



# | 2025



# ANALYSIS OF IMPEDIMENTS

Analysis of Impediments to Fair Housing Choice



Prepared For



ROCK COUNTY  
WISCONSIN



CITY OF JANEVILLE  
Wisconsin's Park Place



**Beloit**  
WISCONSIN

# Table of Contents

<b>I.</b>	<b>EXECUTIVE SUMMARY</b>	<b>3</b>
A.	Introduction	3
B.	<b>Why Assess Fair Housing?</b>	5
C.	<b>Research Methodology/Community Participation Process</b>	7
D.	Current 2024 Impediments and Contributing Factors	8
E.	Glossary of Terms	10
<b>II.</b>	<b>COMMUNITY CHARACTERISTICS</b>	<b>16</b>
A.	Historical Profile	16
B.	Demographic Profile	17
C.	Income Profile	24
D.	Employment Profile	27
E.	Housing Profile	30
F.	Segregation Analysis	63
<b>III.</b>	<b>ACCESS TO OPPORTUNITY</b>	<b>65</b>
	<b>Overview of HUD-Defined Opportunity Factors</b>	66
A.	Low Poverty Index	66
B.	School Proficiency Index	67
C.	Labor Market Engagement Index	68
D.	Transit Index	69
E.	Low Transportation Cost Index	69
F.	Jobs Proximity Index	70
G.	Environmental Health Index	71
<b>IV.</b>	<b>LOCAL OPPORTUNITY FACTORS</b>	<b>73</b>
A.	Unemployment	73
<b>V.</b>	<b>ANALYSIS OF PUBLIC POLICY IMPEDIMENTS</b>	<b>83</b>
A.	General Plan Land Use Element	83
B.	Comprehensive Plan Land Use Designations for Housing	84
C.	Zoning Ordinance & Building Codes	85
D.	Home Mortgage Disclosure Act (HMDA)	90
E.	Loan Origination, Type, and Purpose	91
F.	Loan Denials	94

G.	Loan Denial Reasons for Home Purchases .....	95
H.	Discussion of Results.....	95
<b>VI.</b>	<b>FAIR HOUSING TRENDS AND COMPLAINTS.....</b>	<b>97</b>
	What is Housing Discrimination?.....	97
	Affirmatively Furthering Fair Housing .....	97
	Fair Housing Complaints.....	98
	Fair Housing Complaints Filed .....	98
	Complaint Trends.....	99
<b>VII.</b>	<b>REVIEW OF PRIOR AND CURRENT FAIR HOUSING ACTIONS .....</b>	<b>101</b>
	Affirmatively Furthering Fair Housing .....	101
	Previous Impediments to Fair Housing Choice .....	101
<b>VIII.</b>	<b>IMPEDIMENTS TO FAIR HOUSING CHOICE.....</b>	<b>114</b>
<b>VII.</b>	<b>CONCLUSION.....</b>	<b>122</b>

# I. EXECUTIVE SUMMARY

---

## A. Introduction

Providing fair access to housing is essential for building inclusive communities and upholding the principles of justice and fairness. In diverse and growing communities, a commitment to fair housing practices is vital to meeting the needs of all residents. The Analysis of Impediments to Fair Housing Choice serves as a crucial tool for identifying barriers to equal housing opportunities and developing strategies to overcome them.

This document examines various factors that impact fair housing, including socioeconomic disparities, discriminatory practices, zoning regulations, and accessibility issues. By delving into these complexities, we aim to uncover underlying challenges and propose actionable solutions that promote housing equity for every individual and family in our community.

By working closely with stakeholders, utilizing data-driven analysis, and maintaining a commitment to transparency, this study aims to establish a foundation for a more inclusive and accessible housing environment in the Rock County, Beloit, and Janesville community. By directly confronting obstacles to fair housing choice, we can build a future where all residents can live, work, and flourish in a community that values diversity and upholds housing justice for everyone.

### *Background and History*

Title VIII of the 1968 Civil Rights Act, also known as the federal Fair Housing Act, made it illegal to discriminate in the buying, selling, or renting of housing because of a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected classes. Federal fair housing statutes are largely covered by the following three pieces of U.S. legislation:

- The Fair Housing Act,
- The Housing Amendments Act, and
- The Americans with Disabilities Act.

State or local governments may enact fair housing laws that extend protection to other groups as well. For example, the Wisconsin Fair Housing Act protects marital status, ancestry, source of income, sexual orientation, age, and status as a victim of domestic abuse, sexual assault, or stalking free from discrimination.

This Analysis of Impediments to Fair Housing Choice (AI) documents a variety of fair housing issues faced by residents, assesses their underlying causes, and identifies goals

and actions to address those issues. It aims to harness data, community input, and policy analysis to craft solutions that will have a real impact on residents.

The Rock County Consortium (Consortium), consisting of Rock County and the Cities of Beloit and Janesville, are entitlement communities under the U.S. Department of Housing and Urban Development (HUD), are required to submit certification of affirmatively furthering fair housing. This certification has three elements and requires that each jurisdiction:

1. Complete an Analysis of Impediments to Fair Housing Choice (AI).
2. Take actions to overcome the effects of any impediments identified; and
3. Maintain records reflecting the actions taken in response to the analysis.

HUD describes impediments to fair housing choice in terms of their applicability to local, state, and federal law. The federal Fair Housing Act defines impediments as:

*Any actions, omissions, or decisions taken because of race, color, religion, sex, national origin, familial status, and mental or physical disability that restrict housing choices or the availability of housing choices.*

The AI is part of a multi-stage planning process: it provides a focused, comprehensive look into fair housing issues and generates fair housing goals to inform later planning processes, such as the Consolidated Plan (designating use of Community Development Block Grant and HOME Investment Partnership Program funds), as well as other relevant activities. The AI process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system, and housing transactions, particularly for persons who are protected under fair housing law. AI sources include census data, employment, and income information, federal and state fair housing complaint information, surveys of housing industry experts and stakeholders, and related information found in the public domain.

While housing issues are complex and multi-faceted and affect all residents of the region, the purpose of this AI is to focus specifically on fair housing and related needs and actions. The AI, therefore, examines whether housing issues are experienced differently on the basis of characteristics protected by the Fair Housing Act, which was crafted to address segregation and prohibit discrimination on the basis of race, ethnicity, national origin, religion, sex, familial status, and disability. It also includes characteristics protected under state and local law, including any protections for sexual orientation and gender identity.

An AI also includes an involved public input and review process via direct contact with stakeholders, public forums to collect input from residents and interested parties,

distribution of draft reports for public review, and formal presentations of findings and possible actions to overcome the identified impediments.

The AI follows the Assessment of Fair Housing process and template, as developed by HUD in its 2015 regulation and Assessment Tool. As described below, its scope includes in-depth looks at a number of areas relevant to fair housing, including trends and description of demographics; patterns of segregation and integration; identification of racially/ethnically concentrated areas of poverty (“R/ECAPs”); disproportionate housing needs (including cost burden and the adequacy and safety of housing); disparities in access to opportunity (education, employment, low poverty exposure, and environmental health); disabilities and access; publicly-supported housing; and fair housing enforcement, outreach, and capacity. In addition to data, maps, and policy analysis, it examines barriers to fair housing and their underlying causes (“contributing factors”). Most importantly, its data and analyses (including community input) provide the foundation for meaningful fair housing goals that address specific local issues.

## **B. Why Assess Fair Housing?**

Assessing fair housing is crucial for several compelling reasons that reflect the community's unique dynamics and needs:

1. **Diverse Demographic Landscape:** The region is home to a diverse population with varying socioeconomic backgrounds, cultural heritages, and housing preferences. Assessing fair housing ensures that all residents, regardless of race, ethnicity, income level, or family status, have equitable access to housing options that meet their needs.
2. **Growth and Development Challenges:** As a rapidly growing region in Wisconsin, ongoing challenges related to urban development, housing availability, and affordability are becoming more apparent: Assessing fair housing helps identify barriers that may hinder residents' ability to secure safe, affordable housing amidst rapid growth and expansion.
3. **Legal Compliance and Accountability:** By conducting fair housing assessments, these jurisdictions adhere to federal, state, and local fair housing laws and regulations. This ensures accountability for promoting housing opportunities without discrimination based on protected characteristics such as race, disability, or familial status.
4. **Addressing Discrimination and Inequities:** Assessing fair housing allows the Consortium to confront and address discriminatory practices and systemic inequities that may exist within the housing market. By identifying these barriers, the Consortium can implement targeted strategies to dismantle discriminatory practices and promote fair housing practices for all residents.

5. **Community Well-being and Quality of Life:** Access to safe, stable housing is essential for individual and community well-being. Assessing fair housing helps to identify areas where housing conditions may impact health outcomes, educational opportunities, and overall quality of life for residents.
6. **Promoting Economic Opportunity:** Fair housing assessments contribute to economic development by ensuring that housing policies and practices support economic stability and mobility for all residents. By fostering diverse and inclusive neighborhoods, the region can attract businesses, spur economic growth, and enhance community prosperity.
7. **Building Inclusive Communities:** Assessing fair housing fosters inclusive communities where individuals from diverse backgrounds can live, work, and thrive together. By promoting integration and diversity within neighborhoods, the Consortium can strengthen social cohesion and cultivate a sense of belonging among all residents. This certification has three parts and requires:
  - Conducting an Analysis of Impediments to Fair Housing Choice (AI)
  - Taking appropriate actions to overcome the effects of any impediments identified through the analysis and
  - Maintaining records reflecting the analysis and actions taken.

***HUD interprets these three certifying elements to entail:***

- Analyzing and working to eliminate housing discrimination in the jurisdiction.
- Promoting fair housing choices for all people.
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy.
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

On July 16, 2015, the Affirmatively Furthering Fair Housing (AFFH) Final Rule was published, providing program participants with an approach to more effectively and efficiently incorporate the duty of affirmatively furthering the policies of the Fair Housing Act into the planning process. The purpose of this rule was to refine the prior analysis of the impediments approach by replacing it with a fair housing assessment tool that would better inform HUD program participants' planning process and assist them in fulfilling the statutory obligation. Per the AFFH Rule, no Assessment of Fair Housing (AFH) will be due before the publication of the Assessment Tool applicable to the program participant. In addition, HUD must provide a minimum of nine (9) months after publication of the Assessment Tool when setting the deadline for submission of the AFH.

On February 9, 2023, HUD published a Notice of Proposed Rulemaking in the Federal Register entitled “Affirmatively Furthering Fair Housing.” The proposed rule, which builds on and refines HUD’s 2015 rule, would faithfully implement the Fair Housing Act’s statutory mandate that HUD ensure that recipients of its funding affirmatively further fair housing (AFFH). The AFFH mandate requires the agency and its program participants to proactively take meaningful actions to overcome segregation patterns, promote fair housing choices, eliminate disparities in opportunities, and foster inclusive communities free from discrimination. At the time of publishing of this Analysis of Impediments, the proposed AFFH changes have not been implemented and Grantees are required to continue to act in accordance with the *AFFH Interim Final Rule*.

### **C. Research Methodology/Community Participation Process**

The 2024 Analysis of Impediments to Fair Housing Choice offers a thorough examination of a variety of sources related to housing, such as demographic change, economic influences, and the state of the housing market, but also information pertaining to affirmatively furthering fair housing, the state of the fair housing delivery system and housing transactions affecting people throughout the region. This information was collected and evaluated through four general approaches:

- **Primary Research** – the collection and analysis of raw data that did not previously exist.
- **Secondary Research** – the review of existing data and studies.
- **Quantitative Analysis** – the evaluation of objective, measurable, and numerical data.
- **Qualitative Analysis** – the evaluation and assessment of subjective data, such as people’s beliefs, feelings, attitudes, opinions, and experiences.

Some of the baseline secondary and quantitative data providing a picture of the Consortium’s housing marketplace were drawn from the 2020 census and intercensal estimates. These data included population, personal income, poverty estimates, housing units by tenure, cost burdens, and housing conditions. Other data were drawn from records provided by the Bureau of Economic Analysis, the Bureau of Labor Statistics, and a variety of other sources. The narrative below offers a brief description of other key data sources employed for the 2024 AI.

#### **Community Engagement**

- **Stakeholder Surveys in conjunction with this Analysis** - a survey was designed to collect information from community stakeholders. These surveys were distributed in hard-copy format and were also hosted online through SurveyMonkey.com to provide an alternative means of response.

The Fair Housing Survey was designed to collect input from a broad spectrum of the community and receive responses from residents and non-residents. The survey consisted of 44 distinct questions, allowing a mixture of both multiple-choice and open-ended responses. In all, there were 170 responses to this survey, though not every question was answered by every respondent. As a result, where a percentage of survey respondents is cited in this Analysis, it refers only to the percentage of respondents to the question being discussed and may not be a percentage of the total survey respondents.

Surveys were received over a period from May 20, 2024 – June 24, 2024. Paper surveys received were manually entered by the survey administrator into Survey Monkey for tabulation and analysis. To prevent “ballot stuffing,” the Survey Monkey software bars the submission of multiple surveys from a single IP address. The link to the online survey was distributed through various email distribution lists.

- **Public Meeting** – Public meetings were held to provide a forum for residents and other interested parties to contribute to this Analysis and the Consolidated Plan. These meetings were advertised via flyers distributed by the Consortium using its various mailing distribution lists. Local libraries and nonprofits receiving the posters were asked to print and post or distribute them as appropriate. The format of these meetings ranged from small-group round-table discussions to moderated forums. Notes were taken of the public comments at all meetings.

#### **D. Current 2024 Impediments and Contributing Factors**

The impediments identified below are fully detailed with recommendations in the Impediments to Fair Housing Choice section of this document.

##### **Impediment #1**

##### **Insufficient Tenant Protections in the Rental Market**

Affordable, stable, and accessible housing, along with a wide range of housing options, are essential for creating just and equitable communities. However, the power imbalance between renters and landlords increases the risk of housing instability, harassment, and homelessness for tenants, further exacerbating racial inequity. Tenant protections, passed in the form of laws and policies, are critical to preventing evictions and keeping renters stably housed.

##### **Contributing Factors**

- Absentee Landlords
- Legal safeguards to protect tenant rights
- Discrimination in the rental market based on source of income
- Excessive Tenant Screening Requirements

## **Impediment #2**

### **Housing Affordability/Cost Burden**

High rents in relationship to the earnings of average workers put housing affordability out of reach for many. Housing is the largest monthly cost for most households. Owners and renters with a severe cost burden are at risk of homelessness. Cost-burdened households that experience a financial setback often must choose between rent and food or rent and health care for their families or face eviction or foreclosure.

#### **Contributing Factors**

- Increased job growth and steady or decrease in affordable units (Beloit and Rock County)
- Increased Housing Units and Employment Growth (Janesville)
- Reduction in Rental Units below \$500 and \$1,000 per Month

## **Impediment #3**

### **Racial and Ethnic Disparities in Housing**

Racial and ethnic disparities in housing refer to the unequal treatment and outcomes that individuals from different racial and ethnic backgrounds experience in housing markets. These disparities manifest in various ways, including differences in homeownership rates, access to affordable housing, increased housing cost burden, neighborhood quality, and exposure to discriminatory practices. These inequalities are deeply rooted in historical practices and continue to perpetuate economic and social disadvantages for minority communities.

#### **Contributing Factors:**

- Systemic Inequities
- Unequal access to opportunity

## **Impediment #4**

### **Inadequate Fair Housing Education**

The lack of sufficient information and awareness about fair housing rights and responsibilities among both housing providers and residents can lead to widespread ignorance of fair housing laws, resulting in discriminatory practices, unintentional violations, and a lack of enforcement. As the Consortium continues to expand with an increasingly diverse population, fair housing education must be continuous and presented in a context that is relative to the current community concerns.

#### **Contributing Factors**

- Lack of Awareness and Training
- Insufficient Public Awareness
- Limited English Proficiency

- Limited Resources
- Accessibility Issues

## Impediment #5

### Lack of Quality Housing

In high-cost cities, towns, and counties, lower-income individuals and families often need to make tradeoffs to find or keep housing they can afford. In some cases, these tradeoffs mean living in low-quality housing that may pose health and safety risks. When left unaddressed, quality and safety issues can pose serious threats to residents' well-being, especially young children and older adults.

#### Contributing Factors

- Older Housing Stock
- Absentee Landlords

## E. Glossary of Terms

Throughout this document, you will find specialized terms used to describe some of the research and findings. This glossary of terms has been prepared to familiarize the reader with some of the words and the way they are being defined and used in this Analysis of Impediments to Fair Housing Choice.

**Accessibility:** whether a physical structure, object, or technology is able to be used by people with disabilities such as mobility issues, hearing impairment, or vision impairment. Accessibility features include wheelchair ramps, audible crosswalk signals, and TTY numbers.

**Affirmatively Further Fair Housing (AFFH):** a requirement under the Fair Housing Act that local governments take steps to further fair housing, especially in places that have been historically segregated.

**American Community Survey (ACS):** a survey conducted by the US Census Bureau that regularly gathers information about demographics, education, income, language proficiency, disability, employment, and housing. Unlike the Census, ACS surveys are conducted both yearly and across multiple years. The surveys study samples of the population, rather than counting every person in the U.S. like the Census.

**Americans With Disabilities Act (ADA):** federal civil rights law that prohibits discrimination against people with disabilities.

**Annual Action Plan:** an annual plan used by local jurisdictions that receive money from HUD to plan how they will spend the funds to address fair housing and community development. The Annual Action Plan carries out the larger Consolidated Plan.

**CDBG:** Community Development Block Grant. Money that local governments receive from HUD to spend on housing and community improvement.

**Census Tract:** small subdivisions of cities, towns, and rural areas that the Census uses to group residents together and accurately evaluate the demographics of a community. Several census tracts, put together, make up a town, city, or rural area.

**Consolidated Plan (Con Plan):** a plan that helps local governments evaluate their affordable housing and community development needs and market conditions. Local governments must use their Consolidated Plan to identify how they will spend money from HUD to address fair housing and community development. Any local government that receives money from HUD in the form of CDBG, HOME, ESG, or HOPWA grants must have a Consolidated Plan. Consolidated Plans are carried out through annual Action Plans. See: Action Plan, CDBG, HOME, ESG, HOPWA.

**Consortium:** A formal way for local governments that would not otherwise qualify for funding to join with other contiguous units of local government to directly participate in the HOME Investment Partnerships Program (HOME) program.

**Continuum of Care (CoC):** a HUD program designed to promote commitment to the goal of ending homelessness. The program provides funding to nonprofits and state and local governments to quickly rehouse homeless individuals and families, promote access to and effect utilization of mainstream programs by homeless individuals, and optimize self-sufficiency among individuals and families experiencing homelessness.

**Data and Mapping Tool (AFFHT):** an online HUD resource combining data from various sources including HUD, the decennial Census data, and the American Community Survey to generate maps and tables evaluating the demographics of an area for a variety of categories, including race, national origin, disability, Limited English Proficiency, housing problems, environmental health, and school proficiency, etc.

**Disparate Impact:** practices in housing that negatively affect one group of people with a protected characteristic (such as race, sex, or disability, etc.) more than other people without that characteristic, even though the rules applied by landlords do not single out that group.

**Dissimilarity Index:** measures the percentage of a particular group's population that would have to move to a different census tract in order to be evenly distributed with a city or metropolitan area in relation to another group. The higher the Dissimilarity Index, the higher the level of segregation. For example, if a city's Black/White Dissimilarity Index were 65, then 65 percent of Black residents would need to move to another neighborhood for Black people and White people to be evenly distributed across all neighborhoods in the city.

**Entitlement Jurisdiction:** a local government that receives funds from HUD for housing and community development.

**ESG:** Emergency Solutions Grant. Funding provided by HUD to 1) engage homeless individuals and families living on the street, 2) improve the number and quality of emergency shelters for homeless individuals and families, 3) help operate these shelters, 4) provide essential services to shelter residents, 5) rapidly re-house homeless individuals and families, and 6) prevent families/individuals from becoming homeless.

**Environmental Health Index:** a HUD calculation based on potential exposure to harmful toxins at a neighborhood level. This includes air quality carcinogenic, respiratory, and neurological hazards. The higher the number, the less exposure to toxins harmful to human health.

**Environmental Justice:** the fair treatment and meaningful involvement of all people, especially minorities, in the development, implementation, and enforcement of environmental laws, regulations, and policies. In the past, environmental hazards have been concentrated near segregated neighborhoods, making minorities more likely to experience adverse health effects. Recognizing this history and working to change future environmental planning are essential pieces of environmental justice.

**Exclusionary Zoning:** the use of zoning ordinances to prevent certain land uses, especially the building of large and affordable apartment buildings for low-income people. For example, a community with exclusionary zoning might only allow single-family homes to be built in the jurisdiction, excluding people who cannot afford to buy a house.

**Exposure Index:** a measurement of how much the typical person of a specific race is exposed to people of other races. A higher number means that the average person of that race lives in a census tract with a higher percentage of people from another group.

**Fair Housing Act:** a federal civil rights law that prohibits housing discrimination on the basis of race, class, sex, religion, national origin, or familial status. See also: Housing Discrimination.

**Gentrification:** the process of renovating or improving a house or neighborhood to make it more attractive to middle-class residents. Gentrification often causes the cost of living in the neighborhood to rise, pushing out lower-income residents and attracting middle-class residents. Often, these effects which are driven by housing costs have a corresponding change in the racial demographics of an area.

**HOME:** HOME Investment Partnership. HOME provides grants to States and localities that communities use (often in partnership with nonprofits) to fund activities such as building, buying, and rehabilitating affordable housing for rent or ownership, or providing direct rental assistance to low-income people.

**HOPWA:** Housing Opportunities for Persons With AIDS. HUD makes grants under the HOPWA program to local communities, states, and nonprofits for projects that benefit low-income people living with HIV/AIDS and their families.

**Housing Choice Voucher (HCV):** a HUD rental subsidy issued to a low-income household that promises to pay a certain amount of the household's rent. Prices, or payment standards, are set based on the rent in the metropolitan area, and voucher households must pay any difference between the rent and the voucher amount. Participants of the HCV program are free to choose any rental housing that meets program requirements.

**Housing Discrimination:** the refusal to rent to or inform a potential tenant about the availability of housing. Housing discrimination also applies to buying a home or getting a loan to buy a home. The Fair Housing Act makes it illegal to discriminate against a potential tenant/buyer/lender based on that person's race, class, sex, religion, national origin, or familial status.

**Isolation Index:** a measurement of how much the typical person of a specific race is only exposed to people of the same race. For example, an 80 percent isolation index value for White people would mean that the population of people the typical White person is exposed to is 80 percent White.

**Inclusionary Zoning:** a zoning ordinance that requires that a certain percentage of any newly built housing must be affordable to people with low and moderate incomes.

**Jobs Availability Index:** number of jobs per 1000 people within a five-mile radius of the census tract center-point. Index is computed by the UC Davis Center for Regional Change.

**Jobs Proximity Index:** a HUD calculation based on distances to all job locations, distance from any single job location, size of employment at that location, and labor supply to that location. The higher the number, the better the access to employment opportunities for residents in a neighborhood.

**Labor Market Engagement Index:** a HUD calculation based on level of employment, labor force participation, and educational attainment in a census tract. The higher the number, the higher the labor force participation and human capital in the neighborhood.

**Limited English Proficiency (LEP):** residents who do not speak English as a first language, and who speak English less than "very well."

**Local Data:** any data used in this analysis that is not provided by HUD through the Data and Mapping Tool (AFFHT), or through the Census or American Community Survey.

**Low Income Housing Tax Credit (LIHTC):** provides tax incentives to encourage individual and corporate investors to invest in the development, acquisition, and rehabilitation of affordable rental housing.

**Low Poverty Index:** a HUD calculation using both family poverty rates and public assistance receipt in the form of cash-welfare (such as Temporary Assistance for Needy Families (TANF)). This is calculated at the Census Tract level. The higher the score, the less exposure to poverty in the neighborhood.

**Low Transportation Cost Index:** a HUD calculation that estimates transportation costs for a family of 3, with a single parent, with an income at 50 percent of the median income for renters for the region. The higher the number, the lower the cost of transportation in the neighborhood.

**Market Rate Housing:** housing that is not restricted by affordable housing laws. A market rate unit can be rented for any price that the market can support.

**NIMBY: Not In My Back Yard.** A social and political movement that opposes housing or commercial development in local communities. NIMBY complaints often involve affordable housing, with reasons ranging from traffic concerns to small town quality to, in some cases, thinly veiled racism.

**Poverty Line:** the minimum level of yearly income needed to allow a household to afford the necessities of life such as housing, clothing, and food. The poverty line is defined on a national basis. The 2024 US poverty line for a family of three is \$25,820.

**Project-Based Section 8, Project-Based Rental Assistance, PBRA:** a government-funded program that provides rental housing to low-income households in privately owned and managed rental units. The funding is specific to the building. If you move out of the building, you will no longer receive the funding.

**Public Housing:** housing that is owned and managed by a Public Housing Authority for eligible low-income households.

**Publicly Supported Housing:** housing assisted with funding through federal, State, or local agencies or programs, as well as housing that is financed or administered by or through any such agencies or programs.

**Other Multi-Family Housing:** multifamily housing that is owned and operated by private owners, and is subsidized through programs other than HCV, PBRA, or LIHTC. Units include properties funded through Supportive Housing for the Elderly (Section 202), and Supportive Housing for Persons with Disabilities (Section 811).

**Reasonable Accommodation:** a change to rules, policies, practices, or services which would allow a person with disabilities an equal opportunity to use and enjoy their housing, including in public and common use areas. It is a violation of the Fair Housing Act to refuse to make a reasonable accommodation when such accommodation is necessary for the person to have equal use and enjoyment of the housing.

**R/ECAPs:** Racially and Ethnically Concentrated Areas of Poverty. This is a HUD-defined term indicating a census tract that has more than 50 percent Non-White residents, and 40 percent or more of the population is in poverty OR where the poverty rate is greater than three times the average poverty rate in the area. In the HUD Data and Mapping Tool (AFFHT), R/ECAPS are outlined in pink.

**Rehabilitation Act (Section 504):** a federal civil rights law that prohibits discrimination on the basis of disability in programs conducted by federal agencies, in programs receiving federal financial assistance, in federal employment and in the employment practices of federal contractors.

**School Proficiency Index:** a HUD calculation based on performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The higher the number, the higher the school system quality is in a neighborhood.

**Segregation:** the separation or isolation of a race/ethnic group, national origin group, individuals with disabilities, or other social group by enforced or voluntary residence in a restricted area, by barriers to social connection or dealings between persons or groups, by separate educational facilities, or by other discriminatory means.

## II. COMMUNITY CHARACTERISTICS

---

### A. Historical Profile

Janesville, Beloit, and Rock County have evolved from their industrial roots to embrace new economic opportunities in education, healthcare, and services. Their histories reflect broader national trends, including shifts in manufacturing and the growth of educational and healthcare sectors.

The City of Janesville, WI was founded in 1835 by Henry Janes. The City grew rapidly due to its location on the Rock River and its accessibility via major transportation routes. In the late 19th and early 20th centuries, Janesville became a significant industrial hub, particularly in the automotive industry.

The General Motors plant, established in 1919, was a major employer and economic driver for the City. The establishment of institutions like the University of Wisconsin-Rock County has contributed to the city's educational and cultural landscape. The expansion of healthcare facilities, including Mercyhealth, has become a major part of the local economy. Over the years, Janesville has diversified its economy. While the automotive sector has diminished due to plant closures and restructuring, the City has seen growth in healthcare and education sectors.



The City of Beloit was founded in 1836 and developed rapidly due to its strategic location on the Rock River and its proximity to the Illinois-Wisconsin border. In the 19th and early 20th centuries, Beloit was known for its manufacturing, particularly in textiles and machinery. Beloit Corporation, established in 1858, was a major player in the manufacturing industry. Beloit has transitioned from heavy manufacturing to a more diversified economy

with a focus on education and healthcare. The closure of major manufacturing plants has led to economic restructuring. The establishment of Beloit College in 1846 played a significant role in the City's development, making it an educational and cultural center. Beloit College remains a key institution, contributing significantly to the local economy and cultural life.

Rock County was established in 1836 and named for the Rock River, which runs through the County and was instrumental in its early settlement and development. The County has a rich history of agriculture and manufacturing. The automotive industry, particularly in Janesville, was a major economic driver in the 20th century. The decline of manufacturing has led to shifts towards healthcare and education. The County's agricultural base has historically been a significant part of its economy, with family farms and agribusinesses playing crucial roles. The shift from manufacturing to a more diversified economy has included growth in sectors like healthcare and education.



## **B. Demographic Profile**

The primary source of demographic data used in this study comes from the U.S. Census Bureau. The American Community Surveys (ACS) provides the most recent demographic data and important information used to show the trends in population and household changes over the years. Demographic data was analyzed and obtained from the 2020 U.S. Census and the 2022 American Community Survey (ACS).

### **Population**

Janesville, Wisconsin, is a city located in Rock County, about 40 miles south of Madison. As of the most recent estimates, its population is around 65,000 people. Janesville has experienced various shifts in population over the years. It saw growth throughout the 20th century, though recent trends show more stability or modest changes. According to ACS estimates, Janesville, WI, has experienced a 3.21% population increase, with the population increasing from 63,575 in 2010 to 65,615 in 2020.

Beloit, Wisconsin, located in Rock County near the Illinois border, has a population of approximately 36,000 people as of recent estimates. Beloit has seen fluctuations in population over the years. It experienced growth in the early 20th century, but like many smaller cities, it has had periods of stability and modest decline. According to ACS estimates, Beloit, WI, has experienced an 0.84% population decrease, with the population decreasing from 36,966 in 2010 to 36,657 in 2020.

Rock County, Wisconsin, is in the southern part of the state and encompasses cities such as Janesville and Beloit. As of recent estimates, Rock County has a population of approximately 160,000 people. The county has experienced steady growth over the past few decades, though the rate of growth can vary. The growth trend reflects a mix of urban expansion and economic development. According to ACS estimates, Rock County, WI, has experienced a 2.09% population increase, with the population increasing from 160,331 in 2010 to 163,687 in 2020.

### Age and Sex Over the Years

The City of Janesville has a diverse age distribution, with a mix of families, young professionals, and retirees. The median age typically hovers around the mid-30s to early 40s. According to the 2022 American Community Survey 5-Year Estimates, the median age of Janesville Residents is 39.5. The largest concentration of residents is in the 25-64 age range, making up 52.67% of this population.

JANESVILLE, WI AGE & SEX POPULATION CHARACTERISTICS			
2022			
Age	Both Sexes	Male	Female
	<b>65,669</b>	<b>32,499</b>	<b>33,170</b>
Under 18 years	14,541	7,765	6,776
18 to 24 years	5,420	2,845	2,575
25 to 44 years	17,736	8,914	8,822
45 to 64 years	16,855	8,370	8,485
65 years and over	11,117	4,605	6,512
<b>Median Age [years]</b>	<b>39.5</b>	<b>37.5</b>	<b>41.4</b>

Table 1: Age & Sex Population Characteristics Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

The City of Beloit’s age distribution is fairly balanced, with a mix of young adults, working-age individuals, and retirees. The median age tends to be in the mid to late 30s. According to the 2022 American Community Survey 5-Year Estimates, the median age of Beloit Residents is 33.9. The largest concentration of residents is in the 25-64 age range, making up 48.87% of this population.

BELOIT, WI AGE & SEX POPULATION CHARACTERISTICS			
2022			
Age	Both Sexes	Male	Female
	<b>36,642</b>	<b>17,963</b>	<b>18,679</b>
Under 18 years	9,066	4,882	4,184
18 to 24 years	4,712	2,344	2,368
25 to 44 years	9,172	4,379	4,793
45 to 64 years	8,736	4,210	4,526
65 years and over	4,956	2,148	2,808
<b>Median Age [years]</b>	<b>33.9</b>	<b>32.4</b>	<b>34.9</b>

Table 2: Age & Sex Population Characteristics Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

Rock County has a diverse age distribution. The population includes a significant number of young families, working-age adults, and retirees. The median age in the county typically falls in the mid-30s to early 40s. According to the 2022 American Community Survey 5-Year Estimates, the median age of Rock County Residents is 40. Overall, the most significant demographic is 45-64 years old at 44,009. Regarding sex, females have historically slightly outnumbered males within the county. That trend has continued during the period under review, as women edged out men 50.22% to 49.78% as of the 2022 census. The population of adults 65 and over has experienced an 8.88% increase in the previous 5 years. With this observation, the County will need to consider the growing number of older adults when developing community housing plans.

ROCK COUNTY, WI AGE & SEX POPULATION CHARACTERISTICS			
2022			
Age	Both Sexes	Male	Female
	163,817	81,542	82,275
Under 18 years	37,158	19,244	17,914
18 to 24 years	14,298	7,322	6,976
25 to 44 years	40,556	20,553	20,003
45 to 64 years	44,009	22,043	21,966
65 years and over	27,796	12,380	15,416
<b>Median Age [years]</b>	<b>40</b>	<b>38.8</b>	<b>41.2</b>

Table 3: Age & Sex Population Characteristics Source: U.S. Census Bureau 2018 & 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

## Households

A household consists of all the people who occupy a housing unit, which can be a single-family home, apartment, or other types of housing. Family households include married couples with children, single parents with children, and other family configurations. Nonfamily households include individuals living alone as well as groups of unrelated people living together. The number of households in each area is influenced by factors such as population growth, migration patterns, and housing availability.

According to the 2022 ACS 5-Year Estimates Survey, there are currently 27,895 households in Janesville, WI. Currently, the average household size is 2.32 and the family size is 2.93. The data also shows most households are owner-occupied married-couple family households, followed by nonfamily households. The majority of renter-occupied households are female lead, no spouse present family households.

JANESVILLE, WI HOUSEHOLD AND FAMILIES					
	Total	Married-couple family household	Male householder, no spouse present, family household	Female householder, no spouse present, family household	Nonfamily household
Total Households	27,895	11,970	1,545	3,204	11,176
Average Household Size	2.32	3.05	2.99	3.07	1.24
JANESVILLE, WI FAMILIES					
Total Families	16,719	11,970	1,545	3,204	(X)
Average Family Size	2.93	3.02	2.64	2.72	(X)
JANESVILLE, WI HOUSING TENURE					
Owner-Occupied Housing	66.40%	86.10%	61.60%	46.30%	51.80%
Renter-Occupied Housing	33.60%	13.90%	38.40%	53.70%	48.20%

Table 4: Household and Families Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

According to the 2022 ACS 5-Year Estimates Survey, there are currently 13,919 households in Beloit, WI. Currently, the average household size is 2.51 and the family size is 3.3. The data also shows most households are owner-occupied married-couple family households. The majority of renter-occupied households are female lead, no spouse present family households.

BELOIT, WI HOUSEHOLD AND FAMILIES					
	Total	Married-couple family household	Male householder, no spouse present, family household	Female householder, no spouse present, family household	Nonfamily household
<b>Total Households</b>	13,919	5,230	772	1,880	6,037
<b>Average Household Size</b>	2.51	3.41	3.44	3.55	1.3
BELOIT, WI FAMILIES					
<b>Total Families</b>	7,882	5,230	772	1,880	(X)
<b>Average Family Size</b>	3.3	3.37	3.01	3.25	(X)
BELOIT, WI HOUSING TENURE					
<b>Owner-Occupied Housing</b>	59.30%	79.80%	47.30%	37.80%	49.90%
<b>Renter-Occupied Housing</b>	40.70%	20.20%	52.70%	62.20%	50.10%

Table 5: Household and Families Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

Rock County has approximately 66,000 households. The county has a mix of family households and single-person households, which is consistent with national trends. The average household size in Rock County is around 2.42 people. A significant portion of households in Rock County are family households. Married-Couple Family households make up a substantial majority of the total number of households in the county. The remaining households are non-family households, which represent a smaller but significant portion of the total.

ROCK COUNTY, WI HOUSEHOLD AND FAMILIES					
	Total	Married-couple family household	Male householder, no spouse present, family household	Female householder, no spouse present, family household	Nonfamily household
<b>Total Households</b>	66,439	31,243	3,449	6,984	24,763
<b>Average Household Size</b>	2.42	3.08	3.15	3.25	1.26
ROCK COUNTY, WI FAMILIES					
<b>Total Families</b>	41,676	31,243	3,449	6,984	(X)
<b>Average Family Size</b>	3.01	3.06	2.77	2.93	(X)
ROCK COUNTY, WI HOUSING TENURE					
<b>Owner-Occupied Housing</b>	69.90%	87.20%	60.10%	48.20%	55.60%
<b>Renter-Occupied Housing</b>	30.10%	12.80%	39.90%	51.80%	44.40%

Table 6: Household and Families Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

In Rock County, City of Janesville, and City of Beloit, marital status data provides insights into the distribution of various marital and relationship statuses among its residents. A significant portion of adults are married. This typically includes both couples with and without children. A notable percentage of adults are divorced. This reflects broader trends seen across many regions where divorce rates have historically been high. A smaller segment of the population is widowed. This group includes individuals who have lost a spouse and may be living alone or in other family arrangements. The proportion of widowed individuals tends to be higher among older age groups. The percentage of

never-married individuals has been increasing in recent decades, reflecting changing attitudes toward marriage. This group includes individuals who have not yet married. It often includes younger adults, though it can also encompass those who have chosen not to marry.

MARITAL STATUS					
Janesville, WI		Beloit, WI		Rock County, WI	
Never married	17,030	Never married	12,381	Never married	42,275
Now married, except separated	25,046	Now married, except separated	11,079	Now married, except separated	65,359
Divorced or separated	8,221	Divorced or separated	4,071	Divorced or separated	18,049
Widowed	3,369	Widowed	1,385	Widowed	7,790
<b>Total Households</b>	<b>27,895</b>	<b>Total Households</b>	<b>13,919</b>	<b>Total Households</b>	<b>66,439</b>
Average household size	<b>2.32</b>	Average household size	<b>2.51</b>	Average household size	<b>2.42</b>

Table 7: Household Type Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### Race and Ethnicity

Understanding race and ethnicity is crucial for comprehending the demographic diversity of any region. The majority of Janesville, Beloit, and Rock County’s population is White, with this group comprising around 90% of the total population. This high percentage reflects the historical and cultural demographics of the region. Janesville, Beloit, and Rock County have seen a gradual increase in racial and ethnic diversity over the past few decades. The Hispanic and Black populations, in particular, have been growing in recent years, contributing to the county’s increasing diversity. The area’s increasing diversity reflects broader national trends.

Janesville’s racial makeup consisted of 84.81% White; 3.34% Black or African American; 0.42% American Indian and/or Alaskan Native; 1.65% Asian; 0.05% Pacific Islander; 2.94% from some other races; and 6.80% from two or more races.

Beloit’s racial makeup consisted of 60.00% White; 14.55% Black or African American; 1.04% American Indian and/or Alaskan Native; 1.61% Asian; 0.06% Pacific Islander; 11.38% from some other races; and 11.35% from two or more races.

Rock County’s racial makeup consisted of 81.32% White; 5.08% Black or African American; 0.54% American Indian and/or Alaskan Native; 1.26% Asian; 0.04% Pacific Islander; 4.56% from some other races; and 7.21% from two or more races.

RACE AND ETHNICITY			
	Janesville, WI	Beloit, WI	Rock County, WI
<b>TOTAL POPULATION</b>	<b>65,615</b>	<b>36,657</b>	<b>163,687</b>
White	55,645	21,995	133,107
Black or African American	2,190	5,333	8,311
American Indian and Alaska Native	274	381	878
Asian	1,083	592	2,059
Native Hawaiian and Other Pacific Islander	35	23	72
Some other race	1,927	4,173	7,457
Two or more races	4,461	4,160	11,803
HISPANIC OR LATINO			
Hispanic or Latino	5.4%	21.5%	9.5%
White Alone; Not Hispanic or Latino	86.2	59.1%	81.0%

Table 8: Race and Ethnicity Source: U.S. Census Bureau 2020 Decennial, [www.census.gov](http://www.census.gov)

### Origin and Ancestry

The origin and ancestry of a population provide insights into the diverse backgrounds and cultural heritage of its residents. For Janesville, Beloit, and Rock County, Wisconsin most of the foreign-born population originated from Latin America, while another notable portion comes from Asia.

US CITIZEN STATUS			
	Janesville, WI	Beloit, WI	Rock County, WI
<b>Total Foreign-Born Population</b>	<b>2,289</b>	<b>3,836</b>	<b>8,077</b>
Naturalized citizen	1,097	1,373	3,405
Not a citizen	1,192	2,463	4,672
<b>Population born outside the United States</b>	<b>2,667</b>	<b>4,050</b>	<b>8,862</b>
Native	<b>378</b>	<b>214</b>	<b>785</b>
Entered 2010 or later	42	146	222
Entered before 2010	336	68	563
Foreign born	<b>2,289</b>	<b>3,836</b>	<b>8,077</b>
Entered 2010 or later	254	992	1,503
Entered before 2010	2,035	2,844	6,574

Table 9: Foreign-Born Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

The "World Region of Birth of Foreign-Born" data provides insights into where immigrants in a particular area originate from. For Janesville, Beloit, and Rock County, Wisconsin, a major source of immigrants is from Latin America. Mexican immigrants are the largest group. Many immigrants also came from European countries like Germany, Ireland, and the United Kingdom. Earlier waves of immigration were predominantly from Europe, while more recent trends show increased immigration from Latin America, Asia, and Africa. The foreign-born population continues to diversify, with growing numbers from a wide range of regions contributing to the cultural and demographic landscape.

WORLD REGION OF BIRTH OF FOREIGN BORN			
	Janesville, WI	Beloit, WI	Rock County, WI
Foreign-born population excluding population born at sea	2,289	3,836	8,077
Europe	391	93	741
Asia	698	251	1,114
Africa	16	81	170
Oceania	11	0	14
Latin America	1,057	3,406	5,902
Northern America	116	5	136

Table 10: World Region of Birth Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

The following table presents the ancestry of Janesville, Beloit, and Rock County residents in 2022. The most common ancestries identified were German, Irish, Norwegian, and English.

ANCESTRY			
	Janesville, WI	Beloit, WI	Rock County, WI
<b>Total population</b>	<b>65,669</b>	<b>36,642</b>	<b>163,817</b>
American	2,726	720	5,723
Arab	41	67	168
Czech	557	102	1,282
Danish	409	198	1,034
Dutch	1,092	377	2,656
English	6,156	2,732	15,017
French (except Basque)	1,147	856	3,354
French Canadian	258	93	554
German	22,235	8,965	53,745
Greek	130	34	304
Hungarian	156	46	430
Irish	9,850	3,320	21,789
Italian	2,200	951	4,880
Lithuanian	123	36	355
Norwegian	7,611	2,542	18,173
Polish	2,453	815	5,828
Portuguese	47	18	85
Russian	451	214	761
Scotch-Irish	499	49	827
Scottish	831	468	2,074
Slovak	133	14	265
Subsaharan African	253	96	514
Swedish	1,510	910	3,825
Swiss	1,203	182	3,132
Ukrainian	76	45	188
Welsh	445	78	800
West Indian (excluding Hispanic origin groups)	77	0	107

Table 11: Ancestry Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

## Limited English Proficiency

Section 601 of Title VI, the Civil Rights Act of 1964, is the federal law that protects individuals from discrimination based on their race, color, or national origin in programs or activities that receive federal financial assistance. One type of national origin discrimination is based on a person's inability to speak, read, write, or understand English. In certain situations, failure to ensure that persons who have Limited English Proficiency (LEP) can effectively participate in or benefit from federally assisted programs may violate the Civil Rights Act.

The LEP population of Janesville, Beloit, and Rock County is consistent with the national origin data. Other than English, Spanish is, by far, the most spoken language among LEP individuals. Although English is predominantly spoken, roughly 8.75% of the population speak other languages, which suggests a need for accommodations for those non-English speaking residents.

LANGUAGE SPOKEN AT HOME			
	Janesville, WI	Beloit, WI	Rock County, WI
Population 5 years and over	62,205	34,076	154,307
English only	58,131	27,998	140,798
Language other than English	4,074	6,078	13,509
Spanish	2,450	5,568	10,716
Other Indo-European languages	1,070	185	1,659
Asian and Pacific Islander languages	494	282	900
Other languages	60	43	234

Table 12: Language Spoken at Home Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

## C. Income Profile

An income profile provides insights into the economic well-being of a population by examining income levels, distribution, and related factors. The income and poverty profile presents an overview of household income, data elements that include household size, low-income population, and percentage of median family households in poverty. Household income is a determining factor of where people can afford to live and the quality of housing conditions they can afford to have. Quality jobs provide access to sufficient household income and improve housing choice.

As noted in the table below, the average median household income for Janesville, Beloit, and Rock County is \$68,610, \$57,168, and \$70,630 respectively, while the average mean family income is \$80,144.00, \$74,660, and \$85,333 respectively according to the 2022 5yr ACS estimates.

HOUSEHOLD INCOME						
	Janesville, WI		Beloit, WI		Rock County, WI	
	Number of Households	%	Number of Households	%	Number of Households	%
<b>Total Households</b>	<b>27,895</b>	<b>100%</b>	<b>13,919</b>	<b>100%</b>	<b>66,439</b>	<b>100%</b>
Less than \$10,000	1,088	3.90%	738	5.30%	2,458	3.70%
\$10,000 to \$14,999	976	3.50%	585	4.20%	2,126	3.20%
\$15,000 to \$24,999	2,148	7.70%	1,308	9.40%	4,651	7.00%
\$25,000 to \$34,999	1,841	6.60%	1,225	8.80%	5,116	7.70%
\$35,000 to \$49,999	3,571	12.80%	2,004	14.40%	7,707	11.60%
\$50,000 to \$74,999	5,746	20.60%	2,728	19.60%	13,088	19.70%
\$75,000 to \$99,999	4,910	17.70%	2,255	16.20%	11,295	17.00%
\$100,000 to \$149,999	4,686	16.80%	1,642	11.80%	11,627	17.50%
\$150,000 to \$199,999	1,981	7.10%	891	6.40%	5,116	7.70%
\$200,000 or more	948	3.40%	543	3.90%	3,256	4.90%
<b>Median Household Income</b>	<b>\$68,610.00</b>		<b>\$57,168.00</b>		<b>\$70,630.00</b>	
<b>Mean Family Income</b>	<b>\$80,441.00</b>		<b>\$74,660.00</b>		<b>\$85,333.00</b>	

Table 13: Household Income Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

The Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs including Public Housing and the Housing Choice Voucher Program. Since FY 2011, HUD has based its median family income estimates on data from the Census Bureau’s American Community Survey (ACS). Since FY 2012, there has been a 3-year lag between the ACS estimates and the fiscal year for which the income limits are in effect. For example, the FY 2022 median family incomes and income limits were based on the ACS 2019 data. The FY 2023 median family incomes and income limits would ordinarily be based on the ACS 2020 estimates. However, because of the lack of 1-year ACS 2020 estimates described above, HUD intends to instead base the FY 2024 median family incomes and income limits on ACS 2021 data.

The CDBG Program provides annual grants on a formula basis to Entitlement Communities to support viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities, principally for persons with low-and moderate-income levels. For a project or program to qualify for CDBG funds, 51% of the program beneficiaries must have low- to moderate-income levels as defined by HUD.

The following table reflects the current HUD income limits for one to eight-person households who earn at or below 80% of the Area Median Income (AMI) for Janesville-Beloit, WI MSA.

2024 HUD MAXIMUM INCOME LIMITS			
Household Size	Extremely Low-Income Limits	Very Low (50%) Income Limits	Low (80%) Income Limits
1	\$18,200	\$30,350	\$48,550
2	\$20,800	\$34,650	\$55,450
3	\$25,820	\$39,000	\$62,400
4	\$31,200	\$43,300	\$69,300
5	\$36,580	\$46,800	\$74,850
6	\$41,960	\$50,250	\$80,400
7	\$47,340	\$53,700	\$85,950
8	\$52,720	\$57,200	\$91,500

**Table 14: FY 24 Income Limits Summary** Source: [FY 2024 Income Limits Documentation System – Summary for Rock County, Wisconsin \(huduser.gov\)](#)

**Percentage of Poverty**

The percentage of poverty typically refers to the proportion of a population living below the poverty line, which is defined based on income levels relative to the cost of living. This measure is crucial for understanding economic hardship and assessing the effectiveness of social support programs.

According to U.S. Census and ACS data, 9.90% of the Janesville, WI population is living below the poverty level. The table below breaks down this number by age group.

JANESVILLE, WI POVERTY CHARACTERISTICS			
	Total	Below Poverty Level	% Below Poverty Level
<b>Population for whom poverty status is determined</b>	<b>64,668</b>	<b>6,384</b>	<b>9.90%</b>
Under 18 years	14,045	1,991	14.20%
18 to 64 years	39,784	3,368	8.50%
	10,839	1,025	9.50%

**Table 15: Family Poverty** Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

According to U.S. Census and ACS data, 15.40% of Beloit, WI population is living below the poverty level. The table below breaks down this number by age group.

BELOIT, WI POVERTY CHARACTERISTICS			
	Total	Below Poverty Level	% Below Poverty Level
<b>Population for whom poverty status is determined</b>	34,915	5,389	15.40%
Under 18 years	8,848	1,853	20.90%
18 to 64 years	21,319	3,052	14.30%
65 years and older	4,748	484	10.20%

Table 16: Family Poverty Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

According to U.S. Census and ACS data, 9.90% of Rock County, WI population is living below the poverty level. The table below breaks down this number by age group.

ROCK COUNTY, WI POVERTY CHARACTERISTICS			
	Total	Below Poverty Level	% Below Poverty Level
<b>Population for whom poverty status is determined</b>	160,664	15,851	9.90%
Under 18 years	36,310	5,108	14.10%
18 to 64 years	97,287	8,564	8.80%
65 years and older	27,067	2,179	8.10%

Table 17: Family Poverty Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

#### D. Employment Profile

Janesville, Wisconsin, is a city with a diverse employment landscape. Historically, Janesville has been a strong manufacturing hub, particularly with the presence of companies like General Motors. Although the automotive industry has seen changes, manufacturing remains a significant sector. Healthcare is a key industry, providing numerous jobs in medical and support roles. Retail businesses and service industries contribute significantly to local employment. Local schools and educational institutions also provide employment opportunities, including roles for teachers, administrators, and support staff.

Beloit, Wisconsin, has a distinct employment profile shaped by its historical background and evolving economic landscape. Beloit has a long history as a manufacturing center. While traditional manufacturing has seen some decline, the city remains home to several manufacturing facilities and industrial operations. Beloit is home to Beloit College, a private liberal arts college that is a significant employer in the region. The college contributes to the local economy through jobs in education, administration, and support services. The healthcare sector also plays a substantial role in Beloit's economy. Facilities like Beloit Health System provide various healthcare-related jobs. Retail businesses and service industries are vital for local employment, encompassing everything from grocery stores and restaurants to repair services and financial institutions.

Rock County, Wisconsin, has a varied employment profile influenced by its geographic location, industrial history, and economic trends. Manufacturing has been a cornerstone of Rock County's economy, with a history of significant manufacturing operations, including automotive and machinery production. While traditional manufacturing has declined in some areas, it remains an important sector, with diverse manufacturing operations including machinery, automotive parts, and other industrial products. Healthcare is a significant industry in Rock County that continues to expand, offering opportunities in medical, administrative, and support roles. Rock County is home to several educational institutions that contribute to the local job market through positions in teaching, administration, and support services.

Data regarding the labor force, defined as the total number of persons working or looking for work and employment, is gathered from the decennial census, and American Community Survey estimates are presented below. The labor force participation remained consistent across jurisdictions although the unemployment rate in the City of Beloit spiked high in comparison to City of Janesville and Rock County.

<b>EMPLOYMENT</b>						
	<b>Janesville, WI</b>		<b>Beloit, WI</b>		<b>Rock County, WI</b>	
<b>Population 16 years and over</b>	<b>52,893</b>	<b>100%</b>	<b>28,537</b>	<b>100%</b>	<b>131,307</b>	<b>100%</b>
<b>In labor force</b>	34,666	65.50%	18,190	63.70%	85,865	65.40%
<b>Not in labor force</b>	18,277	34.50%	10,347	36.30%	45,442	34.60%
<b>Population 16 years and over</b>	<b>52,893</b>	<b>100%</b>	<b>28,537</b>	<b>100%</b>	<b>131,307</b>	<b>100%</b>
<b>Civilian labor force</b>	<b>34,628</b>	<b>65.50%</b>	<b>18,142</b>	<b>63.60%</b>	<b>85,765</b>	<b>65.30%</b>
<i>Employed</i>	33,302	62.80%	17,045	59.70%	82,453	62.80%
<i>Unemployed</i>	1,426	2.70%	1,097	3.8%	3,312	2.50%
<b>Armed Forces</b>	<b>38</b>	<b>0.10%</b>	<b>48</b>	<b>0.20%</b>	<b>100</b>	<b>0.10%</b>
<b>Unemployment Rate</b>	<b>(x)</b>	<b>4.1%</b>	<b>(x)</b>	<b>6%</b>	<b>(x)</b>	<b>3.9%</b>

Table 18: Employment Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### ***Jobs Held by Residents***

The employment landscape in Janesville, Beloit, and Rock County, Wisconsin, is influenced by a mix of historical industries and evolving economic trends. In these areas, residents are employed in a variety of sectors reflecting the economic history and current trends of each location. Manufacturing has been a traditional stronghold but is complemented by significant employment in healthcare, education, and retail/services. The shift towards service-oriented roles and healthcare positions highlights broader economic transitions and the adaptation of local job markets. The largest portion of workers are in manufacturing, healthcare, education, and retail service jobs.

The following charts illustrate the categories of workers and their occupations.

OCCUPATIONAL CHARACTERISTICS						
Occupations of Residents	Janesville, WI		Beloit, WI		Rock County, WI	
	Estimated Number of Residents	% Employed by Occupation	Estimated Number of Residents	% Employed by Occupation	Estimated Number of Residents	% Employed by Occupation
<b>Civilian employed population 16 years and over</b>	<b>33,202</b>	<b>100%</b>	<b>17,045</b>	<b>100%</b>	<b>82,453</b>	<b>100%</b>
Management, business, science, and arts occupations	10,575	31.90%	5,106	30.00%	26,975	32.70%
Service occupations	5,350	16.10%	2,843	16.70%	12,786	15.50%
Sales and office occupations	6,772	20.40%	3,193	18.70%	15,933	19.30%
Natural resources, construction, and maintenance occupations	2,933	8.80%	1,153	6.80%	8,709	10.60%
Production, transportation, and material moving occupations	7,572	22.80%	4,750	27.90%	18,050	21.90%

Table 19: Occupational Characteristics: Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

WORK CLASS CHARACTERISTICS						
Class of Worker	Janesville, WI		Beloit, WI		Rock County, WI	
	Estimated Number of Residents	% Employed by Worker Class	Estimated Number of Residents	% Employed by Worker Class	Estimated Number of Residents	% Employed by Worker Class
<b>Civilian employed population 16 years and over</b>	<b>33,202</b>	<b>100%</b>	<b>17,045</b>	<b>100%</b>	<b>82,453</b>	<b>100%</b>
Private wage and salary workers	28,222	85.00%	15,178	89.00%	69,589	84.40%
Government workers	3,900	11.70%	1,257	7.40%	9,179	11.10%
Self-employed workers in own not incorporated business	1,005	3.10%	610	3.60%	3,531	4.30%
	75	0.20%	0	0.00%	154	0.20%

Table 20: Work Class Characteristics: Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

### Major Employers

The Cities of Janesville and Beloit, and Rock County are home to a variety of firms that are an integral part of our diversified industry mix. These employers represent a mix of healthcare, education, manufacturing, and retail sectors, reflecting the diverse economic base of Janesville, Beloit, and Rock County. The presence of major institutions in healthcare and education highlights key areas of employment, while manufacturing and retail contribute significantly to the local job market while providing a boost in employment opportunities in advanced manufacturing, life sciences and healthcare, transportation, and logistics, and more.

Company	Industry	Full-Time Local Employment
Mercyhealth	Healthcare	3,025
Beloit Health System	Healthcare	1,553
Janesville School District	Education	1,390
Grainger (Lab Safety et al.)	Supplies	1,185
Rock County	Government	1,161
Hendricks Holdings (ABC et al.)	Construction	1,140
Kerry Americas	Food Products	971
SSI Technologies, Inc.	Manufacturing	950
Beloit School District	Education	938
SSM Health	Healthcare	882
Wal-Mart / Sam's Club	Retail	804
Data Dimensions	Business Automation	783
Frito-Lay	Food Products	663
Blackhawk Technical College	Education	588
J.P. Cullen & Sons	Construction	588
City of Janesville	Government	575
Blain Supply Inc. (Farm & Fleet	Wholesale	551
Fairbanks Morse Engines	Manufacturing	505
Seneca Foods Corporation	Food Products	504
Dollar General	Retail/Distribution	435
Serta-Simmons Bedding Co.	Retail	432
Lemans Corporation	Distribution	415
Prent Corporation & GOEX	Manufacturing	410
Beloit College	Education	384
City of Beloit	Government	368
Hormel	Food Products	325
Staples Fulfillment Center	Distribution	323
Woodman's Food Market, Inc.	Food Products	320
Bliss Communications	Media	307
Menard's	Retail	300
ANGI Energy Systems	Manufacturing	282
Ecolab	Manufacturing	306
First National Bank & Trust Co.	Financial Services	303
State Collection Service	Healthcare	274
Rakuten Rebates	Retail	266
Chambers & Owen	Wholesale	255
BlueScope Buildings	Manufacturing	250
HUFCOR, Inc.	Manufacturing	249
Beloit Turner School District	Education	219
Kettle Foods (Synder's Lance)	Food Products	199

Table 21 Major Employers: Source: [RC Major Employers List 2019.pdf \(jobsinrockcounty.com\)](#)

## E. Housing Profile

Fair housing is also concerned with the availability of a range of housing types and prices. This section provides an overview of the housing market and of the dynamics affecting housing availability by analyzing the characteristics of housing stock, housing conditions,

housing market sales, foreclosure data, owner/renter affordability, and housing problems. Housing stock impacts the ability to access adequate housing. This includes the number, type, size, and affordability of units. This is particularly important to persons with low- and moderate-income levels, and persons in protected classes, including persons with disabilities, families with children, and older adults.

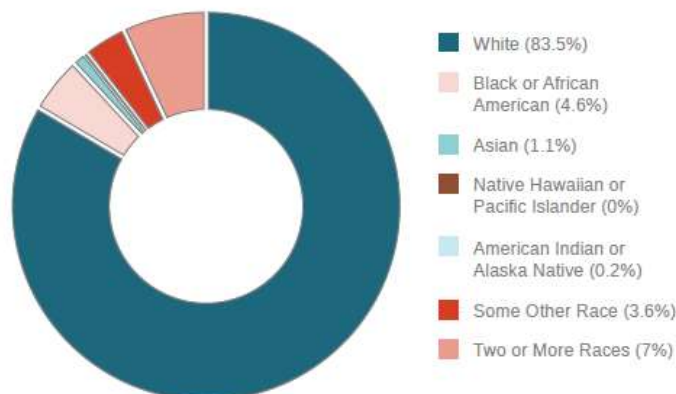
### Housing Demographics

Examining demographics is key to understanding and addressing the housing needs of Rock County, Beloit, and Janesville. Data on age, racial composition, disability, and socioeconomic status can provide insight into who lives in the region and help to inform decisions about how to meet diverse needs and allocate resources where most needed. Examining demographic data is also important for identifying mobility trends among different populations into and out of the region. The total population increased by just 2.2 percent since 2012 in Rock County. The City of Beloit had a slight decrease in population of just under 1 percent while the City of Janesville had an increase in population of 3.3 percent. Slightly more than 60 percent of the population is between the age of 18 and 64, while 17 percent are 65 years or older and slightly more than 20 percent of the population are children less than 18.



**Figure 1: Population by Age: Rock County**  
 Source: Census 2008-2012 - 2018-2022 Data Contains: Rock County

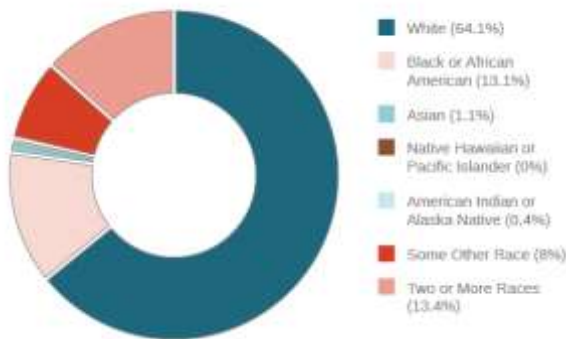
The population of the Consortium is characterized by growing diversity in ethnicity and race. In the region, 83.5 percent of residents are White, and all other races combined make up 16.5 percent of the population.



**Figure 2: Racial Composition - Rock County**  
 Source: Census 2008-2012 - 2018-2022 Data Contains: Rock County

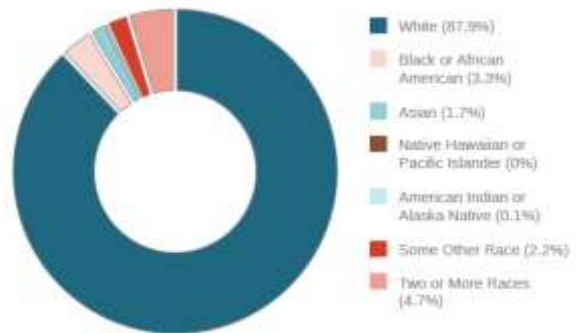
There is a difference in the racial makeup of Janesville and Beloit, however. In the City of Beloit, only about 64 percent of residents are White and all other races combined make up about 36 percent of the population. Multi-Racial and Black or African American residents make represent 13.4 percent and 13.1 percent of the population. However, in the City of Janesville, the racial makeup shows that more than 87 percent of the population is White, and all other races combined make up about 13 percent of the population.

**City of Beloit Racial Composition**



**Figure 3: Racial Composition - City of Beloit Janesville**

**City of Janesville Racial Composition**

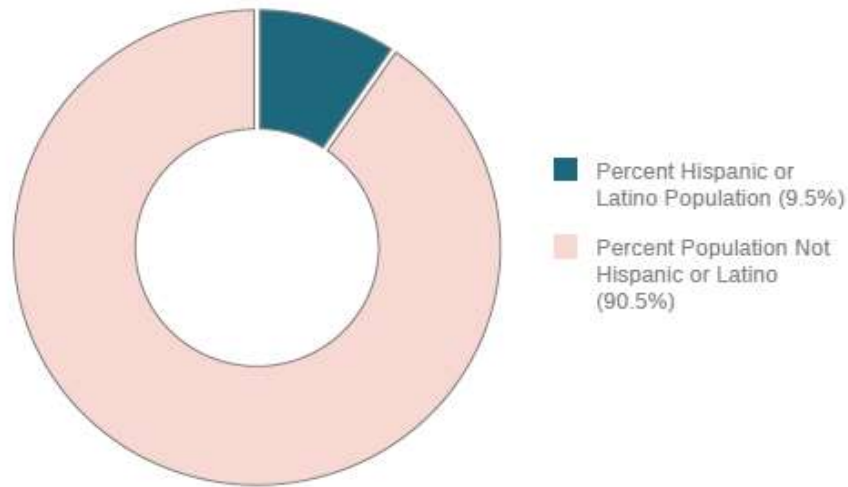


**Figure 4: Racial Composition - City of Janesville**

Source: Census 2008-2012 - 2018-2022 Data Contains: Beloit

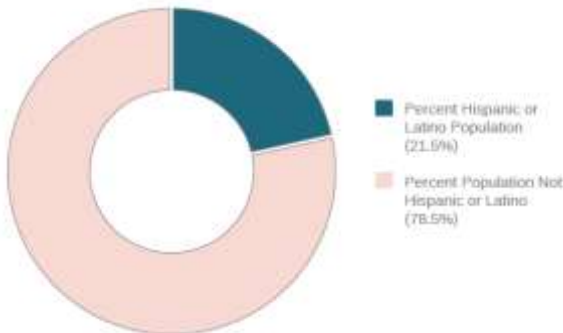
Source: Census 2008-2012 - 2018-2022 Data Contains: Janesville

As the following three figures will show, about 10 percent of Rock County residents are Hispanic and the remaining residents are not Hispanic. Additionally, a higher proportion of Hispanic or Latino population resides in Beloit (21.5%) compared to Janesville (5.4%) and Rock County overall (9.5%). The Hispanic or Latino segment makes up a significant portion of the Beloit population. These differences could result from a combination of migration trends, economic opportunities, housing availability, or regional policies in different areas.



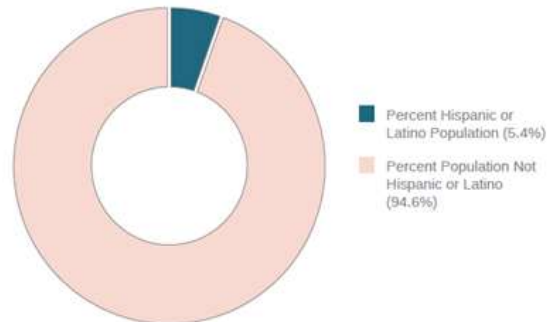
**Figure 5: Ethnic Composition - Rock County**  
 Source: Census 2008-2012 - 2018-2022 Data Contains: Rock County

### City of Beloit Ethnic Composition



**Figure 6: Ethnic Composition – Beloit**  
 Source: Census 2008-2012 - 2018-2022 Data Contains: Beloit

### City of Janesville Ethnic Composition



**Figure 7: Ethnic Composition – Janesville**  
 Source: Census 2008-2012 - 2018-2022 Data Contains: Janesville

## Characteristics of Housing

A thorough understanding of the characteristics of the housing stock is essential to identify and anticipate potential issues that may need to be addressed. These issues can include poor housing quality, flooding risks, and mismatches between the types of housing units available and the needs of the population. By examining these characteristics, each jurisdiction can develop targeted strategies to improve housing conditions, ensure safety, and meet the diverse housing needs of their communities.

According to the U.S. Census, the number of housing units in the region increase by 2.6 percent. Janesville and Rock County’s number of units increased by 4.93 percent and 1.9 percent, respectively. Beloit experienced a 4.28 percent decrease in the number of units

from 2018 to 2022. The homeowner vacancy rate decreased in all jurisdictions in 2022 and the rental vacancy rate slightly increased over the last five years in Rock County and Janesville, while it decreased slightly in Beloit.

Housing Unit Data						
	Rock County, WI		Beloit, WI		Janesville, WI	
Year	2022	2018	2020	2018	2020	2018
<b>Total housing units</b>	<b>70,230</b>	<b>68,875</b>	<b>14,815</b>	<b>15,479</b>	<b>28,850</b>	<b>27,494</b>
Occupied housing units	66,439	64,538	13,919	14,140	27,895	26,405
Vacant housing units	3,791	4,337	896	1,339	955	1,089
Homeowner vacancy rate	0.4%	0.8%	0.5%	1.4%	0.0%	0.5%
Rental vacancy rate	3.7%	3.3%	5.0%	5.3%	2.5%	1.9%

Figure 8: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

**Relative Growth of Population, Employment and Housing Stock**

This chart, and accompanying text, are designed to help the Consortium understand whether the supply of housing is keeping pace with population and employment growth. If the population is falling faster than the housing stock, the resulting surplus of housing units can depress property values and result in increased vacancy, abandonment, and a general decline in the quality of the low-priced housing stock. In contrast, when the population is growing faster than the housing stock, generally the vacancy rate is declining (as vacant units become occupied) or crowding is increasing. A third factor to consider is the number of jobs in the locality. When the number of jobs is rising faster than the housing stock is expanding, the excess demand pressure can cause housing prices and rents to rise and traffic congestion to increase as employees locate outside the city.

In Rock County, between 2012 and 2022, the change in the total number of housing units of 2.7% exceeded the 2.2% increase in the population. Over a similar period, from 2011 to 2021, the number of jobs also increased by 10.4%. Based on the above analysis, the number of jobs is rising faster than the housing stock is expanding contributing to higher demand for housing and driving housing costs to increase.

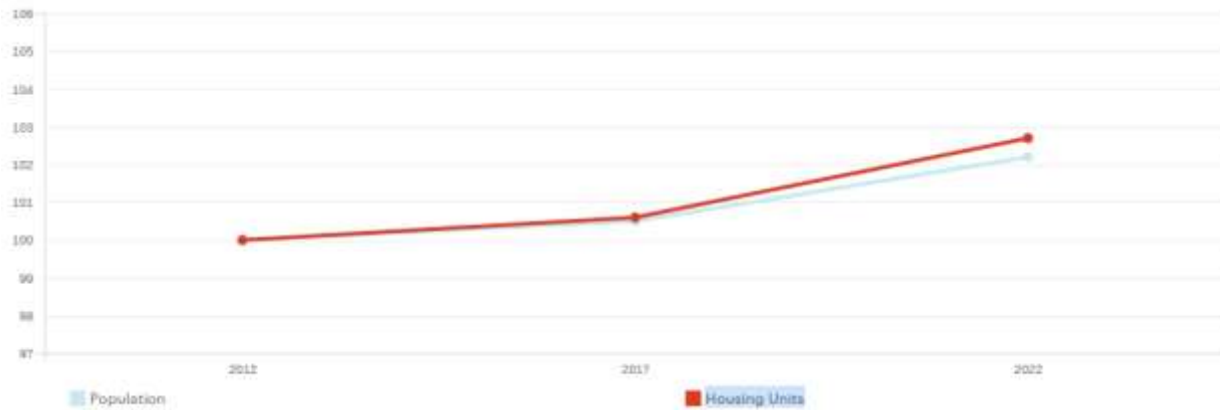


Figure 9: 2008-2012 - 2018-2022 Data Contains: Rock County

In Beloit, between 2012 and 2022, the change in the total number of housing units decreased by 3.5% lagging behind the 0.8% decrease in the population which could contribute to overcrowding or people moving out of the jurisdiction. Over a similar period, from 2011 to 2021, the number of jobs in Beloit increased by 9.8%. Further underscoring the higher demand for housing and driving housing costs to increase.

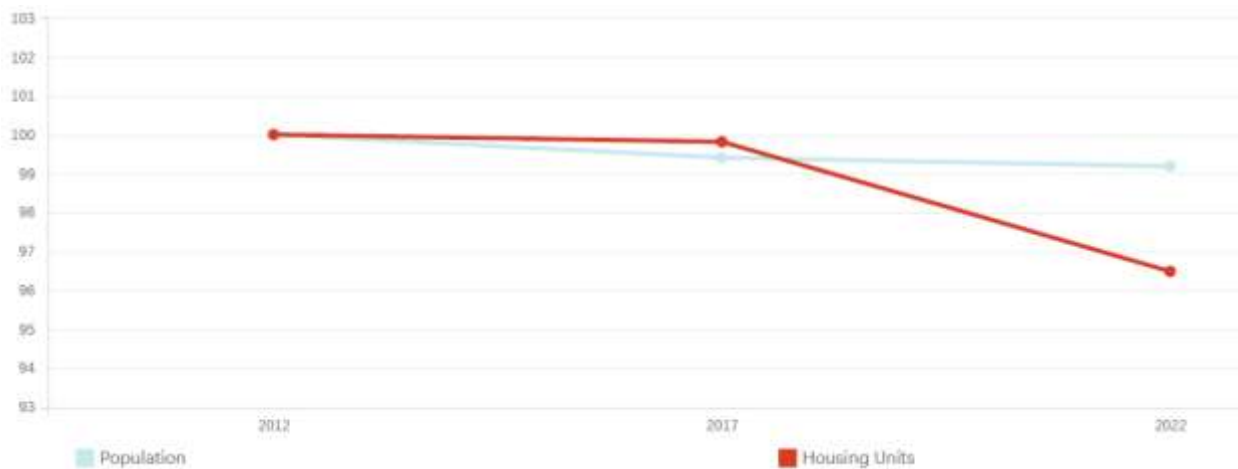


Figure 10: 2008-2012 - 2018-2022 Data Contains: Beloit

In Janesville, between 2012 and 2022, the change in the total number of housing units of 6.3% exceeded the 3.3% increase in the population. Over a similar period, from 2011 to 2021, the number of jobs in Janesville increased by 6.8%, increasing local demand for housing. In Janesville, housing growth and employment growth exceeds the rate of population growth. With community efforts to increase housing supply, the City is hopeful for a more healthy vacancy rate.

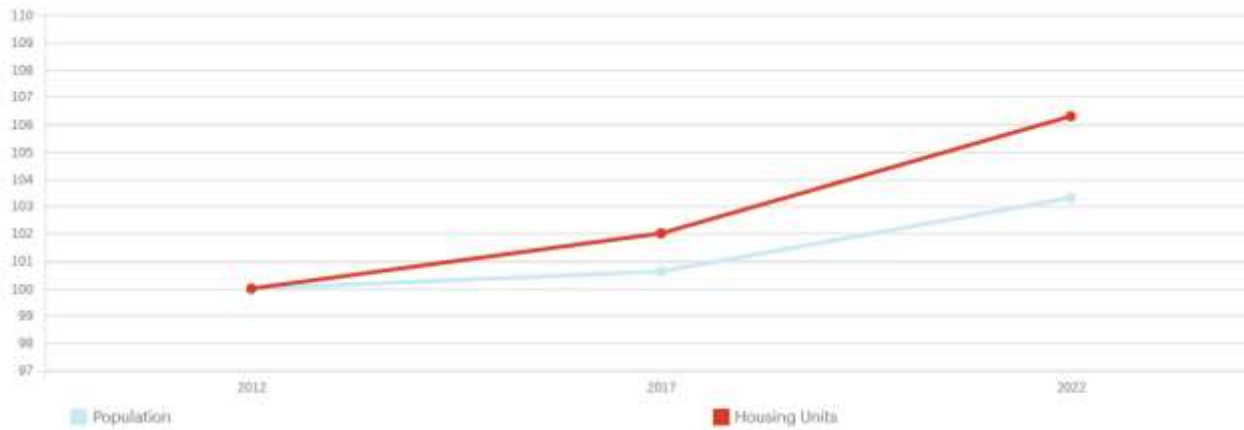


Figure 11: 2008-2012 - 2018-2022 Data Contains: Janesville

Figure 12: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

### Age of Structure

The age of a dwelling unit is a factor used to evaluate the structural quality of the unit. The average industry standard for the life span of a single-family dwelling is generally 50 years. However, this typical life span often depends on the quality of the original construction and continued maintenance of the unit. Using this standard, some homes found within the Consortium constructed prior to 1970 may be approaching the end of their utility.

All else being equal, older homes tend to require major capital investment or to exhibit lower quality more generally than newer homes, and so it can be helpful to examine the age of the stock. The median year a housing unit was built in Rock County is 1969 (1979 for the U.S. as a whole). In Rock County, 19.8 percent of the housing units were built before 1940 and 32.2 percent more between 1940 and 1969. More recently, 13.6 percent of the housing units have been built since 2000. (The respective percentages for the U.S. as a whole are 12.0%, 24.7% and 22.3%). The City can use housing code violation data and windshield surveys to bolster their understanding of housing quality to determine the nature and extent of quality issues that should be addressed.

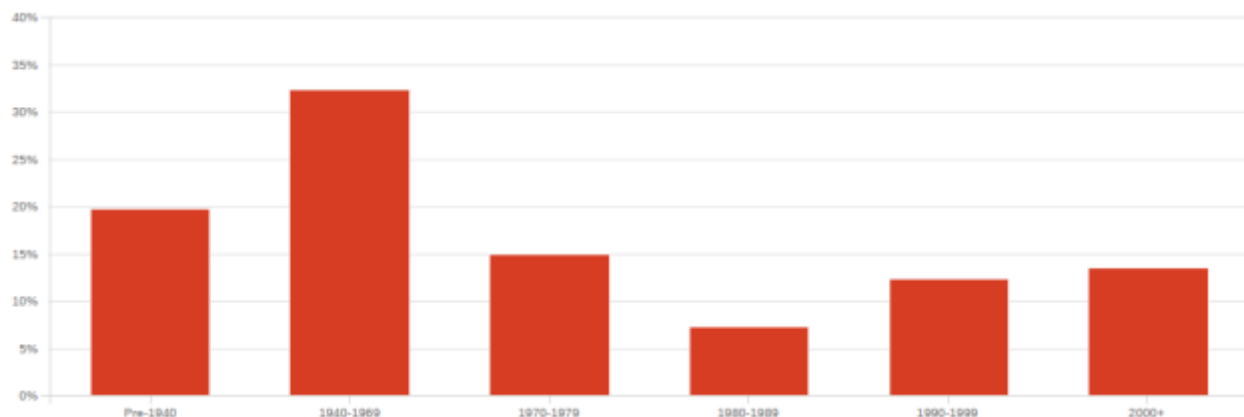


Figure 13: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates – Rock County

The housing stock trended older in the City of Beloit, where the median year a housing unit was built is 1957. In Beloit, 24.7% of the housing units were built before 1940 and 44.2% more between 1940 and 1969. While only 10.0% of the housing units have been built since 2000.

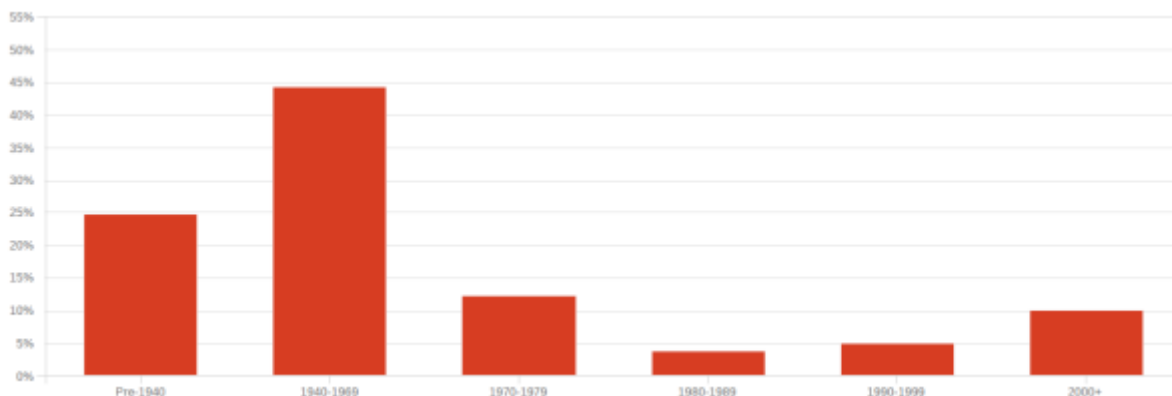


Figure 14: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates – Beloit

The median year a housing unit was built in Janesville is 1972. In Janesville, 16.2% of the housing units were built before 1940 and 31.2% more between 1940 and 1969. More recently, 12.4% of the housing units have been built since 2000.

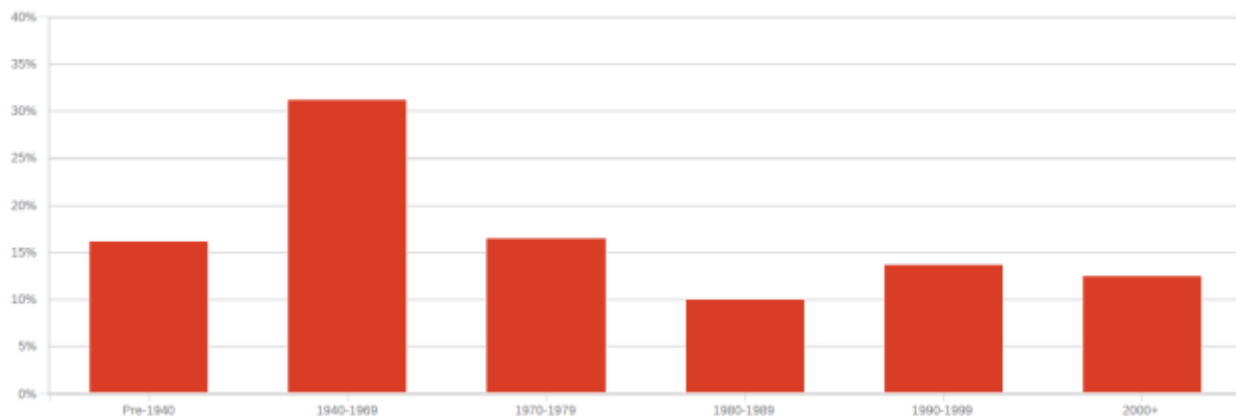


Figure 15: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates – Janesville

### Comprehensive Housing Affordability Strategy (CHAS)

HUD’s Comprehensive Housing Affordability Strategy (CHAS) is a commonly used gauge of housing affordability, or lack thereof. HUD considers a housing unit affordable if the occupant household expends no more than 30% of its income on housing cost. In the situation where the household expends greater than 30% of its income on housing cost, the household is considered cost burdened. In cases where housing cost is 50% of income or greater, the household is considered severely cost burdened. Cost burdened households have fewer financial resources to meet other basic needs (food, clothing, transportation, medical, etc.), less resources to properly maintain the housing structure, and are at greater risk for foreclosure or eviction.

## Income Categories

- Extremely Low Income: 0%-30% of the Area Median Income (AMI)
- Low Income: 31%-50% of the AMI
- Moderate Income: 51%-80% of the AMI
- Middle and Upper Income: 80% or More of the AMI

Housing Problem categories are defined below:

“Substandard Housing – lacking complete plumbing or kitchen facilities” is defined as a household without hot and cold piped water, a flush toilet and a bathtub or shower, and kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator.

Occupied housing units	Rock County		Beloit		Janesville	
	#	%	#	%	#	%
Lack Completed Plumbing Facilities	201	0.3%	75	0.5%	107	0.4%
Lack Completed Kitchen Facilities	485	0.7%	159	1.1%	282	1.0%
No telephone Service Available	583	0.9%	50	0.4%	340	1.2%

Table 3A: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

The second housing problem identified is households living in overcrowded conditions. There are two forms of overcrowding defined by HUD:

- Severely overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.51 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.
- Overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.01 to 1.5 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.

Occupied housing units	Rock County		Beloit		Janesville	
	#	%	#	%	#	%
1.00 or less	63,457	98.3%	13,741	97.2%	26,025	98.6%
1.01 to 1.50	830	1.3%	221	1.6%	345	1.3%
1.51 or more	251	0.4%	178	1.3%	35	0.1%
<b>Total</b>	<b>64,538</b>	<b>(X)</b>	<b>14,140</b>	<b>(X)</b>	<b>26,405</b>	<b>(X)</b>

Table 4B: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

## Disproportionate Housing Burden:

The final housing problem identified is the cost burden. Cost burden is a fraction of a household’s total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage

payment, taxes, insurance, and utilities. Cost burden is broken into two categories based on severity:

- Severe housing cost burden greater than 50% of income
- Housing cost burden greater than 30% of income

Black and Hispanic households are overrepresented among those facing severe cost burdens. For instance, 31% of Hispanic households and 42% of Black households face severe cost burdens, compared to about 11% of White households. This suggests that Black and Hispanic populations are more likely to experience financial strain due to housing costs, which may reflect broader socioeconomic disparities, such as income inequality or access to affordable housing. On its face, the majority of households appear to have affordable housing (<=30%). However, this masks the significant number of households—particularly in minority communities—struggling with severe burdens.

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
<b>Jurisdiction as a whole</b>	<b>46,359</b>	<b>10,092</b>	<b>7,346</b>	<b>646</b>
White	42,115	8,672	5,611	516
Black / African American	1,241	654	894	80
Asian	372	19	74	0
American Indian, Alaska Native	39	14	0	4
Pacific Islander	4	0	0	0
Hispanic	2,126	592	655	50

### Rental Affordability

A healthy housing market provides a diverse range of housing options, including rental and for-sale homes and homes affordable to people of different incomes. An examination of the percentage of households that rent their homes, and the characteristics of these renter households (age, income, and cost-burden) can help jurisdictions understand the needs of renters and the extent to which policy changes may be needed to help ensure those needs are met.

By examining how the data changes over time, jurisdictions can spot trends, such as increased or decreased rental affordability. Data at the MSA and state levels provide benchmarks that can be helpful for interpreting the jurisdiction’s data. In addition to developing new dedicated affordable rental homes, it is important to consider how both to preserve existing dedicated affordable rental homes and to preserve unsubsidized rental homes that are nevertheless affordable. Since the overall supply of homes for rent can affect rent levels, localities interested in making rental homes more affordable also may wish to focus on reducing barriers to the creation of new supply.

## Renter Housing

The supply of rentals has decreased in Rock County and Beloit between 2018 and 2022 by just over 1,221 units and there was an increase in rental units in the City of Janesville totaling 263 units. There was a total of 34,456 occupied units paying rent in 2018 and 33,498 occupied units paying rent in 2022. The median monthly rent in 2018 for Rock County, Beloit, and Janesville was \$803, \$777, and \$816, respectively and increased to \$981, \$957, and \$993, respectively in 2022. A moderate share of households rent in the region underscoring the importance of quality affordable rental housing. As of 2022, 30.1% of households in Rock County were renters, lower than the renter percentage in Wisconsin (32.3%) and lower than the renter percentage in the U.S. (35.2%). Conversely 40.7% in Beloit, and 33.6% in Janesville were renters, which is higher than the state average. The share of households who rent remained relatively flat in 2022. The following table estimates rental rates within the region according to the 2018 and 2022 ACS data.

The area median rent is estimated at \$981, \$957, and \$993 for Rock County, Beloit, and Janesville respectively, according to the 2022 ACS estimates. The average rents commercially tend to exceed the area median rent and the fair market rent limits. The rental market is increasingly more competitive as evidenced by the increase in rent prices over the last five years. It is also important to note that assisted rental housing units do not disproportionately impact the market forces dictating rents in the region. Renters seeking efficiency and 1-bedroom units may face a tougher time accessing available units as its increasingly cost prohibitive to rent such units and there has been a steady decline in the number of 1-bedroom and efficiency units.

GROSS RENT	Rock County				Beloit				Janesville			
	2022		2018		2022		2018		2022		2018	
<i>Occupied units paying rent</i>	19,065	%	19,755	%	5,488	%	6,019	%	8,945	100%	8,682	100%
Less than \$500	1172	6.1%	1997	10.10%	321	5.80%	766	12.70%	517	5.80%	621	7.2%
\$500 to \$999	8895	46.7%	12891	65.30%	2777	50.60%	4107	68.20%	4064	45.40%	5819	67.0%
\$1,000 to \$1,499	7486	39.3%	4348	22%	2109	38.40%	1095	18.20%	3547	39.70%	2057	23.7%
\$1,500 to \$1,999	1152	6.0%	334	1.70%	246	4.50%	40	0.70%	536	6%	131	1.5%
\$2,000 to \$2,499	150	0.8%	52	0.30%	30	0.50%	11	0.20%	91	1%	0	0.0%
\$2,500 to \$2,999	0	0.0%	23	0.10%	0	0%	0	0%	0	0%	19	0.2%
\$3,000 or more	210	1.1%	110	0.60%	5	0.10%	0	0%	190	2.10%	35	0.4%
<b>Median (dollars)</b>	<b>981</b>	<b>(X)</b>	<b>803</b>	<b>(X)</b>	<b>957</b>	<b>(X)</b>	<b>777</b>	<b>(X)</b>	<b>993</b>	<b>(X)</b>	<b>816</b>	<b>(X)</b>
<b>No cash rent</b>	<b>912</b>	<b>(X)</b>	<b>926</b>	<b>(X)</b>	<b>175</b>	<b>(X)</b>	<b>114</b>	<b>(X)</b>	<b>418</b>	<b>(X)</b>	<b>309</b>	<b>(X)</b>

Table 22: Gross Median Rent, US Census, 2022 American Community Survey 5-Year Estimates

Fair Market Rents (FMRs) are primarily used to determine payment standard amounts for HUD assisted housing. The High HOME Rent Limit for an area is the lesser of the Section 8 FMR for the area or a rent equal to 30% of the annual income of a family whose income equals 65% of the area median income (AMI), as determined by HUD. The Low HOME Rent Limit for an area is 30% of the annual income of a family whose income equals 50% of the AMI, as determined by HUD, capped by the High HOME Rent Limit. HUD’s Economic and Market Analysis Division calculates the HOME rents each year using the FMRs and Section 8 Income Limits. These limits are used to determine rent payment standards. The 2023 FMRs and HOME Rent Limits for the Janesville-Beloit HUD MSA are shown below.

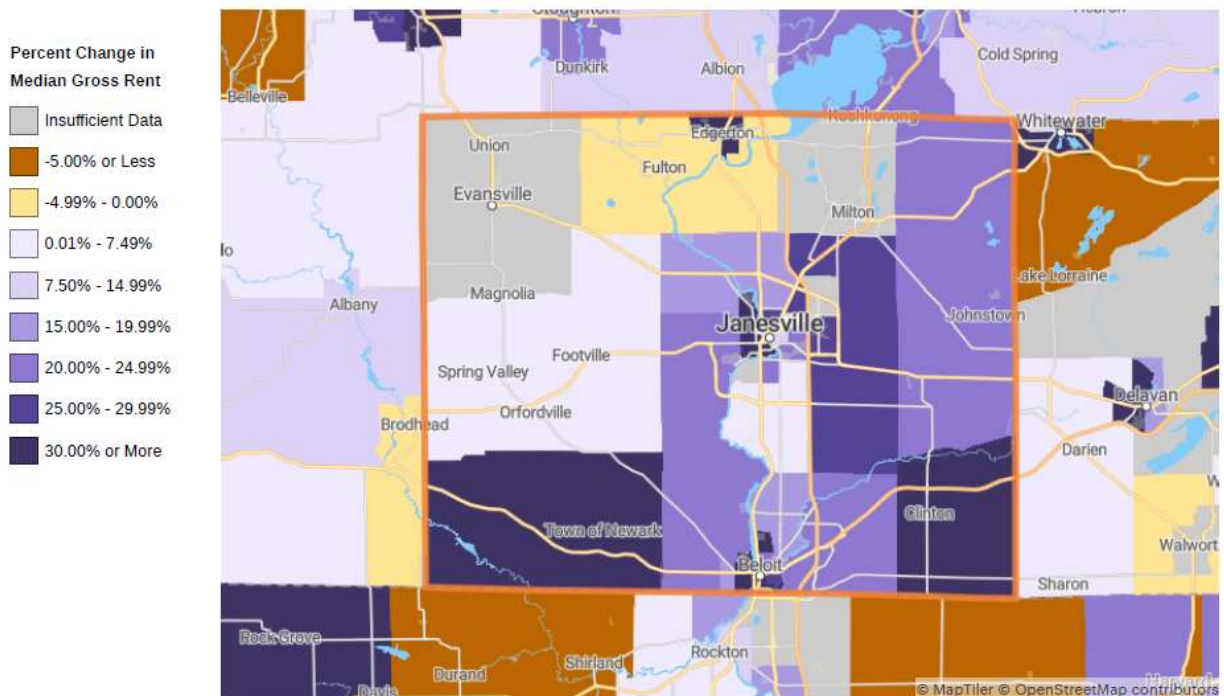
# of Bedrooms Limit	Fair Market Rent	High Rent Limit 80% of Units	Low Rent Limit 20% of Units
0	\$797	\$828	\$756
1	\$841	\$1,005	\$810
2	\$1,105	\$1,222	\$972
3	\$1,461	\$1,426	\$1,123
4	\$1,533	\$1,571	\$1,253

Fair Market Rent, HOME High Rent Limit Rent Limit, and HOME Low

Table 23: Source: HUD Fair Market Rent, <https://www.hudexchange.info/programs/home/home-rent-limits/>

## Change in Median Rent by Neighborhood

Neighborhood-level data on rent trends can help jurisdictions spot large rent increases that could lead to (or be markers of) displacement in certain neighborhoods as well as decreases in other neighborhoods that could be signs of continued or growing distress. The map below illustrates the change in median gross rent in Rock County between 2017 and 2022 by census tract. According to U.S. Census<sup>1</sup>, there was an overall 25.5 percent change in median rent. In 2022, the median gross rent in the County was \$981 compared to the median gross rent for Beloit and Janesville at \$957 and \$993 respectively.



Understanding how rents vary by neighborhood is important for a variety of purposes. For example, jurisdictions seeking to help Housing Choice Voucher holders access resource-rich neighborhoods will need to set the rental payment standards at a high enough level to provide access to rental housing in these neighborhoods. Neighborhoods with comparatively high median rents may also be important locations to consider for the development of new dedicated affordable rental units. By contrast, it may be important to closely monitor and address any deterioration of housing quality in areas with very low rents.

The National Low Income Housing Coalition’s “Out of Reach” 2024 Annual Report calculates the amount of money a household must earn in order to afford a rental unit based on the number of bedrooms in a rental unit at the Fair Market Rent (FMR), consistent with HUD’s affordability standard of paying no more than 30% of income for

<sup>1</sup> U.S. Census 2008-2012 - 2018-2022

housing costs. Data is presented in the Renter Affordability table for the Janesville-Beloit Metro Statistical Area (MSA).

As noted in the 2024 Out of Reach Report, the NLIHC estimates that the median income for a renter in the Janesville-Beloit MSA is \$48,645. The Area's Fair Market Rent (FMR) for a two-bedroom apartment is \$1,105 and in order to afford this level of rent and utilities, without paying more than 30% of income on housing, a person would need to work 48 hours per week at the mean renter wage and 117 hours at minimum wage of \$7.25 per hour.

### Share of Renter Households Cost Burdened by Race/Ethnicity

A moderately cost burdened renter household spends between 30 and 49.9% of their household income on gross rent (defined as monthly rent plus utilities expenses). A severely cost burdened renter household spends 50% or more of their household income on gross rent. Examining how the share of renter households that are cost-burdened changes over time can help the region understand whether affordability problems are easing or worsening. In Rock County, the share of renter households that are moderately or severely cost burdened decreased from 43.5 percent in 2017 to 38.9 percent in 2022.

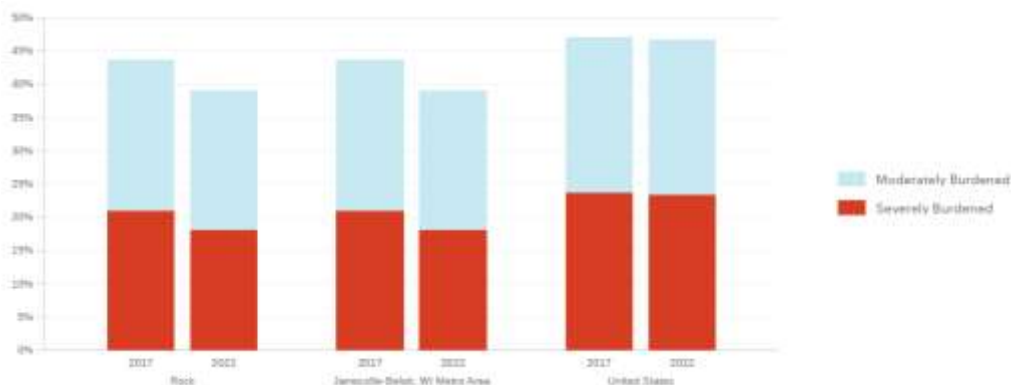


Figure 16: Share of Renter Households Moderately or Severely Cost Burdened  
Source: Census2013-2017 - 2018-2022 Data Contains: Rock County

Data on the share of households that are cost-burdened at the regional and national levels can provide a useful context for understanding the extent to which the jurisdiction's affordability challenges are more or less severe than these benchmarks.

In Beloit, the share of renter households that are moderately or severely cost burdened decreased from 50.7% in 2017 to 44.7% in 2022 and the share of renter households in Beloit that were moderately or severely cost-burdened in 2022 (44.7%), higher than the share in the Janesville-Beloit, WI Metro Area, (38.9%), and lower the share in the United States, (46.5%).

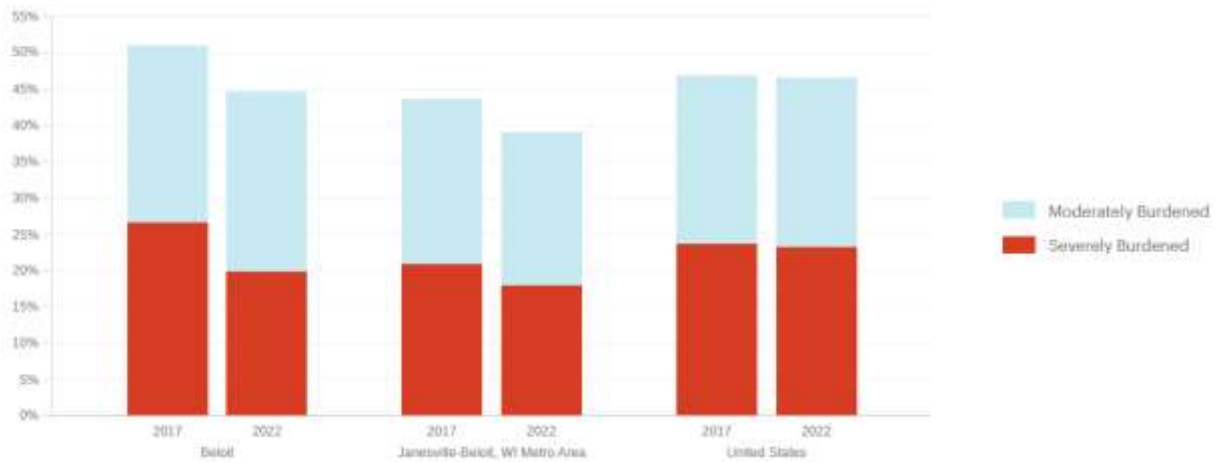


Figure 17: Share of Renter Households Moderately or Severely Cost Burdened – Beloit  
 Source: Census2013-2017 - 2018-2022 Data Contains: Beloit

In Janesville, the share of renter households that are moderately or severely cost burdened decreased from 42.6% in 2017 to 39.1% in 2022 and the share of renter households in Janesville that were moderately or severely cost-burdened in 2022 (39.1%) was higher than the share in the Janesville-Beloit, WI Metro Area, (38.9%), and lower the share in the United States, (46.5%).

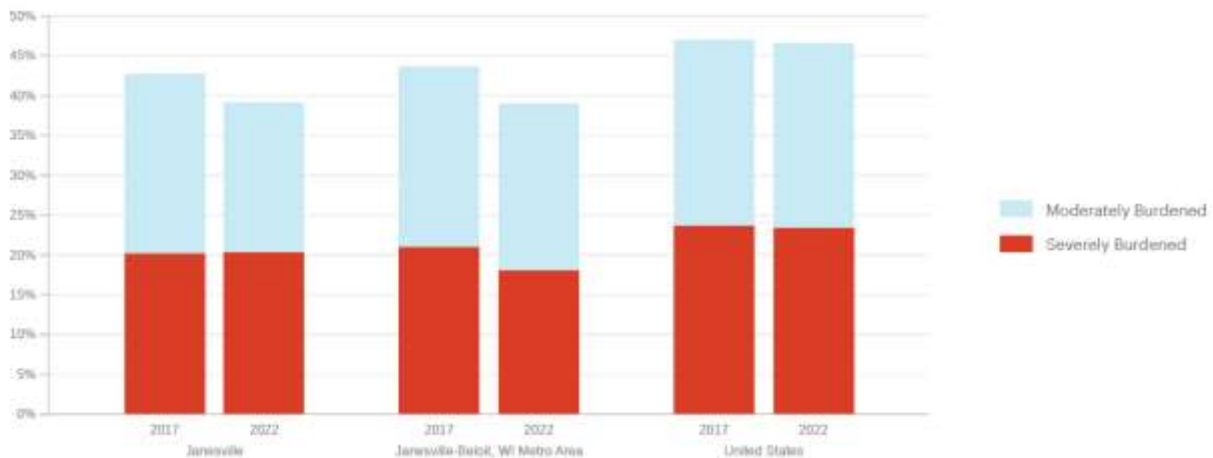


Figure 18: Share of Renter Households Moderately or Severely Cost Burdened – Janesville  
 Source: Census2013-2017 - 2018-2022 Data Contains: Janesville

### Share of Renter Households Cost Burdened by Race/Ethnicity

Across the U.S. there are substantial disparities in rental cost burdens by race and ethnicity. Although data may be limited for some races or ethnic groups, the Consortium can use these charts to examine how the prevalence of both moderate and severe cost burdens vary across population subsets. The data shows that Hispanic and Black households were disproportionately burdened as only 9.5 and 4.6 percent of the population is Hispanic or Black, respectively but over 24 and 13 percent face cost burden indicating that greater portion of their income must be dedicated to housing as opposed to other resources, followed by Asian families. While White families are not

disproportionately affected by cost burden, the percentage of this group facing cost burden remains high at 45 percent of which 20 percent of those residents are severely cost burdened.

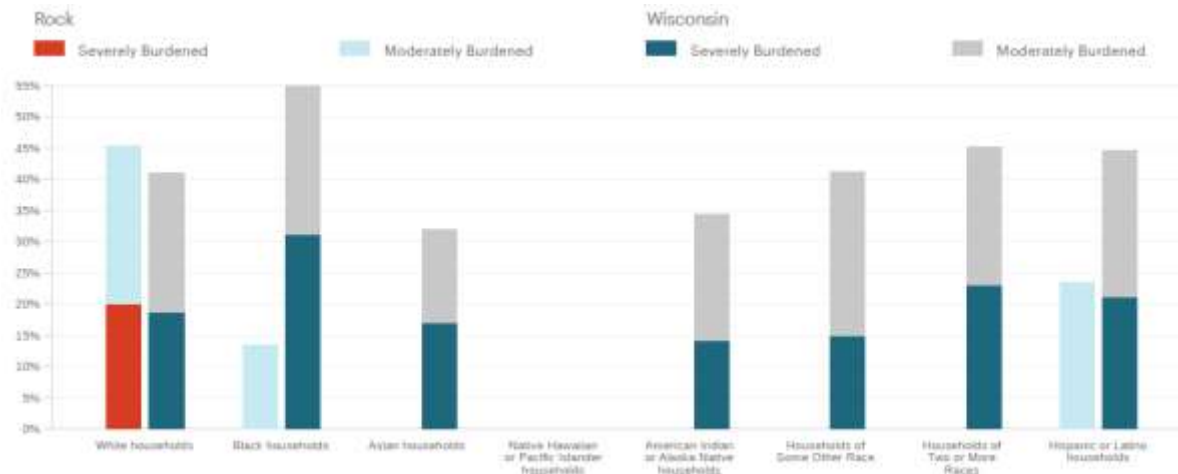


Figure 19: Share of Renter Households Cost Burdened by Race/Ethnicity  
 Source: 2008-2012 - 2018-2022 Data Contains: Rock County, Wisconsin

### Share of Renter Households that are Cost Burdened across Income Ranges

The incidence of housing cost burdens is generally highest for unassisted renter households with the lowest incomes, a key reason federal housing vouchers and federally funded public housing are targeted primarily toward extremely low-income renters. In developing a local housing strategy, it is important to consider both the incidence of moderate- and severe housing cost burdens among households of different income levels and the absolute number of renter households with these problems within each income category. It is also important to consider whether the incidence of housing problems is rising among certain income groups as well as whether there are important gaps not targeted by federal assistance.

In Rock County, renter households with incomes of less than \$20,000 had the highest incidence of cost burden in 2022 (83.6%), with a decrease in incidents for households earning less than \$35,000 (62%) and those earning less than \$50,000 (14%). As shown in the previous visualization, the share of households rent burdened in Rock County decreased overall from 2017 to 2022. It is important to note that the trends held steady for Beloit and Janesville.

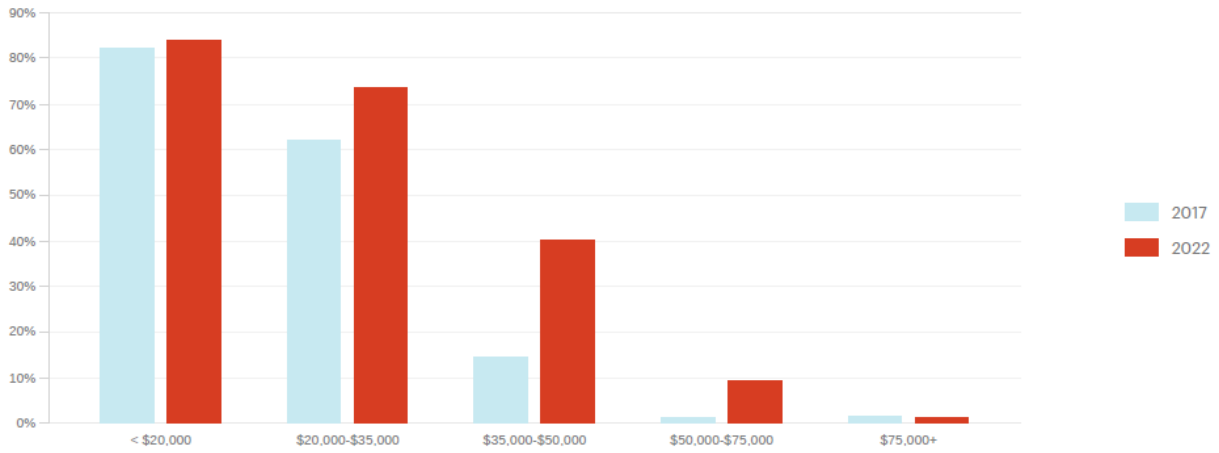


Figure 20 Share of Renter Households that are Cost Burdened across Income Ranges  
 :Source: Census 2008-2012 - 2018-2022 Data Contains: Rock County

### Distribution of Renter Households and Affordable Rental Units by Income

This chart compares the cumulative share of renters below specified income levels to the share of the rental stock affordable to households with these incomes to help in identifying housing supply shortages at different income levels. It is important to note that some of the units identified as affordable to people of a particular income level may in fact be occupied by households with higher incomes, reducing the stock available for lower income households. There are deficits in affordable supply for the lowest income households in all markets, Rock County, Beloit, and Janesville.

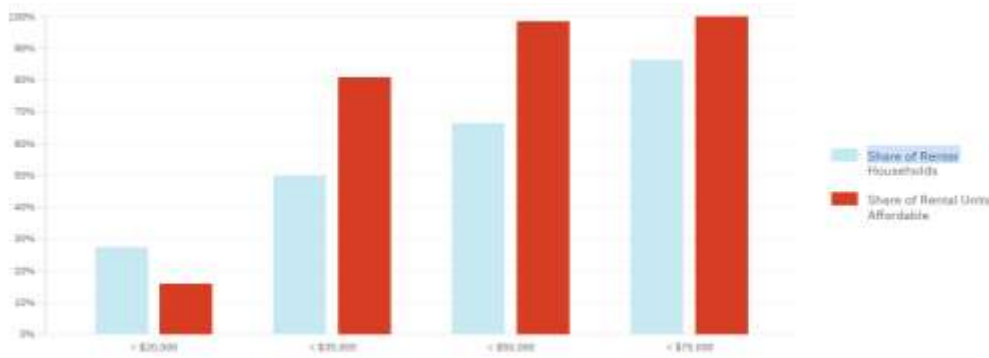


Figure 21: Distribution of Renter Households and Affordable Rental Units by Income  
 Source: American Community Survey 2008-2012 - 2018-2022 Data Contains: Rock County



Figure 22: Distribution of Renter Households and Affordable Rental Units by Income in Beloit and Janesville  
 Source: American Community Survey 2008-2012 - 2018-2022 Data Contains: Beloit and Janesville

## Comparison of Trends in Rent and Income (Indexed) 2012 to 2022

In Rock County, incomes are increasing faster than rents, leading to increased affordability. The monthly median rent in Rock County rose from \$739 in 2012 to \$981 in 2022 (growth of 32.7%). During this same period, the annual median family income in Rock County rose from \$60,703 to \$84,424 (growth of 39.1%).

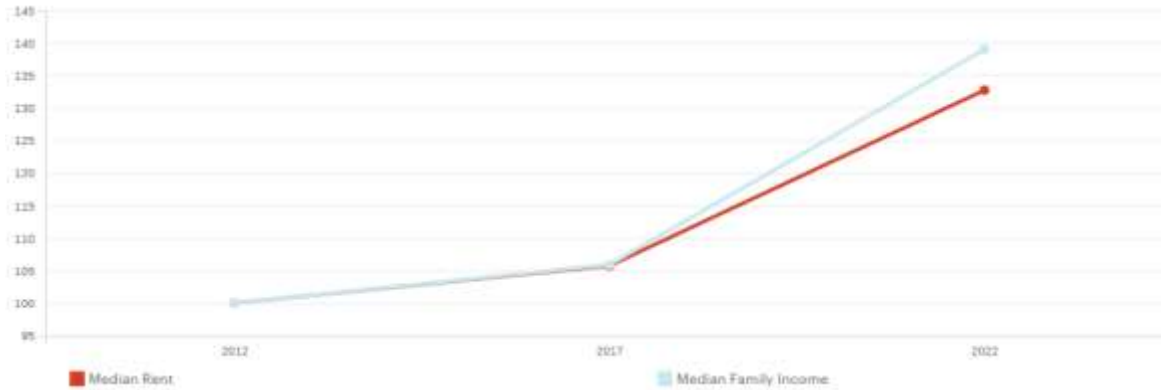


Figure 23: Comparison of Trends in Rent and Income (Indexed) 2012 to 2022  
Source: American Community Survey 2008-2012 - 2018-2022 Data Contains: Rock County

The monthly median rent in Beloit rose from \$705 in 2012 to \$957 in 2022 (growth of 35.7%). During this same period, the annual median family income in Beloit rose from \$43,772 to \$67,686 (growth of 54.6%).

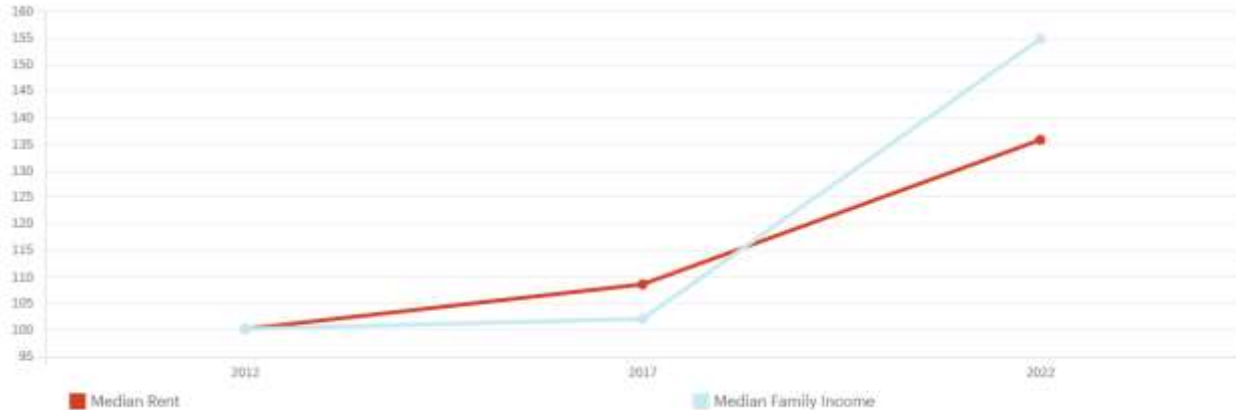


Figure 24: Comparison of Trends in Rent and Income (Indexed) 2012 to 2022  
Source: American Community Survey 2008-2012 - 2018-2022 Data Contains: Beloit

The monthly median rent in Janesville rose from \$749 in 2012 to \$993 in 2022 (growth of 32.6%). During this same period, the annual median family income in Janesville rose from \$59,907 to \$82,461 (growth of 37.6%).

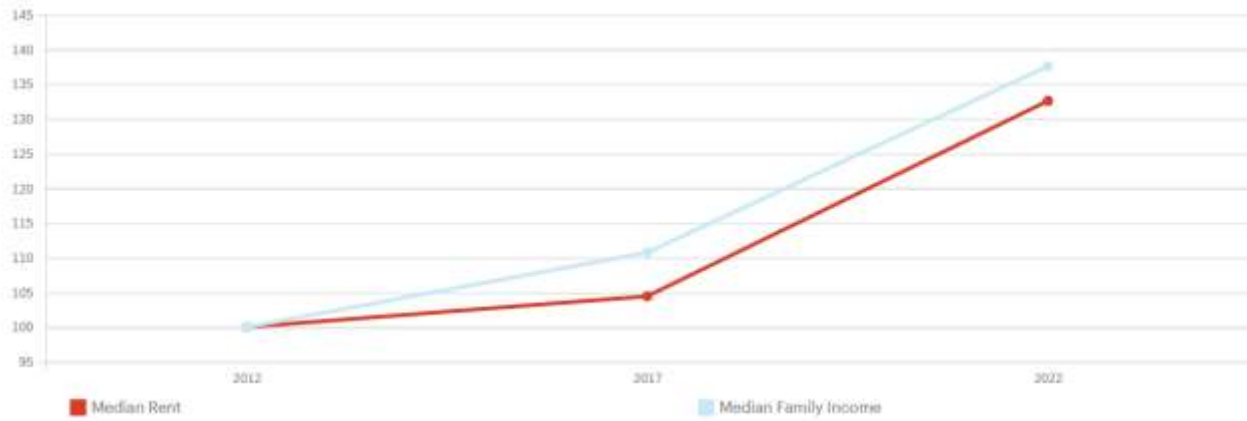


Figure 25: Comparison of Trends in Rent and Income (Indexed) 2012 to 2022  
 Source: American Community Survey 2008-2012 - 2018-2022 Data Contains: Janesville

### Change in Stock of Rental Units below \$500 and \$1,000 a Month 2017 to 2022

Some localities are experiencing a reduction in the stock of units with low rents as owners renovate housing or simply align rents with a rising market. In Rock County 6.2% of rental units in 2022 had a monthly rent of \$500 or less, and 52.8% of units rented for \$1,000 or less monthly. This is a smaller share than in 2017, when 80.7% of rented units in Rock had a gross rent of \$1,000 or less. Note that these figures reflect nominal dollars and have not been adjusted for inflation. Based on affordability standards defining an affordable rent at or below 30% of income, monthly rent levels at \$500 and \$1,000 are affordable to households with annual incomes of \$20,000 and \$40,000, respectively.

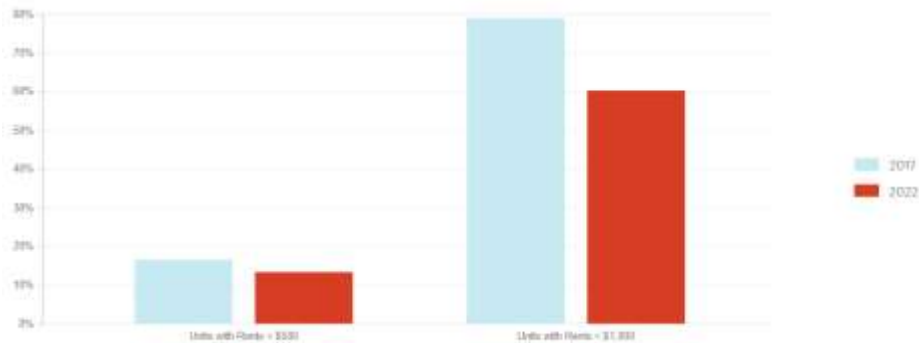


Figure 26: Change in Stock of Rental Units below \$500 and \$1,000 a Month  
 Source: Census - 2008-2012 - 2018-2022 Data Contains: Rock County, Wisconsin

In Beloit, 5.9% of rental units in 2022 had a monthly rent of \$500 or less, and 56.5% of units rented for \$1,000 or less monthly. This is a smaller share than in 2017, when 85.5% of rented units in Beloit had a gross rent of \$1,000 or less.

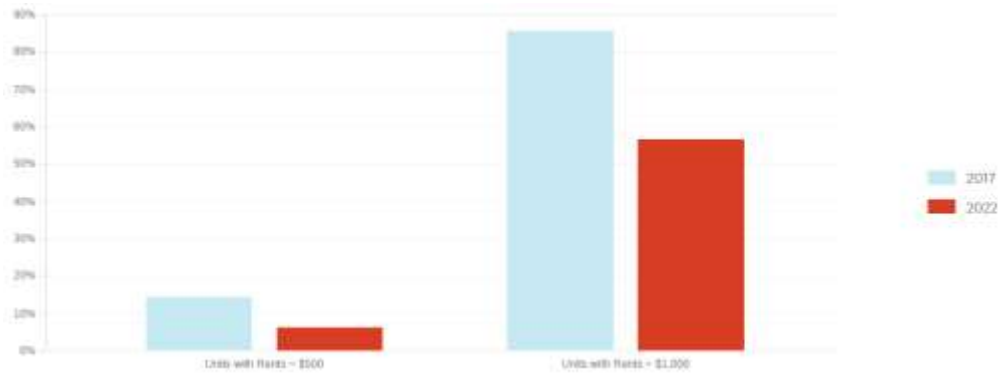


Figure 27: Change in Stock of Rental Units below \$500 and \$1,000 a Month  
 Source: Census - 2008-2012 - 2018-2022 Data Contains: Rock County, Wisconsin

In Janesville, 5.8% of rental units in 2022 had a monthly rent of \$500 or less, and 51.2% of units rented for \$1,000 or less monthly. This is a smaller share than in 2017, when 81.1% of rented units in Janesville had a gross rent of \$1,000 or less.

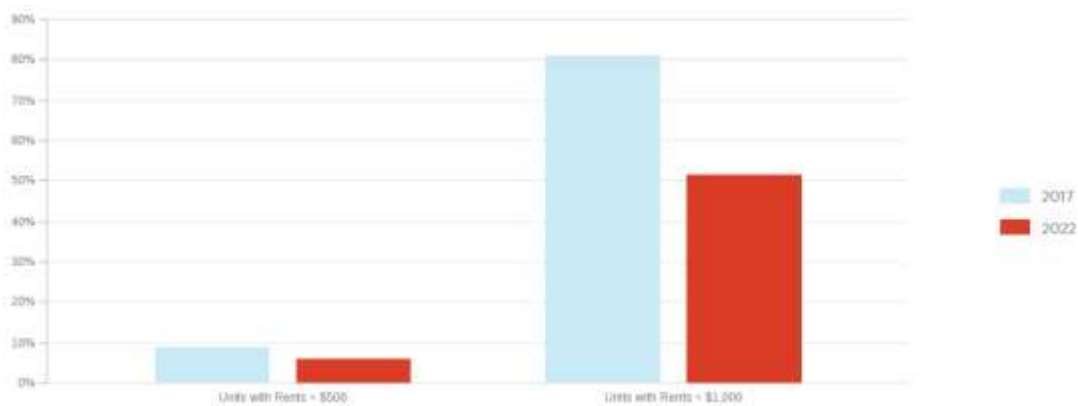


Figure 28: Change in Stock of Rental Units below \$500 and \$1,000 a Month  
 Source: Census - 2008-2012 - 2018-2022 Data Contains: Rock County, Wisconsin

### Change in Rental Vacancy Rates

Since 2017, the vacancy rate in Rock County has risen by 0.8 percentage points (the number of vacant rental units increased from 608 to 768). As of 2022, the rental unit vacancy rate in Rock County was 3.7% and has been lower than the state of Wisconsin's rate, which was 4.7% in 2022. All else being equal, higher vacancy rates are a sign of a softer housing market, in which there are fewer signs of supply limitations. Dropping rental vacancy rates may indicate increasing pressure on a local jurisdiction's rental housing supply.

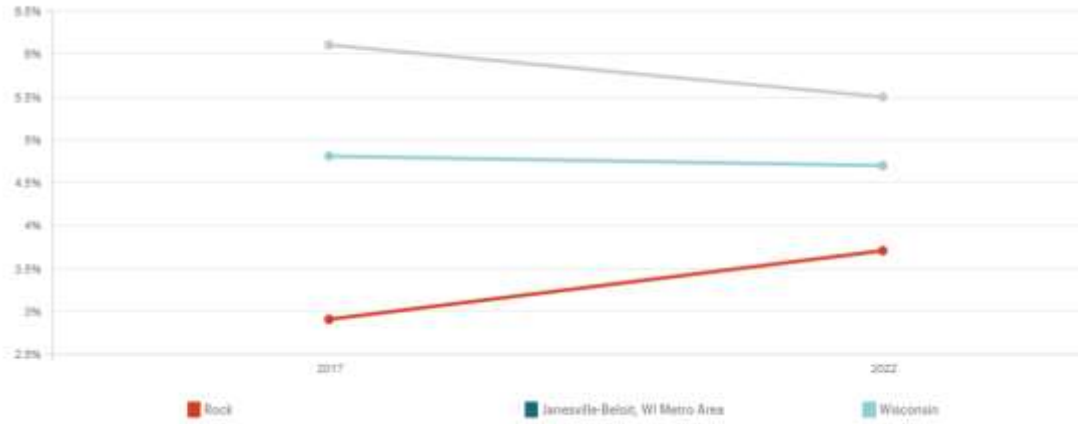


Figure 29: Change in Rental Vacancy Rates  
 Source: Census - 2008-2012 - 2018-2022 Data Contains: Rock County, Wisconsin

Since 2017, the vacancy rate in Beloit rose by 0.2 percentage point(s) (the number of vacant rental units increased from 296 to 304). As of 2022, the rental unit vacancy rate in Beloit was 5.0%, and has been higher than the state of Wisconsin's rate, which was 4.7% in 2022.

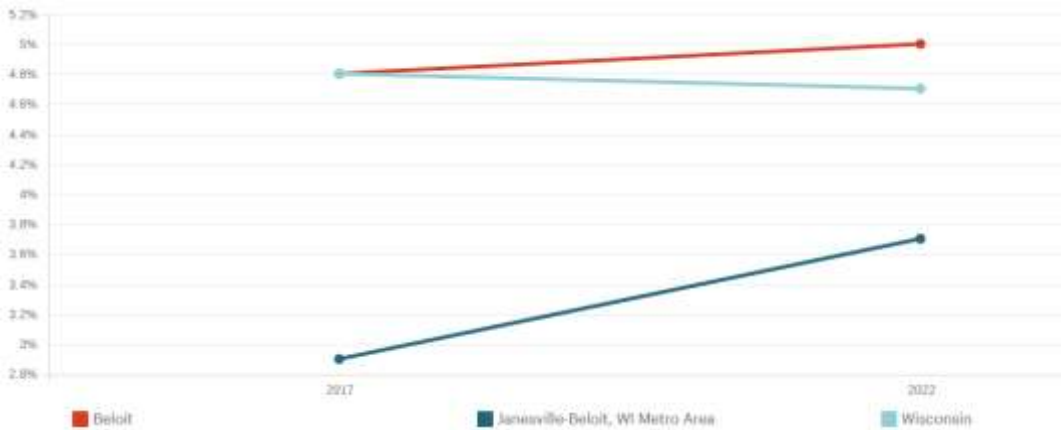


Figure 30: Change in Rental Vacancy Rates  
 Source: Census - 2008-2012 - 2018-2022 Data Contains: Beloit, Wisconsin

Since 2017, the vacancy rate in Janesville rose by 0.1 percentage point(s) (the number of vacant rental units increased from 216 to 241). As of 2022, the rental unit vacancy rate in Janesville was 2.5%, and has been lower than the state of Wisconsin's rate, which was 4.7% in 2022.

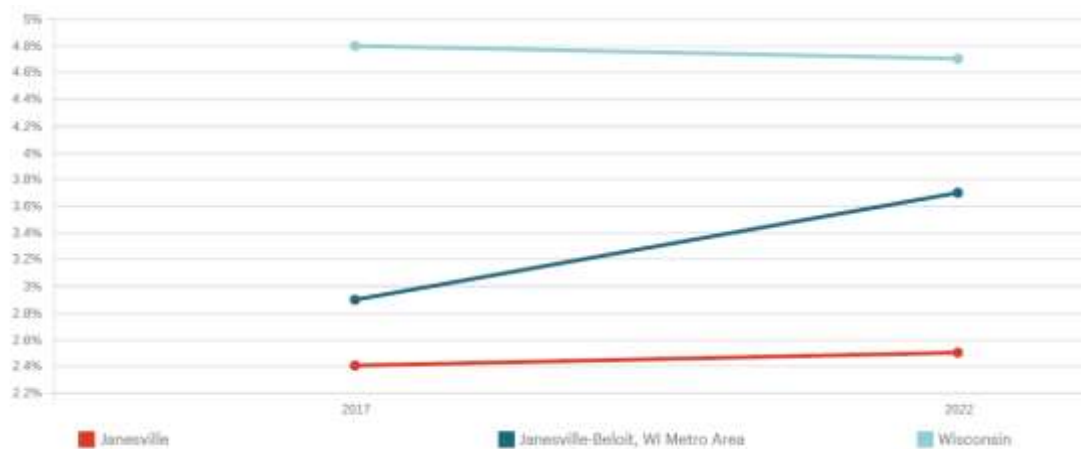


Figure 31: Change in Rental Vacancy Rates  
 Source: Census - 2008-2012 - 2018-2022 Data Contains: Beloit, Wisconsin

### Homeownership Affordability

An examination of the homeownership rate and affordability of owner-occupied homes is important for developing a strategic approach to homeownership. Localities with homeownership rates that are low relative to the region or state may want to consider policies to encourage homeownership. There are also several policy options to bring homeownership within reach of low- and moderate-income households, such as community land trusts, deed-restricted homeownership, housing counseling, down payment assistance, and shared appreciation mortgages. In addition to helping renters become homeowners, many localities focus on helping existing homeowners stay in their homes through policies including foreclosure prevention and property tax relief. Since the overall supply of homes for sale can affect home prices, localities interested in making homes more affordable also may wish to focus on reducing barriers to the creation of a new supply of affordable housing.

### Homeownership Rate

The state and national averages provide useful context for understanding a locality's homeownership rate and the change over time in that rate. In 2022, 69.9% of households in Rock County owned their homes. This is higher than the state of Wisconsin (67.7%) and higher than the homeownership rate in the United States (64.8%). Between 2017 and 2022, the homeownership rate in Rock County rose by 1.2 percentage points the number of homeowners increased from 44,273 to 46,462.

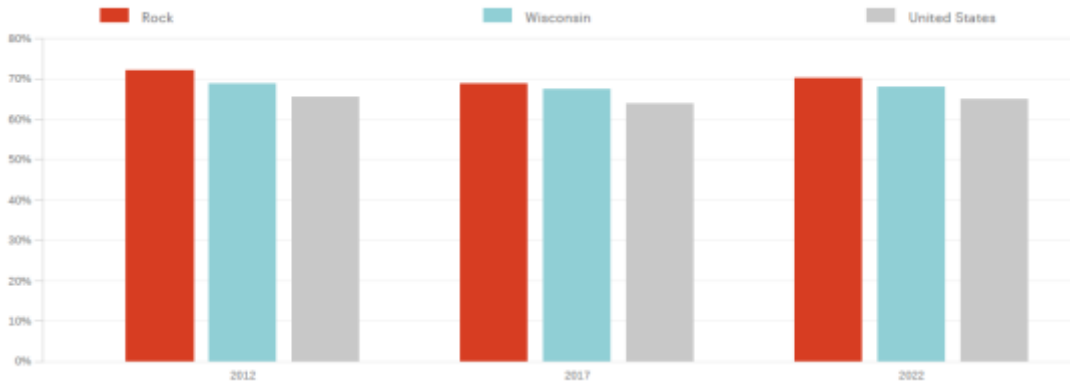


Figure 32: Homeownership Rate in Rock County  
 Source: Census 2008-2012 - 2018-2022 Data Contains: Rock County, Wisconsin

In 2022, 59.3% of households in Beloit owned their homes. This is lower than the state of Wisconsin (67.7%) and lower than the homeownership rate in the United States (64.8%). Between 2017 and 2022, the homeownership rate in Beloit rose by 1.7 percentage points (the number of homeowners increased from 8,022 to 8,256).

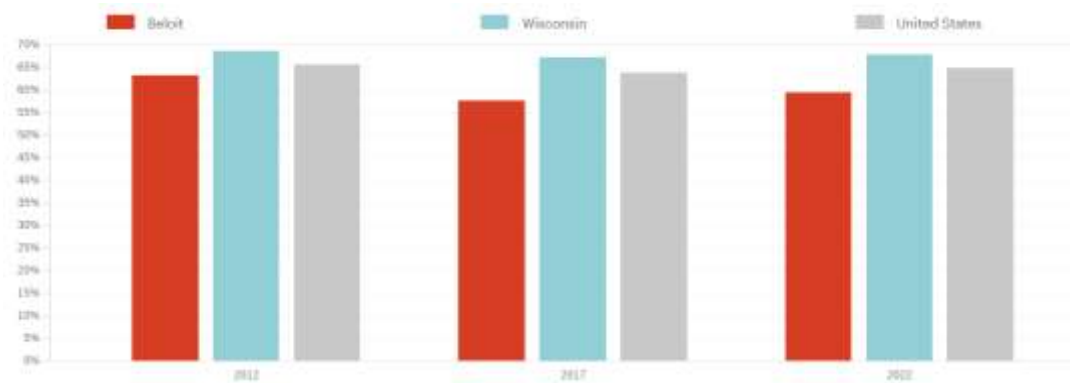


Figure 33: Homeownership Rate in Beloit, WI  
 Source: Census - 2008-2012 - 2018-2022 Data Contains: Beloit, Wisconsin

In 2022, 66.4% of households in Janesville owned their homes. This is lower than the state of Wisconsin (67.7%) and higher than the homeownership rate in the United States (64.8%). Between 2017 and 2022, the homeownership rate in Janesville fell by 0.4 percentage points (the number of homeowners increased from 17,685 to 18,532).

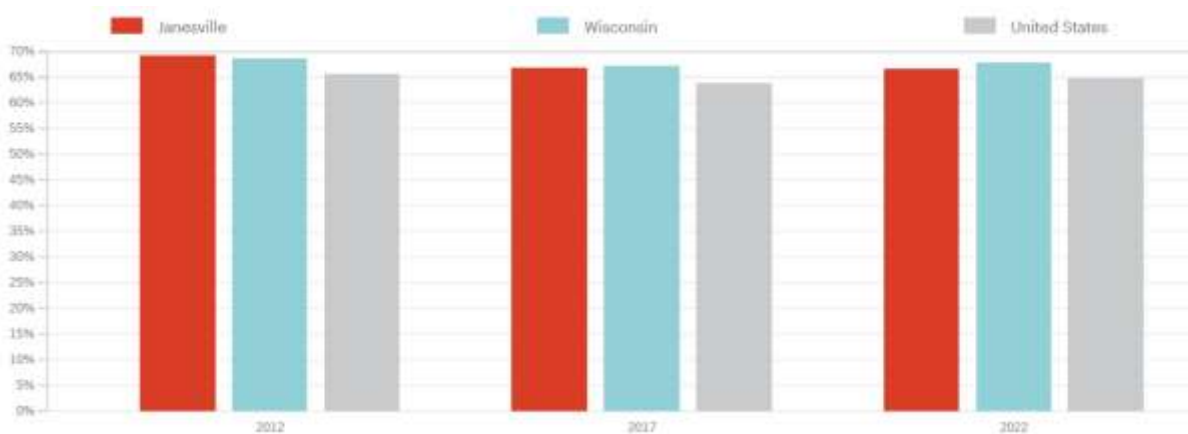


Figure 34: Homeownership Rate in Janesville, WI  
 Source: Census - 2008-2012 - 2018-2022 Data Contains: Janesville, Wisconsin

## Homeownership Rate by Race/Ethnicity

Across the U.S. there are significant variations in homeownership rates by race and ethnicity. Localities can use these charts to compare homeownership rates by race or ethnicity in their jurisdiction to those of the state and the U.S. as a whole and to understand how trends and disparities in homeownership rates have changed within their jurisdiction over time.

In Rock County, as of 2022, the homeownership rate for white householders was 73.1%, compared to 71.9% in Wisconsin and 71.1% in the United States as a whole. During this same time period, the Rock County homeownership rate for Black or African American householders was 29.7%, higher than Wisconsin's 26.5%, and lower than the United States rate of 43.1%. The Hispanic homeowner population in Rock County is 59.8%, which is higher than Wisconsin's 47.3% and the national rate of 50%.

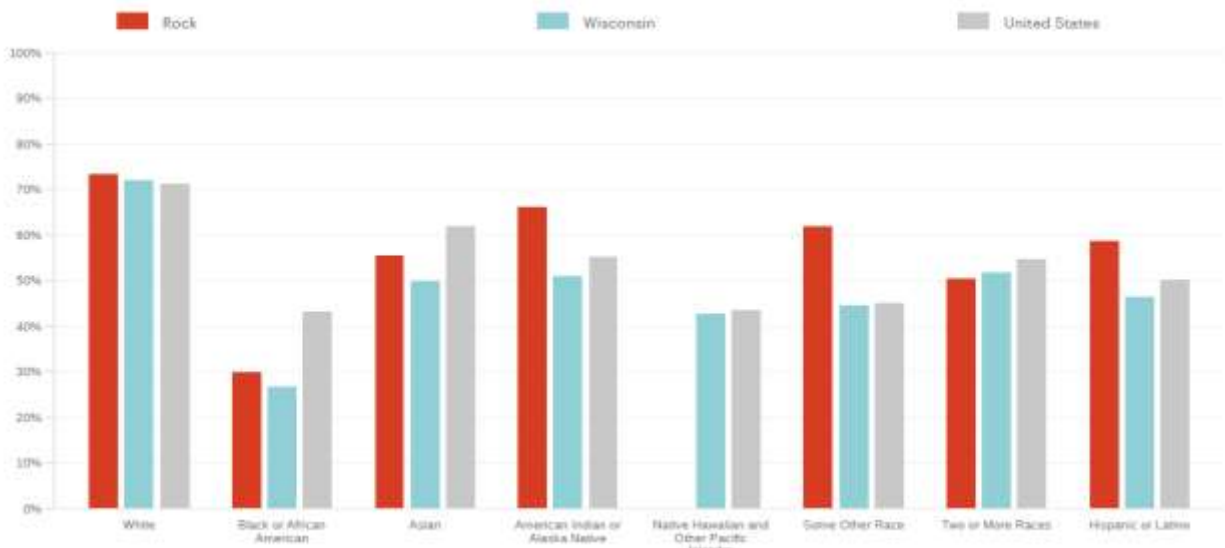


Figure 35: Homeownership Rate by Race/Ethnicity  
Source: Census 2008-2012 - 2018-2022 Data Contains: Rock County, Wisconsin

In Beloit, as of 2022, the homeownership rate for white householders was 65.4%, compared to 71.9% in Wisconsin and 71.1% in the United States as a whole. During this same time period, the Beloit homeownership rate for Black or African American householders was 34.8%, higher than Wisconsin's 26.5%, and lower than the United States rate of 43.1%. The Hispanic homeowner population in Beloit is 58.2%, which is higher than Wisconsin's 47.3% and the national rate of 50%.

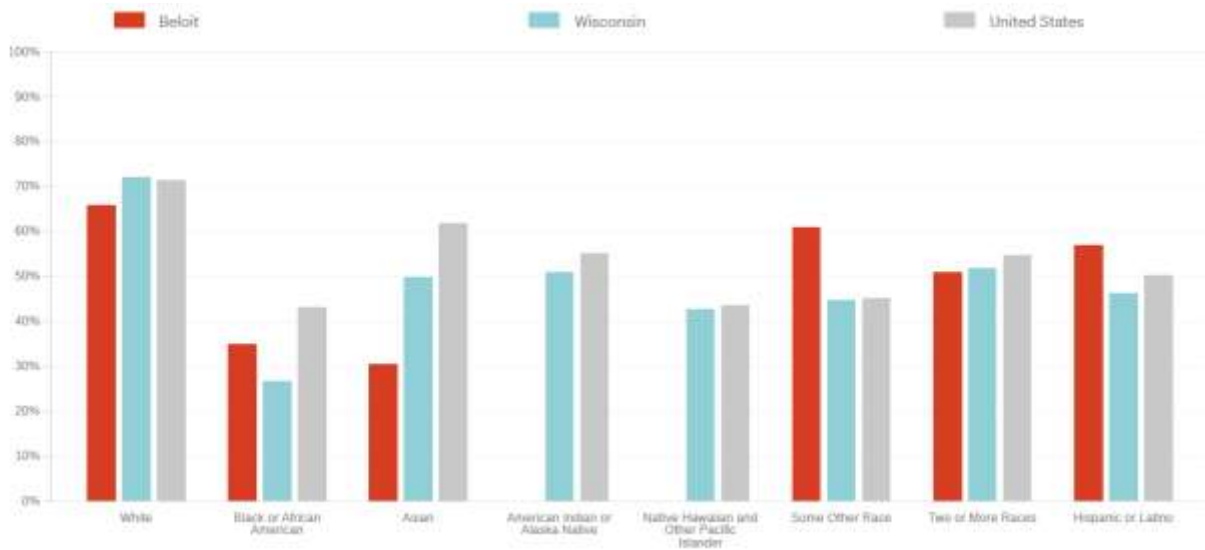


Figure 36: Homeownership Rate by Race/Ethnicity  
Source: Census 2008-2012 - 2018-2022 Data Contains: Beloit, WI

In Janesville, as of 2022, the homeownership rate for white householders was 69.3%, compared to 71.9% in Wisconsin and 71.1% in the United States as a whole. During this same time period, the Janesville homeownership rate for Black or African American householders was 13.2%, lower than Wisconsin's 26.5%, and lower than the United States rate of 43.1%. The Hispanic homeowner population in Janesville is 59.8%, which is higher than Wisconsin's 47.3% and the national rate of 50%.

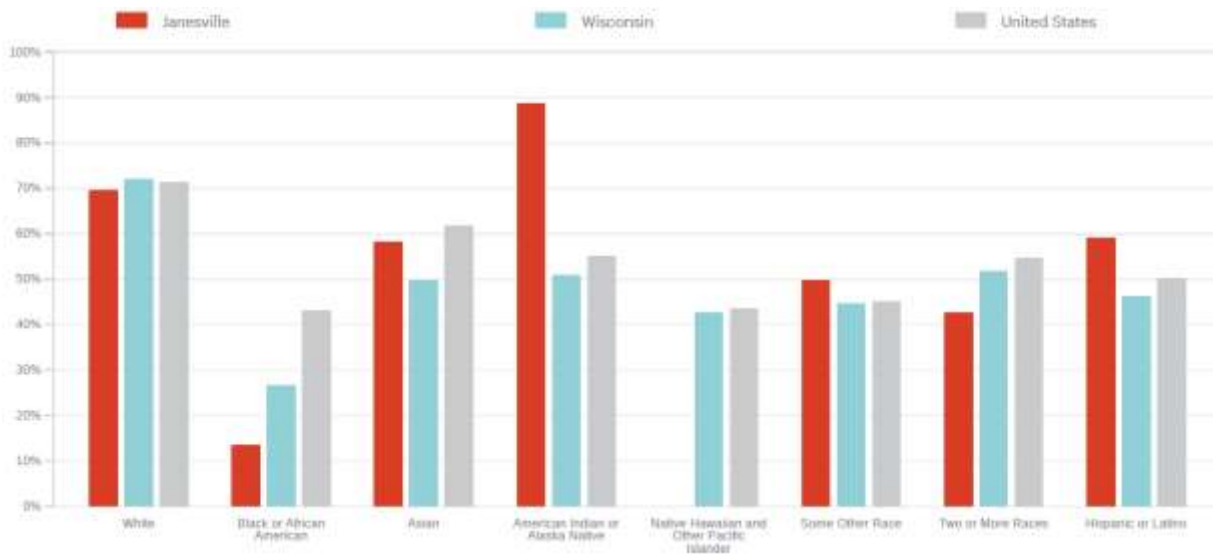


Figure 37: Homeownership Rate by Race/Ethnicity  
Source: Census 2008-2012 - 2018-2022 Data Contains: Janesville, WI

## Homeownership Rate Trend by Race/Ethnicity

In Rock County, from 2012 to 2017, there was a general decline in homeownership for all racial and ethnic groups, except for Multi-racial. However, from 2017 through 2022, there was an increase in homeownership by all races except Black or African American and Multi-racial.

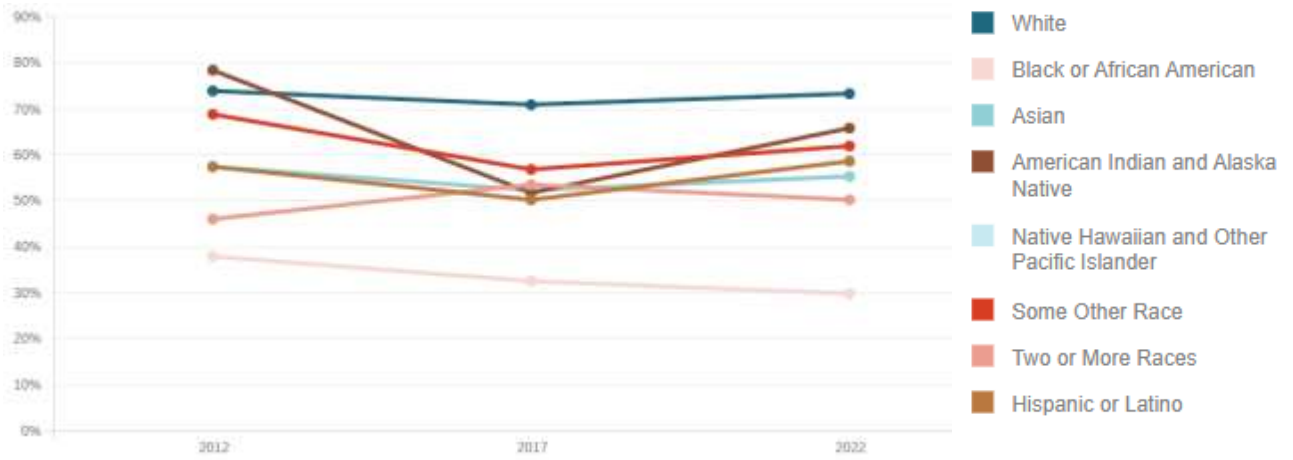


Figure 38: Homeownership Rate Trends by Race/Ethnicity  
Source: Census 2008-2012 - 2018-2022 Data Contains: Rock County, Wisconsin

In Beloit, from 2012 to 2017, there was a general decline in homeownership for all racial and ethnic groups, except Asian. However, from 2017 through 2022, there was a slight increase in homeownership by all races and ethnicities except Asian and a significant decrease for American Indian and Alaska Native.

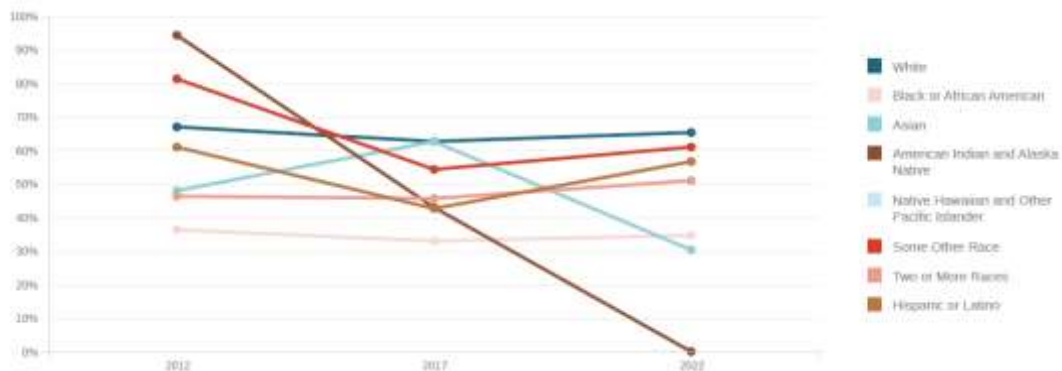
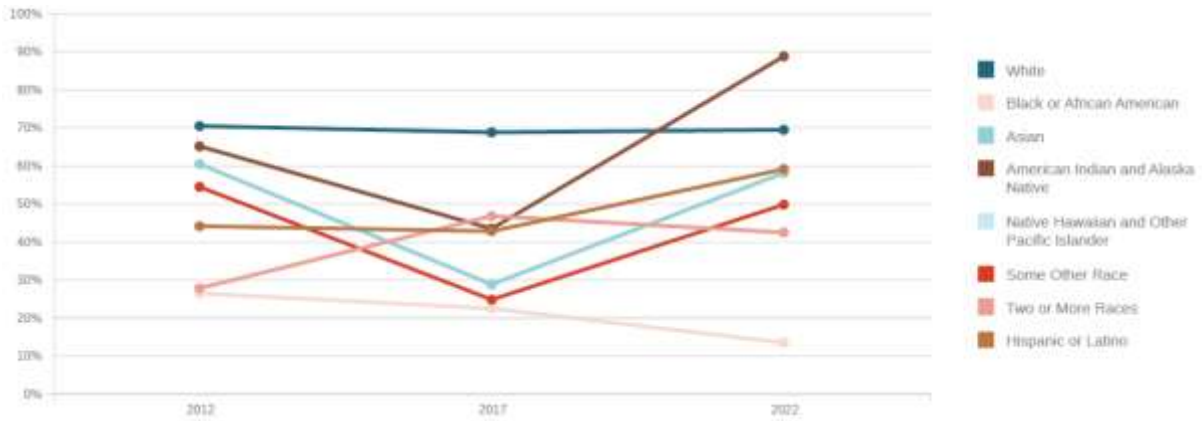


Figure 39: Homeownership Rate Trends by Race/Ethnicity  
Source: Census 2008-2012 - 2018-2022 Data Contains: Beloit, Wisconsin

In Janesville, from 2012 to 2017, there was a general decline in homeownership for all racial and ethnic groups, except for Multi-racial. However, from 2017 through 2022, there was an increase in homeownership by all races except Black or African American and Multi-racial.



### Comparison of Trends in Median Home Values and Median Family Incomes

Median home values in Rock County have risen \$56,300 in nominal dollars since 2012. As of 2022, the median home value in Rock was \$193,000 (an increase of 41.2% since 2012). During the period between 2012 and 2022, median family income in Rock County has grown from \$60,703 (2012) to \$84,424 (2022), a growth of 39.1%.

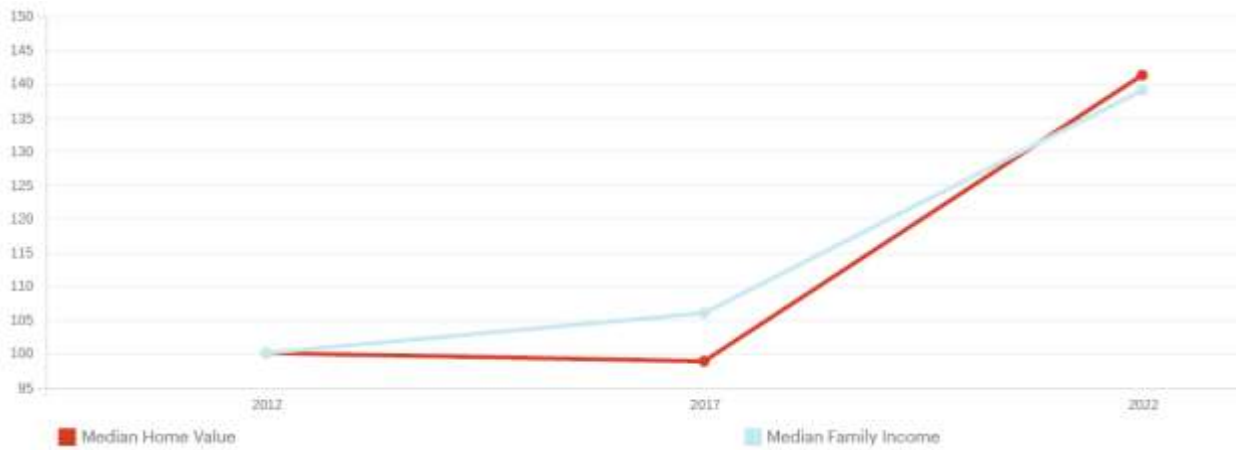


Figure 40: Comparison of Trends in Median Home Values and Median Family Income  
Source: Census 2008-2012 - 2018-2022 Data Contains: Rock County, Wisconsin

Median home values in Beloit have risen \$33,300 in nominal dollars since 2012. As of 2022, the median home value in Beloit was \$121,900 (an increase of 37.6% since 2012). During the period between 2012 and 2022, median family income in Beloit has grown from \$43,772 (2012) to \$67,686 (2022), a growth of 54.6%.

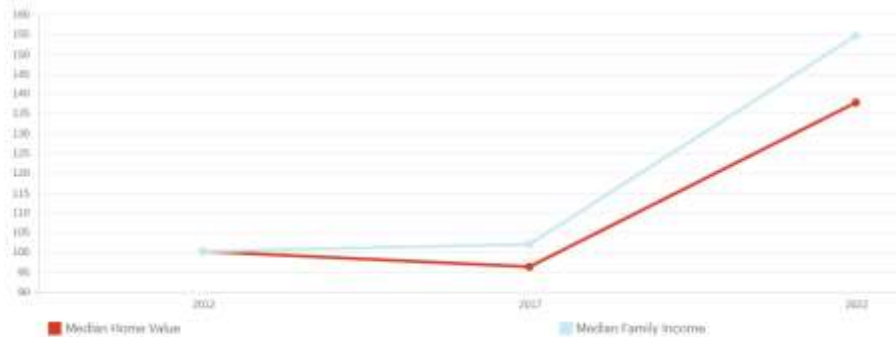


Figure 41: Comparison of Trends in Median Home Values and Median Family Income  
Source: Census 2008-2012 - 2018-2022 Data Contains: Beloit, Wisconsin

Median home values in Janesville have risen \$54,900 in nominal dollars since 2012. As of 2022, the median home value in Janesville was \$186,600 (an increase of 41.7% since 2012). During the period between 2012 and 2022, median family income in Janesville has grown from \$59,907 (2012) to \$82,461 (2022), a growth of 37.6%. As shown below, the price of housing is outpacing the increase in income.

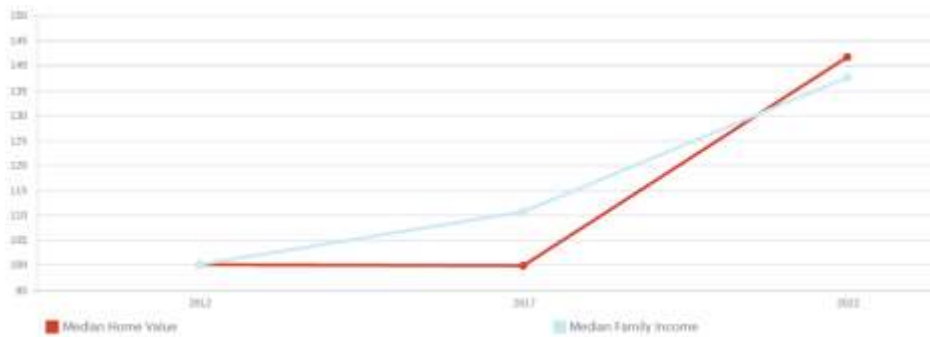


Figure 42: Comparison of Trends in Median Home Values and Median Family Income  
Source: Census 2008-2012 - 2018-2022 Data Contains: Janesville, Wisconsin

### Distribution of Reported Home Values 2022

This chart shows the distribution of reported home values of owner-occupied homes in Rock County. The area median income (AMI) for Rock County was \$81,200 in 2022. Generally, households at 60%, 80%, 100% and 120% of the AMI in Rock County could afford homes of about \$146,700, \$195,600, \$243,600, and \$293,400, respectively. This trend holds true for Beloit and Janesville as shown in the figures below.

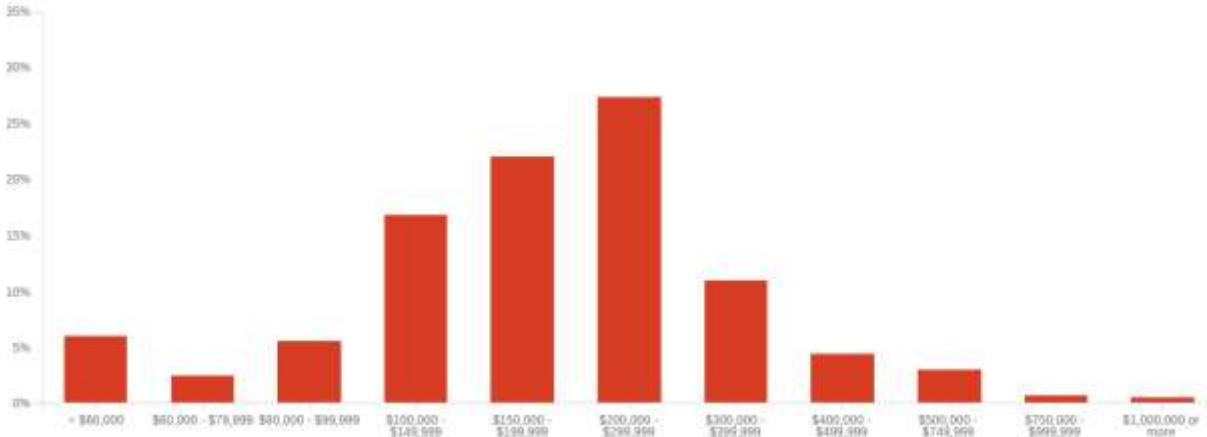


Figure 43: Distribution of Reported Home Values  
Source: Census 2008-2012 - 2018-2022 Data Contains: Rock County, Wisconsin

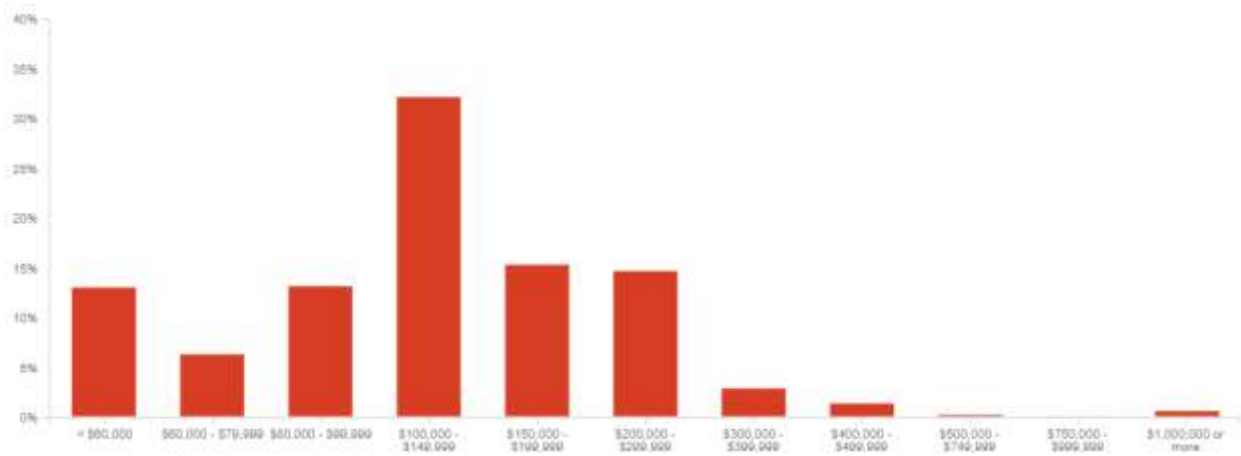


Figure 44: Distribution of Reported Home Values  
 Source: Census 2008-2012 - 2018-2022 Data Contains: Beloit, Wisconsin

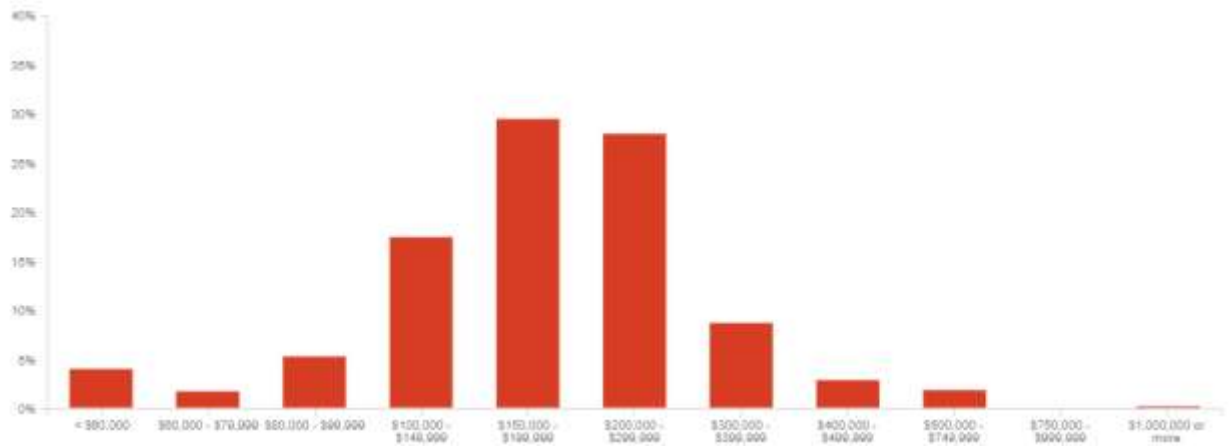


Figure 45: Distribution of Reported Home Values  
 Source: Census 2008-2012 - 2018-2022 Data Contains: Janesville, Wisconsin

### Change in Median Home Value by Neighborhood

Recent trends in home prices can help with the design and targeting of programs resources and policies to those neighborhoods subjected to the greatest upward (or downward) pressure on housing prices. The map below illustrates the change in median home prices in Rock County between 2017 and 2022 by census tract. The areas shaded in dark purple indicate the sharpest increase in home values.

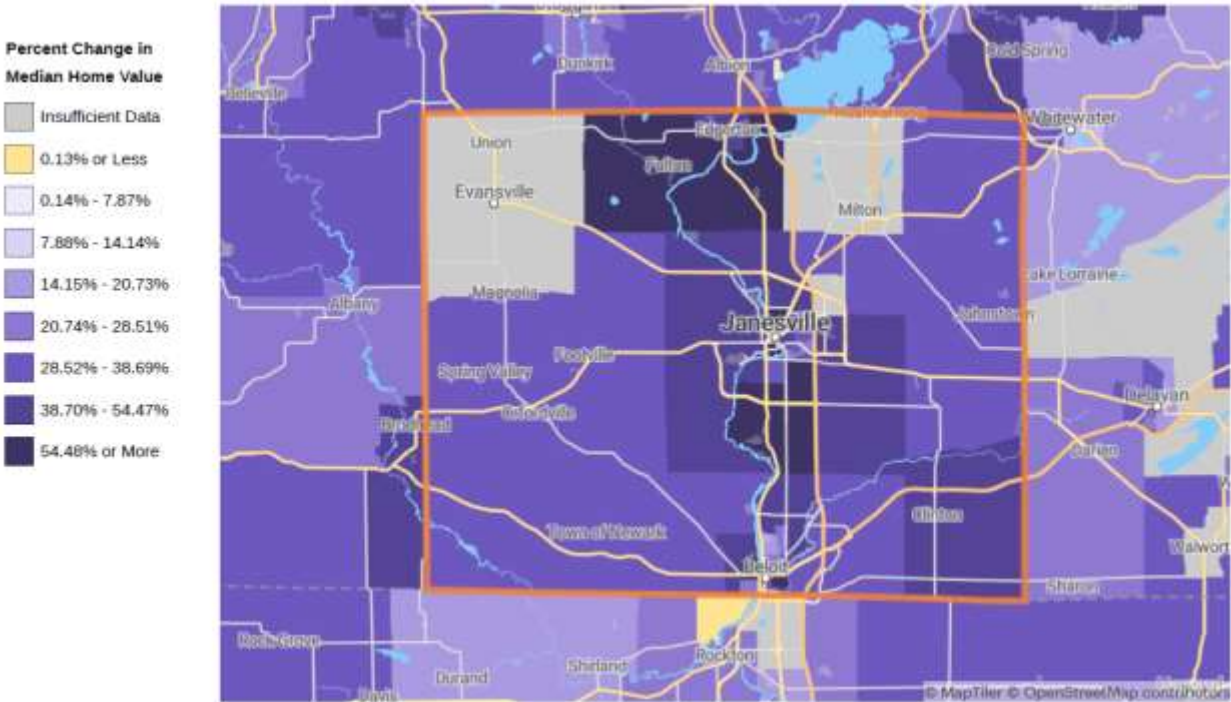


Figure 46: Distribution of Reported Home Values  
 Source: Census 2008-2012 - 2018-2022 Data Contains: Rock County, Wisconsin

As of 2022, the median home price in Beloit was \$121,900. The map below illustrates the variation in median home prices by census tract in Beloit as of 2022.



Figure 47: Distribution of Reported Home Values  
 Source: Census 2008-2012 - 2018-2022 Data Contains: Beloit, Wisconsin

The map below illustrates the change in median home prices in Janesville between 2017 and 2022 by census tract. Use the map to determine how home

prices within each census tract in Janesville compared to the 41.8% overall change.

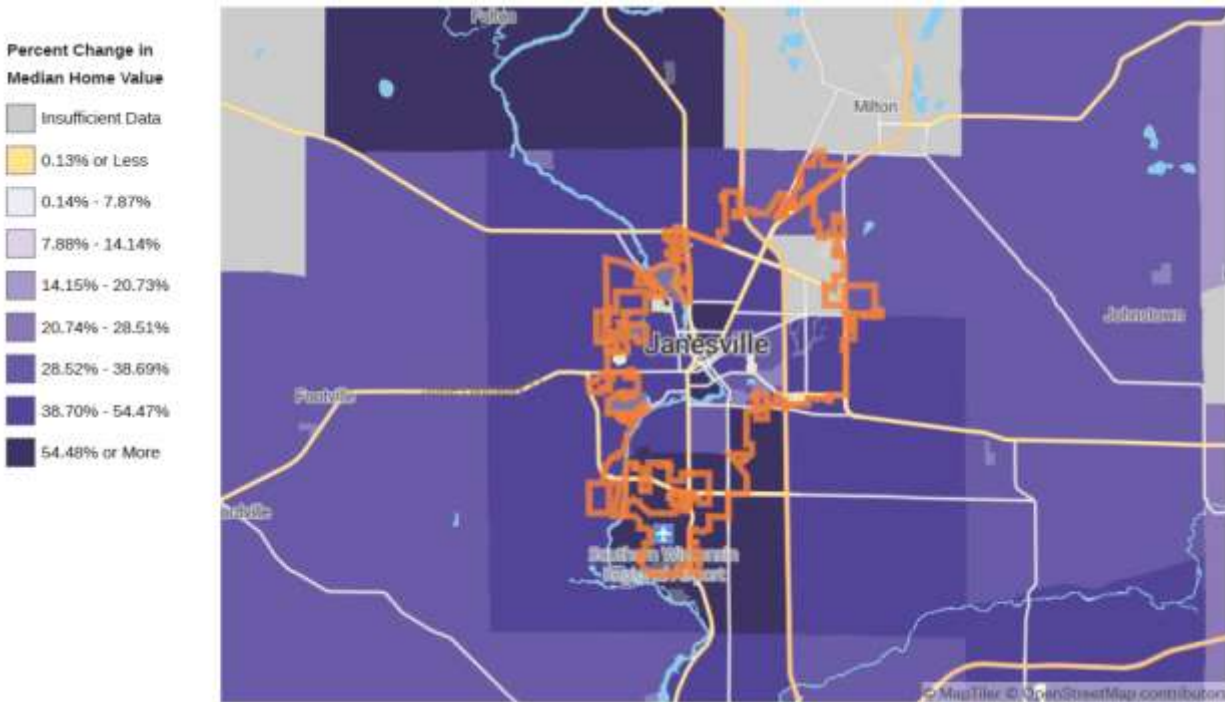


Figure 48: Distribution of Reported Home Values  
Source: Census 2008-2012 - 2018-2022 Data Contains: Beloit, Wisconsin

### Cost Burdened Older Adults Households 2017 to 2022

This chart examines whether housing cost burdens are greater among households with adults older than age 65 compared to the general population in the jurisdiction. In Rock County, as of 2022, a larger share of renter households are cost-burdened (51.3%) than are renter households overall (38.9%). For senior homeowners, the same relationship exists.

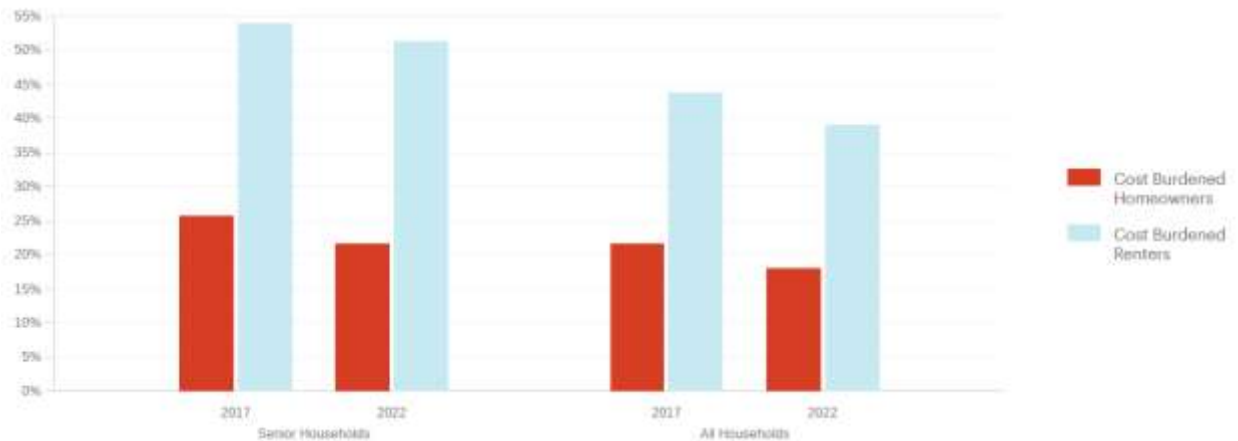


Figure 49: Cost Burdened Households with Adults Older than Age 65 – Rock County  
Source: Census 2013-2017 - 2018-2022 Data Contains: Rock County, Wisconsin

In Beloit, as of 2022, a larger share of renter households with adults older than age 65 are cost-burdened (66.6%) than are renter households overall (44.7%).

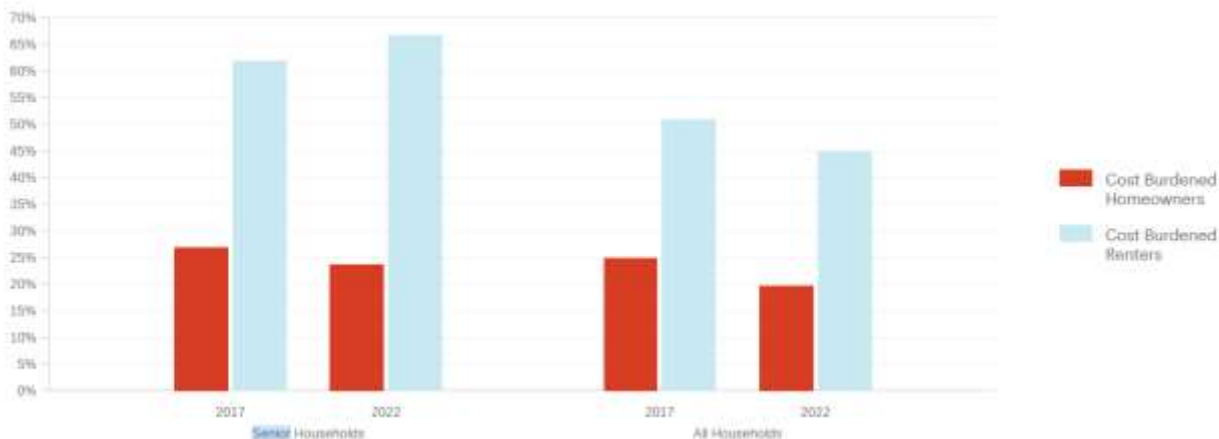


Figure 50: Cost Burdened Households with Adults Older than Age 65 - Beloit  
Source: Census 2013-2017 - 2018-2022 Data Contains: Beloit, Wisconsin

In Janesville, as of 2022, a larger share of renter households with adults older than age 65 are cost-burdened (49.6%) than are renter households overall (39.1%). For homeowners, the same relationship exists.

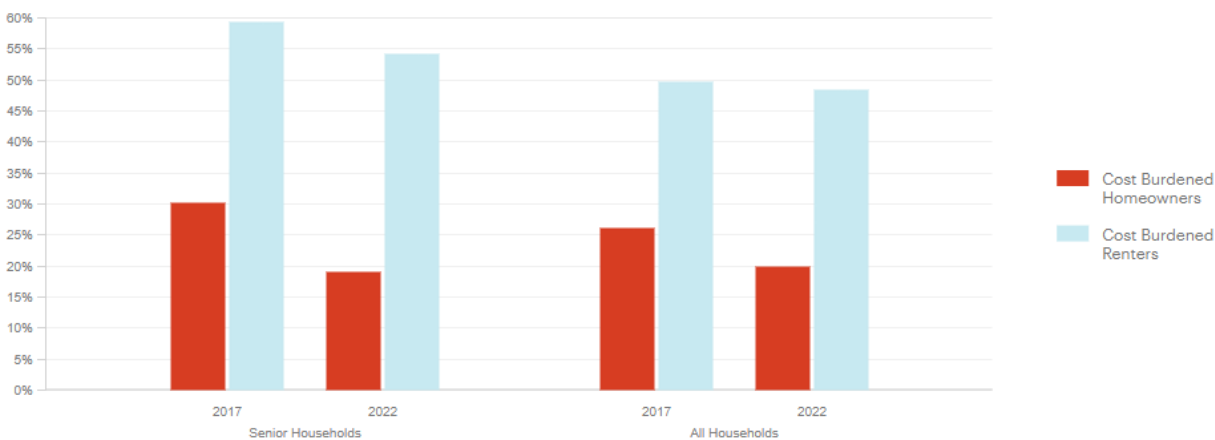


Figure 51: Cost Burdened Households with Adults Older than Age 65 - Janesville  
Source: Census 2013-2017 - 2018-2022 Data Contains: Janesville, Wisconsin

## Dedicated Affordable Housing

There are two main types of affordable housing: (a) dedicated affordable housing that comes with binding rent and/or income restrictions to ensure it is occupied by households with low-income levels and (b) market affordable housing – units that rent or sell at an affordable price but have no binding restrictions. This section focuses on the first type, providing information about the amount and location of dedicated affordable housing in the jurisdiction. Surveying the landscape of existing affordable housing in the jurisdiction can help clarify gaps left by federal subsidies and identify the extent to which existing dedicated affordable housing units may be at risk of loss from the subsidized inventory as federal regulatory agreements expire.

## Federally Subsidized Housing Units

In 2021, the inventory of federally subsidized rental housing in Rock County included 2,852 units and comprised 14.3% of Rock County's total rental stock. Of these subsidized units, 235 are HUD public housing units. The remaining units are privately owned and receive federal subsidies. In addition to the federally subsidized rental programs tracked here, some jurisdictions also have rental units that are subsidized by state or local sources. Not included in this inventory are approximately 975 Housing Choice Vouchers, the majority of which are tenant-based (assigned to individuals who may use them in rental housing of their choosing) and a portion of which may be project-based (tied to specific units). Tenant-based vouchers may be used in Low Income Housing Tax Credit properties or in other privately-owned units that meet voucher program criteria.

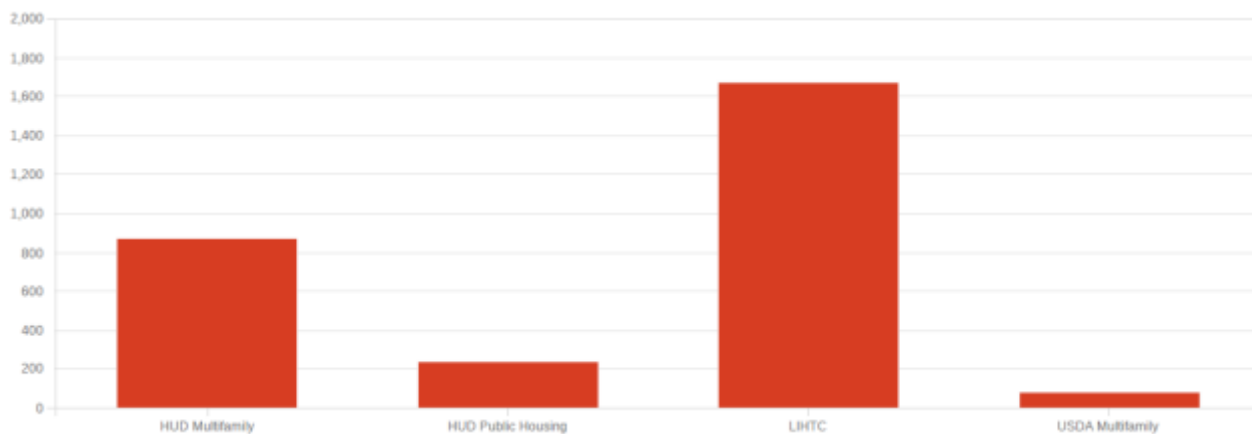
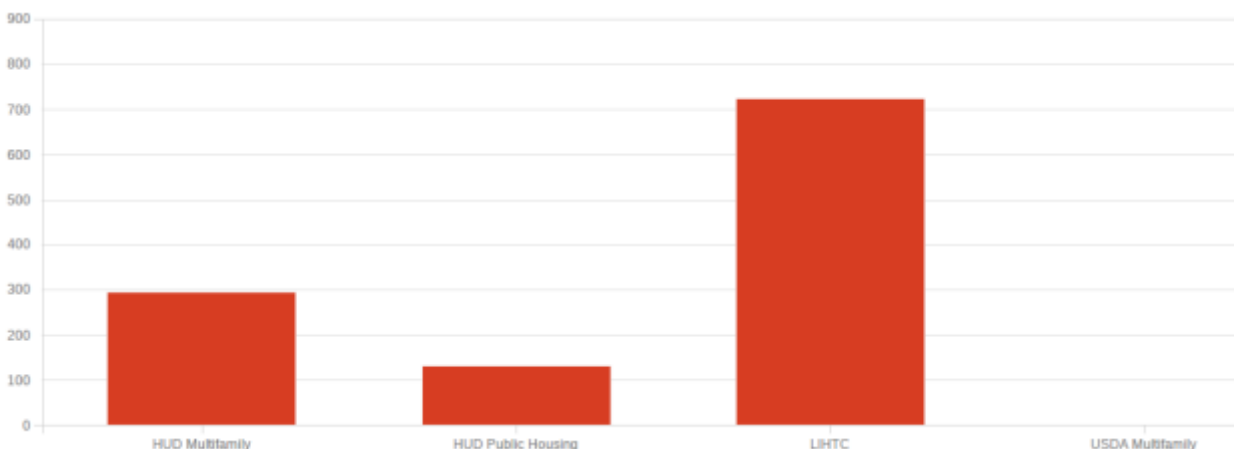


Figure 52: Federally Subsidized Housing Units – Rock County  
Source: HUD Multifamily DB, HUD's Picture of Subsidized Households, LIHTC, USDA

The inventory of federally subsidized rental housing in Beloit included 1,150 units and comprised 20.3% of Beloit's total rental stock. Of these subsidized units, 131 are HUD public housing units. The remaining units are privately owned and receive federal subsidies. Not included in this inventory are approximately 523 Housing Choice Vouchers issued in the City of Beloit.



Further, the inventory of federally subsidized rental housing in Janesville included 1,144 units and comprised 12.2% of Janesville's total rental stock. Of these subsidized units, none are HUD public housing units. The remaining units are privately owned and receive federal subsidies. Not included in this inventory are approximately 558 Housing Choice Vouchers issued in the City of Janesville.

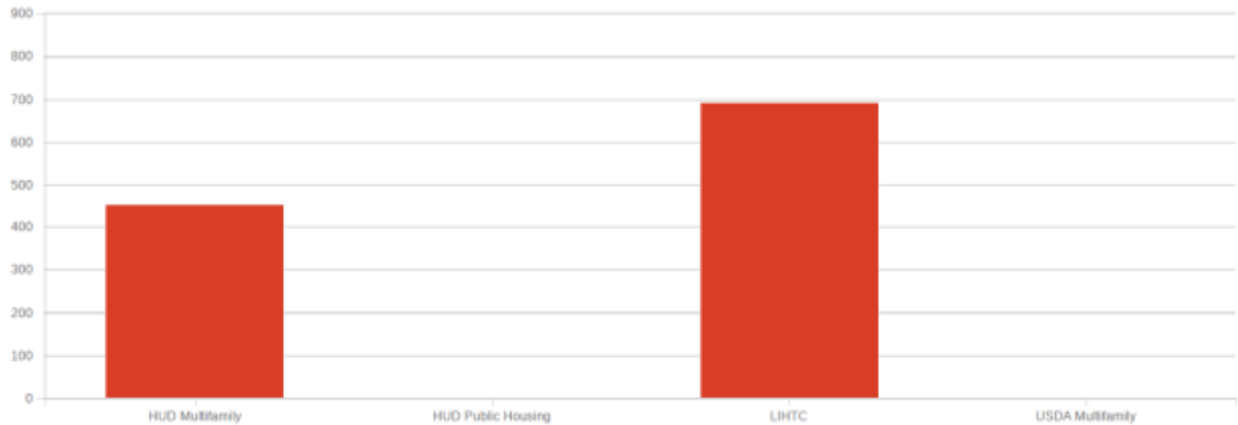


Figure 54: Federally Subsidized Housing Units – Janesville, WI  
Source: HUD Multifamily DB, HUD's Picture of Subsidized Households, LIHTC, USDA

## F. Segregation Analysis

### Dissimilarity Index

The dissimilarity index compares the residential locations of two groups within a jurisdiction to measure the degree to which group members are segregated or geographically separate from one another.

The index value is presented as a number between 0 and 100, which represents the share of one group that would need to move to new neighborhoods (approximated as census tracts) in order to have the same distribution across neighborhoods as the comparison group. For example, a dissimilarity index of 0 for Black households relative to White households in a jurisdiction would indicate total integration, with both groups living in the same proportions across all jurisdiction neighborhoods. Alternatively, an index score of 100 would indicate complete residential segregation. In this scenario, 100% of households in one or the other group would need to move to new neighborhoods to achieve a balanced distribution across the jurisdiction.

Index values between 0 and 30 are generally assumed to indicate more integrated communities and low levels of segregation, while values between 31 and 60 indicate moderate segregation and values between 61 and 100 indicate high levels of segregation.

The index is calculated at the Core-Based Statistical Area (CBSA) level (also referred to informally as “metro area”), when white residents and Black, Latino, and/or Asian residents represent at least 5% of total CBSA population.

In Rock County, the dissimilarity index value was N/A for Non-Hispanic Black and Non-Hispanic White residents, N/A for Non-Hispanic Asian and Non-Hispanic White residents, and 40.8 for Hispanic and Non-Hispanic White residents.



Figure 55: Dissimilarity Index  
Source: Census 2018-2022 Data Contains: Rock County

In Beloit, the dissimilarity index value was 29.8 for Non-Hispanic Black and Non-Hispanic White residents, N/A for Non-Hispanic Asian and Non-Hispanic White residents, and 32.2 for Hispanic and Non-Hispanic White residents.



Figure 56: Dissimilarity Index  
Source: Census 2018-2022 Data Contains: Beloit, Wisconsin

In Janesville the dissimilarity index value was N/A for Non-Hispanic Black and Non-Hispanic White residents, N/A for Non-Hispanic Asian and Non-Hispanic White residents, and 30 for Hispanic and Non-Hispanic White residents.



Figure 57: Dissimilarity Index

Source: Census 2018-2022 Data Contains: Janesville, Wisconsin

### III. ACCESS TO OPPORTUNITY

Access to opportunity measures poverty, local conditions, access to jobs, education, healthy and safe living conditions, public services, and amenities, which are critical factors to consider when measuring fair housing choice. Social research has demonstrated negative effects of residential segregation on income and opportunity for minority families, who are commonly concentrated in communities “characterized by older housing stock, slow growth, and low tax bases – the resources that support public services and schools.”<sup>2</sup> Households living in lower-income areas of racial and ethnic concentration have fewer opportunities for education, wealth building, and employment.<sup>3</sup>

To describe the variation in neighborhood opportunity across regions, HUD has adopted a “Communities of Opportunity” model based on research developed by The Kirwan Institute for the Study of Race and Ethnicity at Ohio State University. Communities of Opportunity is a framework that assigns each neighborhood a score reflecting the degree to which its residents have access to amenities and services such as good schools, jobs, stable housing, transit, low crime, and minimal health hazards.

HUD and the Institute draw upon an extensive research base demonstrating the importance of neighborhood conditions in predicting life outcomes. The ultimate goals of the exercise are to bring opportunities to amenity-deprived areas and to connect people to existing opportunities throughout a region. The Institute argues that “we need to assess the geographic differences in resources and opportunities across a region to make informed, affirmative interventions into failures and gaps in ‘free market’ opportunities.”

The Communities of Opportunity model is highly spatial and therefore map-based, generating a geographic footprint of inequality. The process of creating opportunity maps involves building a set of indicators that reflect local issues and are also based on

<sup>2</sup> Orfield, Myron. “Land Use and Housing Policies to Reduce Concentrated Poverty and Racial Segregation.” *Fordham Urban Law Journal*. Volume 33, Issue 3, 2005.

<sup>3</sup> Turner, Margery, et al. “Discrimination in Metropolitan Housing Markets: National Results from Phase I HDS 2000. Urban Institute. Online: [huduser.org/Publications/pdf/Phase1\\_Report.pdf](http://huduser.org/Publications/pdf/Phase1_Report.pdf)

research that validates the connections between the indicators and increased opportunity. Data is collected at the smallest geographic unit possible for each indicator and organized into sectors (prosperity, mobility, etc.), which are then combined to create a composite opportunity map. The resulting maps allow communities to analyze opportunity, “comprehensively and comparatively, to communicate who has access to opportunity-rich areas and who does not, and to understand what needs to be remedied in opportunity-poor communities,” according to the Institute.

### **Overview of HUD-Defined Opportunity Factors**

HUD developed opportunity indicators to identify communities with disparate access to opportunity and identify protected classes experiencing disparate impacts of unfair housing choice. The opportunity index includes scores for poverty, education, employment, transportation, and environmental health. The following sections provide definitions of each opportunity indicator as defined in HUD’s AFFH-T Data Documentation and describe local findings.

#### **A. Low Poverty Index**

The Low Poverty Index measures poverty in a community, a higher score represents a more prosperous community with lower poverty levels. A low poverty index means that the percentage of people living below the poverty line is relatively low compared to other regions. This indicates higher overall income levels, better economic conditions, and potentially greater access to resources and opportunities. This indicator measures family poverty rates and the receipt of public assistance, such as cash welfare. Values for each range from 0 to 100 with 0 representing a low score and less access to opportunity and 100 representing a high score and more access to opportunity

The table below shows Low Poverty Index scores across race and ethnicity for Janesville, Beloit, and the Consortia. In general, the Black and Hispanic communities are the least prosperous and experience the most poverty, while the White and Asian/Pacific Islander non-Hispanic communities are the most prosperous and experience the least poverty in the area.

LOW POVERTY INDEX			
	(Janesville, WI CDBG) Jurisdiction	(Beloit, WI CDBG) Jurisdiction	(Cnsrt-Janesville, WI CONSORTIA(HOME)) Jurisdiction
<b>Total Population</b>			
White, Non-Hispanic	51.12	28.88	54.05
Black, Non-Hispanic	43.10	19.27	28.08
Hispanic	39.60	19.57	34.76
Asian or Pacific Islander, Non-Hispanic	42.19	29.12	45.90
Native American, Non-Hispanic	42.26	21.48	44.37
<b>Population below federal poverty line</b>			
White, Non-Hispanic	37.45	22.14	41.70
Black, Non-Hispanic	30.73	18.84	24.98
Hispanic	30.09	18.31	26.74
Asian or Pacific Islander, Non-Hispanic	25.32	N/a	49.33
Native American, Non-Hispanic	19.19	7.78	20.60

**Table 5: Low Poverty Index: Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>**

## B. School Proficiency Index

The School Proficiency Index measures the quality of the school systems in a community. The higher the score, the higher the school system met HUD’s definition of proficiency. This indicator uses school-level data on the performance of 4th-grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower-performing elementary schools. The School Proficiency Index in Janesville, Beloit, and Rock County varies by district and school, reflecting a range of academic outcomes. Values for each range from 0 to 100 with 0 representing a low score and less access to opportunity and 100 representing a high score and more access to opportunity

The proficiency levels of students in the Janesville School District vary by school and grade level. Historically, proficiency rates in subjects like reading and math have been somewhat mixed, with some schools performing above state averages and others below. Efforts have been made to improve academic outcomes through curriculum changes, professional development for teachers, and targeted intervention programs.

The Beloit School District has faced challenges with academic proficiency in recent years, with lower scores in reading and math compared to state averages. The district has been working on initiatives to enhance educational outcomes. Focus has been on improving literacy and numeracy through various programs and partnerships with educational organizations.

Rock County includes a mix of urban and rural schools, with performance levels reflecting these differences. School proficiency varies widely depending on the district and specific

schools. Rock County has focused on addressing disparities in academic performance and providing additional resources to underperforming schools. Current and detailed information can be located in Wisconsin DPI's reports.

SCHOOL PROFICIENCY INDEX			
	(Janesville, WI CDBG) Jurisdiction	(Beloit, WI CDBG) Jurisdiction	(Cnsrt-Janesville, WI CONSORTIA(HOME)) Jurisdiction
<b>Total Population</b>			
White, Non-Hispanic	52.33	9.38	45.88
Black, Non-Hispanic	46.29	8.35	18.81
Hispanic	46.56	8.69	27.02
Asian or Pacific Islander, Non-Hispanic	49.36	7.86	40.29
Native American, Non- Hispanic	45.28	9.68	38.05
<b>Population below federal poverty line</b>			
White, Non-Hispanic	45.73	10.64	39.10
Black, Non-Hispanic	35.71	7.94	16.90
Hispanic	41.95	8.15	24.11
Asian or Pacific Islander, Non-Hispanic	30.37	N/a	44.39
Native American, Non- Hispanic	31.18	6.59	27.58

Table 19: School Proficiency Index: Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

### C. Labor Market Engagement Index

The Labor Market Index is a composite measure used to assess the health and performance of a region's labor market. It typically includes indicators such as employment rates, job growth, unemployment rates, labor force participation, and other related metrics. The Labor Market Engagement Index measures a community's level of employment, labor force participation, and educational attainment in a community. Values for each range from 0 to 100 with 0 representing a low score and less access to opportunity and 100 representing a high score and more access to opportunity. The table below shows the Labor Market Engagement Index scores across race and ethnicity.

LABOR MARKET INDEX			
	(Janesville, WI CDBG) Jurisdiction	(Beloit, WI CDBG) Jurisdiction	(Cnsrt-Janesville, WI CONSORTIA(HOME ) Jurisdiction
<b>Total Population</b>			
White, Non-Hispanic	51.42	28.60	51.28
Black, Non-Hispanic	41.54	22.25	29.50
Hispanic	42.30	21.89	35.64
Asian or Pacific Islander, Non-Hispanic	45.54	32.16	46.74
Native American, Non- Hispanic	47.72	20.51	42.95
<b>Population below federal poverty line</b>			
White, Non-Hispanic	38.39	18.37	39.06

Black, Non-Hispanic	30.22	23.76	27.70
Hispanic	35.54	22.12	30.04
Asian or Pacific Islander, Non-Hispanic	21.34	N/a	41.66
Native American, Non-Hispanic	23.10	14.23	24.43

Table 20: Labor Market Index: Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

#### D. Transit Index

The Transit Index measures the utilization of public transportation in a community. Transit access describes the accessibility of amenities using public transit. Values for each range from 0 to 100 with 0 representing a low score and less access to opportunity and 100 representing a high score and more access to opportunity. The higher the score, the more likely residents in that community utilize public transit. This indicator estimates transit trips taken by families that: are a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e., the Core-Based Statistical Area (CBSA)). Based on these parameters, transit use is consistent across racial and ethnic communities with the Hispanic community below the poverty line with the highest score, while regionally Black Non-Hispanic and Hispanic communities have the highest score.

	TRANSIT INDEX (Janesville, WI CDBG) Jurisdiction	(Beloit, WI CDBG) Jurisdiction	(Cnsrt-Janesville, WI CONSORTIA(HOME)) Jurisdiction
<b>Total Population</b>			
White, Non-Hispanic	30.90	32.11	23.64
Black, Non-Hispanic	33.75	31.84	30.51
Hispanic	35.18	34.11	30.12
Asian or Pacific Islander, Non-Hispanic	33.68	29.65	27.26
Native American, Non-Hispanic	34.47	35.88	28.19
<b>Population below federal poverty line</b>			
White, Non-Hispanic	36.49	36.24	29.72
Black, Non-Hispanic	40.99	32.94	33.63
Hispanic	38.60	31.92	33.58
Asian or Pacific Islander, Non-Hispanic	44.49	N/a	28.46
Native American, Non-Hispanic	44.77	21.27	34.55

Table 21: Transit Index: Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

#### E. Low Transportation Cost Index

The Low Transportation Cost Index estimates transportation costs for families that are a 3-person single-parent family with income at 50% of the median income for renters for the region. Values for each range from 0 to 100 with 0 representing a low score and less access to opportunity and 100 representing a high score and more access to opportunity.

The table below shows the Low Transportation Cost Index scores across race and ethnicity.

LOW TRANSPORTATION COST INDEX			
	(Janesville, WI CDBG) Jurisdiction	(Beloit, WI CDBG) Jurisdiction	(Cnsrt- Janesville, WI CONSORTIA(HO ME)) Jurisdiction
<b>Total Population</b>			
White, Non-Hispanic	37.07	36.99	31.64
Black, Non-Hispanic	39.95	38.85	37.75
Hispanic	40.36	38.17	35.85
Asian or Pacific Islander, Non-Hispanic	40.37	39.36	36.03
Native American, Non- Hispanic	38.92	38.57	33.74
<b>Population below federal poverty line</b>			
White, Non-Hispanic	41.96	38.66	35.93
Black, Non-Hispanic	44.87	38.96	39.36
Hispanic	41.62	38.72	38.40
Asian or Pacific Islander, Non-Hispanic	47.60	N/a	38.27
Native American, Non- Hispanic	45.29	40.65	42.19

Table 22: Low Transportation Cost Index: Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

## F. Jobs Proximity Index

The Jobs Proximity Index measures how easily residents can access job opportunities within a specific area. It assesses the geographic proximity of jobs relative to where people live, often considering factors such as transportation infrastructure, commuting times, and the density of employment opportunities. The competition for a job location measured by labor supply is inversely weighted reflecting varying levels of job accessibility influenced by local economic conditions, infrastructure, and transportation options. Values for each range from 0 to 100 with 0 representing a low score and less access to opportunity and 100 representing a high score and more access to opportunity.

Janesville has a moderate employment density with a mix of manufacturing, healthcare, and service jobs. The historical concentration in manufacturing has shifted, influencing current job accessibility. Commuting times in Janesville are generally moderate. The city's size and layout allow for relatively short commutes within the city, though longer commutes might be required for jobs outside the area. Janesville has a well-developed road network and public transportation options, but accessibility might vary depending on specific locations and job centers.

Beloit's employment density reflects its transition from manufacturing to more diversified sectors, including education and healthcare. Beloit's commuting times are generally manageable, with local jobs accessible within the city. Regional transportation

networks benefit the community although the quality and availability of public transit may impact job accessibility for some residents.

Rock County has a diverse job market with varying employment densities. Rock County has a mix of transportation options, including highways and local roads. Public transit options are available but may be less comprehensive in rural areas.

JOBS PROXIMITY INDEX			
	(Janesville, WI CDBG) Jurisdiction	(Beloit, WI CDBG) Jurisdiction	(Cnsrt-Janesville, WI CONSORTIA(HOME)) Jurisdiction
<b>Total Population</b>			
White, Non-Hispanic	68.75	31.72	48.60
Black, Non-Hispanic	71.87	34.93	43.02
Hispanic	69.47	33.66	44.65
Asian or Pacific Islander, Non-Hispanic	71.69	42.59	58.10
Native American, Non-Hispanic	69.78	30.97	46.43
<b>Population below federal poverty line</b>			
White, Non-Hispanic	71.35	26.51	48.91
Black, Non-Hispanic	66.78	37.69	44.18
Hispanic	63.13	37.09	48.29
Asian or Pacific Islander, Non-Hispanic	70.31	N/a	61.04
Native American, Non-Hispanic	73.82	46.42	62.06

Table 23: Jobs Proximity Index: Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

### G. Environmental Health Index

The Environmental Health Index measures the environmental quality of a community. The higher the score, the less exposure a community has to harmful environmental toxins. The index measures the potential for exposure to harmful toxins within a community, as determined by the Environmental Protection Agency’s Toxic Release Inventory by volume and toxicity. Values for each range from 0 to 100 with 0 representing a low score and less access to opportunity and 100 representing a high score and more access to opportunity

In this table, we see that the racial/ethnic exposure to environmental toxins varies by jurisdiction. For the overall population, the Hispanic population has the greatest exposure within the City of Janesville; the Asian or Pacific Islander, Non-Hispanic population has the greatest exposure within the City of Beloit; and the Black, Non-Hispanic population has the greatest exposure for Rock County. For populations below the federal poverty level, the Native American, non-Hispanic community has the greatest exposure to environmental toxins.

ENVIRONMENTAL HEALTH INDEX			
	(Janesville, WI CDBG) Jurisdiction	(Beloit, WI CDBG) Jurisdiction	(Cnsrt-Janesville, WI CONSORTIA(HOME)) Jurisdiction
<b>Total Population</b>			
White, Non-Hispanic	80.75	72.87	79.72
Black, Non-Hispanic	80.16	71.89	74.50
Hispanic	79.44	72.27	76.59
Asian or Pacific Islander, Non-Hispanic	79.72	69.72	76.99
Native American, Non- Hispanic	80.97	72.36	79.03
<b>Population below the federal poverty line</b>			
White, Non-Hispanic	79.89	73.06	77.85
Black, Non-Hispanic	78.09	71.41	73.81
Hispanic	78.42	71.03	74.94
Asian or Pacific Islander, Non-Hispanic	83.00	N/a	74.00
Native American, Non- Hispanic	73.93	68.59	73.36

Table 24: Environmental Health Index: Source: HUD AFFH Mapping Tool, <https://egis.hud.gov/affht/>

Looking at the indices overall, White, Non-Hispanic population tends to live in more prosperous communities, have access to higher-quality schools, and have the most labor market engagement. Black non-Hispanic and Hispanic communities are the least prosperous, have the least access to quality schools, and have the lowest labor market engagement. Understanding the disproportionality of opportunity access within White, Non-Hispanic communities compared to minority communities will help inform the location of housing that is accessible to minority communities to ensure they are also given access to housing within higher opportunity neighborhoods.

## IV. LOCAL OPPORTUNITY FACTORS

In addition to the Access to Opportunity Indices provided by HUD. Data provided by the ACS and HUD Comprehensive Housing Affordability Strategy (CHAS) provides insight into the conditions of Communities and Housing. The following analysis examines employment, education, broadband access, transportation, environmental justice, and disproportionate housing.

### A. Unemployment

Unemployment is a key economic indicator that reflects the percentage of the labor force that is actively seeking employment but is currently without a job. The tables below show employment status over time and by gender and race/ethnicity. Employment status is assessed for the population aged 16 years and over. Persons in the age group of 16 to 64 years who are seeking employment or currently working are participating in the labor force. An individual who is not actively seeking a job is not considered to be participating in the labor force and thus is not part of the unemployment calculation.

The unemployment rates have remained relatively consistent from 2019 to 2023 aside from the spike in 2020 due to the COVID-19 pandemic.

UNEMPLOYMENT RATES					
YEAR	2019	2020	2021	2022	2023
Janesville-Beloit, WI Metropolitan Statistical Area	3.6%	7.3%	4.5%	3.4%	3.4%

Table 25: Unemployment Source: U.S. Bureau of Labor Statistics, <https://data.bls.gov/pdq/SurveyOutputServlet>

The rate of unemployment in Janesville, WI is higher for females when compared to the male population. Beloit, WI has a fairly even distribution between both sexes although the males slightly outnumber females in the data set shown. Rock County also shows an even distribution of unemployment between sexes with females showing a slightly higher rate in comparison to males. The data shows significant disparities between racial and ethnic groups. The Black and American Indian communities experience higher rates of unemployment than other racial and ethnic communities.

2022 UNEMPLOYMENT RATE			
	Janesville, WI	Beloit, WI	Rock County, WI
<b>SEX</b>			
<i>Male</i>	3.60%	5.40%	3.30%
<i>Female</i>	4.60%	5.20%	3.90%
<b>RACE AND HISPANIC OR LATINO ORIGIN</b>			
<i>White alone</i>	3.60%	4.80%	3.30%
<i>Black or African American alone</i>	12.70%	7.50%	9.10%
<i>American Indian and Alaska Native alone</i>	12.50%	11.10%	6.00%
<i>Asian alone</i>	8.90%	19.60%	10.30%
<i>Native Hawaiian and Other Pacific Islander alone</i>	-	0.00%	0.00%
<i>Some other race alone</i>	0.00%	10.70%	4.70%
<i>Two or more races</i>	8.90%	7.90%	6.40%

<i>Hispanic or Latino origin (of any race)</i>	2.40%	8.50%	5.90%
<i>White alone, not Hispanic or Latino</i>	3.60%	4.20%	3.10%

Table 26: Unemployment Rate Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

## Occupation by Industry

In addition to employment patterns, a closer look at where residents work helps to assess overall access to economic opportunity. Educational Services, Retail, and Manufacturing comprise the largest sector of the employed population over 16.

JOB INDUSTRY			
Industry Sector	Janesville, WI	Beloit, WI	Rock County, WI
<b>Civilian employed population 16 years and over</b>	<b>33,202</b>	<b>17,045</b>	<b>82,453</b>
Agriculture, forestry, fishing and hunting, and mining	247	116	1,194
Construction	1,784	639	5,775
Manufacturing	6,809	4,636	17,359
Wholesale trade	1,462	483	3,235
Retail trade	4,374	2,097	9,873
Transportation and warehousing, and utilities	1,853	1,073	4,236
Information	492	341	1,294
Finance and insurance, and real estate and rental and leasing	1,437	435	3,165
Professional, scientific, and management, and administrative and waste management services	2,239	1,163	5,503
Educational services, and health care and social assistance	7,042	3,397	17,934
Arts, entertainment, and recreation, and accommodation and food services	2,926	1,637	6,591
Other services (except public administration)	1,312	689	3,588
Public administration	1,225	339	2,706

Table 27: Occupation by Industry Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

## Means of Transportation to Work

Means of transportation refer to the various modes and systems people use to move from one location to another. Understanding transportation options is important for assessing accessibility, commuting patterns, and overall mobility within a region.

Personal vehicles are predominantly used for commuting and personal travel in Janesville. Traffic congestion is generally manageable, with ample parking in commercial and residential areas. Janesville Transit System provides bus services within the city and surrounding areas. Routes cover major destinations including shopping centers, educational institutions, and medical facilities. According to the 2022 5-Yr American Community Survey, an estimated 30,552 workers commute to work daily. 87.18% commuted by car, truck, or van, 9.57% carpooled, 0.86 utilized public transportation, and 2.39% did not identify their means of transportation. Workers had a mean travel time to work of approximately 20.9 minutes.

<b>JANESVILLE, WI MEANS OF TRANSPORTATION TO WORK</b>				
	<b>Total</b>	<b>Car, truck, or van -- drove alone</b>	<b>Car, truck, or van -- carpoled</b>	<b>Public transportation (excluding taxicab)</b>
Workers 16 years and over in households	30,552	26,636	2,925	262
<b>TIME OF DEPARTURE TO GO TO WORK</b>				
12:00 a.m. to 4:59 a.m.	8.20%	8.50%	6.60%	0.00%
5:00 a.m. to 5:29 a.m.	6.00%	6.10%	7.00%	0.00%
5:30 a.m. to 5:59 a.m.	7.40%	7.80%	5.50%	3.80%
6:00 a.m. to 6:29 a.m.	7.90%	7.90%	8.10%	3.80%
6:30 a.m. to 6:59 a.m.	8.40%	8.80%	3.90%	8.00%
7:00 a.m. to 7:29 a.m.	11.30%	11.20%	13.30%	6.10%
7:30 a.m. to 7:59 a.m.	13.50%	14.40%	8.60%	0.40%
8:00 a.m. to 8:29 a.m.	6.10%	5.70%	7.90%	37.80%
8:30 a.m. to 8:59 a.m.	3.60%	3.50%	1.30%	8.00%
9:00 a.m. to 11:59 p.m.	27.60%	25.90%	37.80%	32.10%
<b>TRAVEL TIME TO WORK</b>				
Less than 10 minutes	20.00%	19.30%	27.00%	13.00%
10 to 14 minutes	22.90%	23.40%	19.60%	10.30%
15 to 19 minutes	17.00%	16.70%	19.90%	8.40%
20 to 24 minutes	9.50%	9.20%	11.60%	9.20%
25 to 29 minutes	4.70%	5.20%	1.10%	0.00%
30 to 34 minutes	7.40%	7.30%	4.30%	37.80%
35 to 44 minutes	6.40%	6.80%	3.70%	5.70%
45 to 59 minutes	7.40%	7.20%	10.50%	11.50%
60 or more minutes	4.70%	4.90%	2.40%	4.20%
<b>Mean travel time to work (minutes)</b>	<b>20.9</b>	<b>21.2</b>	<b>18.7</b>	<b>25.9</b>

Table 28: Means of Transportation: Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

City of Beloit residents utilize personal vehicles for commuting and personal travel. The City has a road network that supports automobile use. Beloit Transit System offers local bus services with routes connecting key areas including downtown, educational institutions, and shopping centers. According to the 2022 5-Yr American Community Survey, an estimated 15,895 workers commute to work daily. 82.07% commuted by car, truck, or van, 12.54% carpoled, 0.82 utilized public transportation, and 4.57% did not identify their means of transportation. Data was not available to calculate the mean travel time to work.

<b>BELOIT, WI MEANS OF TRANSPORTATION TO WORK</b>				
	<b>Total</b>	<b>Car, truck, or van -- drove alone</b>	<b>Car, truck, or van -- carpooled</b>	<b>Public transportation (excluding taxicab)</b>
Workers 16 years and over in households	15,895	13,045	1,994	130
<b>TIME OF DEPARTURE TO GO TO WORK</b>				
12:00 a.m. to 4:59 a.m.	10.90%	10.70%	12.50%	0.00%
5:00 a.m. to 5:29 a.m.	7.90%	6.90%	16.20%	0.00%
5:30 a.m. to 5:59 a.m.	7.30%	7.30%	8.20%	29.20%
6:00 a.m. to 6:29 a.m.	6.10%	6.90%	2.10%	3.10%
6:30 a.m. to 6:59 a.m.	6.60%	7.10%	4.00%	0.00%
7:00 a.m. to 7:29 a.m.	13.00%	14.70%	5.20%	27.70%
7:30 a.m. to 7:59 a.m.	10.00%	10.80%	6.00%	13.80%
8:00 a.m. to 8:29 a.m.	7.30%	8.30%	2.80%	10.00%
8:30 a.m. to 8:59 a.m.	3.40%	3.20%	5.50%	0.00%
9:00 a.m. to 11:59 p.m.	27.50%	24.20%	37.50%	16.20%
<b>TRAVEL TIME TO WORK</b>				
Less than 10 minutes	21.50%	20.80%	17.70%	0.00%
10 to 14 minutes	18.70%	19.60%	10.80%	6.20%
15 to 19 minutes	12.60%	13.40%	10.00%	0.80%
20 to 24 minutes	10.50%	9.30%	20.20%	3.10%
25 to 29 minutes	6.20%	6.80%	5.00%	0.00%
30 to 34 minutes	10.70%	10.40%	16.60%	0.00%
35 to 44 minutes	6.10%	5.70%	8.70%	29.20%
45 to 59 minutes	7.70%	7.90%	8.30%	14.60%
60 or more minutes	6.10%	6.20%	2.70%	46.20%
<b>Mean travel time to work (minutes)</b>	<b>N</b>	<b>N</b>	<b>N</b>	<b>N</b>

Table 29: Means of Transportation: Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

Personal vehicles dominate transportation in Rock County, with a mix of urban and rural areas. Road infrastructure supports extensive car use. Traffic varies by location, with urban areas having more developed road systems. Regional transportation services include bus services provided by the Rock County Transit System and the Beloit-Janesville Express bus route operated jointly by the Janesville Transit System and Beloit Transit. These services connect different parts of the county and nearby areas. Rural areas have fewer public transit options, leading to higher reliance on personal vehicles. According to the 2022 5-Yr American Community Survey, an estimated 75,525 workers commute to work daily. 87.12% commuted by car, truck, or van, 9.36% carpooled, 0.54 utilized public transportation, and 2.98% did not identify their means of transportation. Data was not available to calculate the mean travel time to work.

ROCK COUNTY, WI MEANS OF TRANSPORTATION TO WORK				
	Total	Car, truck, or van -- drove alone	Car, truck, or van -- carpoled	Public transportation (excluding taxicab)
Workers 16 years and over in households	75,525	65,796	7,069	409
TIME OF DEPARTURE TO GO TO WORK				
12:00 a.m. to 4:59 a.m.	8.30%	8.40%	8.10%	0.00%
5:00 a.m. to 5:29 a.m.	6.50%	6.30%	9.10%	0.00%
5:30 a.m. to 5:59 a.m.	7.20%	7.40%	6.90%	11.70%
6:00 a.m. to 6:29 a.m.	8.30%	8.60%	6.10%	3.40%
6:30 a.m. to 6:59 a.m.	9.30%	9.70%	7.30%	6.40%
7:00 a.m. to 7:29 a.m.	13.60%	14.00%	11.30%	12.70%
7:30 a.m. to 7:59 a.m.	12.10%	12.70%	8.70%	4.60%
8:00 a.m. to 8:29 a.m.	6.60%	6.70%	5.40%	27.40%
8:30 a.m. to 8:59 a.m.	3.20%	3.10%	3.20%	5.10%
9:00 a.m. to 11:59 p.m.	24.80%	23.00%	34.00%	28.60%
TRAVEL TIME TO WORK				
Less than 10 minutes	17.90%	16.90%	20.40%	8.30%
10 to 14 minutes	17.60%	17.90%	14.30%	8.60%
15 to 19 minutes	14.50%	14.60%	14.10%	5.60%
20 to 24 minutes	12.00%	11.80%	14.60%	8.80%
25 to 29 minutes	6.20%	6.50%	5.10%	0.00%
30 to 34 minutes	10.50%	10.40%	11.70%	26.40%
35 to 44 minutes	7.80%	8.10%	6.40%	13.00%
45 to 59 minutes	8.20%	8.20%	10.00%	12.00%
60 or more minutes	5.50%	5.70%	3.20%	17.40%
Mean travel time to work (minutes)	N	N	N	N

Table 30: Means of Transportation: Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

**A. Minimum Wage**

Minimum wage refers to the lowest amount of compensation that employers are legally required to pay their employees for their work. This wage is set to ensure a basic standard of living for workers and is an important factor in discussions about economic welfare and labor rights. As of 2024, the minimum wage in Wisconsin is \$7.25 per hour, which aligns with the federal minimum wage. The state minimum wage is the same for all individuals, regardless of how many dependents they may have. Wisconsin follows the federal standard, but local jurisdictions cannot set their own minimum wage rates higher than the state or federal minimum. Therefore, the minimum wage in Janesville, Beloit, and Rock County is \$7.25 per hour unless federal or state laws change.

A living wage is an hourly rate that an individual in a household must earn to support themselves and their family. According to MIT, the living wage shown is the hourly rate that an individual in a household must earn to support them and their family. The

assumption is the sole provider is working full-time (2080 hours per year). Based on MIT’s Living Wage Calculator, the minimum wage is \$12.89 below the \$20.14 living wage for one adult with no children and \$13.08 below the living wage for two working adults with one child. Considering these large gaps between minimum and living wages, households with adults earning minimum wage would need additional assistance in securing housing in Janesville or Beloit.

1 ADULT				
	0 Children	1 Child	2 Children	3 Children
Living Wage	\$20.14	\$36.41	\$47.69	\$62.47
Poverty Wage	\$7.24	\$9.83	\$12.41	\$15.00
Minimum Wage	\$7.25	\$7.25	\$7.25	\$7.25

**Table 31: Living Wage- 1 Adult Source: MIT Living Wage Calculator, [Living Wage Calculator - Living Wage Calculation for Janesville-Beloit, WI \(mit.edu\)](#)**

2 ADULTS (1 WORKING)				
	0 Children	1 Child	2 Children	3 Children
Living Wage	\$28.00	\$33.78	\$38.58	\$40.97
Poverty Wage	\$9.83	\$12.41	\$15.00	\$17.59
Minimum Wage	\$7.25	\$7.25	\$7.25	\$7.25

**Table 32: Living Wage-2 Adults 1 Working Source: MIT Living Wage Calculator, [Living Wage Calculator - Living Wage Calculation for Janesville-Beloit, WI \(mit.edu\)](#)**

2 ADULTS (BOTH WORKING)				
	0 Children	1 Child	2 Children	3 Children
Living Wage	\$13.87	\$20.33	\$26.29	\$30.54
Poverty Wage	\$4.91	\$6.21	\$7.50	\$8.79
Minimum Wage	\$7.25	\$7.25	\$7.25	\$7.25

**Table 33: Living Wage-2 Adults Working Source: MIT Living Wage Calculator, [Living Wage Calculator - Living Wage Calculation for Janesville-Beloit, WI \(mit.edu\)](#)**

## Educational Attainment

Educational attainment is a key factor in future wages and economic opportunities. All the jurisdictions (Beloit, Janesville, and Rock County) have graduation rates that outperform the state and national levels. Janesville’s 93.6<sup>4</sup> percent stands out as having the highest graduation rate, followed by Beloit at 91.6 percent<sup>5</sup>, and Rock County at 90.6 percent<sup>6</sup>. indicating particularly strong local education system. Rock County does not operate an independent school district and the graduation rate represented below is an

<sup>4</sup> School District of Janesville, Strategic Dashboard, Graduation Rate, Accessed 10/08/24  
<https://public.tableau.com/app/profile/dan.cunningham/viz/EdFndnDBFinal/EducationDB>

<sup>5</sup> School District of Beloit, District at a Glance, Accessed 10/08/24, chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.sdb.k12.wi.us/cms/lib07/WI01919658/Centricity/Domain/502/SDB%20Factsheet.pdf

<sup>6</sup> Open Data Network, Accessed 10/08/2024,  
[https://www.opendatane트워크.com/entity/0500000US55105/Rock\\_County\\_WI/education.graduation\\_rates.percent\\_high\\_school\\_graduate\\_or\\_higher?year=2018](https://www.opendatane트워크.com/entity/0500000US55105/Rock_County_WI/education.graduation_rates.percent_high_school_graduate_or_higher?year=2018)

average of all school districts within the County. State and National graduation rates were

Jurisdiction	Local	State	National
Beloit	91.2%		
Janesville	93.6%	90%	87%
Rock County	90.6%		

Table 34A: Educational Attainment – Graduation Rate Comparisons Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

The City of Janesville is home to several institutions, including the University of Wisconsin-Whitewater at Rock County, which contributes to higher education attainment. Beloit has a higher percentage of residents with college degrees compared to the national average, thanks in part to Beloit College, a well-regarded liberal arts institution in the City. The overall educational attainment in Rock County shows a mix of high school graduates, some college experience, and varying levels of bachelor’s and advanced degrees. Various local programs aim to improve educational outcomes, including adult education, vocational training, and partnerships with local businesses to provide skills development.

EDUCATIONAL ATTAINMENT						
	Janesville, WI		Beloit, WI		Rock County, WI	
Population 25 years and over	Male	Female	Male	Female	Male	Female
	21,889	23,819	10,737	12,127	54,976	57,385
Less than 9th grade	423	382	525	575	1,399	1,338
9th to 12th grade, no diploma	1,247	780	989	783	3,468	2,500
High school graduate (includes equivalency)	7,887	7,593	4,343	4,174	20,206	18,212
Some college, no degree	4,915	5,237	2,342	2,822	12,153	12,669
Associate degree	2,250	3,095	786	1,374	5,787	7,224
Bachelor's degree	3,558	4,461	1,278	1,678	8,256	10,209
Graduate or professional degree	1,609	2,271	474	721	3,707	5,233

Table 34B: Educational Attainment: Source: U.S. Census Bureau 2022 5-yr ACS Estimates, [www.census.gov](http://www.census.gov)

## B. Broadband Access

Throughout the United States, there is a significant digital divide; a gap between those who have ready access to the internet and computers and those who do not. The divide is perpetuated by limitations that are geographical as well as financial, where people cannot afford to pay a monthly service fee for Broadband service (an internet connection fast enough to stream a video). Nationwide, less than half of households living on or under \$20,000 are connected. This lack of internet access in communities supports a deficit in opportunity, education, and other prospects. From a fair housing perspective, ensuring that residential broadband is available to housing projects both within and in the

outskirts of the city will support community viability and improve the quality of life for residents.

Broadband access in Janesville, Beloit, and Rock County, Wisconsin, is quite robust, with a range of options available for residents. Most urban areas have access to high-speed broadband options, including fiber-optic and cable services. Some more rural, remote, or less developed parts of Rock County may have more limited broadband options or rely on slower DSL connections. Charter Spectrum is a major provider in this region, offering cable internet services with varying speeds depending on the plan. Satellite internet providers like Viasat and HughesNet are available throughout the region, which can be a good option for rural areas where other types of broadband may not reach.

### **C. Environmental Justice and Health**

Historically environmentally hazardous sites have been disproportionately placed in communities of color, leading to exposure to hazardous materials and a higher risk of health problems. Janesville's downtown and historic Fourth Ward neighborhood, and portions of south Janesville along Kellogg Avenue, and portions of Janesville East of Milton Avenue between USH 14 and Black Bridge Road have the highest concentrations of individuals in poverty and minority populations. Janesville, WI has 8 brownfield sites and 9 Superfund Sites with 2 active NPL's. A Brownfields site is any land in the United States that has been contaminated by hazardous waste and identified by the Environmental Protection Agency (EPA) as a candidate for cleanup because it poses a risk to human health and/or the environment. Real property, expansion, or reuse of land may be complicated by the presence or potential presence of a hazardous substance pollutant, or contaminant. A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the Environmental Protection Agency (EPA) as a candidate for cleanup because it poses a risk to human health and/or the environment. The National Priorities List [NPL] Superfund is a list of the most hazardous waste sites that have been identified by Superfund/ CERCLIS where long-term remedial response actions can only be conducted.

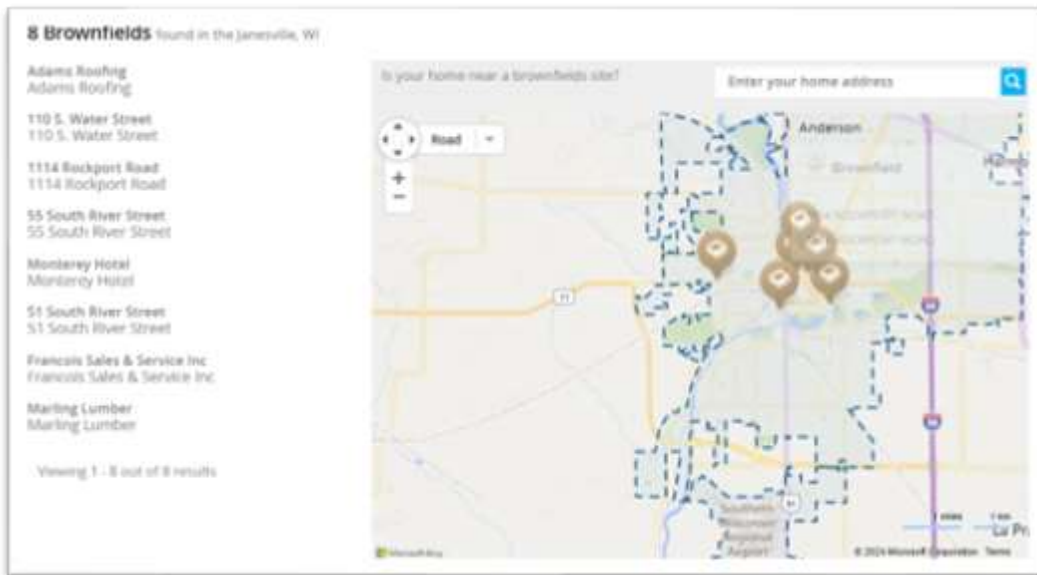


Figure 586: Brownfields-Janesville, WI

Source: [Janesville, WI Hazardous Waste Brownfield in Rock County \(homefacts.com\)](https://homefacts.com)

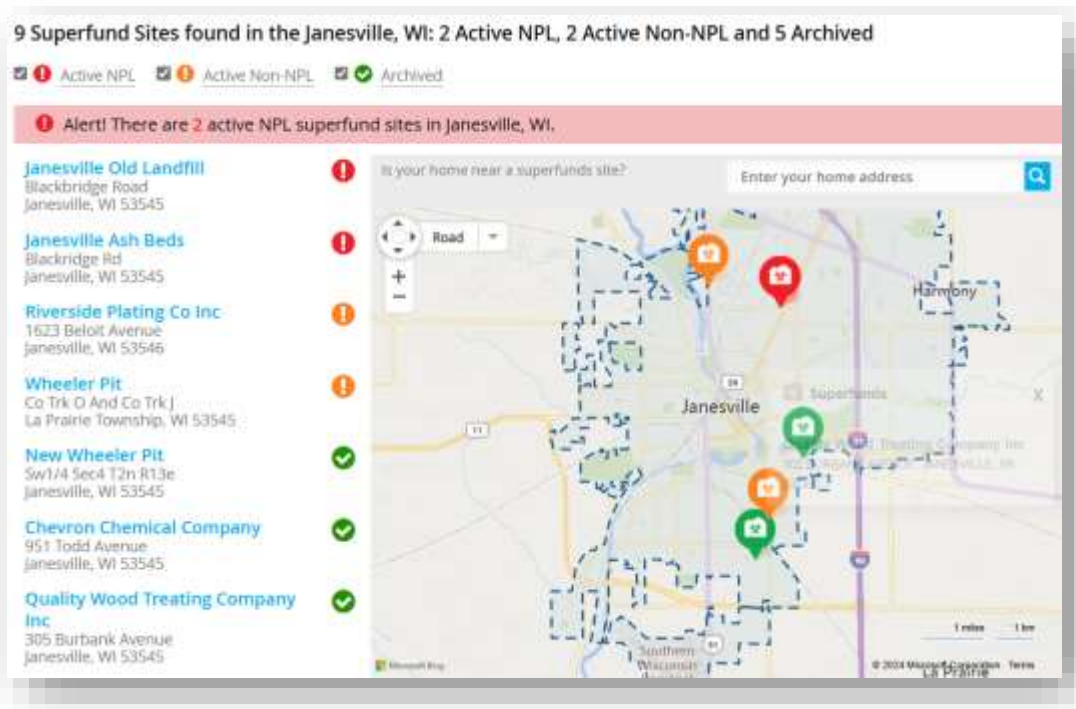


Figure 597: Brownfields-Janesville, WI

Source: [Janesville, WI Hazardous Waste Superfund in Rock County \(homefacts.com\)](https://homefacts.com)

Siting of these dangerous environmental sites corresponds with housing segregation and zoning, placing high intensity uses near areas zoned multifamily or redlined communities. Environmental Justice and fair housing advocacy both seek to address racial segregation, disparities in access to political power, municipal fragmentation, boundary-drawing around resources, disinvestment, and administrative silos.

Environmental justice seeks to ensure that all communities, regardless of race, income, or ethnicity, have equal access to a healthy environment and are not disproportionately affected by environmental hazards. Areas near industrial zones may face higher pollution levels, impacting air and water quality. Proper management of waste and hazardous materials is crucial. Communities near landfills or waste processing facilities might experience environmental challenges. Industrial activities, vehicle emissions, and agricultural practices can contribute to air pollution, which affects respiratory and cardiovascular health. Sources of contamination include agricultural runoff, industrial discharges, and aging infrastructure. Testing and treatment are important for ensuring safe drinking water. Rock County Public Health Department provides information and resources on health and environmental issues, including air and water quality.

## V. ANALYSIS OF PUBLIC POLICY IMPEDIMENTS

---

### A. General Plan Land Use Element

Since 1968, the Fair Housing Act has prohibited explicit and implicit discriminatory practices through land use policies, building codes, public services, and other public and private practices, such as conditional or special use permits and real estate broker steering, that limit access to fair housing choice for members of protected classes. Though examples and effects of such practices vary from jurisdiction to jurisdiction, in general, public and private policies should aim to further fair housing goals and proactively address potentially discriminatory practices and trends.

Zoning ordinances and land use regulations are designed to regulate the development and use of property, in some cases, the promotion or preservation of other factors, such as community character, site and location of services, housing typology, and the overall planning process, may deter fair housing choice by limiting housing choice and access to protected classes. The following sections examine critical public and private policy areas and their potential impact on fair housing choice.

## B. Comprehensive Plan Land Use Designations for Housing

According to the Comprehensive Plan for each jurisdiction, residential structures should be designed and built to ensure intensity and density compatibility with adjacent single-family detached dwellings. The building intensities and densities allowable within the range of land use designations provide for a wide range of housing opportunities throughout the region suitable to accommodate households of all incomes.

Land Use Description	Notes	Rock County	Beloit	Janesville
Residential – Single Family	This district permits a low density of population in which the primary land use is a single-family dwelling unit.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Residential - Two Family or Townhome	This district permits a moderate density of population in which the principal use is single-family dwelling units.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Multi-Family Residential District	This district permits a high density of population in which the principal use is multi-family dwelling units.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Mixed Residential District	This district permits a moderate density of population in which the principal is two-family/townhouse and single-family dwelling units.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Urban Residential District	This district permits a moderately high density of population in which the principal use is single-family dwelling units.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Planned Unit Development	A Planned Unit Development is a special type of zoning overlay district designed to establish a procedure for the development of land under unified controls to increase flexibility.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Mobile Home Residential District	This district permits a low density of population in which the principal use is a mobile home dwelling.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Elderly Residential		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Table 39: Zoning Ordinances in Rock County, Beloit, and Janesville

### C. Zoning Ordinance & Building Codes

There is no Countywide zoning ordinance for Rock County. Zoning throughout the County is covered through a mix of cities, villages, and towns. The City of Janesville and City of Beloit provide the Land Use Planning and Zoning Regulations for each of their respective jurisdictions, which include land use designations, general plan amendment procedures, zoning classifications, zoning districts (including permitted uses, development standards and other regulatory considerations), and general provisions. The regulations contain key definitions of terms that have the potential to impact fair housing choice. An evaluation of these definitions is contained within the Fair Housing Impediment Study summarized in the table below:

#### Fair Housing Impediment Study

Evaluation Description	Jurisdiction Practice			Restrictive? Y/N
	Rock County	Beloit	Janesville	
Definition of "Family"	No Definition	Any number of persons related by blood, adoption or marriage living together in one dwelling as a single housekeeping unit; a number of persons not exceeding four (4) not so related, living together in one (1) dwelling as a single housekeeping unit.	Family means an individual or two or more persons related by blood, marriage, or legal adoption living as a single housekeeping unit in a dwelling unit, including foster children, domestic servants, and not more than four roomers.	Rock County N/A  Beloit No  Janesville No
Single Housekeeping Unit - Group Home- (as related to the definition of "Family")	No Definition	Group Living is characterized by the residential occupancy of a structure by a group of people who do not meet the definition of Household Living. The size of the group may be larger than the average size of a family. Tenancy is arranged on a monthly or longer basis.	Community living arrangement means any of the following facilities licensed or operated or permitted under the authority of the State Department of Health and Social Services: child welfare agencies under Wis. Stats. § 48.60, group homes for children under Wis. Stats. § 48.02(7) and community-based residential facilities under Wis. Stats. § 50.01, but does not include adult family homes, as defined in Wis. Stats. § 50.01, day care centers,	Rock County N/A  Beloit No  Janesville No

			nursing homes, general hospitals, special hospitals, prisons and jails.	
Definition of a "disability"	No Definition	No Definition	<p>Disability means, with respect to a person, any of the following:</p> <p>(1) A physical or mental impairment which substantially limits one or more of the person's major life activities. (2) A record of having an impairment or being regarded as having such an impairment. (3) The term "disability" does not include current, illegal use of or addition to a controlled substance. The behavioral manifestations of a mental disability may be taken into consideration in determining whether or not the applicant is qualified.</p>	<p>Rock County N/A</p> <p>Beloit No</p> <p>Janesville No</p>
On-site supporting services permitted?	No Definition	Yes. Supportive services are allowed in group living arrangements.	<p>Yes. Community living arrangements for eight or fewer individuals and adult family homes subject to the following provisions: (i) Those which provide housing and supportive services for residents with a disability or handicap, defined in <u>Section 18-21</u> as from time to time amended, shall not be subject to a minimum spacing requirement from another community living arrangement or adult family home;</p>	<p>Rock County N/A</p> <p>Beloit No</p> <p>Janesville No</p>

<p>Restrict number of unrelated persons residing together if they are disabled?</p>	<p>No Definition</p>	<p>There is no law specifically restricting on the basis of disability.</p>	<p>Yes. Community living arrangements for eight or fewer individuals and adult family homes.</p>	<p>Rock County N/A  Beloit No  Janesville No</p>
<p>Zoning for Fair Housing</p>	<p>Fair Housing is codified in Chapter 3, Part 6 of County Ordinances.</p>	<p>Fair Housing is codified in the City's zoning code – Chapter 20.01.</p>	<p>Ordinance No. 2019-774 Fair Housing Code codifies the City's intent to protect its residents from discrimination in housing and to render discrimination in housing unlawful. It is the declared policy of the City that all persons shall have an equal opportunity for housing regardless of race, color, sex, national origin, religion, disability/handicap, family/familial status, age, ancestry, marital status, lawful source of income, sexual orientation; status as a victim of domestic abuse, sexual assault, or stalking; or gender identity and/or gender expression.</p>	<p>Rock County No  Beloit No  Janesville No</p>
<p>Senior Housing Restrictions &amp; Federal Law</p>	<p>No Definition</p>	<p>The city has designated a zoning definition for Elderly Residential Districts designed to create, preserve and enhance areas within the Town suitable for medium to higher density housing exclusively for the elderly. The City also allows for</p>	<p>Housing for older persons means any of the following: Housing provided under any state or federal program that is specifically designed and operated to assist elderly persons, as defined in the state or federal program. (2)</p>	<p>Rock County N/A  Beloit No  Janesville</p>

		conditional use permits to reduce parking requirements.	Housing solely intended for, and solely occupied by, persons 62 years of age or older. (3) Housing primarily intended and primarily operated for occupancy by at least one person 55 years of age or older per dwelling unit. The City does not require special use permits to modify homes. Building permits would be required in some instances; however, the COJ has made a conscious decision to not require permits for accessible ramps for residential properties.	No
Allow ADA Modifications in municipal- supplied or managed housing?	No Definition	Special use permit issued for disabled residents needing to modify their home to fully enjoy the premises.	N/A	Rock County N/A Beloit No Janesville N/A

**Table 40: Zoning Definitions**

Beloit Zoning Code - [https://library.municode.com/wi/beloit/codes/code\\_of\\_ordinances?nodeId=CH20FAHOCO\\_20.035DIBEHACR2334](https://library.municode.com/wi/beloit/codes/code_of_ordinances?nodeId=CH20FAHOCO_20.035DIBEHACR2334)

Janesville Zoning Code -

<https://library.municode.com/search?statelD=49&clientId=2760&searchText=Group%20Home&contentTypelD=CODES>

Rock County Zoning Ordinance - <https://www.co.rock.wi.us/departments/corporation-counsel/code-of-ordinances>

Based on the fair housing impediment analysis as it relates to zoning ordinances or building codes, there are no impediments identified.

State housing law requires that cities facilitate and encourage the provision of housing for a full range of economic segments of the community and special needs groups. Local government policies that limit or exclude housing for persons with disabilities, people with lower income levels, people who are homeless, families with children, or other groups may violate the Fair Housing Act. Municipalities must take these factors into account when regulating land use and development standards throughout its residential zones. The Housing Element of the Plan includes a constraints analysis that examines potential constraints to the development of affordable housing. Key elements of analysis include where certain uses are allowable within the community and development standards.

Rock County and the Cities of Beloit and Janesville have adopted Fair Housing language in the Zoning Ordinance stating the commitment to affirmatively further fair housing through its land use regulations and public policies, such as zoning, to promote fair housing choice for all residents.

The Federal Courts have ruled that four to six persons with a disability living together in a single-family residence, should be considered a “family,” and thereby be permitted to live together as a family in any zoning district that permits residential uses. The Cities of Beloit and Janesville currently allow for group living to cohabit and be considered as a family without regard to the number of people.

Enforcing written reasonable accommodation policy that allows for changes in rules and procedures to afford persons with disabilities equal opportunity to housing, as required by the Fair Housing Act. A reasonable accommodation policy allows flexibility in the application of zoning and land use, as well as providing housing developers guidance in requesting reasonable accommodations.

### ***Accessibility Regulations***

HUD encourages its grantees to incorporate “visitability” principles into their designs. Housing that is “visitable” includes the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. “Visitable” homes have at least one accessible means of egress/ingress for each unit, and all interior and bathroom doorways have at least a 32-inch clear opening. As a minimum, HUD grantees are required to abide by all Federal laws governing accessibility for persons with disabilities. The jurisdictions appear to be in full compliance with the HUD visitability standards.

Federal laws governing accessibility requirements include Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act.

Section 504 of the Rehabilitation Act (24 CFR Part 8), known as “Section 504” prohibits discrimination against persons with disabilities in any program receiving Federal funds. Specifically, Section 504 concerns the design and construction of housing to ensure that a portion of all housing developed with Federal funds is accessible to those with mobility, visual, and hearing impairments.

The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. Specifically, the ADA gives HUD jurisdiction over housing discrimination against persons with disabilities.

The Fair Housing Act prohibits discrimination in the sale or rental of housing. It also requires that property owners must make reasonable modifications to dwellings and common use areas to accommodate persons who have a disability. For all new residential buildings of four or more units built after March 13, 1991: public and common areas must be accessible to persons with disabilities; doors and hallways must be wide enough for wheelchairs; all housing units must have accessible routes into and through the unit; there must be accessible light switches, outlets, thermostats; bathroom walls must be reinforced to allow for the installation of grab bars, and kitchens and baths must be accessible so they can be used by persons in wheelchairs.

#### **D. Home Mortgage Disclosure Act (HMDA)**

Homeownership offers a pathway to wealth accumulation and long-term housing stability. However, households with lower income levels and protected classes often remain excluded from fair lending opportunities or miss out on the economic advantages of homeownership due to the enduring impact of historical lending practices and policies that systematically denied these groups access to homeownership. The following section examines current lending patterns within the region to evaluate access to home loans for protected classes and to identify potential barriers to fair housing.

The private sector has traditionally generated the most easily recognized impediments to fair housing choice in regard to discrimination in the sale, rental, or advertising of dwellings; the provision of brokerage services; or in the availability of financing for real estate purchases. The Fair Housing Act and local laws prohibits such practices as the failure to give the same terms, privileges, or information; charging different fees; steering prospective buyers or renters toward a certain area or neighborhood; or using advertising that discourages prospective buyers or renters because of race, color, religion, sex, handicap, familial status, and national origin.

To comply with fair housing law, everyone must have the opportunity to live where they choose and can afford, including equal access to homeownership. Prospective homebuyers should have access to mortgage credit, and homeownership programs must be available without discrimination. This Home Mortgage Disclosure Act (HMDA) analysis aims to assess how well home loan lenders are meeting the housing needs of residents.

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The annual HMDA data can be found online at [www.ffiec.gov/hmda/](http://www.ffiec.gov/hmda/). The most recent HMDA Data is that of 2023, which is the data that was used for this analysis. The following tables provide an analysis of the HMDA data in the Janesville-Beloit Metropolitan Statistical Area (MSA). The MSA includes the following areas: Rock County, Beloit, and Janesville.

Home lending patterns are established using the latest available data from the Home Mortgage Disclosure Act (HMDA) for the Janesville-Beloit Metropolitan Statistical Area (MSA) 2012- 2022, with an emphasis on information available from 2022. The MSA is the smallest available geographic unit in the 2022 HMDA dataset, which also provides a broader understanding of the regional lending trends occurring in the Metro area. The following section analyzes current lending patterns within the region and the greater metropolitan area to assess overall access to home lending for protected classes to identify potential barriers to fair housing.

**E. Loan Origination, Type, and Purpose**

There are no clear trends in the data provided in the table below, growing concerns with lackluster housing production and the tightening of lending and credit standards, as expressed by local developers through focus groups and conversations, in recent years have led to some market uncertainty in the region. Nonetheless, mortgage brokers expect further tightening of lending as spikes in interest rates continue to soar.

**All Originated Mortgages, Janesville-Beloit, WI 2021-2023**

Year	All originated mortgages	% Change from Previous Year
2021	4,445	X
2022	5,448	22.56
2023	8,413	54.42
<b>TOTAL</b>	<b>18,306</b>	X

Table 41: Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

During 2023, over 87.99 percent of all lending activity in the region was in the form of conventional loans, which are private loans that are not backed by a governmental entity. Nationally, conventional loans comprise 75 percent of all lending activity<sup>7</sup>. A smaller percentage of conventional loans in the region may signal market gaps in the local private lending market and possibly indicate a lack of savings and income for residents. Only about 8.10 percent are FHA loans, which are mortgages issued by lenders approved by the Federal Housing Administration (FHA) and insured by the FHA. These loans have lower down payment requirements and other underwriting criteria that make them more accessible to borrowers with limited assets or lower credit scores<sup>8</sup>. Based on HMDA data, nationwide FHA loans represented 14.3 percent of all mortgage lending activity.

**Loans Purchased by Type of Loan & Amount, 2023**

Loan Type	# of Records	\$ Amount	
Conventional	3,911	\$547,545,000	87.99%
FHA	360	\$75,030,000	8.10%
FSA/RHS	168	\$41,890,000	3.78%
VA	6	\$1,550,000	0.13%
Loan Purpose			
Home Purchase	2,041	\$461,325,000	45.92%
Home Improvement	610	\$36,480,000	13.72%
Refinancing	662	\$65,650,000	14.89%
Cash Out Refinancing	442	\$60,900,000	9.94%
Other Purpose	690	\$41,660,000	15.52%
<b>TOTALS</b>	<b>4,445</b>	<b>\$666,015,000</b>	<b>(x)</b>

Table 42: Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

A market that relies more heavily on conventional loans is an indicator of a healthy lending and real estate market, as borrowers and lenders opt for more conventional loans. However, a shift from government-backed mortgages may also signal a narrowing of options for borrowers from protected classes that have been historically left out of the private mortgage market and homeownership. In the case of the Janesville-Beloit MSA, data indicates that there is a fairly balanced market that responds to the financial need of all borrowers in the area. In addition to home purchase loans, cash-out or refinancing products were key components of the local lending market. Approximately 25 percent of the lending activity was for refinancing or cash-out purposes while home improvement loans were just under 14 percent.

<sup>7</sup> Conventional Loans,” Consumer Financial Protection Bureau. Available at: <https://www.consumerfinance.gov/owning-a-home/loan-options/conventional-loans/>

<sup>8</sup> Let FHA Help You,” U.S. Department of Housing and Urban Development. Available at: <https://www.hud.gov/buying/loans>

### Disposition of Loan Applications, by Race of Applicant, 2023 Janesville-Beloit MSA

Race (Not Hispanic or Latino)	# of Loan Originated	Total Amount	Percent of Loans
American Indian or Alaska Native	13	\$1,595,000.00	0.29%
Asian	32	\$7,880,000.00	0.72%
Black or African American	61	\$9,075,000.00	1.37%
Native Hawaiian or Other Pacific Islander	0	\$0.00	
White	3,735	\$532,625,000.00	84.06%
Free Form Text Only	3	\$265,000.00	0.07%
Race Not Available	510	\$99,640,000.00	11.48%
Joint	89	\$14,755,000.00	2.00%
TOTALS	4443	\$665,835,000.00	(X)

Table 43: Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

There is a significant racial disparity in loan applications, with minority applicants often facing higher denial rates and less favorable loan terms compared to their White counterparts, reflecting broader systemic inequities in access to credit and financial resources. Hispanic or Latino borrowers were underrepresented in the home lending activity of the area in 2022. As the table below highlights, Hispanic or Latinos borrowers were only about 4 percent of all lending activity of the area but makeup about 9 percent of the population. Moreover, the totals loan amount for Hispanic or Latino borrowers was significantly lower than the total loan amounts for Non- Hispanic or Latino borrowers.

### Disposition of Loan Applications, by Ethnicity of Applicant, 2024 Janesville-Beloit MSA

Ethnicity	# of Loan Originated	Percent of Loans	Total Amount
Hispanic or Latino	204	4.6%	28,400,000
Not Hispanic or Latino	3,622	81.5%	522,410,000
Joint	106	2.4%	17,670,000
Ethnicity Not Available	513	11.5%	97,535,000
TOTALS	4445	(X)	666,015,000

Table 44: Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

In addition to challenges based on race and ethnicity in the local lending market, there is also a gender gap in lending activity. As the table below demonstrates, female borrowers represented approximately 19 percent of all lending activity in 2023. It should be noted that when females

represent slightly more than half of the population. It is worth noting that the HMDA dataset also provides data on Joint applications with male and female co-applicants, which accounted for about 45 percent of the lending activity in the area.

**Disposition of Loan Applications, by Sex of Applicant, 2023  
Janesville-Beloit MSA**

Sex	# of Loan Originated	Percent of Loans	Total Amount
Female	862	19.4%	\$103,480,000
Joint	2,008	45.2%	\$317,720,000
Male	1,223	27.5%	\$170,965,000
Sex Not Available	352	7.9%	\$73,850,000
<b>TOTALS</b>	<b>4,445</b>	<b>(X)</b>	<b>\$666,015,000</b>

Table 45: Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

**F. Loan Denials**

In addition to overall application numbers, a closer look at denial rates per loan type, loan purpose, and borrower demographics helps to reveal potential disparities in the home lending market. As the table below highlights, conventional loans represent the largest percent of denials across all loans and have the highest rates of denials within each of the loan types. At 36 percent of all denials, home purchase had the highest proportion of denials followed by cash out refinance. Within the individual loan type, about 84 percent of conventional loans were denied, while government-backed FHA have denial rates of just under 11 percent.

**Loan Application Denials, Loan Type, 2023  
Janesville-Beloit MSA**

Loan Type	# of Applications		% of all Denials
	Denied	Amount	
Conventional Loan	863	\$71,485,000	84.03%
FHA	112	\$19,760,000	10.91%
VA	50	\$10,770,000	4.87%
USDA	2	\$440,000	0.19%
<b>TOTALS</b>	<b>1027</b>	<b>\$102,455,000</b>	<b>(X)</b>

Table 46: Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

Across the Janesville-Beloit MSA, minority borrowers did not have a disproportionate percentage of denial rates within each race or ethnicity for all lending activity in the area. This includes home purchase, home improvement, refinancing, and other purpose loans.

**Total Denials by Derived Race and Ethnicity, 2022**  
**Janesville-Beloit, MSA**

Race/Ethnicity	# of Applications Denied	% of all Denials
<b>RACE</b>		
2 or more minority races	0	0.00%
American Indian or Alaska Native	5	0.49%
Asian	17	1.66%
Black or African American	49	4.77%
Free Form Text Only	1	0.10%
Joint	8	0.78%
Native Hawaiian or Other Pacific Islander	0	0.00%
Race Not Available	148	18.52%
White	799	77.80%
<b>ETHNICITY</b>		
Hispanic or Latino	88	8.57%
Not Hispanic or Latino	805	78.38%
Ethnicity Not Available	115	11.20%
Joint	19	1.85%

Table 47: Source: Home Mortgage Disclosure Act Data, <https://www.ffiec.gov/hmda/default.htm>

**G. Loan Denial Reasons for Home Purchases**

In addition to general denial rates based on the loan type, loan purpose, and borrower characteristics, an assessment of the primary reasons provided for application denials helps to understand potential barriers keeping borrowers from accessing homeownership opportunities. The following section examines denial reasons through the lens of race and ethnicity to reveal potential barriers to fair housing choice in the home-buying market for protected classes.

The reasons for loan denials were consistent among demographic groups with debt-to-income ratio, credit history, and unverifiable information being among the top reasons in 2023. For some borrowers, a debt-to-income ratio was the primary reason given by financial institutions for denial of an application. It is worth pointing out that Hispanic or Latino borrowers made up only a fraction of the lending activity. The denial reasons given for the group reflected similar trends noted in other demographic groups with debt-to-income and credit history being the top reasons for loan denial.

**H. Discussion of Results**

As data from this chapter has shown, discrepancies in the home lending market are not

apparent for communities of color in the Janesville-Beloit MSA since the last Analysis of Impediments to Fair Housing Choice. Based on HMDA data, recent lending activity does not reflect the racial composition of the area and does not represent that ethnic composition of the area. Black and Hispanic borrowers are underrepresented and White borrowers overrepresented in the local market. When analyzing HMDA data and recent trends in homeownership, it is apparent that minority groups may not seek homeownership explaining the variances in homeownership trends and HMDA data.

The 2023 HMDA data also reveals that issues related to debt-to-income ratios and credit history are the main reasons for loan denials in the area. Other factors, such as adequate collateral, down payments, and mortgage insurance, are playing a drastically less significant role in loan denials. When borrowers from communities of color are able to secure a loan, their average loan amounts are often lower than those from White borrowers. Such differences highlight the ongoing struggle for communities of color in securing adequate capital to access the home-buying market in the area and ultimately build lasting family wealth.

Looking ahead, the Consortium will continue to monitor these lending patterns to tailor local programs to meet the needs of all residents and encourage greater financial security and homeownership opportunities in the jurisdiction.

## VI. FAIR HOUSING TRENDS AND COMPLAINTS

---

Gaining a clear understanding of fair housing trends and complaints is crucial for assessing housing access free from discrimination. This chapter explores the fair housing enforcement process and reviews complaints filed at local and federal levels, aiming to identify trends, emerging issues, and potential barriers to fair housing access, enforcement, and education.

The consortium is committed to advancing fair housing by promoting equal housing opportunities for all residents. It upholds the Fair Housing Law, Title VIII of the Civil Rights Act of 1968, by actively addressing discrimination within the community and supporting programs that educate the public about their rights to equal housing opportunities.

The consortium's policy is to deliver services without discrimination based on race, color, ancestry, religion, national origin, age, gender, marital status, familial status, source of income, sexual orientation, or disability. Additionally, the protections exist beyond the federal requirement to include status of a victim of domestic abuse, sexual abuse, stalking, age, sexual orientation, marital status, ancestry, lawful source of income, gender identity, and gender expression. This commitment extends to all grant-funded housing programs provided by the consortium.

### *What is Housing Discrimination?*

Housing discrimination is unjust or prejudicial treatment of individuals, in the area of housing and real estate, based on the individual's protected class. Within the context of an increasingly diverse society, the potential for discrimination in housing choice remains an issue which must be vigilantly observed. In efforts to combat discrimination, federal and state laws have been enacted to provide a framework for ensuring fair housing choice.

### *Affirmatively Furthering Fair Housing*

The Fair Housing Act has two goals: to end housing discrimination and to promote diverse, inclusive communities. The second goal is referred to as Affirmatively Furthering Fair Housing (AFFH), and it embodies our strongly held American values of fair access and equal opportunity.

The Affirmatively Furthering Fair Housing provision was part of the Fair Housing Act when it was passed by Congress in 1968. Through that provision, Congress directed HUD to make sure that neither the agency itself, nor the cities, counties, states, and public housing agencies it funds, discriminate in their programs. Further, Congress intended that HUD programs be used to expand housing choices and help make all neighborhoods places of opportunity, providing their residents with access to the community assets and resources they need to flourish.

### ***Fair Housing Complaints***

The Office of Fair Housing and Equal Opportunity [FHEO] administers federal laws and establishes national policies that make sure all Americans have equal access to the housing of their choice. Individuals who believe they are victims of housing discrimination can choose to file a fair housing complaint through the respective Regional FHEO. Typically, when a complaint is filed with the agency, a case is opened and an investigation of the allegations of housing discrimination is reviewed.

If the complaint is not successfully mediated, the FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Where reasonable cause is found, the parties to the complaint are notified by HUD's issuance of a "Determination," as well as a "Charge of Discrimination," and a hearing is scheduled before a HUD administrative law judge. Either party [complainant or respondent] may cause the HUD-scheduled administrative proceeding to be terminated by electing instead to have the matter litigated in Federal court.

### ***Fair Housing Complaints Filed***

Region V of the Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin. The mission of the FHEO is to protect individuals from employment, housing, and public accommodation discrimination, and hate violence. To achieve this mission, the FHEO maintains databases of and investigates complaints of housing discrimination, as well as complaints in the areas of employment, housing, public accommodations, and hate violence.

Complaints filed with HUD are classified by race, national origin, disability, familial status, religion, sex, and retaliation bases. FHEO investigates complaints which may be of one or both of the following types:

- Discrimination under the Fair Housing Act (including housing that is privately owned and operated)
- Discrimination and other civil rights violations in housing and community development programs, including those funded by HUD.

Complaints involving discrimination under the Fair Housing Act may be applied in cases where one's discrimination in renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities are violated. The filing of these complaints may be against property owners, property managers, developers, real estate agents, mortgage lenders, homeowner associations, insurance providers, and others who affect housing opportunities.

Complaints involving discrimination in housing and community development programs may be based on the violation of rights because of discrimination and other violations of civil rights in HUD programs. For example, the failure to ensure meaningful access by persons with limited English proficiency. Applicable laws include:

- Title VI of the Civil Rights Act of 1964 (race, color, national origin)
- Section 109 of the Housing and Community Development Act of 1974
- Section 504 of the Rehabilitation Act of 1973 (disability)
- Title II of the American with Disabilities Act of 1990
- Architectural Barriers Act of 1968
- Age Discrimination Act of 1975
- Title IX of the Education Amendments Act of 1972

Complaints may be filed against any recipient or sub-recipient of HUD financial assistance, including states, local governments, and private entities operating housing and community development and other types of services, programs, or activities. At the time of this report, complaint data has not been received from HUD.

### **Complaint Trends**

Overall, the 2023 National Fair Housing Trends Report shows that private fair housing organizations continue to address the majority of housing discrimination complaints reported throughout the country. The report also revealed that private, non-profit fair housing organizations provide the largest support for people alleging housing discrimination. These groups processed 73.94 percent of complaints filed in 2022 compared to 5.80 percent processed by HUD, 20.15 percent by FHAP agencies, and 0.11 percent by DOJ. The report also revealed that discrimination based on disability accounted for the majority (53.26 percent) of complaints filed with FHOs, HUD, and FHAP agencies. However, the report also showed in 2022, there were 2,490 complaints based on sex, the highest number recorded since 2005 when NFHA began collecting data specifically on sex complaints. Similarly, the report also revealed there was an uptick in all the “other” categories of complaints regarding source of income, marital status, age, and domestic violence with significant increases in complaints regarding source of income and domestic violence.

Complaints by type were most commonly made on the basis of disability, followed by sex and religion. According to the National Fair Housing Alliance 2023 Fair Housing Trends Report, the number of complaints filed nationwide in 2022 was 33,007, which was the

highest number of reported complaints of housing discrimination in a single year<sup>9</sup>. Additionally, there was a startling uptick in hate crime offenses and the number of reported victims of hate crimes.<sup>10</sup>

While outreach and education efforts to inform the public on fair housing protections have resulted in significant progress for the Consortium, more will need to be done in the next five years to ensure that recent fair housing trends are curbed or eliminated and that all residents are provided fair housing choice and access.

---

<sup>9</sup> NFHA, <https://nationalfairhousing.org/resource/2023-fair-housing-trends-report/>

## VII. REVIEW OF PRIOR AND CURRENT FAIR HOUSING ACTIONS

---

### Affirmatively Furthering Fair Housing

Advancing fair housing necessitates addressing historical segregation patterns, ensuring equitable housing options, and creating inclusive communities. To eliminate existing obstacles, it is crucial to identify barriers to fair housing and develop comprehensive strategies with timely actions.

The Analysis of Impediments reviews past efforts and current conditions that may still limit housing choices for individuals protected by State and federal fair housing laws. This section highlights previously identified challenges to fair housing and summarizes the steps taken to address them. The findings from this analysis will help identify ongoing conditions and trends relevant in the Rock County, Janesville, and Beloit regions.

Starting Tuesday, September 8, 2020, HUD's "Preserving Community and Neighborhood Choice" Final Rule officially repealed the 2015 "Affirmatively Furthering Fair Housing" (AFFH) rule and the 1994 Analysis of Impediments to Fair Housing Choice (A.I.) where they appeared in regulation. The new rule aims to reduce the paperwork burden on local grantees and empower entitlement communities by offering greater flexibility in designing and implementing policies tailored to local needs. It does so by removing overly burdensome, intrusive, and inconsistent reporting and monitoring requirements.

Under this new rule, grantees are still required to commit to "using funds to take active steps to promote fair housing." However, their AFFH certifications will be considered sufficient as long as the grantee undertook any actions related to promoting fair housing during the relevant period.

### Previous Impediments to Fair Housing Choice

The barriers to fair housing choice identified in the 2019 Analysis of Impediments to Fair Housing Choice for the City of Beloit, City of Janesville, and Rock County, Wisconsin are listed below, without any specific order or priority. The analysis and status of these barriers are based on the data available at the time and input from community members and stakeholders. Further analysis of past and existing trends is discussed in other sections of this document.

As outlined in the 2019 Analysis of Impediments, these identified barriers provide a roadmap for advancing fair housing protections within its jurisdiction. Reviewing the status of these actions helps to understand the current trends that may still hinder fair housing choice in the region.

The following are detailed descriptions of the impediments as presented in the 2019 Analysis of Impediments.

## Fair Housing Impediments and Goal Outcomes by Jurisdiction

Impediment #1	
<b>An inadequate supply of affordable housing, exacerbated by low vacancy rates.</b>	
<p><b>Contributing Factors:</b> <i>Housing cost burden is a significant problem for many households in Rock County, particularly households of color. The supply of market rate, affordable housing is insufficient to meet the demand of low and moderate-income residents. Other contributing factors to this impediment include:</i></p> <ol style="list-style-type: none"> <li><i>a. High rents, partially because of low vacancy rates</i></li> <li><i>b. Excessive housing provider screening practices and eligibility requirements (according to multiple stakeholders)</i></li> <li><i>c. Frequent evictions</i></li> </ol>	
Goal Outcomes	
City of Beloit	<ul style="list-style-type: none"> <li>• The City funded Legal Action of Wisconsin through ARPA funding to assist households experiencing evictions and/or unsafe property conditions.</li> <li>• Legal Action offers free legal advice, assistance and representation in court depending on the needs of the participant.</li> <li>• Utilized federal funds to support the construction and rehabilitation of single-family homes.</li> </ul>
City of Janesville	<ul style="list-style-type: none"> <li>• Financially supported the construction of a 92-unit multi-family affordable housing project.</li> <li>• Neighborhood and Community Services lead an eviction workgroup to include social services agencies as well as representatives from Legal Action of Wisconsin addressing primary concerns regarding insufficient notice to obtain counsel and advocating for a county-funded program to provide legal services for tenants.</li> <li>• Implemented a Housing Choice Voucher Homeownership Program in 2021 called A Place of My Own.</li> <li>• Continued to work with Housing Choice Voucher Clients, Housing Non-Profits, and Lenders.</li> <li>• Completed the HOME-American Rescue Plan, identifying affordable housing development as the top priority and allocating over 80% of funds towards this goal.</li> <li>• Created a program to retain one year of TIF funding for the purpose of affordable housing</li> </ul>

	<p>development.</p> <ul style="list-style-type: none"> <li>• 65 down payment loans were provided.</li> <li>• Completed the construction of 11 single family homes sold to income eligible buyers.</li> <li>• Completed 63 housing rehabilitation projects to preserve existing affordable housing.</li> <li>• Worked with affordable housing providers to encourage the construction of multi-family housing projects.</li> <li>• Encouraged WHEDA to adjust their formula to reward project development outside of high poverty census tracts.</li> </ul>
Rock County	<ul style="list-style-type: none"> <li>• Allocated County American Rescue Plan Funding to affordable housing to help offset the financing gap.</li> <li>• Utilized federal funds to support the rehabilitation of single-family homes and rental properties.</li> <li>• Implemented a program with Legal Action and a non-profit to provide tenant legal services to reduce evictions and strengthen tenant rights using County-ARPA funds.</li> </ul>

### Impediment #2

#### Zoning and land division restrictions (Janesville and Rock County balance only)

**Contributing Factors:** *In many parts of Rock County, zoning codes don't allow for increased density of housing, multi-family and duplex developments. Minimum home and lot sizes are barriers to the construction and development of more affordable housing options, which would expand housing opportunities for persons of color and lower income households*

#### Goal Outcomes

City of Janesville	<ul style="list-style-type: none"> <li>• Housing and Neighborhood Services participated in the Comprehensive Plan update related to affordable housing. In addition, the City of Janesville has begun a full Zoning Code Update. Housing Service will encourage such things as parking reduction, increased density, approval of accessory dwelling units, etc.</li> </ul>
Rock County	There is no Countywide zoning ordinance for Rock County. Zoning throughout the County is covered through a mix of cities, villages, and towns.

### Impediment #3

#### NIMBYism, community opposition to multi-family and affordable housing units

**Contributing Factors:** *Opposition both by elected officials and residents can prevent needed housing from being developed.*

*Stakeholders indicated that opposition to affordable housing is present in Beloit, Janesville and other municipalities in Rock County.*

**Goal Outcomes**

City of Beloit	The Equal Opportunity Commission of the City of Beloit administers and enforces the City’s local Fair Housing Ordinance. Fair Housing complaints are received by City Staff, referred to an investigator, and conciliation/mediation is facilitated if necessary. The EOC will hear administrative appeals regarding determinations of probable cause and conducts full hearings when needed to determine whether housing discrimination has occurred. The EOC has the authority to impose fines and award damages.
City of Janesville	Participated in programs hosted by the Diversity Action Team of Rock County on the lasting effects of evictions and affordable housing in 2021 and 2022. Presented a Housing Showcase to the Janesville City Council on February 12, 2024, highlighting the need for affordable housing and the obstacles facing affordable housing. Presented at the Janesville Community Breakfast on April 24, 2024, to local leaders regarding the challenges to affordable housing. Enforces its Fair Housing Ordinance.
Rock County	Enforces its Fair Housing Ordinance.

**Impediment #4**

**Racially and economically segregated housing patterns**

**Contributing Factors**

- a. Housing provider discrimination (see more detailed description below).*
- b. The location of affordable housing, whether naturally occurring or publicly subsidized, can contribute to segregation or integration, as well as to residents’ access to opportunities such as education and employment. Maps in earlier sections of this report show that renters are more concentrated in certain census tracts of Beloit and Janesville.*

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

**Goal Outcomes**

City of Beloit	<ul style="list-style-type: none"> <li>• Enforcing fair housing laws ensures that people have equal access to housing opportunities, reducing segregation. The City of Beloit does this through the Equal Opportunity Commission which enforces fair housing law.</li> <li>• Offered homeownership programs on a city-wide basis.</li> <li>• The fixed transit route system was revised to better serve the City’s low-moderate income census tracts, community centers, schools, and employment corridors offering more access to opportunity.</li> </ul>
City of Janesville	<ul style="list-style-type: none"> <li>• Offered homeowner and homeownership programs on a city-wide basis. Implemented a payment standard that is greater than the HUD Fair Market Rent for HCV participants to expand housing choice into areas with higher rent levels, which tend to be in areas with lower poverty levels. Provided information to HCV tenants with schools, bus lines, shopping, and areas of job opportunities, as well as areas of lower poverty levels.</li> <li>• In addition to the HCV Homeownership Program, the City is working with NeighborWorks Blackhawk Region, Acts Housing, and Movin’ Out, Inc. to assist residents in becoming a homeowner.</li> <li>• The City has hired bilingual staff and translated all of our housing and homeownership programs into Spanish.</li> <li>• Enforces its Fair Housing Ordinance</li> </ul>
Rock County	<ul style="list-style-type: none"> <li>• Offered homeownership programs on a county-wide basis outside of the Cities of Janesville and Beloit.</li> <li>• Enforces its Fair Housing Ordinance.</li> </ul>

**Impediment #5**

**Lack of quality affordable housing**

**Contributing Factors**

- According to multiple stakeholders, much older, affordable rental housing in Rock County is in disrepair. Over seventy percent of housing units in Beloit are older than 50 years. In Janesville, 47 percent of housing units are over 50 years old.

- Stakeholders throughout Rock County expressed concerns about various problems associated with poor quality housing, including health issues for residents of these housing units, retaliation (including eviction) when tenants complain to building inspection entities, as well as an overall declining housing stock and tax base.

**Goal Outcomes**

City of Beloit	<ul style="list-style-type: none"> <li>• Completed 18 homeowner rehabilitation projects.</li> </ul>
City of Janesville	<ul style="list-style-type: none"> <li>• Revised our homeowner rehabilitation program to remove barriers of affordability by structuring loans as deferred or forgivable.</li> <li>• Completed 37 homeowner rehabilitation projects.</li> <li>• Neighborhood and Community Services lead an eviction workgroup to include social services agencies as well as representatives from Legal Action of Wisconsin.</li> <li>• Primary concerns regarding sufficient tenant notice to obtain counsel have been addressed as court officials have continued temporary changes originally implemented during the pandemic.</li> </ul>
Rock County	<ul style="list-style-type: none"> <li>• Offers housing rehabilitation programs for persons aged 55 and older, persons with low income, and property owners who rent to families with low income.</li> </ul>

**Impediment #6**

**Lack of consumer education for renters and homebuyers\***

**Contributing Factors**

- Community input suggests that available housing-related education is not reaching many residents of Rock County. Residents need to be connected to:
  - Tenant rights and responsibilities
  - Credit counseling
  - The home purchase process, especially for first-time homebuyers
  - Fair housing rights
  - Numerous historic and current government and industry-created barriers have put nonwhites, persons with disabilities, etc., at a disadvantage in terms of credit, accumulated wealth, education, etc.

City of Beloit	The City partnered with Community Action, ACTS Housing, and NeighborWorks Blackhawk Region to host a “Pathways to Homeownership” event in the Merrill neighborhood (NRSA). Speakers at this
----------------	---

	event provided information about resources for first-time homebuyers, housing rehab loan funds available, Fair Housing, and the City's Equal Opportunities Commission (EOC).
City of Janesville	The City is working with NeighborWorks of the Blackhawk Region, Acts Housing, and Movin' Out, Inc to assist residents in homeownership readiness. These services are offered in multiple languages. The City also posts employment opportunities, job fairs and education programs in our office.
Rock County	The County implemented a program with Legal Action and a non-profit to provide tenant legal services to reduce evictions and strengthen tenant rights using County-ARPA funds.

### Impediment #7

#### Transit limitations (Beloit only)

##### Contributing Factors

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

##### Goal Outcomes

City of Beloit	In 2019, the city moved the Public Transit Division from the Department of Public Works to the Community Development Department to provide opportunities for more input from the public and service provider agencies on Transit Development Plans (TDP). This also allows the Transit Division to consider the transportation needs outlined in the Consolidated Plan, Neighborhood Revitalization Strategy Area (NRSA) Plan, and Analysis of Impediments to Fair Housing (AI). In 2020 and 2021, Beloit Transit's fixed route system was completely revised to better serve the City's low-moderate income census tracts, community centers, schools, and employment corridors. In 2022 the city made additional minor modifications to the routes to better serve the public.
----------------	--

### Impediment #8

#### Insufficient affordable housing accessible for persons with disabilities

##### Contributing Factors

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

supply.

**Goal Outcomes**

City of Beloit	The Consortium members did not specifically target goals to address affordable housing accessible for persons with disabilities. However, each of the jurisdictions offer housing rehabilitation program that would allow homeowners who are disabled to make repairs or retrofit their homes.
City of Janesville	
Rock County	

**Impediment #9**

**Lack of resources for fair housing outreach and enforcement**

**Contributing Factors**

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

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

**Goal Outcomes**

<p>City of Beloit</p>	<ul style="list-style-type: none"> <li>• The City worked with Beloit College through the Duffy Partnership Program to support a semester-long internship to update and develop new outreach materials and suggested outreach events for use by the Equal Opportunities Commission (EOC) in 2023.</li> <li>• The City also updated and distributed materials related to Fair Housing during a housing fair hosted in one of the NRSA neighborhoods. Additionally, Legal Action of Wisconsin hosted a series for residents to educate about landlord/tenant rights and resources available for LMI residents.</li> <li>• The EOC also administers and enforces the City's local Fair Housing Ordinance. Fair Housing complaints are received by City Staff, referred to an Investigator, and conciliation/mediation is facilitated if necessary.</li> <li>• The EOC hears administrative appeals regarding determinations of probable cause and conducts full hearings when needed to determine whether housing discrimination has occurred. The EOC has the authority to impose fines and award damages.</li> <li>• Legal Action of Wisconsin hosted community education events, as well as training for service providers to build broader awareness and understanding of tenant rights.</li> </ul>
<p>City of Janesville</p>	<ul style="list-style-type: none"> <li>• Updated the Fair Housing page on the City's website.</li> <li>• Distributed fair housing information with every Housing Choice Voucher orientation booklet, posters in the lobby, resource bookmarks, assistance with filing formal fair housing complaints.</li> <li>• Adopted Fair Housing Ordinance and annually recognizes the month of April as Fair Housing Month.</li> <li>• Staff also does intake from residents encountering various housing issues and will direct residents to local resources and/or escalate Fair Housing complaints to appropriate State or Federal agencies.</li> <li>• Fair Housing Material has been available at the following events in 2022: Home Buyers Workshop, State of the City Address, presentation to the Civic Academy, Comprehensive Plan Meetings, and the Fourth Ward Park Grand Opening.</li> <li>• Assists residents in filing complaints with Housing and Urban Development and the State of Wisconsin.</li> </ul>

	<ul style="list-style-type: none"> <li>• Refers residents to Legal Action for services.</li> <li>• Translated all Rental Assistance Documents into Mandarin Chinese through a professional translation service.</li> <li>• Cooperated with the US Department of Justice on a large-scale investigation regarding sexual harassment in housing.</li> </ul>
Rock County	<ul style="list-style-type: none"> <li>• The County implemented a program with Legal Action and a non-profit to provide tenant legal services to reduce evictions and strengthen tenant rights using County-ARPA funds.</li> <li>• Legal Action of Wisconsin hosted community education events, as well as training for service providers to build broader awareness and understanding of tenant rights.</li> </ul>
<b>Impediment #10</b>	
<b>Illegal discrimination in the private housing market</b>	
<b>Contributing Factors</b>	
<p>It is difficult to assess the severity of private market discrimination in Rock County based on the number of complaints reported to the U.S. Department of Housing and Urban Development (HUD) and the Wisconsin Equal Rights Division. According to the National Fair Housing Alliance and HUD, illegal housing discrimination is often so subtle that it is not reported by victims, only a small fraction of instances of housing discrimination are reported. Multiple stakeholders from Beloit, Janesville and the balance of Rock County believe housing discrimination is occurring. Housing discrimination complaint data for Rock County from the Metropolitan Milwaukee Fair Housing Council and from the U.S. Department of Housing and Urban Development (found in the Fair Housing Enforcement section) verifies that discrimination.</p>	
City of Beloit	<ul style="list-style-type: none"> <li>• The City updated and distributed materials related to Fair Housing during a housing fair hosted in one of the NRSA neighborhoods.</li> <li>• Legal Action of Wisconsin hosted a series for residents to educate about landlord/tenant rights and resources available for LMI residents.</li> <li>• The City funded Legal Action of Wisconsin through ARPA funding to assist households experiencing evictions and/or unsafe property conditions. Legal Action offers free legal advice, assistance and representation in court depending on the needs of the participant.</li> </ul>
City of Janesville	<ul style="list-style-type: none"> <li>• Gender Identity and Gender Expression were previously added to the City of Janesville Ordinances in 2014.</li> </ul>

Rock County	<ul style="list-style-type: none"> <li>The County implemented a program with Legal Action and a non-profit to provide tenant legal services to reduce evictions and strengthen tenant rights using County-ARPA funds.</li> </ul>
-------------	--

### Impediment #11

#### Fair Housing enforcement in the region does not include testing as a method of investigation.

##### Contributing Factors

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

##### Goal Outcomes

City of Beloit	The EOC drafted a Request for Proposals (RFP) for Fair Housing public education, training, and testing services. The RFP will be released in early 2024.
City of Janesville	The City updated the Fair Housing Ordinance to reflect the recommendations in the ordinance’s review in the Fair Housing Enforcement section.
Rock County	The County has not taken any specific action to offer testing as a method of investigation.

### Impediment #12

#### Predatory land contracts

##### Contributing Factors

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

##### Goal Outcomes

City of Beloit	The previous AI did not set any specific goals to address this impediment. Access to fair housing rights has been made available in various languages to provide general education for persons with Limited English Proficiency on their rights.
City of Janesville	
Rock County	

### Impediment #13

#### Lack of mental health and substance abuse services

**Contributing Factors**

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

**Goal Outcomes**

City of Beloit	The City supported a Community Social Worker position (CSW) through Family Services. The CSW provided in-depth case management including mental health care.
City of Janesville	The City provided CDBG funding to public service agencies that provide mental health services.
Rock County	Rock County Human Services Department provides mental health and substance abuse services through the Comprehensive Community Services program.

**Impediment #14****Barriers to homeownership for Black and Latino residents****Contributing Factors**

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

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

**Goal Outcomes**

City of Beloit	The City made efforts to increase access to homeownership opportunities. This city through partnerships with Community Action, NeighborWorks, ACTS Housing, and the Purchase/Rehab/Resale program that is being operated under the NRSA's efforts.
City of	<ul style="list-style-type: none"> <li>• Housing Services is working with Acts Housing to connect housing opportunities with people of color.</li> </ul>

Janesville	<ul style="list-style-type: none"> <li>• We are posting employment opportunities, job fairs, and educational programs in our office.</li> <li>• Have hired bilingual staff in the office and translated all Rental Assistance Documents into Mandarin Chinese through a professional translation service.</li> </ul>
Rock County	The County has made efforts to increase access to homeownership opportunities through its Down Payment Assistance program. Although not targeted specifically to Black and Hispanic homebuyers, more emphasis has been placed on providing more access.

Table 48: Source: City of Beloit, City of Janesville, and Rock County, Wisconsin 2019 Analysis of Impediments to Fair Housing Choice

## VIII. IMPEDIMENTS TO FAIR HOUSING CHOICE

---

The following are the identified impediments based on the assessment conducted throughout the 2024 Analysis of Impediments to Fair Housing Choice process. The newly identified impediments to fair housing access and choice represent ongoing issues in the Rock County, Beloit, and Janesville area. Of the previously identified impediments, a lack of public awareness of fair housing laws, mortgage lending practices and denial rates among certain races, lack of landlord tenant coordination and limited public transportation in certain areas are still present in the region and will continue to be addressed. Below is a list of new impediments:

### Impediment #1

#### **Insufficient Tenant Protections in the Rental Market**

Affordable, stable, and accessible housing, along with a wide range of housing options, are essential for creating just and equitable communities. However, the power imbalance between renters and landlords increases the risk of housing instability, harassment, and homelessness for tenants, further exacerbating racial inequity. Tenant protections, passed in the form of laws and policies, are critical to preventing evictions and keeping renters stably housed.

#### **Contributing Factors**

- **Absentee Landlords** – Absentee ownership in residential real estate often refers to a situation where an individual owns a property but does not occupy or directly manage it. The absentee owners may be individuals who have invested in rental properties, inherited properties, or own vacation homes that they do not reside in year-round. One issue with absentee landlords is the potential for neglect and mismanagement of the property. Since the real estate owner is not physically present, issues like deferred maintenance and tenant dissatisfaction can arise. Issues with absentee landlords was mentioned in each needs assessment meeting and sited as a major issue contributing to high housing costs, frequent evictions, and poor housing quality.
- **Legal safeguards to protect tenant rights** - Laws and regulations enacted at the federal, state, or local level to protect tenants' rights and ensure fair treatment in the rental market are insufficient. When these safeguards are insufficient, tenants may face numerous challenges.
- **Discrimination in the rental market based on source of income** - Renters who receive a verifiable source of legal income, such as social security, child support, SSI and Section 8 vouchers can still face illegal discrimination. Such practices

unfairly limit housing options for individuals who are financially capable of paying rent but are discriminated against due to the nature of their income.

- **Excessive Tenant Screening Requirements** - Imposing overly stringent criteria on potential renters, such as high credit scores, extensive background checks, or excessive income verification. These requirements can disproportionately affect individuals with low-income levels, people with past financial difficulties, or those from marginalized communities, making it more challenging for them to secure housing despite being otherwise qualified.

## Recommendations

Impediment #1 - Insufficient Tenant Protections in the Rental Market			
Recommendation	Rock County	Beloit	Janesville
Strengthen tenant protection laws to ensure fair treatment in the rental market.	☒	☒	☒
Encourage and provide financial support for resources and services available to help tenants navigate the rental market, assert their rights, and resolve disputes with landlords. Insufficient support systems can leave tenants vulnerable and unable to effectively address issues that arise.	☒	☒	☒
Implement eviction prevention programs to assist renters facing eviction stay in their homes.	☒	☒	☒
Incentivizing Landlords: Offering incentives to landlords, such as tax breaks or subsidies, for accepting tenants with non-traditional income sources can encourage more inclusive rental practices.	☒	☒	☒
Public Awareness Campaigns: Educating landlords, property managers, and the public about the illegality and unethical nature of source of income discrimination can reduce its occurrence. Public campaigns can also inform tenants of their rights and the resources available to them.	☒	☒	☒
Enforcing Fair Housing Laws: Strengthening and enforcing local, state, and federal fair housing laws that prohibit discrimination based on source of income can help protect renters from unfair treatment.	☒	☒	☒
Monitoring and Accountability: Implementing a system to monitor rental practices and hold discriminatory landlords accountable can deter unfair practices. This could involve regular audits, reporting requirements, and penalties for non-compliance.	☒	☒	☒

## Impediment #2

### Housing Affordability/Cost Burden

High rents in relationship to the earnings of average workers put housing affordability out of reach for many. Housing is the largest monthly cost for most households. Owners and renters with a severe cost burden are at risk of homelessness. Cost-burdened households that experience a financial setback often must choose between rent and food or rent and health care for their families or face eviction or foreclosure.

Cost-burdened households are more likely to face eviction, foreclosure, or displacement due to their inability to consistently meet high housing costs, especially if they experience a drop in income. The high cost of housing reduces the options available to cost-burdened households, often forcing them to live in less desirable or unsafe areas, farther from employment opportunities, quality schools, and essential services. Additionally, for cost-burdened renters, saving for a down payment on a home becomes nearly impossible, limiting their ability to transition from renting to owning and building wealth over time. Last, the financial stress associated with being cost-burdened can negatively affect mental and physical health, leading to chronic stress, anxiety, and other health problems. Additionally, the inability to afford adequate housing may result in living in substandard conditions that further harm health.

Overall, the incidence of cost burdened decreased from 2012 to 2022 in Rock County, Beloit, and Janesville. But housing cost burden remains an issue for households earning less than \$50,000.

### Contributing Factors

- **Increased job growth and steady or decrease in housing (Beloit and Rock County)**  
- When the number of jobs rises faster than the housing stock is expanding, the excess demand pressure can cause housing prices and rents to rise and traffic congestion to increase as employees locate outside the city.
- **Increased Housing Units and Employment Growth (Janesville)** – Increased demand for housing due to the increase in jobs in the area causes prices to increase. However, smart growth in housing will prevent increased vacancies, abandonment, or general decline in the housing quality.
- **Reduction in Rental Units below \$500 and \$1,000 per Month** - Based on affordability standards defining an affordable rent at or below 30% of income, monthly rent levels at \$500 and \$1,000 are affordable to households with annual incomes of \$20,000 and \$40,000, respectively. On average, the region lost nearly 30% of units in this price range contributing to the loss of housing options and increased cost burden for people with low and very low incomes.

Impediment #2 - Housing Affordability/Cost Burden			
Recommendation	Rock County	Beloit	Janesville
<b>Develop New Affordable Units:</b> Invest in the construction of affordable housing, including low-income housing tax credits (LIHTC) and other incentives for developers to build homes that are accessible to families with lower income levels.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Preserve Existing Affordable Housing:</b> Protect and renovate existing affordable housing units to prevent them from falling into disrepair or being converted into market-rate housing.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Expand Rental Assistance Programs:</b> Expand programs like Section 8 housing vouchers that help households with low-income levels afford rent in the private market. Implement or expand local rent subsidy programs that directly assist renters with high housing costs.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Mandate or Incentivize Affordable Units:</b> Require or incentivize developers to include affordable housing units in new residential developments, ensuring a mix of housing options in various neighborhoods.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Provide Financial Assistance to Homebuyers:</b> Offer down payment assistance in the form of grants or low-interest loans for down payments to help households with low and moderate-income levels purchase homes. Expand access to favorable mortgage terms for first-time homebuyers or those with lower incomes through mortgage assistance programs.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Support Financial Literacy and Counseling:</b> Provide access to housing counseling and financial literacy programs to help households budget effectively, avoid predatory loans, and understand their housing options. Offer counseling and assistance to homeowners facing foreclosure to help them stay in their homes.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Promote Energy Efficiency:</b> Expand programs that help low-income households reduce utility costs through energy efficiency improvements or assistance with energy bills. Fund initiatives that help low-income homeowners and renters make their homes more energy-efficient, thereby reducing overall housing costs.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Impediment #3**

**Racial and Ethnic Disparities in Housing**

Racial and ethnic disparities in housing refer to the unequal treatment and outcomes that individuals from different racial and ethnic backgrounds experience in housing markets.

These disparities manifest in various ways, including differences in homeownership rates, access to affordable housing, increased housing cost burden, neighborhood quality, and exposure to discriminatory practices. These inequalities are deeply rooted in historical practices and continue to perpetuate economic and social disadvantages for minority communities.

Homeownership is often considered a key indicator of financial stability and wealth accumulation, but there are disparities in homeownership rates for Black or African American households. In Rock County the homeownership rate was only 29.7 percent compared to 73 percent of White households. It is also worth noting that Black or African American homeownership in Rock County was also significantly lower than Black or African American homeownership nationally at 43.1 percent. Homeownership rates were slightly higher in Beloit at 34.8 percent but still lower than White counterparts at 65.4 percent for Beloit and 43.1 percent nationally. Last, homeownership in Janesville was significantly lower for Black or African Americans at 13.2 percent compared to 69.3 percent for White homeowners and 43.1 percent nationally. It's worth noting that homeownership was slightly less than the state and the country for all races and ethnicities in Janesville and Beloit.

High average neighborhood poverty rates for a certain group, or wide variations in average neighborhood poverty rates across groups, can indicate disparities in access to housing and neighborhoods that offer educational and economic mobility opportunities. A neighborhood's poverty rate—calculated as the share of a given census tract's residents that have incomes at or below the federal poverty level—is a commonly used proxy for overall neighborhood quality and access to educational or economic mobility opportunities. Neighborhood poverty rates of 30 to 40 percent or higher are typically considered high and potentially detrimental to individual and family health and well-being, while neighborhood poverty rates at or below ten percent are associated with a range of positive long-term outcomes for adults and children. In Rock County, the average neighborhood poverty rate was high for all races except Native Hawaiian and Pacific

### **Contributing Factors:**

- **Systemic Inequities:** Longstanding systemic inequities, including discriminatory practices in housing, employment, and lending, have limited wealth accumulation and access to affordable housing for minority groups.
- **Unequal access to opportunity** refers to the disparities in the availability and quality of resources, services, and chances for success that different groups of people experience. This can lead to significant gaps in outcomes, perpetuating cycles of disadvantage and limiting the potential for individuals and communities to thrive.

Impediment #3 - Racial and Ethnic Disparities in Housing			
Recommendation	Rock County	Beloit	Janesville
<b>Expanding Homeownership Opportunities:</b> Offer programs that provide down payment assistance, affordable mortgage options, and financial education can help increase homeownership rates among minority households. <b>(Janesville and Beloit)</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Increasing Access to Affordable Housing:</b> Expanding affordable housing programs, including development of affordable units in diverse neighborhoods, can help address the housing needs of minority communities.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Improve Affirmative Marketing Plans:</b> Ensure that affirmative marketing plans are in place and are effective in promoting affordable housing opportunities to diverse groups of residents, including people of color.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Enforcement of Fair Housing Laws:</b> Strengthening the enforcement of the Fair Housing Act and other anti-discrimination laws is essential to combat discriminatory practices in both the rental and homebuying markets.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Impediment #4**

**Inadequate Fair Housing Education**

The lack of sufficient information and awareness about fair housing rights and responsibilities among both housing providers and residents can lead to widespread ignorance of fair housing laws, resulting in discriminatory practices, unintentional violations, and a lack of enforcement. As the City continues to expand with an increasingly diverse population, fair housing education must be continuous and presented in a context that is relative to the current community concerns.

Education and awareness of fair housing laws is imperative to alleviating housing discrimination. Nearly half of the survey respondents stated they did not know where to file a fair housing complaint. The survey also supports the notion that increased education is also needed for property owners. Of those respondents to the survey believing they had been discriminated against, more than 85 percent said a property owner had perpetrated the discrimination followed by 12 percent for real estate professional and mortgage lenders.

**Contributing Factors**

- **Lack of Awareness and Training:** Insufficient training for housing providers, real estate professionals, and landlords can lead to a lack of understanding of fair

housing laws and best practices. Additionally, inconsistent implementation of training programs results in variability in the quality and frequency of fair housing resulting in uneven levels of knowledge among housing professionals.

- **Insufficient Public Awareness:** Limited outreach efforts or ineffective public awareness campaigns can leave residents unaware of their fair housing rights and how to report discrimination.
- **Limited English Proficiency:** Educational materials and resources may not be available in multiple languages, leaving non-English-speaking populations underserved. It is also worth noting that educational materials may be written too high level for the average person to understand.
- **Limited Resources:** Fair housing enforcement agencies and community organizations may lack the resources to effectively educate the public and enforce fair housing laws. Additionally, there is a shortage of funding for educational programs and resources dedicated to fair housing.
- **Accessibility Issues:** Online resources and educational materials may not be accessible to individuals without reliable internet access or technological devices. Also, inadequate physical accessibility of educational resources or events can limit participation by individuals with disabilities.

<b>Impediment #4 - Inadequate Fair Housing Education</b>			
<b>Recommendation</b>	<b>Rock County</b>	<b>Beloit</b>	<b>Janesville</b>
<b>Public Awareness Campaigns:</b> Launching widespread campaigns to inform the public about fair housing rights and how to recognize and report discrimination.	☒	☒	☒
<b>Training for Housing Providers:</b> Offering training programs for landlords, property managers, and real estate professionals to ensure they understand and comply with fair housing laws.	☒	☒	☒
<b>Educational Resources:</b> Developing and distributing multilingual educational materials that explain fair housing laws and resources available for both tenants and housing providers.	☒	☒	☒
<b>Community Outreach:</b> Engaging with community organizations, advocacy groups, and local leaders to spread awareness and provide fair housing education at the grassroots level.	☒	☒	☒
<b>Support for Victims:</b> Providing accessible legal support and resources for individuals who believe they have experienced housing discrimination, including guidance on how to file complaints.	☒	☒	☒
<b>Fair Housing Education:</b> Enhance educational opportunities to ensure renters and prospective	☒	☒	☒

homebuyers are aware of their rights under the law. Increase fair housing education helps landlords and other real estate professionals to understand their obligations so they can stay in compliance with fair housing laws.			
--	--	--	--

**Impediment #5**

**Lack of Quality Housing**

In high-cost cities, towns, and counties, individuals and families with lower income levels often need to make tradeoffs to find or keep housing they can afford. In some cases, these tradeoffs mean living in low-quality housing that may pose health and safety risks. When left unaddressed, quality and safety issues can pose serious threats to residents’ well-being, especially young children and older adults.

In approaching this challenge, it is helpful to remember that in some cases, poor quality conditions may be the result of neglect, while in other cases, landlords renting units at low rents simply lack the resources needed to make repairs. Current rent levels may not generate enough revenue to support needed improvements, or owners may be unable to find a lender to lend to them. In neighborhoods with higher levels of poverty and vacancy rates, otherwise well-intentioned owners may be unable to cover the cost of necessary repairs without raising the rent to levels that the current market will not support.

**Contributing Factors**

- **Older Housing Stock** - All else being equal, older homes tend to require major capital investment to decent and suitable for living. The median year a housing unit was built in Rock County, Beloit, and Janesville is 1969, 1957, and 1972 respectively. For context, the median year for the U.S. as a whole was 1979. More than half the housing stock was built before 1969.
- **Absentee Landlords** – These landlords own a property but do not occupy or directly manage it. These individuals may be individuals who have invested in rental properties or inherited properties. Since the real estate owner is not physically present, issues like deferred maintenance and tenant dissatisfaction can arise. Issues with absentee landlords was mentioned in each needs assessment meeting and sited as a major issue contributing to high housing costs, frequent evictions, and poor housing quality.

Impediment #5 - Lack of Quality Housing			
Recommendation	Rock County	Beloit	Janesville
Monitor existing housing quality by taking a proactive approach to ensuring the safety and quality of the housing stock.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Work with owners to address code violations. Code enforcement can help to ensure that existing housing remains safe and habitable.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Provide assistance or incentives to owners of lower-cost rental housing in need of repairs to make necessary repairs and upgrades and also keep rents low.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Help older homeowners make necessary repairs and modifications. Older homeowners on a fixed income may have difficulty covering the cost of regular home maintenance and may be unable to take care of repairs on their own.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

## VII. CONCLUSION

Through this Analysis of Impediments to Fair Housing Choice, several barriers have been identified that restrict the housing choice available to residents of the Rock County, Beloit, and Janesville area. These barriers may prevent residents from realizing their right to fair and equitable treatment under the law. It is imperative that residents know their rights and that those providing housing or related services know their responsibilities. The Consortium will work diligently toward achieving fair housing choices for its residents using the recommendations to address the identified impediments. However, it should be noted that these impediments are largely systemic and will require effort from both private sector and public sector actors to correct. The region has an important role to play but cannot, on its own, bring about the change necessary to remove these impediments to fair housing choices.

The recommendations proposed in this document address impediments relative to the need for fair housing education, the age of housing stock, unequal distribution of resources, disparities in lending practices, and affordable housing location. Implementation of the recommendations can assist the city in achieving the reality of an open and inclusive region that truly embraces fair housing choices for all its residents.