., the Illinois Human Rights Act, the Iowa Civil Rights Act, the federal FHAA, the Americans with Disabilities Act, constitutional due process and equal protection), which apply not only to private

²⁷ John M. Levy. *Contemporary Urban Planning, Eighth Edition*. Upper Saddle River, NJ: Pearson Prentice Hall, 2009.

individuals but also to government actions. See H.R. Rep. No. 100-711, at 24 (1988), reprinted in 1988 U.S.C. C.A.N. 2173, 2185 (showing that Congress' intent was that the amendments "would also apply to state or local land use and health and safety laws, regulations, practices or decisions which discriminate against individuals with handicaps"). In a recent landmark disparate impact case under the FHA, the Supreme Court affirmed that part of the FHA's central purpose is to eradicate discriminatory housing practices, including specifically unlawful zoning laws and other housing restrictions. *Tex. Dep't of Hous. & Cmty. Affairs v. Inclusive Cmty. Project, Inc.*, 135 S.Ct. 2507, 2521-2522 (2015) (citing multiple published court opinions involving challenges to local zoning and land use decisions and stating: "Suits targeting such practices reside at the heartland of disparate-impact liability.") Besides intentional discrimination and disparate treatment, discrimination under the FHA also includes

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

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

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

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

Fair housing laws do not preempt local zoning laws but do apply to municipalities and local government units and prohibit them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons. And even where a specific zoning decision does not violate a fair

housing law, HUD entitlement communities must certify annually that they will set and implement standards and policies that protect and advance fair housing choice for all.

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

As of 2024, aside from the Illinois Human Rights Act and the Fair Housing Act, Moline and Rock Island have not adopted their own local fair housing ordinance. However, the Illinois Human Rights Act currently extends protections for protected classes such as prohibiting discrimination in real estate transactions or the interference with fair housing rights. The Illinois Human Rights Act is in accordance with the Fair Housing Act in that it protects against discrimination based on race, color, national origin, religion, sex, familial status, and age.

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

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

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

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

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

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

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

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

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

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

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

TABLE 15. ZONING CODE RISK SCORES

Issue	Risk Scores		
	Moline	Davenport	Rock Island
<p>1a. Does the jurisdiction’s definition of “family” have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive?</p> <p>1b. Does the definition of “family” discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?</p>	2	1	2
<p>2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.?</p> <p>2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?</p>	2	1	2
<p>3a. Do the jurisdiction’s policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements?</p> <p>3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?</p>	1	2	2
<p>4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?</p>	3	2	2
<p>5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?</p>	2	2	3

Issue	Risk Scores		
	Moline	Davenport	Rock Island
6. Does the jurisdiction's zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?	1	1	1
7a. Does the zoning ordinance fail to provide residential districts where multi-family housing is permitted as of right? Are multifamily dwellings excluded from all single-family dwelling districts?	1	1	1
7b. Do multi-family districts restrict development only to low-density housing types?			
8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?	2	2	2
9a. Are the jurisdiction's design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act's accessibility standards for design and construction?	1	1	1
9b. Is there any provision for monitoring compliance?			
10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?	1	2	2
Average Risk Score	1.6	1.5	1.8

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

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

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

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

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

Impact of Zoning Provisions on Affordable Housing

Academic and market research have proven what also is intuitive: land use regulations can directly limit the supply of housing units within a given jurisdiction, and thus contribute to making housing more expensive, i.e. less affordable.²⁸ Zoning policies that impose barriers to housing development and artificially limit the supply of housing units in a given area by making developable land and construction costlier than they are inherently can take different forms and may include: high minimum lot sizes, low density allowances, wide street frontages, large setbacks, low floor area ratios, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, low maximum building heights, restrictions against infill development, restrictions on the types of housing that may be constructed in certain residential zones, arbitrary or antiquated historic preservation standards, minimum off-street parking requirements, restrictions against residential conversions to multi-unit buildings, lengthy permitting processes, development impact fees, and/or restrictions on accessory dwelling units. Where these zoning regulations are not congruent with the actual standards necessary to protect the health and safety of residents and prevent overcrowding, they may not be in express violation of fair housing laws but may nonetheless contribute to exclusionary zoning and have the effect of disproportionately reducing housing choice for moderate to low-income families,

²⁸ See Gyourko, Joseph, Albert Saiz, and Anita A. Summers, A New Measure of the Local Regulatory Environment for Housing Markets: The Wharton Residential Land Use Regulatory Index (2007), available at real.wharton.upenn.edu; Randal O'Toole, The Planning Penalty: How Smart Growth Makes Housing Unaffordable (2006), available at independent.org/pdf/policy_reports/2006-04-03-housing.pdf; Edward L. Glaeser and Joseph Gyourko, The Impact of Zoning on Housing Affordability (2002), available at law.yale.edu/system/files/documents/pdf/hier1948.pdf; The White House's Housing Development Toolkit, 2016, available at whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf.

minorities, persons with disabilities on fixed incomes, families with children, and other protected classes by making the development of affordable housing cost prohibitive.

Missing Middle and Higher-Density Housing

Question 6 examines zoning and land use regulations that have the effect of limiting affordable housing. Large minimum lot sizes tend to increase the overall cost of housing, make it more difficult for residents to obtain housing, increase social segregation, and exacerbate sprawl. Large minimum living areas also tend to increase housing costs by prohibiting the development of smaller units, which tend to be more affordable.

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

Rezoning is a discretionary review process, which makes more sense for large, complex developments, but is less efficient or economical for smaller-scale, less complex projects which often can be effectively reviewed by planning staff in accordance with objective criteria, lowering the risk and cost to developers and making these projects more feasible. Jurisdiction-wide upzoning that opens more neighborhoods to townhomes, duplexes, and small apartment buildings by-right could substantially increase the supply of housing, while also making those communities financially accessible to more families. Smaller lots and homes near transportation and services should take priority. The Cities could also upzone more acreage to medium and high density multifamily and mixed-use zones; adopt minimum density requirements (especially around transit nodes and commercial and public services); and rezone underutilized industrial and/or commercial areas for adaptive residential use. Implementing regulatory changes and incentives to increase missing middle and higher density multifamily housing can ease price pressure on existing home sales as more housing makes it to market.

Multifamily Uses

Questions 7a and 7b inquire if the zoning ordinance allows multifamily uses by right.

Consistent with the adopted Moline Comprehensive Plan, Moline's zoning code and map divide the City's residential districts into a single-family district, R-2, a one to six family district, R-4, a multifamily district, R-6, and a manufactured home district, R-7.

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

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

Density is limited by a maximum number of units per acre of 14 for R-4 and 34 for R-6 and R-7. R-6 and R-7 also require a 1,250 square foot minimum area per unit. Height is restricted to 2.5 stories in R-4 and 12 stories in R-6 and R-7. Floor area ratio is limited but only for non-residential uses. The R-4 district is somewhat restrictive because of the height and maximum density requirements. The R-6 and R-7 districts allow for a fair amount of density, though the 34 units per acre maximum makes any development approaching the maximum 12 stories unlikely.

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

Davenport's zoning code was updated in 2029, including amendments to its Zoning Map and additional amendments approved in 2024. Currently, the map divides the City's residential districts into eight different districts, including, low density (R-1: Single-Family and R-2: Single-Family), moderate density (R-3: Single-Family and Two-Family and R-3C: Single-Family and Two-Family Central Residential District, R-4: Single-Family and Two-Family and R-4C: Single-Family and Two-Family Central Residential), high density (R-MF: Multi-family Residential), and a manufactured home park (R-MHP: Residential Manufactured Home Park District). Minimum single-family lot sizes range from 20,000 sq. ft. per unit in the R-1 district; 10,000 sq. ft. in the R-2 district; 7,500 sq. ft. in the R-3 districts; and 6,000 sq. ft. in the R-4 district. The R-4C districts are now limited to a minimum lot area of 4,000 sq. ft, and the R-MF district is limited to a minimum of 4,000 sq. ft. Although the minimum lot sizes for R-1 and R-2 are large and may make the construction of affordable housing in these districts challenging, the zoning map shows that these districts are not widespread throughout the city. R-3, with a 7,500 minimum, is more common, though this is still a fairly large lot on which to provide affordable housing. Front setbacks are 25 feet or more in all zoning districts except for R-4 districts which have a front setback minimum requirement between 15-20 feet. Building height appears to be limited to approximately 3 stories in all districts except R-MF, which allow up to 70 feet. Two-family units are allowed in all these

districts except R-1 and R-2 districts with a somewhat larger minimum lot area for two-family developments and other requirements. There are no floor area ratio, minimum bedroom, or minimum livable floor area standards.

Multifamily dwellings are allowed in the R-MF district in Davenport. In addition, several commercial districts, C-T, C-1, C-2, C-3, C-D, C-V, and C-E allow multifamily dwellings. Single family lots in R-MF are required to be a minimum of 4,000 square feet, but for multifamily housing in the R-MF zoning district, a minimum of 1,500 square feet per unit is required. This equates to about 29 units per acre. Though the R-MF district allows multifamily building heights up to 70 feet, the minimum 1,500 square feet per acre makes any development approaching the maximum height unlikely.

Rock Island's zoning code was updated in 2020 and divides the City's residential districts into four districts with minimum single-family lot sizes ranging from 7,500 square feet for the R-1 district, and 6,000 square feet for the R-2 district. The R-3 district, which allows one-to-six-unit residences, requires a 2,000 square foot lot area per dwelling unit. Front setbacks are 25 feet or more in all zoning districts. Height is limited to 2.5 stories in the R-1 - R-4 districts.

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

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

Accessory Dwelling Units

Question 8 explores the Cities' restrictions on the construction, rental or occupancy of accessory dwelling units and mobile homes. The use of accessory structures as dwellings provides private market opportunities to incorporate smaller, more affordable housing units, with a very low impact to the zoning district's infrastructure or traffic, in neighborhoods of opportunity that otherwise would be expensive places to live.

Davenport's code defines "accessory dwelling unit" as an additional dwelling unit incidental to a principal single-family dwelling on the same lot with separate cooking and sanitary facilities, and with its own legal means of ingress and egress. These units

are expressly allowed in the R-1, R-2, R-3, and R-4 zoning districts; Accessory dwelling units are not listed as an allowable use in any other zoning district. Manufactured homes are allowed only in the MHP zoning district, but within that district do not necessarily have to be located within a manufactured home park.

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

In Rock Island, accessory dwelling units were not expressly discussed in the zoning ordinance in the 2019 AI. As of the 2020 Zoning Code, accessory dwelling units are discussed under "Accessory Buildings and Accessory Dwellings in Residence Districts". Accessory structures or buildings must be located away from the front yard and meet specific setback requirements in side and rear yards, with no more than 30% of the rear yard occupied. They must also maintain required distances from lot lines and other structures. Height limits are set based on roof type, ranging from 15 feet for certain roof styles to 20 feet for others. Accessory buildings cannot be built before the principal structure and may only be connected by a breezeway if at least 6 feet apart. An accessory dwelling unit (ADU) is allowed on residential lots but must be a detached structure no larger than 400 square feet, located in the rear yard, and meet setback and height regulations. The ADU requires one additional off-street parking space and must share utility services with the principal dwelling, though with separate meters. The principal dwelling and ADU must also maintain required off-street parking for both units.

Design and Construction Requirements

Questions 9a and 9b ask design and construction requirements as they pertain to the Fair Housing Act. HUD identifies the 2009, 2012, 2015 and 2018 editions of the International Building Code (IBC) as safe harbors under the Fair Housing Act, promoting the health, safety, and welfare of the public through building construction. Monitoring compliance with these codes is not required but is a good practice for ensuring safe and accessible housing products. The City of Moline²⁹ has adopted the 2021 International Building Code with local amendments to the Moline Code of

²⁹ City of Moline. Current Codes. Retrieved from: <https://www.moline.il.us/427/Current-Codes>

Ordinances. Both the City of Davenport³⁰ and the City of Rock Island³¹ have adopted the 2015 International Building Code.

Incentives for Affordable Housing

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

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

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

³⁰ City of Davenport, Building Codes. Retrieved from: https://www.davenportiowa.com/our_community/building_land_development/codes_and_regulations/building_codes

³¹ City of Rock Island, Building Codes & Ordinances. Retrieved from: <https://www.rigov.org/645/Building-Codes-Ordinances>

CHAPTER 7.

PUBLICLY SUPPORTED HOUSING

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

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

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

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

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

years have seen many states revising their allocation formulas to discourage this pattern in new developments. The reasons for clustering of HCVs is more complicated since factors in decision-making vary greatly by individual household. However, there are indications that proximity to social networks, difficulties searching for housing, and perceived or actual discrimination contribute to clustering. This section will review the current supply and occupancy characteristics of publicly supported housing types and its geographic distribution across the region.

Supply and Occupancy

Low-income residents Moline, Davenport, and Rock Island receive publicly supported housing assistance from the Housing Authorities of their respective cities. Together, these authorities manage a total of 1,686 Housing Choice Vouchers, 1,788 Project-Based Section 8 units, 727 Public Housing units, 137 Section 202 units and 24 Section 811 units. The City of Moline has all five types of units, while Davenport has no public housing units and Rock Island has no Section 202 or Section 811 units.

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

Housing Authority	Public Housing Units	Housing Choice Vouchers (HCV)	Project-Based Section 8 Units	Section 202	Section 811
Moline	486	261	222	60	14
Davenport	0	865	734	77	10
Rock Island	241	560	832	0	0
Total	727	1,686	1,788	137	24

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

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

Table 17 shows the residents of publicly supported housing in the three cities by race and ethnicity. White and Black residents are the primary residents served by publicly supported housing in all three cities, with Davenport having significant unreported data on the race or ethnicity of many publicly supported housing residents. In Moline, Black residents are the primary demographic served by Public Housing and Housing Choice Vouchers, while white residents are the primary demographic served by the Project-Based Section 8, Section 202, and Section 811 programs. In Rock Island, Black residents are the primary demographic served by all three available programs. In Davenport, among residents whose race and ethnicity is reported, white residents are

the primary demographic served by the Public Housing, Housing Choice Vouchers, and Project-Based Section 8 programs, with no data on the racial or ethnic makeup of Section 811 residents.

TABLE 17 – RACE AND ETHNICITY OF PUBLICLY SUPPORTED HOUSING RESIDENTS BY PROGRAM CATEGORY IN MOLINE, DAVENPORT, AND ROCK ISLAND

Race/Ethnicity	Public Housing	HCV Program	Project-Based Section 8	Section 202	Section 811
MOLINE					
White	42%	33%	55%	61%	50%
Black/African American	53%	59%	19%	2%	N/A
Asian/Pacific Islander	0%	1%	1%	N/A	N/A
American Indian/Alaska Native	N/A	N/A	N/A	N/A	N/A
Hispanic/Latino	5%	8%	14%	4%	0%
Other/Unknown	0%	0%	11%	23%	50%
Total	100%	100%	100%	100%	100%
DAVENPORT					
White		33%	48%	78%	N/A
Black/African American		1%	1%	N/A	N/A
Asian/Pacific Islander		1%	1%	1%	N/A
American Indian/Alaska Native		1%	1%	1%	N/A
Hispanic/Latino		4%	6%	6%	N/A
Other/Unknown		60%	47%	14%	N/A
Total		100%	100%	100%	100%
ROCK ISLAND					
White	37%	25%	38%		
Black/African American	58%	70%	47%		
Asian/Pacific Islander	0%	0%	3%		
American Indian/Alaska Native	0%	0%	0%		

Hispanic/Latino	4%	5%	4%		
Other/Unknown	1%	0%	8%		
Total	100%	100%	100%		

Geography of Supported Housing

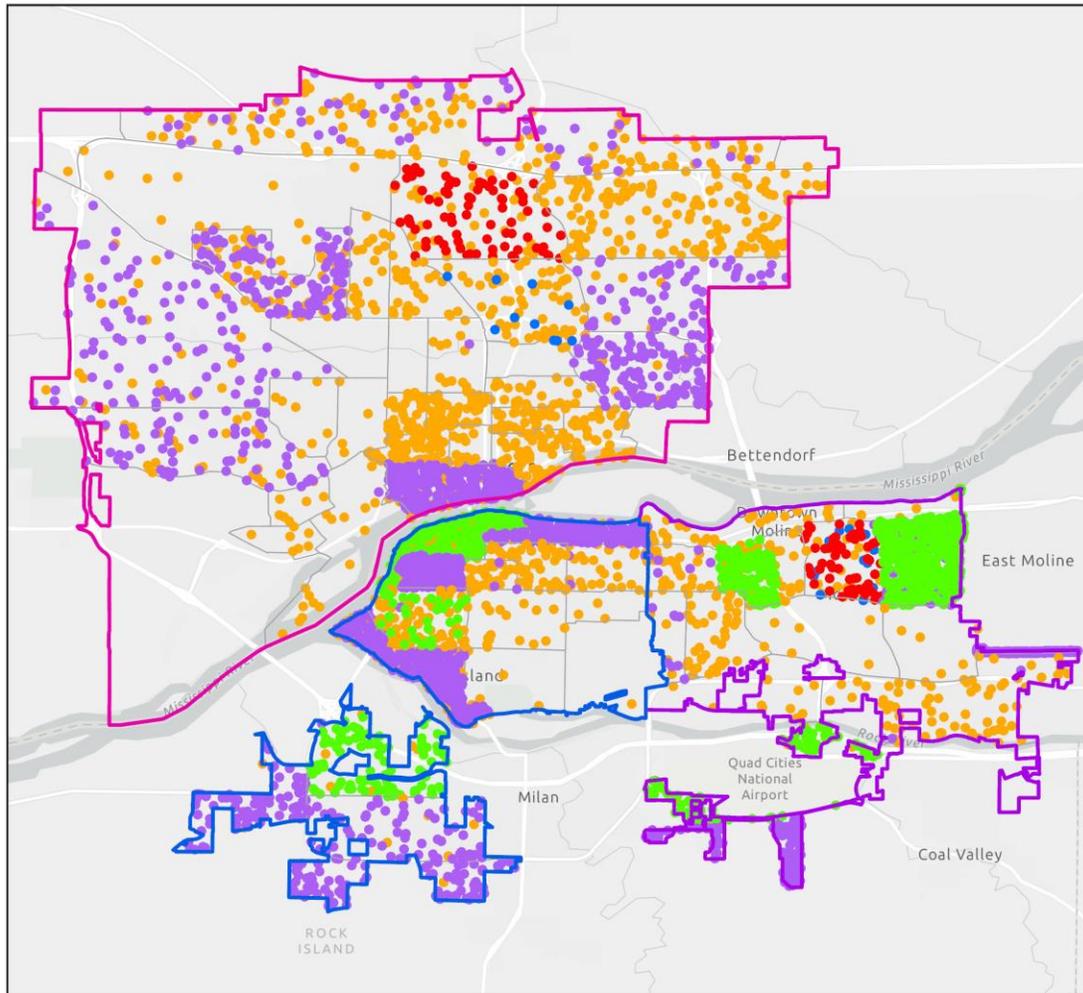
Figure 29 depicts the locations and prevalence of various types of publicly supported housing throughout Moline, Davenport, and Rock Island. As shown in table 16, Davenport has no Public Housing units, while Rock Island has no Section 202 or Section 811 units.

Publicly supported housing appears to be the most diversely located within Davenport, although some clustering is present near the Mississippi River. Housing Choice Voucher use is more widespread than Project-Based Section 8, which is expected due to the program nature. All Section 202 units are clustered within a single census tract, which likely indicates that there is only one Section 202 development within the City.

Moline shows diversely located Housing Choice Voucher usage, but all other types of publicly supported housing within the City are tightly clustered. The City's Section 202 and Section 811 developments are both located within the same census tract, while public housing is present in three tracts and Project-Based Section 8 units are only present in the southernmost portion of the City.

Publicly supported housing units are most tightly clustered in Rock Island, where even Housing Choice Voucher usage follows specific patterns and is largely absent from the southeastern portion of the City. The southwestern portion of the City contains many public housing and Project-Based Section 8 units, but few Housing Choice Vouchers. The northern and western portions of the City have significantly more publicly supported housing activity than the southeastern quadrant, which has almost none.

FIGURE 29. PUBLICLY SUPPORTED HOUSING BY TYPE IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND



Publicly Supported Housing

1 dot = 1 unit

- Section 202
 - Housing Choice Voucher
 - Section 811
 - Project-Based Section 8
 - Public Housing
-
- Davenport
 - Moline
 - Rock Island

Map Source: HUD APSH Data, 2023

CHAPTER 8.

HOUSING FOR PEOPLE WITH DISABILITIES

An estimated 12.9% of the U.S. population had a disability as of the American Community Survey Five-Year Estimates for 2018-2022. Research has found an inadequate supply of housing that meets the needs of people with disabilities and allows for independent living. The U.S. Department of Housing and Urban Development identified that approximately one third of the nation's housing stock can be modified to accommodate people with disabilities, but less than 1% is currently accessible by wheelchair users³².

Identifying and quantifying existing accessible housing for all disabilities is a difficult task because of varying needs associated with each disability type. Unique housing requirements for people with ambulatory difficulty may include accessibility improvements such as ramps, widened hallways and doorways, and installation of grab bars, along with access to community services such as transit. People with hearing difficulty require modifications to auditory notifications like fire alarms and telecommunication systems while visually impaired individuals require tactile components in design and elimination of trip hazards. Housing for people that have difficulty with cognitive functions, self-care, and independent living often require assisted living facilities, services, and staff to be accessible. For low- and moderate-income households, the costs of these types of home modifications can be prohibitive, and renters may face particular hardships, as they could be required to pay the costs not just of the modifications, but also the costs of removing or reversing the modifications if they later choose to move.

Modifications and assisted living arrangements tend to pose significant costs for people with disabilities, who already experience more difficulty affording housing compared to populations with no disability. Studies have found that 55% of renter households that have a member with a disability have housing cost burdens, compared with 45% of those with no disabilities³³.

Residential Patterns

In the City of Moline, an estimated 5,772 persons 5-years-old or older have a disability, representing 13.6% of the total population. People aged 65+ have the highest disability rate (6.1%), and the rate for those aged 18-64 is 5.8%. In contrast, less than 2% of

³² Chan, S., Boshier, L., Ellen, I., Karfunkel, B., & Liao, H. . L. (2015). Accessibility of America's Housing Stock: Analysis of the 2011 American Housing Survey. U.S. Department of Housing and Urban Development: Office of Policy Development and Research.

³³ America's Rental Housing 2017. (2017). Joint Center for Housing Studies of Harvard University.

children between the ages of 5 and 17 are disabled. In Davenport, an estimated 13,670 persons 5-years-old or older have a disability, representing 13.5% of the total population. Though this overall share of the population is similar to Moline's, the age distribution is different. People aged 18-64 have the highest disability rate (7.2%), followed by people aged 65+ (5.2%). In Rock Island, as in Davenport, those aged 18-64 had the highest rates of disability (7.4%), followed by those over 65 (5.9%), and also have the highest share of people under 5 with a disability (1.8%).

Ambulatory disabilities are the most common type in two of the three jurisdictions affecting 6.2% of Davenport and 7.6% of Rock Island residents. In Moline, the most common type of disability are cognitive difficulties, affecting 5.6% of the population. Independent living and cognitive disabilities are the two next most common across all jurisdictions. The three least common in all cities are hearing, self-care, and vision.

TABLE 18. DISABILITY BY TYPE IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Disability Type	City of Moline		City of Davenport		City of Rock Island		Davenport-Moline-Rock Island MSA	
	#	%	#	%	#	%	#	%
Hearing difficulty	1,288	3.0%	3,443	3.4%	1,177	3.2%	13,546	3.5%
Vision difficulty	734	1.7%	2,138	2.1%	591	1.6%	6,884	1.8%
Cognitive difficulty	2,383	5.6%	5,675	5.6%	2,499	6.7%	19,309	5.0%
Ambulatory difficulty	2,349	5.5%	6,336	6.2%	2,845	7.6%	22,320	5.8%
Self-care difficulty	885	2.1%	2,094	2.1%	1,053	2.8%	7,885	2.1%
Independent living difficulty	1,881	4.4%	4,539	4.5%	1,869	5.0%	16,282	4.3%
Total Population with a Disability	5,772	13.6%	13,670	13.5%	5,518	14.8%	48,979	12.8%

Note: All % represent a share of the total population within the jurisdiction or region.
Data Source: American Community Survey, 2018-2022, Table S1810

TABLE 19. DISABILITY BY AGE GROUP IN THE CITIES OF DAVENPORT, MOLINE, AND ROCK ISLAND AND THE DAVENPORT-MOLINE-ROCK ISLAND MSA

Age of People with Disabilities	City of Moline	City of Davenport	City of Rock Island	Davenport-Moline-Rock Island MSA
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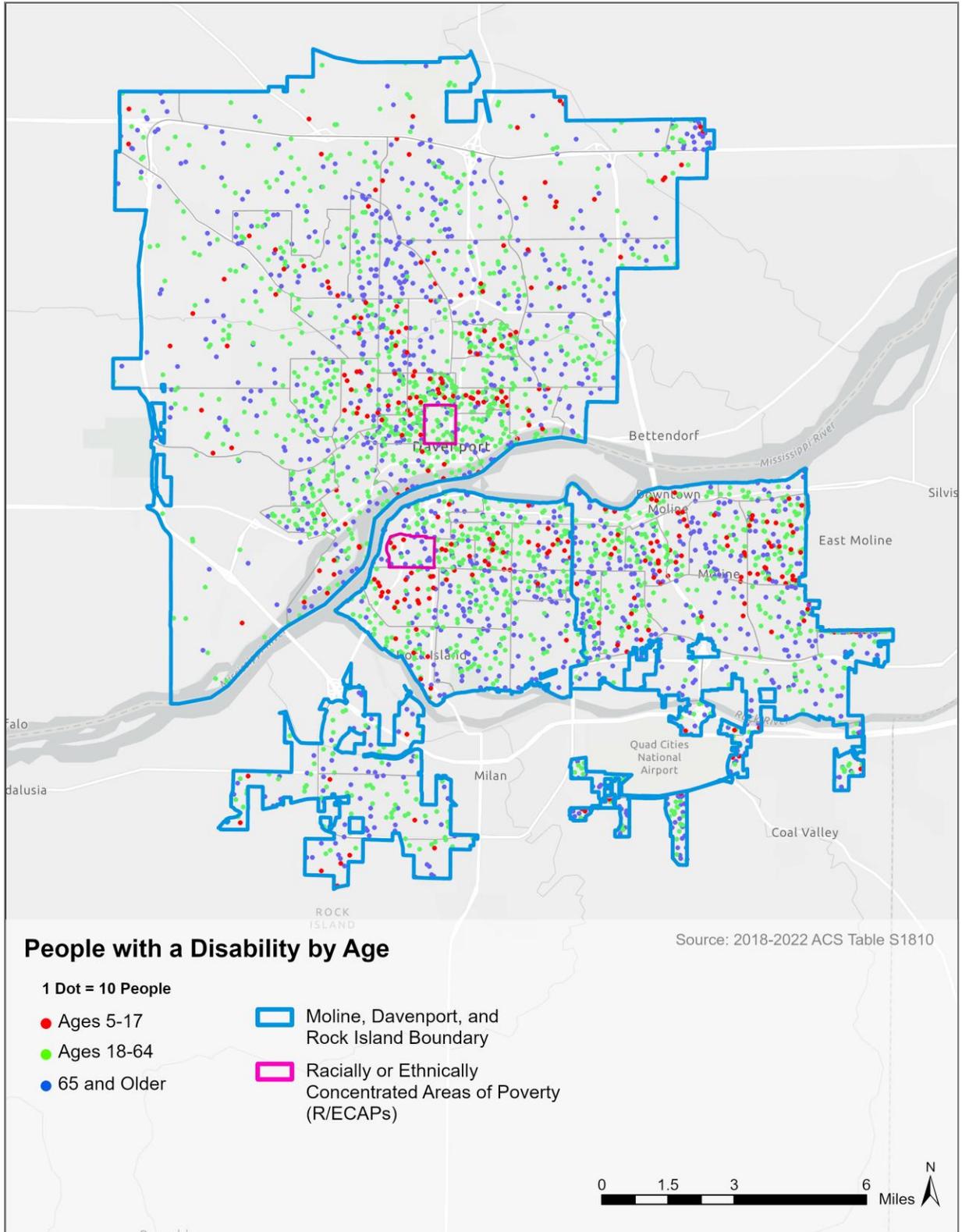
	#	%	#	%	#	%	#	%
Age 5-17 with disabilities	736	1.75%	1,252	1.25%	660	1.80%	4,863	1.29%
Age 18-64 with disabilities	2,461	5.84%	7,219	7.21%	2,708	7.38%	22,989	6.08%
Age 65+ with disabilities	2,575	6.11%	5,199	5.19%	2,150	5.86%	21,127	5.59%

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

Data Source: American Community Survey, 2018-2022, Table S1810

The map that follows shows the geographic distribution of persons with disabilities throughout the study area. All three cities appear to have the highest concentration of people with disabilities in the tracts at which they all intersect with the Mississippi River. The higher percentage of those aged between 18 and 64 with disabilities is highlighted by the blue dots. Generally, people with disabilities are dispersed throughout the cities in a pattern similar to the population overall.

FIGURE 30. PEOPLE WITH A DISABILITY BY AGE IN THE CITIES OF MOLINE, DAVENPORT, AND ROCK ISLAND



Accessible Housing Supply and Affordability

Any new multifamily housing with five or more units constructed after 1988 using federal subsidies must include a minimum of 5% of units accessible to persons with mobility impairments and an additional 2% of units accessible to persons with vision / hearing impairments (or one unit of each type, whichever is greater). Additionally, HUD provides support for accessible housing through its Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities programs.

A search using HUD's Affordable Apartment Search Tool was conducted to identify affordable rental properties in the cities of Moline, Davenport, and Rock Island designed to serve people with disabilities. The search for Moline returned 5 results; one property specifically designated for low-income elderly people, four listed as serving low-income family households including special needs households. The search for Davenport returned 10 results, all listed as being for low-income households, three specifically for low-income elderly households, and one property specifically serving persons with disabilities. The search for Rock Island returned five results, all of which are designated to serve low-income, elderly, and special needs households.

According to the Social Security Administration, the standard Supplemental Security Income (SSI) payment for the year 2024 is \$943.00 per month. Affordable rent for an individual receiving this monthly income would be \$282.90. It is highly likely that people with disabilities who are unable to work and rely on SSI as their sole source of income face substantial cost burdens and difficulty locating affordable housing. Publicly supported housing is often a key source of accessible and affordable housing for people with disabilities, and in the study area, these subsidized housing options are much more likely to contain households with at least one member with a disability than the housing stock in general. The table below shows that persons with disabilities are able to access all types of publicly supported housing, except for other multifamily in the cities of Moline, Davenport, and Rock Island.

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

Housing Type	People with a Disability									
	City of Moline		City of Davenport		City of Rock Island		Rock Island County		Scott County	
	#	%	#	%	#	%	#	%	#	%
Public Housing	486	18.0%	N/A	N/A	241	35.0%	1,213	21.0%	N/A	N/A
Project-Based Section 8*	222	15.0%	734	16.0%	832	15.0%	2,166	17.0%	884	19.0%
HCV Program	261	17.0%	865	28.0%	560	18.0%	1,162	16.0%	1,351	23.0%
All HUD Programs	1,044	17.0%	1,686	22.0%	1,632	18.0%	4,614	18.0%	2,415	21.0%

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

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

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

Data Source: HUD A Picture of Subsidized Housing, 2023 Data Based on 2020 Census

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

Zoning and Accessibility

From a regulatory standpoint, local government measures to control land use typically rely upon zoning codes, subdivision codes, and housing and building codes, in concurrence with comprehensive plans. Local zoning authority is directed by the state enabling laws as part of the local government’s police power but limited by superseding state laws related to specific land use, for example the regulation of public

property, flood plains, utilities, natural resources, airports, housing regulated by a state licensing authority for persons with disabilities, higher education institutions, etc.

Fair housing laws do not preempt local zoning laws but do apply to municipalities and local government units and prohibit them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons. This includes a local government's affirmative obligation to provide reasonable accommodations to land use or zoning policies when such accommodations may be necessary to allow persons with disabilities to have an equal opportunity to use and enjoy housing. It also includes the affirmative obligation not to segregate housing for protected classes into lower-opportunity, less desirable areas of the jurisdiction. A jurisdiction's design and construction requirements (as contained in the zoning ordinance or building codes) also must be congruent with the Fair Housing Amendments Act's accessibility standards for design and construction.

Effective March 8, 2021, the 2018 IBC is a HUD-recognized safe harbor for compliance with the FHAA's accessibility design and construction requirements. Additionally, HUD identifies the 2009, 2012, 2015 editions of the International Building Code (IBC) as safe harbors under the Fair Housing Act, promoting the health, safety, and welfare of the public through building construction. Monitoring compliance with these codes is not required but is a good practice for ensuring safe and accessible housing products. The City of Moline³⁴ has adopted the 2021 International Building Code with local amendments to the Moline Code of Ordinances. Both the City of Davenport³⁵ and the City of Rock Island³⁶ have adopted the 2015 International Building Code.

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

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

The City of Moline defines “family” to include one or more persons related by blood, marriage or adoption (including foster children), and in addition, any domestic servants and up to one gratuitous guest thereof, or a group of not more than three

³⁴ City of Moline. Current Codes. Retrieved from: <https://www.moline.il.us/427/Current-Codes>

³⁵ City of Davenport, Building Codes. Retrieved from: https://www.davenportiowa.com/our_community/building_land_development/codes_and_regulations/building_codes

³⁶ City of Rock Island, Building Codes & Ordinances. Retrieved from: <https://www.rigov.org/645/Building-Codes-Ordinances>

persons who need not be so related, and in addition domestic servants or gratuitous guests thereof, who are living together in a single dwelling unit and maintaining a common household.

As of the 2019 AI, Davenport amended its ordinance to completely remove a “family” definition, so as to make no distinction or limitation on the number of people, related or unrelated, who may live together in a dwelling unit.

Rock Island defines “family” to include one or more persons related by blood, marriage or adoption (including foster children), and in addition, any domestic servants and up to one gratuitous guest thereof, or a group of not more than three persons who need not be so related, and in addition domestic servants or gratuitous guests thereof, who are living together in a single dwelling unit and maintaining a common household. An additional definition, “Unrelated Group Family” allows a group of no more than five unrelated adults living together as a common household by doing their own cooking and living together, as distinguished from a group occupying a boarding house, lodging house, club, fraternity, sorority, or hotel. Unrelated group families are permitted with administrative approval, provided that they submit an application, pay an application fee, comply with certain standards such as a spacing requirement, and pay for and pass bi-annual inspections.

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

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

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

Reasonable Accommodations

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

Neither Davenport nor Rock Island have adopted a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. Rather both jurisdictions rely on the variance process for such matters. In Davenport, this is through the Board of Adjustments, and in Rock Island, it is the Board of Zoning Appeals. This is required for any applicant seeking a variance and is not limited to housing for persons with disabilities. The purpose of a variance is not congruent with the purpose of requesting a reasonable accommodation, as a variance requires a showing of special circumstances or conditions applying to the land. In contrast, a reasonable accommodation is to allow individuals with disabilities to have equal access to use and

enjoy housing. The jurisdiction does not comply with its duty to provide reasonable accommodation if it applies a standard based on the physical characteristics of the property rather than considering the need for modification based on the disabilities of the residents. Accordingly, both jurisdictions received a “2” on Issue #3. Moline has adopted a process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. Notification of surrounding property owners is required, and the Plan Commission may receive citizen input at their discretion, but Moline was assessed a “1” low risk score for this issue. However, the accommodation is at the discretion of the Plan Commission, and as is true of the variance process in Davenport and Rock Island, subjecting the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities and unfounded speculations about the impact on neighborhoods or threats to safety may impact the outcome.

Supportive Housing for Persons Recovering from Alcohol or Substance Addiction

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

In Davenport, residential drug or alcohol treatment facilities, halfway houses for people who have exited a correctional setting, and homeless shelters all require a special use permit to be located anywhere, and then must be sited in a commercial or industrial zoning district. These facilities must be spaced a minimum of 1,000 feet apart from one another and at least 300 feet from any residential area. Domestic violence shelters and residential care facilities are allowed as of right in multifamily residential, commercial, and industrial zoning districts. In Moline Halfway Houses and Group Homes are included along with other Group/Institutional Land Uses. Presumably treatment facilities would be defined as community based residential facilities though this is not explicit in the code. Small care facilities as defined by the City require a Special Use Permit in R-1, though they are allowed by right in the other residential districts, and large care facilities require a Special Use Permit in any residential zoning district. In Rock Island, “Halfway House/Group Homes” are allowed only in the R-3 and R-4 zoning districts and only when authorized by the Board of Zoning Appeals, so they are not allowed by right in any zoning districts and are effectively prohibited in single-family districts.

While housing for persons with disabilities may be subject to state and local regulations related to health and safety, they cannot be excluded from residential districts altogether, and such regulations must not be based on stereotypes or presumptions about specific types of disabilities. Accordingly, for treatment facilities which house three or fewer unrelated persons (consistent with the City’s family definition) recovering from drug or alcohol addiction, this disparate treatment may

violate the FHA, and Rock Island received a “3” high risk score on Issue #5. Davenport and Moline do not prohibit these facilities but do enforce additional restrictions that are not applicable to other similar uses, so they each received a “2” medium risk score.

CHAPTER 9.

FAIR HOUSING ENFORCEMENT ACTIVITIES

Fair Housing Rights and Resources

Currently, the federal Fair Housing Act—Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq. (the “FHA” or “FHAA”)—protects persons from unlawful discrimination in the sale, rental, financing, advertising, and insurance of dwellings, and from actions or conditions that would otherwise deny or make housing unavailable on an equal basis because of a person’s race, color, national origin, religion, sex, disability (mental or physical), or familial status (families with children). The FHA also makes it illegal to retaliate against someone who files a complaint, testifies, or assists in a fair housing proceeding. The FHA applies broadly to private, public, and subsidized dwellings though it contains some limited exemptions for certain single family home sales by owner, owner-occupied buildings of four or less units, religious and private clubs, and qualifying age-restricted housing for older persons. Specific to protections based on disability, the FHA requires housing providers to allow reasonable modifications to premises and reasonable accommodations to rules and policies, and requires “covered multifamily housing” (generally meaning ground floor units in buildings with four or more units or all units in buildings of four or more units serviced by an elevator and constructed after March 13, 1991) to meet minimum standards of accessible design and construction.

Although federal law sets the minimum standards for fair housing rights and enforcement, it does not preclude state legislatures and local county and city governing bodies from expanding the classes of protected persons and fair housing rights via state fair housing and antidiscrimination laws or county and city ordinances. Under the Iowa and Illinois state civil and human rights laws and the local code of ordinances for Davenport, additional classes of persons residing in Davenport, Moline, and Rock Island also are protected from discriminatory housing practices that would limit access to fair housing.

State and local fair housing laws deemed substantially equivalent to the FHA—with parallel provisions regarding rights, procedures, remedies, and judicial review and enforcement—may qualify the state or local fair housing enforcement agency for HUD-subsidized enforcement funding via grants or reimbursements, technical support, and cooperative and work-share agreements through HUD’s Fair Housing Assistance Program (FHAP). All residents in the Davenport/Moline/Rock Island study jurisdictions are covered by state and local level fair housing laws substantially equivalent to the Fair Housing Act and the additional enforcement and support resources those bring.

Iowa's Civil Rights Act

Iowa's counterpart to the text of the Fair Housing Act is codified within the IOWA CIVIL RIGHTS ACT of 1965 (IOWA CODE § 216.8 et seq., as amended) and is substantively identical to the FHA in rights, remedies, and enforcement processes. The ICRA expands on the FHA's protected classes to include also creed, sexual orientation, and gender identity.³⁷ Like the FHA, unlawful actions under the ICRA include discriminatory terms, conditions, privileges, notices or advertising; a refusal to permit reasonable modifications of existing premises occupied or to be occupied by persons with disabilities; a refusal to make reasonable accommodations in rules, policies, practices, or services to give a person with disabilities equal opportunity to use and enjoy a dwelling; etc. Retaliation against someone exercising (or assisting) fair housing rights is illegal, which could look like evicting a tenant or refusing to renew a lease because the person filed a complaint, testified, assisted, or participated in a fair housing proceeding.

Under the ICRA and Iowa Administrative Code (Chapter 161.9.1 et seq.), the Iowa Civil Rights Commission (ICRC) is empowered to receive, investigate, mediate, conciliate, litigate, and finally determine the merits of complaints alleging unfair or discriminatory housing practices (as well as in the areas of employment, public accommodations, credit, and educational institutions). As of July 1, 2023, an agency realignment moved the ICRC to be part of the Iowa Department of Inspections, Appeals, and Licensing (DIAL). DIAL investigators now will conduct the initial intake and screenings of complaints to help improve case response times. The ICRC also provides education, training, and technical assistance to the public regarding their civil rights and responsibilities.

In 2021, Iowa passed legislation (Senate File 252) prohibiting its cities and counties from enacting and enforcing "source of income" regulatory protections, instead leaving it to landlords to decide whether or not to deny housing to renters who receive assistance through the federal housing choice voucher program. Although source of income is not an explicitly protected class under the FHA or ICRA (nor the DAVENPORT CIVIL RIGHTS ORDINANCE), housing and disability rights advocates have argued that fair housing law may require a housing provider to accept a housing choice voucher as a reasonable accommodation of a tenant's disabilities if accepting the voucher will not impose undue financial and administrative burdens on the landlord.³⁸ A case also could

³⁷ In January 2024, members of an Iowa House panel rejected a proposed bill (House File 2082) to remove "gender identity" as a protected class under the IOWA CIVIL RIGHTS ACT and classify "gender dysphoria" as a disability.

³⁸ Lower courts are divided on whether the FHA's reasonable accommodation provisions require landlords to accept alternative methods of payment such as housing choice vouchers from someone who cannot earn income due to a disability. The Eighth Circuit Court of Appeals recently ruled, however, that the FHA's reasonable accommodation duty does not extend to accommodating a tenant's lack of income by accepting a government housing voucher nor compel landlords to make reasonable

be made that Iowa's law will likely have a disparate impact on low-income Iowans based on race, color, or disabilities as these classes disproportionately make up HCV program recipients and rely on housing subsidy aid.³⁹

The fair housing provisions of Iowa's CIVIL RIGHTS ACT have been certified by HUD as "substantially equivalent" to the "rights, procedures, remedies, and the availability of judicial review" provided in the FHA, allowing the ICRC as the state fair housing enforcement agency to apply for federal funding under HUD's Fair Housing Assistance Program (FHAP). The ICRC is a HUD certified FHAP agency, giving it concurrent jurisdiction to receive, investigate, process, and adjudicate fair housing complaints under the state and federal acts and to receive reimbursement and grant funding through its work-share agreement with HUD for enforcement activities across the state. A complainant under the ICRA has 300 days from the alleged discriminatory conduct to file a complaint with the Commission.

Davenport Fair Housing Ordinance

The City of Davenport also has adopted local civil rights ordinances under its 2000 DAVENPORT MUNICIPAL CODE, Title 2 Ch. 58 et seq., in connection with housing, employment, public accommodations, education, and credit. The fair housing ordinance, MUNICIPAL CODE § 2.58.300 et seq., includes the protected classes found in the FHA and in the Iowa Civil Rights Act—*race, color, creed, religion, sex, national origin or ancestry, familial status, disability, gender identity, and sexual orientation*—and also extends protected status on the basis of *age* and *marital status*. The seven-member Davenport Civil Rights Commission, its director and commission staff, are empowered by ordinance to receive and investigate claims of discriminatory practices with power to issue subpoenas and discovery orders in aid of that investigation. The commission also may file its own complaint against an alleged offending party where an investigation shows an apparent pattern or practice of discrimination. A person has one year from the offense to file a complaint with the Commission. Before seeking redress in district court for an alleged violation of the local ordinance, the complainant must file a complaint with the Commission and receive a release. However, the local ordinance does not limit any right, procedure, or remedy available under federal or state law.

Davenport's local fair housing ordinance also has been certified by HUD as substantially equivalent to the FHA and qualifies the Civil Rights Commission to

accommodations for the economic effects of a disability, only the physical effects. *Klossner v. IADU Table Mound MHP, LLC*, 65 F.4th 349 (8th Cir. 2023). The plaintiff in that case appealed, but the Supreme Court declined to review so the Circuit Court's ruling under these facts remains for Iowa and other Eighth Circuit jurisdictions.

³⁹ According to U.S. Census Bureau data available at the time of the bill's passage, Black residents make up approximately 4% of Iowa's population but 27% of the state's voucher holders. Similarly, 29% of housing choice voucher households have at least one person with a disability.

receive FHAP funding for fair housing discrimination investigation, enforcement, and education activities. The Commission may cross-file complaints with HUD/FHEO.

Illinois Human Rights Act

The ILLINOIS HUMAN RIGHTS ACT, 775 ILCS 5 et seq. (IHRA), was enacted in 1979 and amended over the next decades to become one of the most comprehensive of state civil rights acts. Protected classes have been added and fair housing procedural rights and remedies have been updated to maintain substantial compliance with federal fair housing law. Currently, the IHRA prohibits discrimination in the areas of real estate transactions (residential and commercial), employment, financial credit, and public accommodations. Real estate transactions include renting or leasing, home sales, mortgage lending and insurance, advertising, restrictive covenants or deed restrictions, and housing construction activities. For real estate transactions, the fair housing provisions of the IHRA are more broad than the FHA, protecting people on the basis of race⁴⁰, color, ancestry, national origin, religion, sex (including sexual harassment), pregnancy, age (40 and over), order of protection status, marital status, sexual orientation (including gender-related identity), military status, unfavorable military discharge, disability, arrest record⁴¹, familial status, immigration status, and source of income. Source of income protection—meaning lawful, verifiable non-wage income including but not limited to Section 8 Housing Choice Voucher payments, disability payments, veteran’s benefits, Social Security income, child support, etc.—was added to the IHRA by amendment in 2022, becoming effective January 1, 2023. Immigration status as a protected class became effective January 1, 2024.

Retaliation, intimidation, interference, or coercion in connection with a person’s enjoyment of any of the protected housing rights also are unlawful discriminatory practices. The IHRA applies to most housing in the state with exceptions for owner-occupied housing with four or fewer units or rental of a private room within a home where the owner or family resides.

The IHRA also grants authority for municipalities and counties to pass local antidiscrimination measures and establish a department or commission to address discrimination.

The IHRA bifurcates enforcement between two separate administrative agencies: the Department of Human Rights and the Human Rights Commission. The Department of Human Rights receives and investigates complaints of discrimination, seeks conciliation between the parties, undertakes affirmative actions and public education

⁴⁰ Effective January 1, 2023, Illinois’s Crown Act expanded and clarified the definition of race to include traits commonly associated with a race such as hairstyle and texture.

⁴¹ Effective January 1, 2020, the Housing as a Human Right bill makes it illegal to discriminate against a person seeking housing based on records of arrest that did not lead to a conviction, juvenile records, and sealed/expunged records.

activities, and makes findings and recommendations to the Human Rights Commission. The Commission adjudicates charges via public hearings and may issue orders granting relief to parties harmed by discrimination. The IHRA empowers the state attorney general to investigate broad, systemic problems or incidents of discrimination, referred to as “patterns or practices” of discrimination, and to file suits to seek redress and remedy of such violations. The I Department of Human Rights was certified as a HUD FHAP agency on an interim basis in 2002, fully certified in 2006, and certifications renewed in 2012 and 2018.

Moline and Rock Island Local Fair Housing Ordinances

The City of Moline has not adopted a separate fair housing or civil rights ordinance, but it does maintain an active Human Rights Commission whose duties include educating the public, city staff, and elected officials about diversity and discrimination and notifying aggrieved persons about their rights under the ILLINOIS HUMAN RIGHTS ACT and the complaint process under state law. (MOLINE CODE OF ORDINANCES §2-4700 et seq.)⁴²

Article VI of the City of Rock Island CODE OF ORDINANCES contains fair housing and antidiscrimination provisions and grants authority to a Fair Housing Board and the Human Rights Commission to promote and enforce fair housing for certain protected classes: *Fair Housing Board*, Sec. 2-256.1 et seq. (persons are protected from certain unfair practices on the basis of race, religion, or ancestry) and *Civil Rights Violations: Real Estate Transactions* Sec. 2-274.1 et seq. (persons are protected from certain unlawful discrimination based on familial status, arrest record, or disability; unlawful blockbusting based on present or prospective changes in the race, color, religion, national origin, ancestry, age, sex, sexual orientation, marital status, familial status or disability of residents). The rights, enforcement procedures, and remedies are not as comprehensive as found under the ILLINOIS HUMAN RIGHTS ACT or the FHA. Complaints must be filed within 90 days of the violation (or discovery of the violation but no more than one year from the violation). The Human Rights Commission also serves as the City’s Fair Housing Board. The Fair Housing Board can attempt to resolve housing discrimination complaints between parties through mediation and can make referrals to the Illinois Department of Human Rights or HUD. For violations under Sec. 2-274.1 et seq., after investigation and a finding of probable cause but failure of conciliation efforts, the Commission can require a public hearing before an appointed independent hearing officer. If the hearing officer finds that the respondent has committed a civil rights violation of the city’s ordinances related to unlawful housing discrimination, the

⁴² More information about the Human Rights Commission, including its latest 2023 Annual Report, is available at: moline.il.us/190/Human-Rights-Commission

hearing officer may impose a fine up to \$500 per violation, actual damages, and attorney's fees.

The Fair Housing Board is likely able to help the parties reach a settlement and resolve claims more quickly relative to the federal and state administrative complaint processes or litigation. Even cases that advance to the Human Rights Commission's public hearing procedures are required by ordinance also to have a shorter timeframe than the federal or state processes. However, the Fair Housing Board advises complainants that filing a local complaint should not replace filing a timely complaint with an appropriate court, HUD, and/or the Illinois Department of Human Rights to preserve the complainant's rights to remedies under state and federal fair housing laws. The City's ordinances have not been certified as "substantially equivalent" to the FHA and the Rock Island Human Rights Commission (Fair Housing Board) is not a certified FHAP agency.

Local FHIP Grantees

Under its Fair Housing Initiatives Program (FHIP), HUD administers multiple competitive grant categories to award money to local fair housing advocacy organizations who assist persons believed to have been harmed by discriminatory housing practices; to help people identify government agencies that handle complaints of housing discrimination; to conduct preliminary investigation of claims; to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices; and to educate the public and housing providers about equal opportunity in housing and compliance with the fair housing laws. Fortunately, several nonprofit housing advocacy organizations serving residents of Davenport, Moline, and Rock Island have been awarded FHIP grant funding to provide fair housing related services.

- The **Fair Housing Organizations Initiative (FHOI)** provides funding to start new housing advocacy organization in underserved communities or build the growth, capacity, and effectiveness of existing non-profit fair housing organizations to continue to serve the rights and needs of underserved groups, particularly persons with disabilities.
- The **Private Enforcement Initiative (PEI)** funds non-profit fair housing organizations to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices.
- The **Education and Outreach Initiative (EOI)** funds programs and initiatives that educate the public and housing providers about equal opportunity in housing and compliance with the fair housing laws.

Prairie State Legal Services

Prairie State Legal Services provides legal advice and representation, advocacy, education, and outreach to low-income, elderly, and other vulnerable groups across Illinois. Its Fair Housing Project investigates cases of discrimination by housing

providers; helps clients resolve fair housing disputes; and conducts community legal education on fair housing rights and responsibilities. PSLS may negotiate on behalf of an aggrieved tenant; conduct fair housing testing; and represent a client who files a complaint with HUD or the Illinois Department of Human Rights or in court.

PSLS is consistently a FHIP PEI grantee to build on and continue its fair housing testing program. For FY2024, PSLS was awarded a \$425,000 multiyear grant, up from a \$375,000 PEI award in 2021. Fair housing testing refers to the use of testers who pose as prospective renters, sellers, or buyers of residential real estate for the purpose of determining whether housing providers and others are complying with the Fair Housing Act or whether prospective tenants or buyers are treated differently based on a protected trait. PSLS trains testers and also offers a range of fair housing legal services that include complaint intake, disability accommodation advocacy, legal advice and representation, complaint filing with administrative agencies and courts, conciliation/mediation, settlement negotiation, and referrals. Other housing related services offered include eviction defense; housing protection for seniors, veterans, people living with HIV/AIDS; and subsidized housing eviction defense, termination of assistance, rent calculations, and admissions issues.

PSLS has multiple locations throughout the state and can be contacted through their website or through their Moline office:

1515 5th Avenue
Suite 200
Moline, IL 61265
Phone: 309-794-1328
Web: pslegal.org

HOPE Fair Housing Center

HOPE Fair Housing Center serves clients across 40+ counties in Illinois including Rock Island County (City of Moline and City of Rock Island). HOPE currently has 10 staff members, 1 AmeriCorps VISTA, and 2 social work interns on its team. HOPE has been awarded funds from several categories of FHIP grants over the past five-year period including PEI, EOI, American Rescue Plan, and Fair Housing Organizations Initiative (FHOI) awards: a \$425,000 multiyear PEI award for FY2022, 2023, and 2024; \$374,996 PEI award for FY2021; \$125,000 PEI-ARP (American Rescue Plan) award for FY2021; \$125,000 EOI award for FY2023; \$100,000 EOI-ARP award for FY2023; \$125,000 EOI award for FY2022; \$100,000 EOI-Striving for Equity award for FY2022; \$125,000 EOI award for FY2021; and \$132,000 FHOI award for FY2021.

With PEI funds, HOPE staff conducts intake and screening of fair housing complaints, counsels clients regarding fair housing protections and options, and provides appropriate referrals for other housing issues. HOPE conducts investigations of systemic or complaint-based rental, sales, and lending housing discrimination matters

including through covert testing. HOPE helps mediate and resolve complaints between clients and housing providers. HOPE also assists clients in advocating for their fair housing rights, self-filing complaints with administrative agencies, and refers victims of discrimination to administrative agencies (HUD, DOJ, and IDHR/FHAP) or private counsel when evidence supports allegations of violations to fair housing laws.

With EOI funds, HOPE provides free educational materials and trainings across Illinois for community members, service providers, and housing industry professionals on topics ranging from general fair housing rights; housing providers' rights and responsibilities; realtors responsibilities under fair housing laws; housing rights granted to victims of domestic violence and abuse; understanding assistance animals; design and construction standards; protections based on specific protected classes such as source of income, national origin, individuals with disabilities, etc.; and protections and resources for those seeking housing with a previous arrest or conviction record. HOPE also hosts an annual conference open to community members, community organizations, housing industry, and local governments where participants receive comprehensive education on fair housing topics. HOPE additionally meets or collaborates with public and private partners to increase compliance with the Affirmatively Furthering Fair Housing Rule, and to increase housing opportunities to those groups historically harmed by housing discrimination, residential segregation, and exclusionary public policies.

Since 2020, HOPE has received 15 complaint intakes from Rock Island County residents. Five of those intakes were housing related but not fair housing issues. Seven intakes were connected to a fair housing complaint based on the person's disability. HOPE was able to assist three of those clients in direct advocacy resulting in reasonable accommodation/modification requests related to accessible services, accessible parking spaces, and ramp installation. Other matters involved allegations of housing discrimination based on sex and race in the rental context. HOPE did not file formal administrative or court complaints on any matters deriving from Rock Island County intakes from 2020 - YTD 2024.

IDHR's 2023 Annual Report indicated that only 7 charges of housing discrimination were filed from Rock Island County in one year. From the small number of intakes HOPE has received coming from Rock Island County and the few Rock Island County cases identified by IDHR, HOPE infers that more education on rights and responsibilities under Fair Housing laws and information on what organizations or agencies to contact for assistance would likely benefit Rock Island County residents.

In support of its core mission of ensuring communities and individuals can enjoy housing free from discrimination, specific priorities for 2024 and beyond include addressing inequitable tenant screening practices to prevent the discriminatory effects caused by blanket bans on eviction records, conviction/arrest records, and overly restrictive credit score requirements, and refusals to rent to subsidized renters. Further HOPE will continue to advocate for the dismantling of discriminatory policies

such as Crime Free/ Nuisance Free Ordinances, which disproportionately harm black households, persons with disabilities, and victims of domestic violence. HOPE will continue to advocate for accessible housing in new developments to support persons with disabilities and for occupancy codes and unit sizes that accommodate families with children.

Hope can be contacted via:

Phone: 630-690-6500

Email: info@hopefair.org

Web: hopefair.org/contact

A plethora of resources are available on HOPE's website, including self-advocacy toolkits based on discrimination on the emerging topics of real estate appraisal, eviction, source of income, and arrest and conviction records.

They can be found here: <https://hopefair.org/toolkits/>

Iowa Legal Aid

Residents of Davenport may receive housing-related legal services from Iowa Legal Aid, which provides free legal help for civil (not criminal) issues to low-income Iowans. ILA's Fair Housing Project addresses causes and complaints of illegal housing discrimination to help expand housing opportunities for vulnerable Iowans. ILA received a \$133,183 FHOI grant in FY2021 to help build its housing discrimination enforcement capacity. In FY2023, ILA received \$417,532 in PEI funds and in FY2024 was awarded a \$422,457 PEI multiyear grant, which it will use to expand its fair housing testing program and representation of victims of housing discrimination.

Davenport residents can contact Iowa Legal Aid at:

736 Federal Street

Suite 2309

Davenport, IA 52803

Phone: 1-800-532-1275

Web: iowalegalaid.org

Fair Housing Complaints

The administrative processes for investigating and resolving housing discrimination complaints follow substantially similar tracks and procedures among the FHAP agencies identified above and the HUD/FHEO process. For victims in Davenport (and Iowa generally), an aggrieved party has 300 days from the alleged discriminatory conduct to file a formal complaint with the Iowa Civil Rights Commission or one year to file a complaint with the Davenport Civil Rights Commission. Complainants in Moline and Rock Island have 300 days to file a complaint with the Illinois Department of

Human Rights. In both states, aggrieved persons may file directly with the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of the alleged discriminatory conduct. The investigation, mediation, reasonable or probable cause findings, conciliation efforts, charge procedures, and public hearing decisions under the FHA, IOWA CIVIL RIGHTS ACT, ILLINOIS HUMAN RIGHTS ACT, and Davenport Fair Housing ordinance vary but are substantially similar, including the potential for a finding of liability by an administrative law judge or hearing officer with the availability of compensatory and injunctive relief for the aggrieved complainant. Cases that proceed after a probable cause finding will be adjudicated by the different fact-finding bodies (an ALJ for HUD, an ALJ at the Iowa Department of Inspection and Appeals, an ALJ at the Illinois Human Rights Commission, or a hearing officer with the Davenport Civil Rights Commission).⁴³

If an administrative complaint is filed with the FHEO office, typically, once certified, HUD refers complaints of housing discrimination that it receives back to the state or local FHAP agency for investigation, conciliation, and enforcement activities. HUD policy favors having fair housing professionals based locally where the alleged discrimination occurred because it has found that a state or local agency's closer proximity to the site of the alleged discrimination provides greater familiarity with local housing stock and trends and may lead to greater efficiency in case processing.

Complaints filed with HUD

Region V of the FHEO receives and investigates complaints by households regarding alleged violations of the FHA for cities and counties throughout Illinois, including Moline and Rock Island (as well as Ohio, Indiana, Michigan, Minnesota, and Wisconsin). The FHEO Region VII office receives complaints for cities and counties throughout Iowa, including Davenport (as well as Kansas, Missouri, and Nebraska).

The respective FHEO Regional Offices maintain county-level data reflecting the number of complaints of housing discrimination received by HUD, whether the case is retained by the FHEO or referred to a state or local FHAP for investigation and processing, the status and closure reason of all such complaints, the basis/bases of discrimination and the discriminatory issues identified in each case, and the settlement/conciliation amounts, if any, awarded for each case. Region V and Region

⁴³ A detailed description of the complaint, charge, and hearing procedures under the respective Illinois Human Rights Act, Iowa Civil Rights Act, and Davenport fair housing ordinance are available at: (i) Illinois Department of Human Rights, Procedures for Housing Cases, accessed 11/1/2024, <https://dhr.illinois.gov/content/dam/soi/en/web/dhr/filingacharge/documents/hc-proced.pdf>; (ii) Iowa Civil Rights Commission, Outline of Complaint Process, accessed 11/1/2024, <https://icrc.iowa.gov/file-complaint/outline-complaint-process>; and (iii) Davenport Civil Rights Commission, Complaint Process, accessed 11/1/2024, https://www.davenportiowa.com/UserFiles/Servers/Server_6481372/File/Departments/Civil%20Rights/Complaint%20Process.pdf

VII personnel responded to requests for data regarding complaints received which concern alleged discriminatory housing practices having occurred in Davenport, Moline, or Rock Island for the previous five-year period from October 1, 2019, to October 1, 2024.

HUD reported the filing of 162 formal complaints alleging housing discrimination within the subject jurisdictions: 144 originating from the City of Davenport, 12 from the city of Rock Island, and 6 from the city of Moline.

Of the 144 Davenport cases, 133 cases were referred to a FHAP agency (either the Iowa Civil Rights Commission or the Davenport Civil Rights Commission) for investigation and processing and 11 cases were retained by HUD. For the Moline and Rock Island cases, 2 of the 18 cases were retained by HUD with the others referred to the state FHAP agency (the Illinois Department of Human Rights).

HUD's records showed that 4 of the Illinois cases and 41 of the Davenport cases were still pending/under investigation (as of 10/24/24); 9 Illinois cases (50%) and 69 Davenport cases (48%) were closed by the FHEO/FHAP agency for "no cause"—i.e. after a full investigation was conducted, the investigating agency did not find sufficient evidence to support the complainant's allegations of unlawful discrimination); 21 Davenport cases (15%) had been successfully resolved through conciliation and a settlement agreement negotiated between the parties; 1 Rock Island case and 5 Davenport cases were administratively closed after the complainant stopped cooperating; 1 Moline case and 3 Davenport cases were withdrawn by the respective complainant either after resolution or because the complainant no longer wanted to pursue; 1 Rock Island case was closed for lack of jurisdiction; and 1 Rock Island and 1 Moline case were charged or the FHAP found cause and were still open and pending next steps in the prosecution or conciliation efforts (as of 12/2/24). In 5 Davenport cases, HUD found reasonable cause to believe discrimination occurred and issued a Charge of Discrimination. After election by the parties of these cases to have their respective case then moved to federal district court for a final determination of liability, 3 of the 5 cases were still pending in the courts (as of 10/24/24) and 2 of the 5 charged cases had been dismissed by the district court after overruling the agency's investigative findings or conclusions of law.

In 21 Davenport cases resolved through conciliation/settlement and one case withdrawn after resolution by the complainant, respondents paid damages to the aggrieved party and/or into a victims' fund in amounts ranging from \$500 to \$7,500 and totaling \$35,585. Details regarding whether and what form of equitable or injunctive remedies were also negotiated and approved as part of case settlements were not disclosed in HUD's data. In cases resolved by settlement/conciliation, the respondents did not necessarily admit liability, but may have settled to avoid further expense, time, and the uncertainty of litigation.

The following table shows the basis of discrimination, also understood as the protected class status, alleged in the 12 cases originating in Rock Island, 6 Moline cases, and 144

Davenport cases. More than one basis of discrimination may be cited in a single complaint, thus why there were 205 identified bases of discrimination alleged in the 162 complaints filed.

TABLE 21. BASIS/PROTECTED CLASS STATUS OF DISCRIMINATION COMPLAINTS

Basis of Discrimination Reported	Rock Island	Moline	Davenport
Disability	8	3	66
Race	5	1	64
Retaliation	1	1	25
Sex	0	1	15
National Origin	1	0	7
Familial Status	0	1	5
Religion	0	0	1
Color	0	0	0
Total	15	7	183

The City of Davenport was named as a respondent in 9 cases. One of those cases is still open/under investigation (as of 10/24/24); 6 cases were closed after a “no cause” determination; 1 case was withdrawn by the complainant without resolution; and 1 case was dismissed because the complainant failed to cooperate.

Complainants also may cite more than one discriminatory act or practice, recorded as the discriminatory “issue.” HUD reported complainants identified the following discriminatory issues: “discrimination in terms/conditions/privileges relating to rental” was the most often cited issue in the Davenport cases, in 77 cases (~53% of cases), and cited in 1 Rock Island and 1 Moline case; failure to make reasonable accommodation or permit reasonable modification was cited in 51 Davenport cases (~35% of cases) and 11 Moline/Rock Island cases (~61% of those cases); discriminatory acts under Section 818 (coercion, etc.) was cited in 42 Davenport cases and 1 Moline case; discriminatory terms, conditions, privileges, or services and facilities in 27 Davenport cases and 6 Moline/Rock Island cases; discriminatory refusal to rent in 23 Davenport cases, 2 Moline cases, and 1 Rock Island case; otherwise deny or make housing unavailable in 20 Davenport cases and 2 Rock Island cases; discriminatory advertising, statements and notices in 13 Davenport cases and 2 Rock Island cases; discriminatory financing (includes real estate transactions) was cited in 1 Rock Island case. Finally, using ordinances to discriminate in zoning and land use was reported in 1 Rock Island case (dismissed for lack of jurisdiction).

Complaints filed with Iowa Civil Rights Commission

A request also was made to the Iowa Civil Rights Commission for data reflecting the number of housing discrimination related complaints received by the Commission regarding housing units in the City of Davenport. The Commission provided the following data for 42 cases it processed between October 1, 2019, and October 24, 2024:

TABLE 22. ICRC HOUSING DISCRIMINATION COMPLAINTS

Basis	Cause of Action	Result
National Origin (Hispanic), Retaliation	Terms and Conditions, Participation	No Probable Cause
Disability	Reasonable Accommodation	No Probable Cause
Disability	Refusal to Rent	No Probable Cause
Race (Black)	Terms and Conditions	No Probable Cause
Disability	Refusal to Rent, Reasonable Accommodation	No Probable Cause
Race (Black), Disability	Reasonable Accommodation, Terms and Conditions, Harassment	Satisfactory Adjustment (\$500), plus waive all fees associated with early termination of lease.
Retaliation	Terms and Conditions	No Probable Cause
Sex (Female), Retaliation	Sexual Harassment, Eviction	Administrative Closure
Sex (Female), Retaliation	Sexual Harassment, Eviction	No Probable Cause
Race (Black)	Terms and Conditions	Local – Open
Retaliation	Eviction	No Probable Cause
Disability	Reasonable Accommodation, Terms and Conditions	No Probable Cause
Race (Black)	Terms and Conditions, Harassment, Eviction	Local – Open

Basis	Cause of Action	Result
Familial Status	Terms and Conditions, Eviction	Local – Open
Retaliation	Terms and Conditions	Local – Open
Disability	Harassment	Local Administrative Closure
Race (Black), Sex (Female)	Harassment, Terms and Conditions	Local Administrative Closure
Race (Black)	Terms and Conditions	Local – Open
Race (Other)	Other	Local – Open
Race (White)	Harassment	No Probable Cause
Race (Other), Sex (Female)	Sexual Harassment, Other	Local – Open
Race (Other)	Harassment, Eviction	Local – Open
Race (Other)	Terms and Conditions	Local
Race (Black)	Terms and Conditions	No Probable Cause
National Origin (Mexican)	Terms and Conditions, Eviction	Local – Open
Familial Status, Retaliation	Terms and Conditions, Other	Local – Open
Race (Black)	Terms and Conditions, Other	Local – Open
Race (Black)	Refusal to Rent	No Probable Cause
Race (Black)	Refusal to Rent, Terms and Conditions	No Probable Cause
Race (Black)	Refusal to Rent	No Probable Cause
Race (Black), Familial Status, Disability	Terms and Conditions, Eviction	No Probable Cause
Race (Black)	Terms and Conditions, Harassment	No Probable Cause
National Origin (Mexican)	Terms and Conditions, Otherwise deny or make housing unavailable	No Probable Cause

Basis	Cause of Action	Result
Race (Black), Disability	Reasonable Accommodation, Terms and Conditions	No Probable Cause
Race (Black)	Harassment	No Probable Cause
Race (Black), Sex (Female)	Terms and Conditions, Eviction	No Probable Cause
Disability	Terms and Conditions	No Probable Cause
Race (Black)	Harassment, Eviction	Open; investigation
Race (Black)	Harassment, Eviction	Open; investigation
Sex (Male), Gender Identity, Disability	Reasonable Accommodation, Terms and Conditions	No Probable Cause
Race (Black)	Harassment, Terms and Conditions, Refusal to Rent	Administrative Closure
Race (White), Disability	Denied Accommodation, Harassment, Other	Open; mediation

Of the 42 cases processed by the Commission, 15 cases were still open at the time of reporting (12 open at the local level, 2 cases open in the investigation phase, and 1 case open in the mediation phase). Of the closed cases, a “no cause” finding was made in 22 cases (52%); 2 cases had been administratively closed by the Commission; 1 case closed administratively by the local fair housing enforcement authority; and 1 case reached an individualized settlement that included a satisfactory adjustment of \$500 plus agreement by the respondent landlord to waive all fees associated with early termination of the lease.

Race was the most often cited basis of discrimination in the Davenport cases cited in 25 matters (~60%), followed by disability in 11 cases (~26%); retaliation in 7 cases; sex in 6 cases; national origin in 3 cases; familial status in 3 cases; and gender identity in one case. The most often cited issues (“cause of action”) included discriminatory terms and conditions in 25 cases (~60%); harassment in 12 cases (~29%); eviction in 11 cases; reasonable accommodation or denied accommodation in 7 cases; discriminatory refusal to rent in 6 cases; and sexual harassment in 3 cases.

Complaints filed with Davenport Civil Rights Commission

The Commission reports data reflecting complaints it receives, investigates, and processes in each calendar year’s Annual Report. As of the writing of this report, DCRC Annual Reports for CY2019–2021 were posted. The Commission received and opened

44 housing discrimination cases and closed 40 housing cases in CY2019; opened 14 housing discrimination cases and closed 22 in CY2020; and opened 29 housing discrimination cases and closed 29 cases in CY2021. Three cases were referred to HUD in 2021.

The Annual Reports provide data regarding the basis of discrimination (i.e. race, disability, sex, etc.) and the disposition of cases (i.e. settlement, no probable cause finding, probable cause, etc.), but the numbers are not broken down by whether the alleged discriminatory action occurred in the context of housing versus employment, public accommodation, education, credit, or transit. So, for example, in 2021, of the 105 total complaints that were filed with the Commission, race was cited 62 times as a basis of discrimination, but the report does not indicate how many of those were housing cases versus employment, public accommodation, etc. Annual Reports are available on the Commission’s website.

The Commission’s website also provides information on settlements it has secured stemming from housing discrimination complaints:

TABLE 23. DCRC HOUSING DISCRIMINATION COMPLAINTS RESOLVED BY SETTLEMENT

Davenport Civil Rights Commission Settlement Terms for Resolved Housing Discrimination Complaint Cases			
Closure Date	Basis	Trigger Event/Issue	Terms
7/10/2023	Disability	Failure to Accommodate	\$2,500, Creation of Policy
6/30/2023	Race, Disability, Age	Harassment, Discriminatory Statements, Different Treatment	\$1,750, Notification of Terms of Agreement
6/13/2023	Disability	Failure to Accommodate	Specific Performance, Notification of Fair Housing Policies, Posters
4/24/2023	Familial Status	Discriminatory Statements	\$12,000 to Complainant, \$6,422.13 to the Commission
4/3/2023	Disability	Failure to Accommodate	\$500, Apology, Notification of Fair Housing Policies

3/20/2023	Disability	Failure to Accommodate	\$2,500, Notification of Fair Housing Policies
11/7/2022	Disability	Failure to Accommodate	\$1,000, Notification of Fair Housing Policies
2/28/2022	National Origin	Different Treatment	\$2,000, Training
1/20/2022	Race, Disability	Failure to Accommodate, Different Treatment	\$1,081, Specific Performances
10/29/2021	Race	Different Treatment	\$3,500, Training
10/19/2021	Disability	Failure to Accommodate	\$1,269, Notification of Fair Housing Policies
5/1/2021	Disability	Failure to Accommodate	Apology, Fair Housing Posters
2/12/2021	Disability	Failure to Accommodate	\$1,000, Training
6/1/2020	Disability	Failure to Accommodate	\$835, Letter of Reference, Specific Performances
5/27/2020	Race	Different Treatment	Apology, Fair Housing Logo on Applications, and Leases
3/20/2020	Disability	Failure to Accommodate	\$4,700, Apology, Neutral Reference, Training
3/9/2020	Disability	Failure to Accommodate, Different Treatment	\$4,900, Fair Housing Posters
10/30/2019	Disability	Harassment	Apology, Training

		Total Compensation	\$45,957
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For the 18 housing-related discrimination cases conciliated and settled between October 2019 through December 31, 2023 (the most current data available), disability was the most alleged basis of discrimination, occurring in 14 cases (~78%), followed by race in 4 cases and familial status, age, and national origin occurring in 1 case each. The Commission secured a total of \$45,957 in damages to aggrieved parties and civil penalties. Relief also included fair housing training and terms requiring that housing providers adopt fair housing policies, communications, and notifications.

In its most recently published Annual Report, CY2021, the Commission illustrated its work in resolving fair housing disputes by describing the mediation process in one particular case: A Complainant filed a housing discrimination complaint alleging that the manager of the mobile home park where she leased a lot space for the trailer she owned was terminating her lot lease because of her household’s national origin, though the manager’s stated reason for termination was the complainant’s failure to make repairs to the trailer. Complainant alleged that the manager would not allow her to make the needed repairs to bring the trailer up to standards and instead pressured her to sell the trailer to new owners. Respondents initially refused to cooperate with the investigation, but after going through the Commission’s subpoena process, the respondents submitted the necessary information for the investigation. Prior to the completion of the investigation, the parties agreed to participate in Commission-led conciliation. The complainant ultimately settled in conciliation for \$2,000 in relief and respondents agreed to attend fair housing training as relief in the public interest.

Complaints filed with the Illinois Department of Human Rights

A FOIA response from the IDHR reveals that between October 1, 2019, through October 1, 2024, the Department opened or closed 8 cases alleging housing discrimination related to properties or parties located in the City of Moline and 7 cases from the City of Rock Island.

TABLE 24. IDHR HOUSING DISCRIMINATION COMPLAINTS

Illinois Department of Human Rights					
Jurisdiction	Open and Closure Dates	Basis / Bases	Issues	Closure Reason	Respondent (if a city or city agency)

Moline	01/25/18 - 11/15/22	Sex	Terms	Adjusted Terms of Settlement	
Moline	12/20/18 - 10/24/19	Race	Additional Civil Rights	Lack of Substantial Evidence	Moline Housing Authority
Moline	02/22/19 - 12/18/19	Race	Terms	Lack of Substantial Evidence	Moline Housing Authority
Moline	05/10/19 - 4/15/20	Disability (Mental)	Terms	Failure to proceed	
Moline	04/09/20 - 4/5/21	Disability (Mental)	Failure to accommodate	Lack of Substantial Evidence	Moline Housing Authority
Moline	11/15/21 - 3/14/23	Disability (Mental)	Failure to accommodate	Lack of Substantial Evidence	
Moline	02/23/23 - 11/14/23	Disability (Mental)	Failure to accommodate	Lack of Substantial Evidence	
Moline	05/29/24 - Open	Familial Status	Rental		Moline Housing Authority
Rock Island	09/18/17 - 5/13/21	Religion	Terms	Failure to Proceed	Rock Island Housing Authority
Rock Island	10/22/18 - 10/24/19	Race	Terms	Lack of Substantial Evidence	Rock Island Housing Authority
Rock Island	04/09/20 - 4/12/22	Disability (physical)		Lack of Substantial Evidence	
Rock Island	09/01/20 - open	Race	Terms	Lack of Jurisdiction	City of Rock Island
Rock Island	11/17/22 - open	Race	Terms		City of Rock Island

Rock Island	03/27/23 - open	Disability (Mental)		Lack of Substantial Evidence	
Rock Island	04/18/24 - open	Disability (Mental)	Terms		

For the cases that have been closed/resolved during this time period, the majority were closed after investigation and a finding of lack of substantial evidence (“no probable cause” finding) to proceed. Disability was most often cited as the basis of discrimination—in 7 out of 15 cases—followed by race in 5 cases, and religion, sex, and familial status being the basis of perceived discrimination in one case each.

The Moline Housing Authority was named as the respondent/offending party in 4 cases, the Rock Island Housing Authority in 2 cases, and the City of Rock Island in 2 cases. Two of those cases are still open and pending investigation (as of 10/28/24); however, the other six cases were closed for lack of substantial evidence or lack of jurisdiction without a finding of liability against the local government.

Fair Housing Enforcement through Civil Litigation

Under the FHA, the Iowa Civil Rights Act, and the Illinois Human Rights Act, in addition to or as an alternative to filing an administrative complaint, an aggrieved person may commence a civil action in an appropriate United States district court or state court (with proper jurisdiction and venue) not later than two years after the occurrence or the termination of an alleged discriminatory housing practice, thus maintaining control of the case and the potential to collect punitive damages. Victims do not have to first exhaust their administrative remedies before filing a lawsuit nor be issued a “right to sue” letter from the administrative enforcement agency. If an administrative action has already commenced, the parties still may elect to move the case to court for adjudication as long as the parties have not already entered into a conciliation agreement to resolve the alleged discriminatory housing practices or, following a charge of discrimination, an administrative hearing has not already commenced.

Fair housing lawsuits may be filed against local governments and zoning authorities and against private housing providers, mortgage lenders, developers, or real estate brokers. Because the ICRA and IHRA have been determined to be substantially similar to the FHA, court opinions interpreting the FHA are instructive in interpreting the state laws.

Under the FHA, a plaintiff may hire a private attorney or request a court-appointed attorney for assistance with litigating the case and may seek to prove actual or compensatory damages and request injunctive relief and punitive damages. Settlement amounts or jury awards often are much larger for cases prosecuted in court than victim compensation awards through the administrative process. In an election

case, the Department of Justice may prosecute the case on behalf of the aggrieved party. Additionally, the DOJ or the state attorney general may bring suit on behalf of individuals based on referrals from HUD/FHAP in the case of a “pattern or practice” of discriminatory actions, a case of particular importance to the public interest, or when there has been a breach of a conciliation agreement. In a pattern or practice case, the court may award preventative relief (permanent or temporary injunction, restraining order, or other order) and under the FHA, a civil penalty up to \$50,000 for a first violation and up to \$100,000 for a second or subsequent violation. An aggrieved party may intervene in any action filed by the DOJ.

For the recent five-year period studied—October 1, 2019, through October 31, 2024—only one lawsuit of significance was found regarding allegations of unlawful housing discrimination occurring in Davenport, Moline, or Rock Island that resulted in federal litigation, a published HUD ALJ decision/settlement, or a published state court opinion.

- ***United States v. Goitia*, 3:20-cv-56 (S.D. Iowa) (complaint filed June 29, 2020; consent order entered and case dismissed May 23, 2022).**

The United States DOJ brought this action on behalf of multiple female tenants of rental housing properties owned and managed by the defendants in Davenport, Iowa. The amended complaint alleged that the defendants engaged in a pattern or practice of discrimination on the basis of sex, specifically that the owner/manager Juan Goitia sexually harassed numerous female tenants since at least 2010 by making unwelcome sexual comments and advances, touching tenants’ bodies without their consent, entering the homes of female tenants without their consent and without prior notice, and taking adverse actions against tenants who resisted his sexual overtures or complained about the harassment. The parties ultimately agreed to a settlement before trial resolving claims against the offending landlord and against 908 Bridge Cooperative which, along with Goitia, owned the properties where the harassment occurred. The consent order required defendants to pay \$135,000 in monetary damages to compensate individuals harmed by the harassment and pay a civil penalty to the United States. Further, the consent order bars Goitia from continuing to manage rental housing; requires defendants to hire an independent manager to manage any rental properties that defendants own or manage now or in the future; and requires defendants to obtain fair housing training and implement comprehensive non-discrimination policies and complaint procedures to prevent sexual harassment at their properties in the future.

In a press release announcing the settlement, Assistant Attorney General Kristen Clarke for the Justice Department’s Civil Rights Division stated, “*Sexual harassment by housing providers is an illegal and egregious abuse of power that deprives tenants of their right to be safe and secure in their homes.*” The Justice Department’s Sexual Harassment in Housing Initiative aims to address and raise awareness about this form of sex-based discrimination by landlords, property managers, maintenance workers, loan officers, or other people who have control over housing. Since launching the

initiative in October 2017, the Department of Justice has filed 23 lawsuits alleging sexual harassment in housing and recovered over \$9.6 million for victims of such harassment.

CHAPTER 10.

IDENTIFICATION OF IMPEDIMENTS

Described below are the fair housing impediments identified in this Analysis of Impediments, along with associated contributing factors and supporting datapoints. Following these narrative descriptions is a table containing recommended actions, responsible parties, and potential partners for addressing the named impediments.

Impediment 1: Insufficient access to affordable housing

The persistent housing and affordability crisis, which was noted in the 2019 AI, has continued to grow in Moline, Davenport, and Rock Island and was the most common issue mentioned by stakeholders and community members in focus groups, public forums, and interviews. Many community engagement participants described poor building and unit conditions, and limited oversight has put many renters in unsafe situations. These conditions include aging buildings with mold, pests, and even structural risks, which were amplified by the deadly apartment building collapse⁴⁴ in downtown Davenport in 2023. Participants noted these problems are a result of landlords' neglect upkeep, focusing on profits over tenants' wellbeing. Many believe these issues have become overlooked due to weak code enforcement and inadequate city resources to check and fix housing in need of repair.

Vulnerable and marginalized populations, like those with disabilities, large families, or individuals reentering society after time in prison, are especially impacted by the lack of affordable, accessible housing options. There is a lack of homes and units specifically designed for individuals with disabilities who need accommodations such as ramps, wide doorways, elevators, and more. Families that need more space face high costs and restrictive zoning laws, while people with criminal records often face discrimination making it hard to secure housing. Stakeholder particularly noted the limited funding impacts coordination among housing services and resources. Representatives from local nonprofit housing assistance organizations and agencies also noted their intake capacity has become overwhelmed during and following the COVID-19 pandemic.

Systemic barriers have also resulted in mortgage denial disparities, which affect some minority groups who are two times as likely than non-Hispanic white households to face denial when seeking a loan. This further limits people of color from accessing homeownership opportunities while also widening economic divides. Stakeholder and community residents alike brought attention to the strict tenant requirements from

⁴⁴ Langmaid, CNN, V. (2023). Multiple structural problems caused Davenport, Iowa, apartment building collapse that killed 3 residents, investigation finds. [cnn.com](https://www.cnn.com/2023/09/07/us/davenport-iowa-building-collapse-investigation/index.html).
<https://www.cnn.com/2023/09/07/us/davenport-iowa-building-collapse-investigation/index.html>

landlords, like no tolerance for past evictions or credit issues, leave many people at risk of homelessness and further limit their access to affordable housing and housing in general. Many noted homelessness has increased in recent years, particularly as the cost of living and rents have increased across the cities and region. Different protected class members face additional barriers in accessing for-sale and rental housing.

Data about housing problems presented in Chapter 6 of this report shows that, in each city, affordability issues are more acute for households of color than for White households. Black and Native American households in Davenport, Moline, and Rock Island experience housing problems at disproportionate rates: about 41% to 43% of Black households have at least one of the four housing problems, and 53% to 90% of Native American households have a housing problem. In Rock Island, Asian and Hispanic households also experience housing problems at disproportionate rates (52.7% and 39.6%, respectively). While the total numbers of households are small, the 20 Pacific Islander households in Moline and Rock Island all experience housing problems (100% of the 10 Pacific Islander households in each city). Particularly, housing problems are more prevalent for households with lower incomes than for those with higher incomes. Across the three cities, about 75% to 78% of households with incomes of 30% HAMFI or below have one or more housing problems, while the same is true for only about 11% to 16% of households with incomes of 81% to 100% HAMFI.

Together with input regarding housing condition, these rates show a continued need to expand the supply of affordable housing available in all three cities, along with improving and/or maintaining existing affordable housing. This may include development and preservation of affordable for-sale and rental product. Further, several stakeholders note the specific need for housing assistance directed toward lowest income groups (households with incomes under 30% of area median income) and people experiencing or at risk for homelessness.

Impediment 2: A lack of targeted investment in underserved areas resulting in increasing disparities in access to opportunity

Data and mapping analysis of Moline, Davenport, and Rock Island reveals that each City contains neighborhoods with significant disparities in access to opportunity, especially for protected class groups. A lack of targeted attention and investment to these areas results in widening disparities in access to many resources needed for residents to thrive and achieve upward mobility. The most severely impacted neighborhoods lack many different resources, compounding access issues for residents. The following factors contribute to this impediment to fair housing in Moline, Davenport, and Rock Island:

Low and inconsistent levels of school proficiency

Opportunity Index Disparities, as shown in Table 4, show that variations in school quality disproportionately impact residents living below the poverty line and, in Davenport and Rock Island, residents who are non-white. In addition, Davenport and Rock Island have significantly lower school proficiency scores as a whole than Moline, especially the latter. Residents who participated in the community feedback process additionally noted issues with recent school closures in Davenport.

School proficiency varies widely by location within the jurisdiction, as depicted in Figure 7. Most concerning, school proficiency scores are 10 or less out of a possible total of 100 in roughly half of the area's census tracts. This is especially prominent in Rock Island, where more than half of all census tracts have proficiency scores this low. In addition, Davenport is the only City to have any schools with a proficiency score above 75, and these exist only in small areas of the City. As shown in Figure 10, there is significant correlation between areas with low school proficiency scores and low levels of residents who complete high school.

Limitations in transit options

Transit access and affordability both shape many other opportunity factors, such as access to jobs and good schools. This is especially true for areas in which fewer residents own or have access to a personal vehicle, as is true for neighborhoods along the Mississippi River in all three cities (see Figure 17).

As shown in Figure 16, Davenport has the largest proportion of land area with a transit affordability score under 50 (out of 100). This is likely due to heavier levels of car dependency within the City. Because of this, Davenport residents who do not have access to a personal vehicle may face more difficulties in accessing public transit than residents of Moline or Rock Island. Table 4 also shows that, as a whole, Davenport residents take fewer public transit trips than residents of Moline or Rock Island. This may indicate an increased need for transit options in Davenport.

A need for employment assistance and job training

Neighborhoods along the Mississippi River, especially in Davenport and Rock Island, have the lowest labor market engagement rates in the area. These same neighborhoods also face a lack of many other resources, and these disparities likely compound each other. Figures 12 and 13 show that some of the same neighborhoods with the highest job proximity scores – meaning the most available jobs – have the lowest labor market engagement scores, and Figures 10 and 11 show that these same neighborhoods are those with the lowest level of high school and college education in the jurisdiction. Table 4 shows that a lack of proximity to jobs and low labor market index scores disproportionately impact low-income and non-white residents. The largest discrepancies appear in Davenport, where low-income Asian and Native American residents have labor market index scores of 20 and 30 points lower,

respectively, than their white peers; and in Rock Island, where non-white residents have scores of 15 to 30 points lower than their white peers, with Black residents being most heavily impacted.

These statistics, especially in combination with low educational achievement rates in impacted areas, likely indicate a severe need for employment assistance and job training programs in the most impacted areas.

A need for holistic revitalization planning efforts in areas with many disparities

As previously stated there are many neighborhoods in the jurisdiction, particularly those located along the Mississippi River, which face significant disparities in access to most or all types of opportunity. The largest level of need overall exists in Rock Island. Davenport has perhaps the largest degree of disparity, containing the largest discrepancies in access to resources between different neighborhoods. Moline has fewer neighborhoods with intense levels of need, but also fewer neighborhoods with high levels of access on par with Davenport's most affluent neighborhoods.

For neighborhoods that face several compounding needs – such as neighborhoods with low labor market engagement scores, low school proficiency scores, and low levels of high school educational achievement – there is a significant need for targeted, holistic revitalization efforts following a strategic plan. The Cities may wish to investigate the possibility of designating these areas as opportunity or similar districts and developing a strategic plan for improving resources in these areas at a holistic level.

Impediment 3: Insufficient and unequally distributed publicly supported housing options

Data and mapping analysis indicate that both the supply and distribution of publicly supported housing options in Moline, Davenport, and Rock Island are inadequate. Maintaining a variety of decent and accessible publicly supported housing options is crucial to any community in order to support low-income, disabled, elderly, and other vulnerable populations. The following factors contribute to this impediment to fair housing in Moline, Davenport, and Rock Island:

Inadequate supply and utilization of publicly supported housing

Examining data on the average wait times and the utilization percentages for available publicly supported housing can help us to understand whether there is an adequate supply of publicly supported housing and whether it is being utilized effectively. Where data is available, average wait times for publicly supported housing units programs in Moline, Davenport, and Rock Island range from 8 months to 39 months. These extremely long wait times, particularly for Housing Choice Vouchers, indicate that demand for housing assistance far exceeds supply in all three Cities.

In addition, Moline is the only City that maintains all five types of publicly supported housing programs – Public Housing, Project-Based Section 8, Housing Choice Vouchers, Section 202 (elderly), and Section 811 (disabled). Davenport does not maintain Public Housing, and Rock Island does not maintain Section 202 or Section 811 housing. This means that residents of Davenport and Rock Island in need of such housing have more limited options than residents of Moline.

Despite wait times indicating intense demand, utilization data indicates that some programs are not being utilized as effectively as possible. This is especially in Rock Island, where HCV wait times are 17 months on average and yet only three-quarters of available vouchers are being utilized. This likely indicates that voucher holders are experiencing some form of barrier to using vouchers once approved, such as an inability to find a landlord who accepts vouchers.

Unequal clustering of publicly supported housing options

As depicted in Figure 29, publicly supported housing is clustered in all three Cities to some extent. Davenport has the least clustering, likely due to a higher prevalence of Housing Choice Vouchers, which are intended to allow residents greater choice in where to live. Rock Island displays the highest levels of clustering, particularly among Housing Choice Vouchers, which is unusual due to the aforementioned nature of the HCV Program. As shown in Figure 29, there are almost no HCV holders residing in the southeastern portion of Rock Island. In combination with low utilization rates of Rock Island HCVs, this may indicate a lack of landlords who are willing to accept Housing Choice Vouchers in Rock Island and, to a lesser extent, in Moline and Davenport.

Impediment 4: Fair housing education and equitable enforcement

The report identified several challenges related to fair housing education and enforcement. Many community members shared while they are aware of a few fair housing laws and tenants' rights, many landlords do not abide by them and continue to withhold repairs, threaten tenants with eviction, and discriminate based on mental and physical disabilities. Many participants were also not aware of where to access information or resources when in need of help. Despite some educational efforts, such as training sessions and brochures, these resources remain limited, often reaching only those actively engaged with city or community organizations. There is also a lack of coordination among legal aid, civil rights resources, and local fair housing organizations, which hinders effective enforcement of fair housing regulations.

Planning for community development in general can greatly benefit from an equity lens applied to decision making processes. In this sense, there must be equitable enforcement, however, there are inconsistencies across city ordinances and zoning laws that may act as a barrier. For example, restrictive definitions of "family" and zoning policies that prevent group homes or multi-family housing contribute to

barriers in fair housing choices, particularly for vulnerable populations such as people with disabilities. Additionally, while “Not In My Back Yard” (NIMBY) attitudes were noted among community leaders as a potential fair housing barrier, this sentiment among the general public can also impact affordable housing construction and development of mixed-income neighborhoods and the inclusion of residents with different needs. These policies and attitudes can lead to segregation by limiting affordable housing development and making it difficult for individuals with disabilities to find suitable housing.

Community input also highlighted the cultural and language barriers that complicate fair housing education and enforcement. Populations with limited English proficiency (LEP), including immigrants and refugees, often struggle to access fair housing resources and navigate the legal landscape. Similarly, discriminatory lending practices and inconsistent enforcement across housing and rental markets contribute to disparities, further limiting housing choices for protected groups.

Additionally, stakeholder input suggests a need for training and community education focused on overcoming racism and ableism. Meeting participants cited several examples of prejudicial and “Not In My Backyard” or NIMBY attitudes among people in positions of local leadership as well as among some members of the public at large. A broad-based and respected local convening organization could consider a periodic fair housing training aimed first at community leaders as a starting point to help disseminate the message more widely to other groups.

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #1: Insufficient access to affordable housing		
Limited new rental housing construction or rental rehabilitation in the region	<ul style="list-style-type: none"> • Continue using CDBG and HOME funds to increase and maintain the availability of high-quality, affordable rental and for-sale housing through new construction and rehabilitation. • Review the Qualified Allocation Plans issued by the Illinois Housing Development Authority and Iowa Finance Authority (as appropriate) under their respective Low Income Housing Tax Credit (LIHTC) programs to identify local government policies or actions that may positively impact the competitiveness of developers' applications. For developers proposing LIHTC projects in areas with access to key community resources/opportunity factors or areas experiencing a loss of affordable rental units, work with them to increase the competitiveness of their applications through letters of support, provision of data and information, gap financing, and other assistance. 	<ul style="list-style-type: none"> • City of Moline • City of Davenport • City of Rock Island • Housing developers • LIHTC developers
Limited supply of affordable housing disproportionately impacts households of color	<ul style="list-style-type: none"> • Consider opportunities to support the work of nonprofit housing providers in order to improve quality affordable rental options. • Consider funding financial assistance programs to prevent evictions and support housing stability particularly for vulnerable and cost-burdened households including those who are low-income or who have disabilities. 	<ul style="list-style-type: none"> • City of Moline • City of Davenport • City of Rock Island • Nonprofit housing providers • Social service organizations
Landlords are reluctant to maintain and improve rental properties	<ul style="list-style-type: none"> • The cities of Moline, Davenport and Rock Island all operate rental inspection programs to periodically assess the condition of the rental properties within their jurisdictions. The cities should assess their respective registration and inspection programs for opportunities to close loopholes and make them more effective, 	<ul style="list-style-type: none"> • City of Moline • City of Davenport • City of Rock Island • Landlords

Contributing Factors	Recommended Activities	Responsible Parties and Partners
	<p>including consideration of increased staffing and resource allocations.</p> <ul style="list-style-type: none"> Organize a networking meeting between local government inspection staff and nonprofit housing assistance organizations to develop a referral protocol for situations where a tenant household may have to be displaced due to substandard housing conditions discovered in the course of an inspection. 	<ul style="list-style-type: none"> Nonprofit housing assistance organizations
<p>Mortgage denial disparities disproportionately affect minority groups, particularly Black and Hispanic, who are twice as likely as non-Hispanic white households to face loan denials.</p>	<ul style="list-style-type: none"> Encourage CDBG public services funding applications from organizations providing homeownership counseling and financial literacy programs tailored to minority communities. Services may include guidance on credit building, budgeting, and navigating mortgage application requirements. Regular workshops and resources distributed in multiple languages could better prepare these households to meet lender criteria. 	<ul style="list-style-type: none"> City of Moline City of Davenport City of Rock Island Financial counseling organizations
<p>Impediment 2: A lack of targeted investment in underserved areas resulting in increasing disparities in access to opportunity</p>		
<p>Low and inconsistent levels of school proficiency</p>	<ul style="list-style-type: none"> Share school proficiency and related data from this report with school district officials to aid their planning and decision-making with regard to resource distribution in areas of greatest need. Encourage investigation of creative opportunities to provide extra funding and resources to low-performing schools. Consider whether resources like food and clothing pantries may be helpful in areas with low performing schools. 	<ul style="list-style-type: none"> City of Moline City of Davenport City of Rock Island School districts
<p>Limited transit options</p>	<ul style="list-style-type: none"> When proposed, and where possible, support local efforts to expand bus routes and covered shelters at existing bus stops in all three cities. 	<ul style="list-style-type: none"> City of Moline City of Davenport City of Rock Island

Contributing Factors	Recommended Activities	Responsible Parties and Partners
	<ul style="list-style-type: none"> Consider the possibility of subsidized or refundable rideshare costs for residents using rideshare for specific activities, such as school or employment activities. 	<ul style="list-style-type: none"> Transit providers
Need for employment assistance and job training	<ul style="list-style-type: none"> Encourage CDBG public services funding applications from organizations that will provide job training and other employment assistance programs over the next few years. Create or expand a centralized website or other resource hub where residents can access information on job training and employment assistance resources. 	<ul style="list-style-type: none"> City of Moline City of Davenport City of Rock Island Job training and employment assistance organizations
Need for holistic revitalization planning efforts in areas with many disparities	<ul style="list-style-type: none"> Create a task force to identify neighborhoods in all three Cities that face the most disparities in access to resources and opportunities. Encourage collaborative work among the cities of Davenport, Moline, and Rock Island to coordinate and align where possible to the goals, strategies, and outcomes promoted in their respective community revitalization efforts. Consider including business, neighborhood, and other leaders from impacted areas in neighborhood revitalization planning. Create metrics for measuring success in revitalization efforts, ensuring that business, neighborhood, and other leaders from impacted areas are involved in and agree with metric development. 	<ul style="list-style-type: none"> City of Moline City of Davenport City of Rock Island Business leaders Neighborhood leaders
Impediment 3: Insufficient and unequally distributed publicly supported housing options		
Inadequate supply and utilization of publicly supported housing	<ul style="list-style-type: none"> Investigate the potential for dedicating new funding towards TBRA and other forms of housing assistance in order to meet demand. Encourage public housing authorities to create a task force to identify and develop ideas to address barriers that residents may 	<ul style="list-style-type: none"> City of Moline City of Davenport City of Rock Island Public housing authorities

Contributing Factors	Recommended Activities	Responsible Parties and Partners
	face in accessing and using housing assistance, especially Housing Choice Vouchers.	<ul style="list-style-type: none"> • Nonprofit housing providers
Unequal clustering of publicly supported housing options	<ul style="list-style-type: none"> • Encourage public housing authorities and local civil rights commissions to monitor the prevalence of discrimination against voucher holders by landlords. • Support public housing authorities in developing an educational campaign focused on 1) informing residents of their fair housing rights, especially as voucher holders, and 2) educating landlords on participation in the HCV program. • Support the creation of incentive programs that would incentivize more landlords to accept vouchers (options may include tax breaks, subsidized repair costs, subsidized deposits, etc.). • Continue using CDBG and HOME funds to increase and maintain the availability of high-quality, affordable rental housing and its distribution in neighborhoods offering good access to opportunity. 	<ul style="list-style-type: none"> • City of Moline • City of Davenport • City of Rock Island • Public housing authorities • Housing developers • LIHTC developers
Impediment 4: Fair Housing education and equitable enforcement		
Stakeholder input suggested that some community members have expressed racism and NIMBY attitudes	<ul style="list-style-type: none"> • Either using in-house staff or through a contracted provider, the cities should annually design and/or update and coordinate delivery of a regional fair housing education program that reaches the public with information about fair housing rights and responsibilities, how to recognize discrimination, and how and where to file a complaint. • Restrictive zoning laws that hinder affordable housing options and the development of housing for non-homeless and special-needs populations. The Cities should analyze their current code and amend restrictive zoning policies to promote diverse housing options, including group homes and multi-family developments. 	<ul style="list-style-type: none"> • City of Moline • City of Davenport • City of Rock Island • Civil rights commissions • Fair housing organizations

Contributing Factors	Recommended Activities	Responsible Parties and Partners
<p>Organizations with little personnel that have been overburdened in recent years by the rising demand for services are further burdened by the lack of coordination among fair housing organizations, legal aid services, and other institutions.</p> <p>Additionally, residents are unsure of where to find resources or assistance when seeking help.</p>	<ul style="list-style-type: none"> • Participate in partnerships between legal aid, civil rights, and housing organizations to help streamline fair housing services and resources. • Recruit applications from fair housing agencies for CDBG funding that would support personnel expansion. • Develop a centralized network that allows fair housing organizations, legal aid services, and related institutions to share resources and communicate more effectively. This could include an online platform for case management, referrals, and updates on available services, helping reduce workload on organizations while also easing accessibility for residents in search of help. 	<ul style="list-style-type: none"> • City of Moline • City of Davenport • City of Rock Island • Civil rights commissions • Fair housing organizations • Nonprofit housing assistance organizations
<p>Data on housing discrimination complaint filings indicates that more fair housing education is needed for members of the general public.</p> <p>Immigrants, refugees, and people with</p>	<ul style="list-style-type: none"> • Provide fair housing education in culturally appropriate ways, particularly to non-English speaking communities. • Recruit applications from fair housing agencies for CDBG funding that would support fair housing education in culturally appropriate ways, particularly to non-English speaking communities. • Adhere to established Language Access Plans to ensure that essential fair housing information, complaint processes, and tenant rights are available in multiple languages. This may include translating documents into the most common languages in the 	<ul style="list-style-type: none"> • City of Moline • City of Davenport • City of Rock Island • Civil rights commissions • Public housing authorities

Contributing Factors	Recommended Activities	Responsible Parties and Partners
<p>limited English proficiency are at heightened risk of housing discrimination</p>	<p>area and ensuring interpreters are available for consultations and workshops.</p> <ul style="list-style-type: none"> • Collaborate with local community centers, immigrant support organizations, and refugee aid groups to provide culturally relevant and accessible fair housing education. • Utilize a range of communication channels, such as radio, community newspapers, and social media platforms in multiple languages, to spread awareness about fair housing rights and available resources. Visual aids, simple language, and examples relevant to LEP communities can make these materials more accessible as well. • Fair housing organizations should provide cultural competency training for staff and volunteers to better serve diverse and marginalized populations. This includes understanding cultural differences, avoiding biases, and recognizing potential challenges that immigrants and refugees face in accessing fair housing resources. 	