

REGIONAL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

ST. LOUIS HOME
CONSORTIUM

APRIL 2021

Prepared for

ST. LOUIS COUNTY
ST. CHARLES COUNTY
JEFFERSON COUNTY
CITY OF FLORISSANT
CITY OF O'FALLON

and the

HOUSING AUTHORITY
OF ST. LOUIS COUNTY

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April 2021

ST. LOUIS HOME CONSORTIUM

St. Louis County

St. Charles County

Jefferson County

City of Florissant

City of O'Fallon

Housing Authority of St. Louis County

**Prepared for the St. Louis HOME Consortium by
Mosaic Community Planning, LLC**



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CHAPTER 1.

INTRODUCTION

The purpose of this Regional Analysis of Impediments to Fair Housing Choice is to study a broad array of public and private policies, practices, and procedures affecting housing choice across the St. Louis region. This document will provide detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates in the region with a foundation upon which to implement strategies that will address disparities in housing needs and in access to opportunity; support integrated living patterns; and maintain compliance with civil rights and fair housing laws.

FAIR HOUSING PLANNING

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

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

Local communities that receive grant funds from HUD through its entitlement process have typically satisfied this obligation by performing an “Analysis of Impediments to Fair Housing Choice” (AI). In an AI, grantees evaluate barriers to fair housing choice and develop strategies and actions to overcome identified impediments based on their histories, circumstances, and experiences. Through this process, communities promote fair housing choice for all persons, including classes protected under the Fair Housing Act, and promote racially and ethnically inclusive patterns of housing occupancy, identify structural and systematic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities.

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

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

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

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

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

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

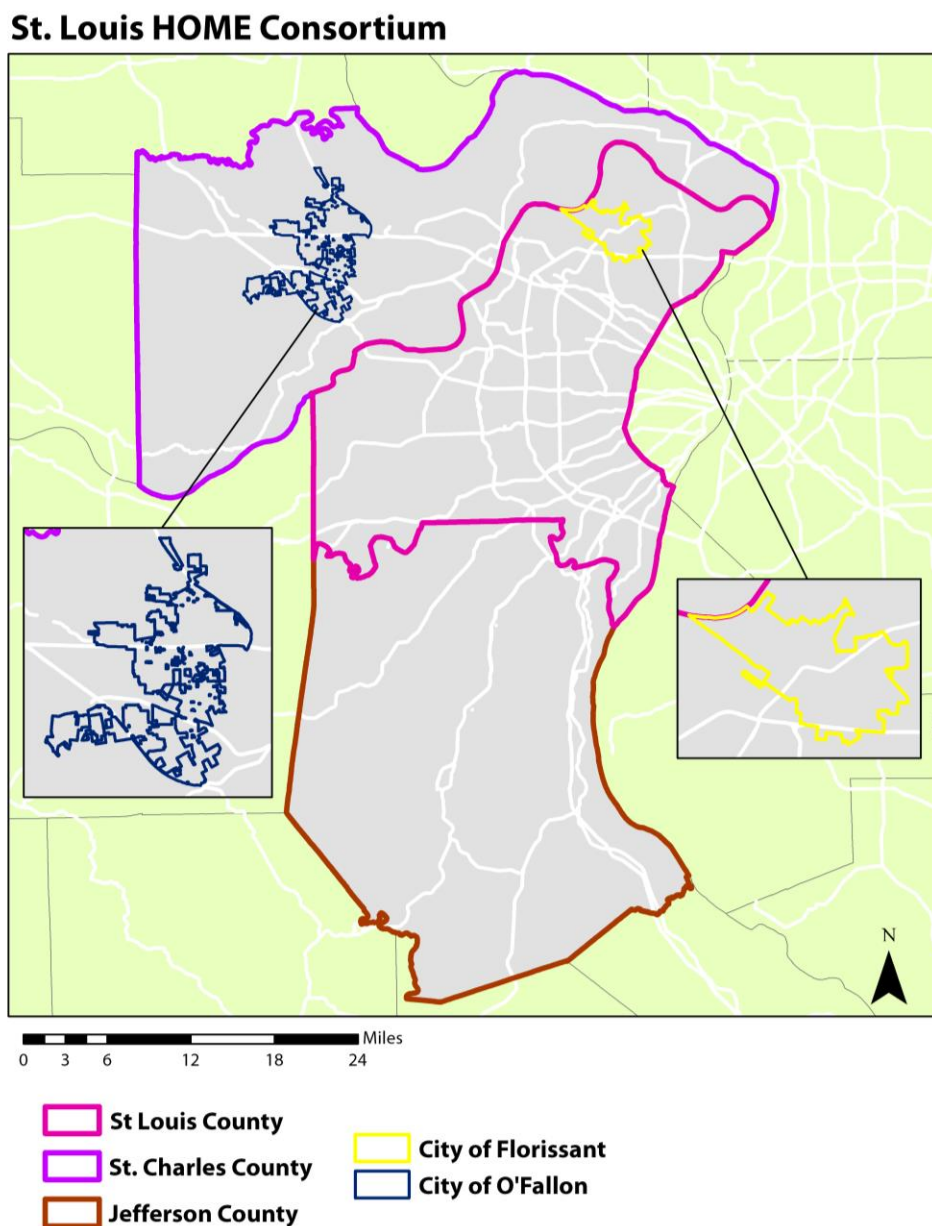
To assist grantees and housing authorities affirmatively further fair housing, HUD began providing publicly-available data, maps, and an assessment tool to use to evaluate the state of fair housing within their communities and set locally-determined priorities and goals. HUD's final rule originally mandated that most grantees begin submitting to HUD an assessment developed using these tools in 2017; however, a 2018 HUD notice withdrew the requirement to prepare such assessments. A subsequent notice further required that grantees instead prepare and keep on file a current Analysis of Impediments to Fair Housing Choice. In September of 2020, HUD repealed its 2015 AFFH rule altogether, however, absent any substitute guidance from HUD on precisely how to assure compliance with their obligations to affirmatively further fair housing, many grantees continue to prepare AIs as a fail-safe measure. By periodically conducting an AI and working to implement the policies and programs proposed by the analysis, grantees provide themselves a solid footing for their AFFH certification.

Mosaic Community Planning assisted the members of the St. Louis HOME Consortium with the preparation of this Regional Analysis of Impediments to Fair Housing Choice. It follows the requirements in HUD's *Fair Housing Planning Guide* but also complies with the regulations and assessment tool features established in HUD's 2015 final rule. In several chapters, it incorporates the maps and data developed by HUD for use by grantees as part of the Affirmatively Furthering Fair Housing final rule.

THE STUDY AREA

This Regional Analysis of Impediments has been developed for the St. Louis HOME Consortium, a group consisting of St. Louis County, St. Charles County, Jefferson County, the City of Florissant, the City of O'Fallon, and the Housing Authority of St. Louis County. The Consortium was first formed in 2002 under HUD regulations allowing contiguous jurisdictions to join together under intergovernmental agreements to receive HOME funding that they would not independently qualify for based on their individual populations. Because housing markets and fair housing issues do not typically stop at county or municipal boundaries, a regional study allows for a more comprehensive understanding of the issues. The map below illustrates the Consortium's geography.

FIGURE 1 – STUDY AREA MAP



DEFINITIONS

Affirmatively Further Fair Housing – In keeping with the text of HUD’s 2015 *Affirmatively Furthering Fair Housing* regulation, to Affirmatively Further Fair Housing Choice (AFFH) is to take “meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.”²

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

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

Fair Housing Choice – In carrying out this Regional Analysis of Impediments to Fair Housing Choice, the St. Louis HOME Consortium used the following definition of “Fair Housing Choice”:

- The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

Impediments to Fair Housing Choice – As adapted from the HUD *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include:³

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

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

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

² “Affirmatively Furthering Fair Housing; Final Rule,” published July 16, 2015, at 80 FR 42272.

³ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

St. Louis HOME Consortium – A group consisting of St. Louis County, St. Charles County, Jefferson County, the City of Florissant, the City of O’Fallon, and the Housing Authority of St. Louis County that is joined together for the purpose of accessing federal funds under the HOME Program.

St. Louis MSA – Technically the “St. Louis, MO-IL Metropolitan Statistical Area”, this geographic region comprises the greater St. Louis region and is used as a basis for comparison throughout this report. The MSA is a larger geography than the HOME Consortium and, in addition to the Consortium jurisdictions, also includes the City of St. Louis; Franklin, Lincoln, and Warren Counties in Missouri; and the Illinois counties of Bond, Calhoun, Clinton, Jersey, Macoupin, Madison, Monroe, and St. Clair.

DATA SOURCES

Decennial Census Data – Data collected by the Decennial Census for 2010 and 2000 is used in this Assessment (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- 2010 and 2000 Census Summary File 1 (SF 1) – This dataset contains what is known as “100% data,” meaning that it contains the data collected from every household that participated in the Census and is not based on a representative sample of the population. Though this dataset is broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.
- 2000 Census Summary File 3 (SF 3) – Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the “long form” Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value. The SF 3 dataset was discontinued for the 2010 Census, but many of the variables from SF 3 are now included in the American Community Survey.

American Community Survey (ACS) – The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census’s SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- ACS Multi-Year Estimates – More current than Census 2010 data, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 1-year estimates. The 2014-2018 ACS 5-year estimates are used most often in this report.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) – HUD’s AFFH Data and Mapping Tool provides a series of online, interactive maps and data tables to assist grantees in preparing fair housing analyses. Topics covered include demographics and demographic trends; racial and ethnic segregation; housing problems, affordability, and tenure; locations of subsidized housing and Housing Choice Voucher use; and access to educational, employment, and transportation opportunities. This report uses HUD’s latest data and maps, AFFHT0006, which was released in July 2020. HUD’s source data includes the American Community Survey (ACS), Decennial Census / Brown Longitudinal Tract Database (BLTD), Comprehensive Housing Affordability Strategy (CHAS), Longitudinal Employer-Household Dynamics (LEHD), HUD’s Inventory Management System (IMS) / Public and Indian Housing (PIH) Information Center (PIC), and others. A complete list of data sources may be found in the Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation which is no longer published or supported by HUD, but a copy preserved by the Urban Institute may be found online at <https://urban-data-catalog.s3.amazonaws.com/drupal-root-live/2020/07/31/AFFH-Data-Documentation.pdf>.

Previous Plans, Codes, and Works of Research – This AI is supported by, and in some cases builds upon, previous local plans, policies, and works of research prepared for the members of the Consortium, including:

- United Way of Greater St. Louis’s 2020 *Community Needs Assessment*
- *Forward Through Ferguson*, the October 2015 report of The Ferguson Commission
- Various articles and pieces of analysis by With Action, www.withaction.org
- The Consolidated Plans, Annual Action Plans, and Consolidated Annual Performance Evaluation Reports (CAPERs) from St. Louis County, St. Charles County, Jefferson County, Florissant, and O’Fallon
- The Admissions and Continued Occupancy Policy (ACOP), Administrative Plan, and Annual PHA Plans from the Housing Authority of St. Louis County

CHAPTER 2.

COMMUNITY PARTICIPATION PROCESS

COMMUNITY ENGAGEMENT OVERVIEW

An important component of the research process for this Analysis of Impediments to Fair Housing Choice involved gathering input regarding fair and affordable housing conditions, perceptions, and needs in the St. Louis HOME Consortium counties and cities. The project team used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders, including stakeholder interviews and a community-wide survey.

Stakeholder Interviews

The planning team engaged with stakeholders representing a variety of perspectives through in-depth individual interviews. Interviews typically lasted 45 minutes to one hour and included discussions about barriers to fair housing, discrimination, access to opportunity, and fair housing resources. Twenty-seven (27) community stakeholders participated in interviews with the planning team. Participating stakeholders represented a range of viewpoints, including affordable housing, community development and planning, education, transportation, health services, homelessness services, senior services, family services, people with disabilities, and others. Participants included representatives from the following organization, agencies, and institutions:

- A Caring Plus Foundation
- Beyond Housing
- Calvary Church in city of St. Peters, St. Charles County
- Community Council of St. Charles
- Delta Center
- Disability Resource Association (Jefferson County, metropolitan St. Louis, and surrounding counties)
- Economic Development Center of St. Charles County
- Forward through Ferguson
- Francis Howell School District (St. Charles County)
- Habitat for Humanity St. Louis
- Housing Authority of St. Louis County
- Legal Services of Eastern Missouri, Inc., The Neighborhood Vacancy Initiative
- Metropolitan St. Louis Equal Housing and Opportunity Council (EHOC)
- MORides
- Northeast Community Action Corporation (NECAC)
- Restore St. Charles
- Select O’Fallon Economic Development
- SHED (Safe Homes for the Elderly and Disabled)
- St. Charles County Habitat for Humanity

- St. Charles Housing Authority
- St. Charles County Housing Team
- St. Louis Community Council
- St. Louis County Continuum of Care
- St. Louis County Department of Human Services
- St. Louis County District 1
- St. Louis County Office of Family and Community Services
- Sts. Joachim and Ann Care Service
- Tri-County Continuum of Care (St. Charles, Lincoln, and Warren counties)
- Washington University Brown School (school of social work, social policy, and public health)

Project Website

The project website, fairhousingMO.com, provided information about the study, linked to the community survey, and directed residents to local and national fair housing resources and information about the St. Louis HOME Consortium.

Community Survey

Another method for obtaining community input was a 36-question survey available to the general public, including people living and/or working in the HOME Consortium area and other stakeholders. The survey was available from August through December 2020 via the project website and online link. The planning team also sent 401 surveys by mail to residents of the St. Louis Housing Authority and provided 50 hard copy surveys to the Sts. Joachim and Ann Care Service to support participation from low-income residents in the region. A total of 301 survey responses were received.

Community Meetings/Hearings

Three virtual community meetings were held during development of the Analysis of Impediments. Conducted over Zoom, each meeting was focused on one of the three counties making up the HOME Consortium. During each meeting, the draft AI was presented and a facilitated community discussion followed wherein the Consortium and its planning team sought feedback on the data and analysis and the community’s input on strategies to address each of the proposed impediments. A total of 40 people joined the three meetings and meeting details are listed below:

Jefferson County Meeting	St. Charles County & O’Fallon Meeting	St. Louis County, Florissant, and HASLC Meeting
Monday, March 15	Monday, March 15	Thursday, March 18
1:00 – 2:00 p.m.	5:00 – 6:00 p.m.	5:00 - 6:00 p.m.

The St. Louis HOME Consortium received one formally-submitted comment on the draft AI and it is included in Appendix I.

Publicity for Community Engagement Activities

Advertisements for the community survey targeted the general public, as well as nonprofits, service providers, housing providers, and others working with low- and moderate-income households and special needs populations. Public notice of community engagement opportunities was given to residents through news announcements on the project website (fairhousingMO.com), social media, and notices in the St. Louis Post-Dispatch newspaper. Project flyers were emailed to more than 80 contacts representing a variety of viewpoints, including elected officials and staff, local government agencies, housing authority staff, housing developers, nonprofit organizations, homeless housing and service providers, mental health service providers, organizations serving people with disabilities, family and senior services, workforce development organizations, and others.

COMMUNITY ENGAGEMENT RESULTS

Comments from stakeholder interviews and the results of the community survey are summarized below. While this summary details general themes discussed in interviews, the full list of comments from stakeholder interviews are included in Appendix II.

Stakeholder Interview Results

1. What types of housing needs are greatest in the region? Are there areas where the need is greater than others?

Residents and stakeholders discussed a wide range of housing needs in the HOME Consortium area, with emphasis on the following themes:

- Need to increase housing affordability and supply
- Need for specific housing types
- Need for housing accessible for people with disabilities and seniors
- Need for housing with accessible transportation and walkability
- Issues of jobs-housing balance
- Need for home rehabilitation and repair
- Issues of foreclosure and vacancy
- Segregation, concentration of poverty, and location of affordable housing
- Need for homeownership opportunities
- Employment and disparate outcomes for Black residents
- Zoning that reduces opportunities for affordable housing
- Lack of housing opportunities for residents using Housing Choice Vouchers and need for source of income protections
- Evictions and need for additional resources
- Homelessness
- Opposition to affordable housing
- Fragmentation among jurisdictions

- Other barriers to affordable housing development
- Property taxes

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

Residents and stakeholders noted multiple areas of opportunity in the HOME Consortium counties, noting the following:

- St. Charles County attracts a lot of families. The houses might be less expensive and newer than in west St. Louis County. The attractiveness of price. Everything is new- roads, stores, hospital. The county normally gets a lot of families more than singles or young professionals. A lot of our larger cities are some of the safest in the US. Crime rates are lower in St. Charles County.
- St. Charles County has about 300,000 residents, and really all of the municipalities are good places to live. Some county subdivisions and mobile home communities are run down, but they're all in good school districts and good areas. Wentzville is the fastest growing community with many subdivisions.
- St. Louis County and St. Charles County have incredible park systems. The library system in St. Charles County is tremendously supportive and invested in the community.
- The inner ring suburbs, such as Richmond Heights and Maplewood, are very popular. The school district used to be majority Black, and the number of students of color continued to decrease as wealthy white families are buying up housing. There is a need to increase the affordable housing stock.
- Central suburbs like Clayton, Ladue, Richmond Height, and Creve Coeur are seen as very affluent and nice communities. The schools in Kirkwood and Webster Groves have a very good reputation. South St. Louis County has lower income areas, but is they are not concentrated like in North St. Louis County.
- Many of the older inner-ring suburbs have rising real estate prices as young professionals are purchasing more affordable housing. In lots of neighborhoods in the inner-ring- Maple wood, Richmond Heights, Clayton, University city- the real estate is getting more expensive.
- Within St. Louis County, the more affluent areas are Clayton, the seat of the county government, Kirkwood, and Lindbergh. In all of those areas the home values are high, and it's a challenge to find affordable housing. Along I-64, property values tend to increase toward the west.
- Webster Groves is a pretty diverse neighborhood, a historic Black neighborhood that they are trying to honor and not gentrify. They have interracial groups, including the Alliance for Racial Dignity. Webster Groves is a good model of a place that has good access to schools, low poverty, and low violence, but is not so homogenously white. Webster Groves implemented a source of income protections with strong teeth, and they are talking about establishing a community land trust.
- As you move from St. Louis City, most of the migration is of Black residents to north St. Louis County (District 1). This is the first area they land that they can afford and there aren't

covenants to keep people out. As people move west, they take the resources with them. The inner ring suburbs are left with fewer businesses and a reduced tax base.

- People prefer the Arnold (northern) area of Jefferson County because the public transportation is better and proximity to healthcare providers in St. Louis. There are more retail opportunities in the northern part of the county.
- Typically more suburban areas are better funded. In areas in the city and north St. Louis County, the effects of redlining are strongly apparent.
- People who say they want diversity may want to live in Tower Grove south/east, Fox Park, or Benton Park. There are parts of the city people may avoid because of racial stereotypes.
- Florissant and the areas further west are areas of opportunity. People are moving there, perhaps for the schools or the opportunities for newer housing stock in those areas. Attracting businesses and families is a challenge for the inner ring suburbs.
- The municipalities in the I-70 corridor- the cities of St. Charles, St. Peters, O'Fallon, Wentzville are out of the flood zone and have the institutions and jobs, but don't have public transportation.
- Employers in St. Charles County offer training. There is an aluminum-casting facility in Wentzville that starts people at \$15 per hour and will move them to \$20 per hour, so the jobs are here. The community college system has a welding program where you can get federal dollars and come out having a certification as a welder. They make very good money in St. Charles County. The community college system is tremendously effective in making sure people are job ready. There are so many employers in St. Charles County that can't get employees because people have difficulty affording housing in the county, and there is a lack of public transportation.
- In Missouri, school funding is based on property taxes, meaning that if you live in a neighborhood in which property values are higher, your school district gets more money. Poorer neighborhoods generate more poorly funded schools. Conversely, wealthier communities have better funded schools. We don't have parity in funding for schools. People have moved to St. Louis County and St. Charles County for the school districts. In the last 10 years, two of the St. Louis County school districts were unaccredited. There are other school districts that are now struggling with shifts in populations. Areas of opportunity are those communities that are safer, with quality schools, and with quality access to public transportation.
- Residents want to live in the Parkway, Rockway, Clayton, Ladue, Kirkwood, Lindbergh, Wentzville, and Francis Howell school districts. The quality of the school district is tied to the value of people's homes and the perceived quality of the neighborhood. Pattonville school district is in a low-income area, but are constantly knocking it out of the park. St. Charles County has very highly rated schools.
- Things are changing over time in terms of housing desirability and demand. A home built in the 1970s may have one bathroom, but today many homebuyers won't look at a home with one bathroom. A place like City of St. Peters has miles of homes built in the 1970s and 1980s. As people's preferences change, those homes may become more affordable.

Residents and stakeholders noted multiple barriers to moving to areas of opportunity, including:

- Municipal policies
- Housing costs
- Housing quality

- Land prices
- Foreclosure and decline in homeownership
- Schools
- Transportation and distance to work
- Opposition to affordable housing
- Racial identity
- Discrimination by landlords
- Steering
- Racism
- Lack of housing accessible to people with disabilities
- Credit and debt
- Access to capital
- Education level
- Housing supply and preferences
- Taxes and insurance
- Amenities that are available vary across communities
- Requirements to live or work in the area to receive assistance

3. Are you aware of any housing discrimination?

Residents and stakeholders discussed their experiences with housing discrimination in the region, including the following themes:

- St. Louis is known for discrimination in housing, including steering to different neighborhoods based on race. There is a well-documented history of racial discrimination in housing.
- All of the protected classes still face discrimination and need enforcement under the Fair Housing Act. Other classes, such as transgender people, need to also be protected. Municipalities could expand their fair housing ordinance to cover additional protected classes, including sexual orientation, gender identity, and source of income.
- I don't have any personal knowledge, but I wouldn't be surprised if people would choose to rent to people who were from the area already, rather than those outside the area. We still have racially discriminatory views in our community.
- We have had instances where a senior living place was cited for being inaccessible for people with disabilities.
- There is some redlining by financial institutions that still goes on that won't give any credence to communities of color.
- It's not rampant, but it still exists. There is racial discrimination and steering by agents.
- Assuming it occurs, but we rarely receive reports, emails, or calls about housing discrimination. The biggest factor is a refusal to allow multifamily housing or workforce housing. If there are communities that won't allow homes under \$400,000 in their communities, that may be a form of discrimination.
- There is documented evidence of housing choice vouchers being turned away.

- Another way to discriminate is through nuisance ordinances. There were federal lawsuits against Maplewood regarding nuisance calls.
- Another ongoing issue has been illegal lockouts, where a landlord forces a tenant to leave while an eviction is in process. In some leases, unless there is immediate violence there is no legal reason for the landlord to evict without due process. Housing is a health priority. The county CARES money has gone primarily to renters. The national moratorium info needs to be out there so people know about it.
- In the Francis Howell School District, families in Park Ashwood Apartments, get put on a month-to-month lease after one year. Then if they complain about the mold or other issues, they get evicted for noise. We try to connect families with Eastern Legal Alliance because it is causing hardship for the families. I can't say it's discrimination but there seems to be a pattern.
- Familial status is a big type of housing discrimination. For single parents, finding an apartment in St. Louis is hard.
- There have been some disability cases and some design and construction cases.
- Religion is seldom a cause of discrimination. In South County someone said they weren't going to sell their home to a Muslim. Some areas have discrimination against Muslims.
- In the last 2 years, there have been a lot of familial status and sexual harassment cases.
- Sometimes apartment managers do not give people enough notice to leave, e.g. a week. The standard is one month.
- We see it. It's veiled sometimes. We had a go-round with a landlord who wouldn't sign the VAWA form because if there was any domestic violence the renter (a woman) would be put out.
- Sometimes the pushback on affordable housing has a racial undertone.

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

Stakeholders described segregation in the region, emphasizing the following themes:

- Segregation by race/ ethnicity
- Segregation by income
- Segregation by political views

Stakeholders noted several causes of segregation, including:

- Municipal policies and fragmentation
- Funding for education
- Subdivision development
- Real estate valuation
- NIMBYism
- Jobs-housing balance and transportation
- Busing
- White flight
- Personal preferences

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

Stakeholders identified a variety of resources for fair housing services, including:

Nonprofit organizations

- Metropolitan St. Louis Equal Housing and Opportunity Council (EHOC) offers tenant education, landlord education, fair housing advocacy, and testing for discrimination.
- Legal Services of Eastern Missouri facilitates cases against landlords or government.
- North East Community Action Corporation and Beyond Housing do financial counseling, foreclosure counseling, and homeowner education.
- The Community Council of St. Charles County tries to be a one-stop shop for social services and was designated as the coordinated entry.
- Habitat St. Charles does financial education and homebuyer readiness. The organization helps prepare anyone in the community to be financially ready to buy a home.
- Better Family Life (in the city) provides workshops for housing ownership and utility assistance.
- Other organizations that provide fair housing services include The Urban League, Arch City Defenders, Land of Lincoln, United Way and the 211 system. Missouri Protection and Advocacy, and Catholic Legal Assistance Ministry.

Local Government

- Municipal governments are proactive in offering fair housing seminars. They present at CoC meetings to a broad community and at a variety of public gatherings.
- St. Charles County runs educational sessions and invites people to learn about financial literacy, how to get loans and acquire housing, and fair housing. When people have complaints, the county pairs them with EHOC.
- Stakeholders noted that St. Louis County may offer services through Housing or Human Services, and the Housing Authority of St. Charles may offer services.

HUD

- Stakeholders also noted that they refer residents to the local HUD office for filing fair housing complaints, and that HUD offers seminars.

State Services

- Stakeholders also noted that the state of Missouri may offer fair housing services.

6. Are public resources (e.g. parks, schools, roads, police & fire services, etc.) available evenly throughout the region? Do some areas get more/less than their share?

Stakeholders noted disparities in access to and funding of public resources by municipality size and racial composition, as well as disparities in HUD funding across the region. Stakeholders emphasized disparities in access to a range of public resources across the region, including:

Disparities in School Quality and Resources

- Schools are well-distributed, but the quality of schools varies greatly throughout the region. The City of St. Louis has one of the lowest-rated school districts in Missouri. At the same time, there are some school districts in the region that are very highly rated.
- As you move into north city and north St. Louis County, you see our beautiful brick schools crumbling. They are vacant.
- The schools in north St. Louis County have the most challenges with test scores, equipment.
- The loss of accreditation of the Normandy school district and the busing of those students into St. Charles County schools is one of the most extreme examples of how structural racism is baked into society. Students with the most trauma get the least resources, including outside of school-tutors, private lessons, etc. Our system produces unequal results. It maps onto poverty, which strongly maps onto race.
- Two school districts, both in North St. Louis County- Normandy and Riverview Gardens, lost accreditation. Families did not want kids from Normandy coming into St. Charles County schools. That was more 10 years ago than now.
- There are not any schools in St. Charles that are strongly better than others. All three school districts in St. Charles County are good. That makes St. Charles County more attractive.
- West St. Louis County has some very good schools. West County is very affluent. When you get into the city, historically east St. Louis has been very violent and desolated.
- Virtual learning is a challenge. We don't have the stay-at-home parents, parents who work from home. Many of our parents are essential workers. There is no one home to make sure the children get on the computer when they are supposed to.

Food Access

- Food access has been an emerging need for youth in north St. Louis County. Many of the challenges go back to the way our capitalistic system is arranged. There have been rapid closures in grocery stores in north St. Louis county. There is a large grocer names Schnuks and they purchased another grocer called Shop-n-Save. They closed a number of Shop-n-Save locations or Schnuks locations when they consolidated. Large parts of North County do not have a grocery store for many miles. What already wasn't great turned into a food desert overnight. There are some nonprofits working in that area. I see that as a valuable activity, but it doesn't solve the problem of sustainable and scaled access to food throughout those communities. There is a need for more than small supermarkets that focus on processed foods. Communities need to have options that include nutritious foods.
- There are still a handful of places in those three counties that have limited access to grocery stores- parts of north St. Louis County it is difficult to find grocery stores in close proximity.
- There are still big food deserts. I see that issue a little differently- the problem is a little more upstream- why fast food is so cheap, and agricultural subsidies.
- Every time a grocery store closes in the area north of the divide, it's more than likely the only one. Talking to volunteers via phone banking, we didn't realize that we would have to travel so far to get groceries. A lot of north city and north st. Louis County are food deserts or have one grocery

store. In the city or rest of the county, you find a Scnuks in every neighborhood, or a Target, or a Home Depot or Lowe's.

- Food access isn't terrible in St. Charles County. I grew up in the City of St. Charles, and for years, there was no grocery store on the north side of town. There are definitely not food deserts, but the grocery stores are more placed in heavily populated areas.
- In St. Charles County, it's pretty evenly dispersed. The north end of O'Fallon is a little bit of a food desert. We could use a grocery store.
- Right now, because of COVID, the food desert is exacerbated. We have several organizations who are giving food away. It's very difficult. The Urban League and people like that have gotten money from the CARES Act to distribute food to areas where it's needed.

Parks

- We have quite a few parks. They are some of the greatest thing St. Louis has. They are accessible, free, and fairly well present, even in impoverished areas. The maintenance, if they are county-owned, has been pretty decent. They are one of the shining parts of St. Louis. In the absence of a community center or neighborhood house where they might have amenities, people do have access to parks.
- One of our assets is the natural areas. We have abundance of greenspace. There is an organization doing greenways around the region. Great Rivers Greenway is the public parks and recreation agency for St. Charles and St. Louis counties, tasked with building a 300-mile network of parks and greenways.
- The North County area has fewer recreational resources. There are some nice parks in north St. Louis County, but the upkeep is not the same as in other areas. We have county parks, and I would assume they are evenly distributed, but not all are created equal. Some have top rate equipment, but the quality may not be on the same level. The pandemic is contributing more to that.
- I think if you were to look at the inner ring areas, the recreational amenities, there is a distinction in quality. There may be a pocket park in the low-income areas, but the upper income areas have many more amenities- ball fields, fishing, trails, more than a small park with some grass and a little playground equipment.
- There are beautiful parks in all of our cities in St. Charles County. People have pretty good access to parks. In St. Charles County, voters approved a tax that goes specifically to parks. In the past 15 years, the county has developed a good parks program, focused on larger parks. There are municipal parks as well. We have a lot of very accessible parks in St. Charles County.
- We have a new park in St. Charles County called Veteran's park. We were told there were people who live close to it who couldn't access it easily and there wasn't a sidewalk to connect the park to the community. We can build something, but really making it accessible to everyone- I think we have holes in the process.

Sidewalks and Bike Trails

- There could be more sidewalks, particularly along some of the more major roads in St. Charles County. The walkability and bikeability in target areas could be looked at. That's definitely an area of improvement, especially since public transportation is limited.
- I don't know that there has been a comprehensive study to evaluate sidewalks, etc. With all the different municipalities and different codes, I am highly doubtful that there is real parity around sidewalks. It's such a large geography. Many parts of the community, particularly in the city, they have tried bike lanes and narrowing streets.
- There are places we could do better with sidewalks and crosswalks – the Francis Howell School District will not provide transportation for students within 1.5 miles because by law the district does not have to transport them. They looked at this to see who would have to walk. It would be okay in some areas, but in others children would have to cross a highway or cross streets without a crossing guard, etc. So those kids are probably getting driven to school.

Healthcare

- Urgent care facilities have popped up in south city. You won't see those in North City and North County.

Fire Services

- In St. Charles County, there are quite a few fire districts. There are probably longer response times in rural areas.

Policing

- Michael Brown and the ensuing protests shined a light on the inequities in policing. In places where there is more affordable housing, the police tend to be not as well regarded and not as resourced in training. There are many police departments but no standard in service.
- In north St. Louis County, patrol is lacking. There are huge differences in the police services and whether residents feel safe.

Broadband

- In general, St. Charles County has good access to broadband. People with physical disabilities and the poorest residents often do not have access to broadband. Due to their income, they might not have a computer, tablet, or smartphone.

Community Engagement

- More resources could be deployed in engaging communities, ways to dialogue with communities about the needs they may have. The pandemic tells us we have to think and doing things differently. It would be good to understand how we use our landscapes from people who may not traditionally participate. Make sure we are casting the widest net possible for community feedback.

Lack of Political Will

- There are great discrepancies. There are gaps in resources like early education, food access, and amenities like parks. There is no public will to do more, and there is no leadership advocating for significant change in resources.

Community Survey

The community survey asked residents and stakeholders about barriers to fair housing access, affordable housing needs, and provision of public services in the region. A total of 301 people responded to the survey.

PARTICIPANT DEMOGRAPHICS

- Survey participants reflected all age groups and income levels, and a range of locations throughout the three counties (see Figures 2, 4, and 5).
- Of the survey participants who identified their race or ethnicity, 63.2% were white and 30.3% were African American or Black. Smaller percentages of participants identified themselves as multiple races (4.3%), Hispanic or Latino (0.7%), Other (0.7%), Asian or Pacific Islander (0.3%), and American Indian or Alaska Native (0.3%) (see Figure 3).

FIGURE 2 – AGE OF SURVEY RESPONDENTS

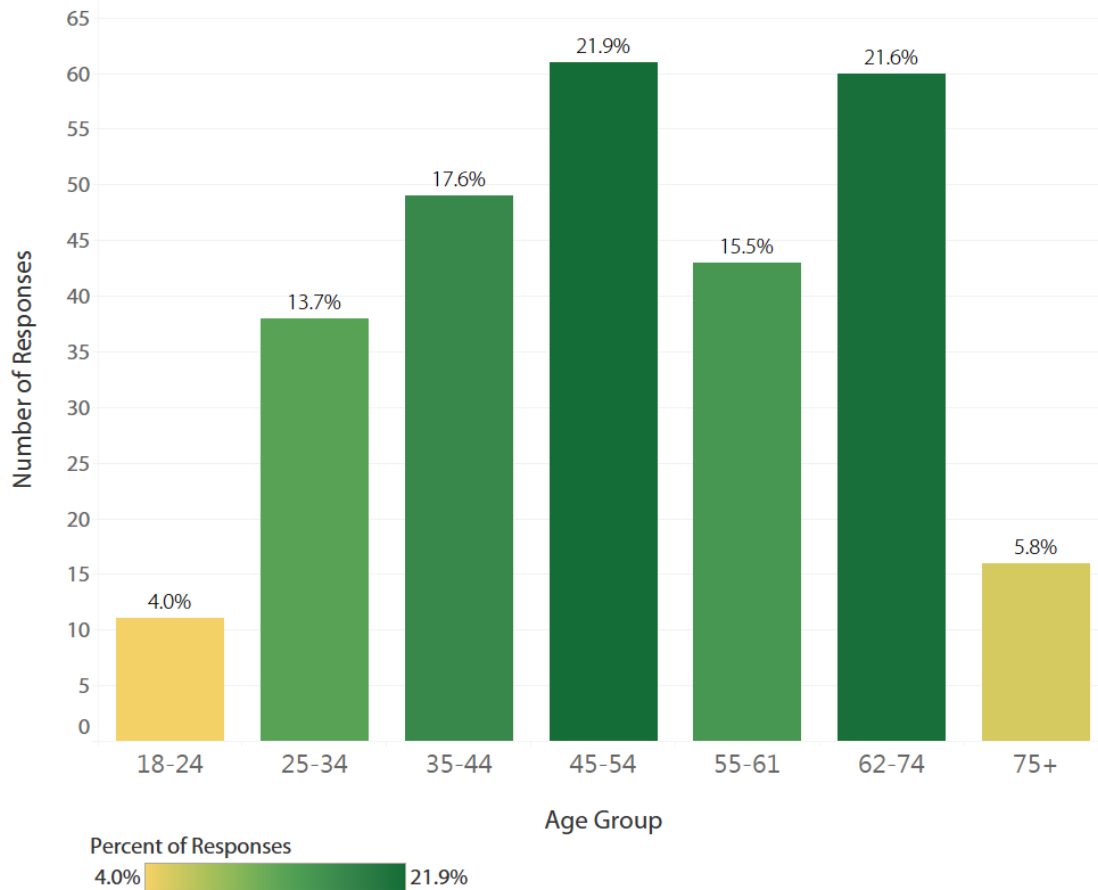
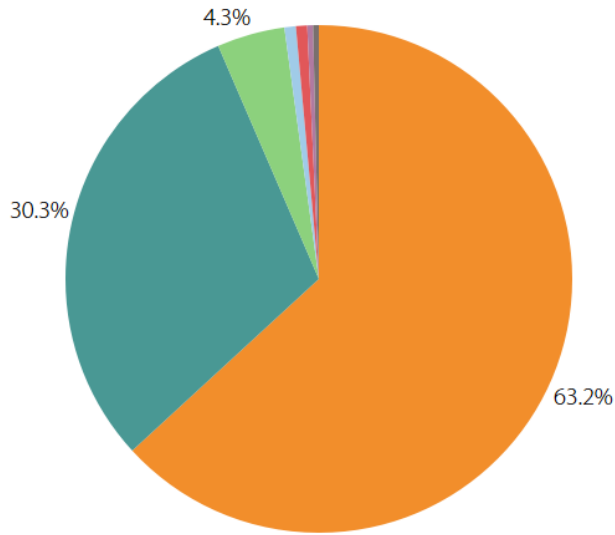


FIGURE 3 – RACE/ ETHNICITY OF SURVEY RESPONDENTS



Race/ Ethnicity of Survey Respondents



FIGURE 4 – INCOME OF SURVEY RESPONDENTS

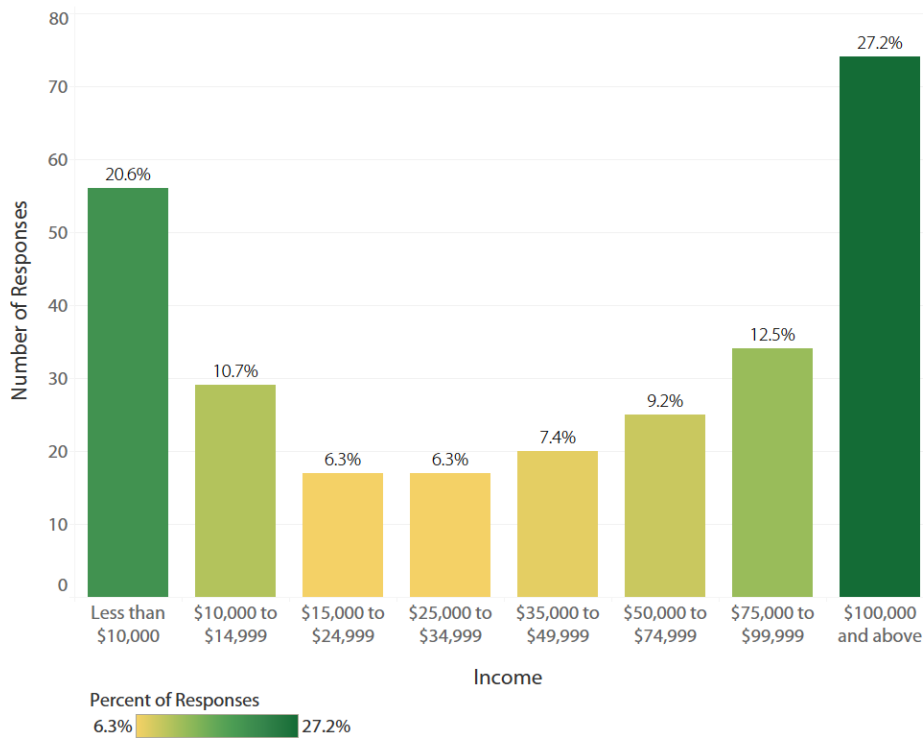
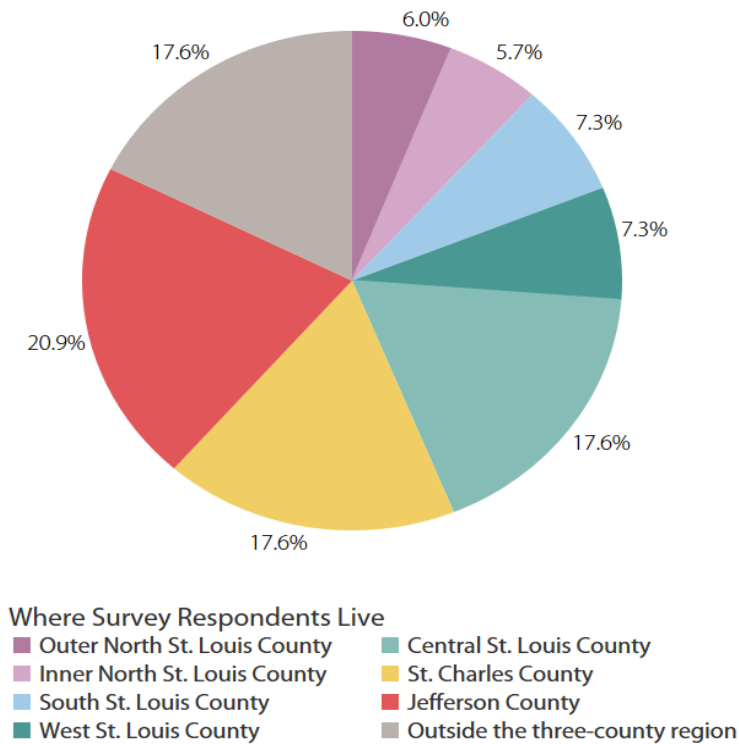


FIGURE 5 – WHERE SURVEY RESPONDENTS LIVE



RESPONDENTS’ THOUGHTS ABOUT THEIR COMMUNITIES

- When asked how satisfied they are with their neighborhoods, 59.3% of survey respondents said they are very satisfied, and 34.3% said they are somewhat satisfied. About 6.3% reported being not very satisfied or not at all satisfied. White residents reported higher levels of satisfaction with their neighborhoods (64.5% very satisfied) relative to African American or Black residents (48.8% very satisfied). Residents with household incomes of \$35,000 and above also tended to report higher levels of satisfaction than those with household incomes of less than \$35,000. Residents of Jefferson County were most likely to report being very satisfied or somewhat satisfied with their neighborhoods (63.0% and 35.2%, respectively), while residents of West St. Louis County were most likely to report being not very satisfied or not at all satisfied (10.5% and 5.3%, respectively).
- When asked whether there is another area in St. Louis, St. Charles and Jefferson Counties where they would like to move, 30.8% of survey respondents said yes, and 69.2% said no. White residents were slightly more likely to report that they would like to move than African American or Black residents (32.7% and 29.1%, respectively), and residents with household incomes of \$15,000 and above were more likely to say they would like to move than residents with household incomes below \$15,000. Residents of south St. Louis County were most likely to say that they would like to move to another area (56.3%), while central St. Louis County, Jefferson County, and outer and inner north St. Louis County had the greatest shares of residents who said they would not want to move (70.6% to 73.9%).

- When asked about access to community resources in their neighborhoods, residents reported having the greatest access to places to shop and bank (72.8% of respondents said they have access), housing that is in good condition (67.9%), and quality public schools (68.2%). Resources for which the greatest shares of residents reported not having access included reliable bus service (39.7% said they do not have access), areas with jobs they could get (11.7%), and quality public schools (7.7%). White residents reported higher levels of access than African American or Black residents to quality public schools, areas with jobs they could get, housing they can afford, and housing that is in good condition, while Black residents reported greater access to reliable bus service and parks and trails. Households in lower income categories tended to report lower levels of access to housing they can afford and housing that is in good condition. Residents of St. Charles County reported having the highest levels of access to quality public schools in the region (87.1% said they have access, and 4.8% said they somewhat have access), while residents of outer north St. Louis County reported the lowest levels of access (28.6% said they have access, and 42.9% said they somewhat have access).
- When asked about the distribution of community resources, more than 30% of survey participants said that roads and sidewalks, property maintenance, bus service, and grocery stores and other shopping are not equally available throughout all areas. More than 70% of survey participants noted that garbage collection and police and fire protection are equally available across their communities (see Figure 6). Black residents were more likely than white residents to report that grocery stores and other shopping, property maintenance, and police and fire protection are not equally provided, while white residents were more likely to note that bus service, roads and sidewalks, and parks and trails are not equally provided. Residents of inner and outer north St. Louis County and Jefferson County were most likely to note that grocery stores and other shopping are not equally provided (42.9% and 38.8%, respectively), while residents of south and west St. Louis County and St. Charles County were most likely to say that they are equally provided (80.0%, 77.8%, and 73.1%, respectively).
- When asked about housing needs in their communities, 31.0% of survey participants noted a high level of need for housing that people with lower incomes can afford, and 28.9% noted a high level of need for first-time homebuyer assistance (see Figure 7). African American or Black respondents reported higher levels of need than white respondents for housing that people with lower incomes can afford, housing that accepts Section 8 vouchers, apartments, and first-time homebuyer assistance. Residents with lower incomes also reported higher levels of need for housing that people with lower incomes can afford, housing that accepts Section 8 vouchers, and apartments. Residents of inner north St. Louis County and St. Charles County were most likely to say that a lot more housing that people with lower incomes can afford is needed (41.7% and 36.8% of respondents, respectively).

FIGURE 6 – AVAILABILITY OF COMMUNITY RESOURCES IN THE REGION AS RATED BY RESIDENTS AND STAKEHOLDERS IN THE COMMUNITY SURVEY

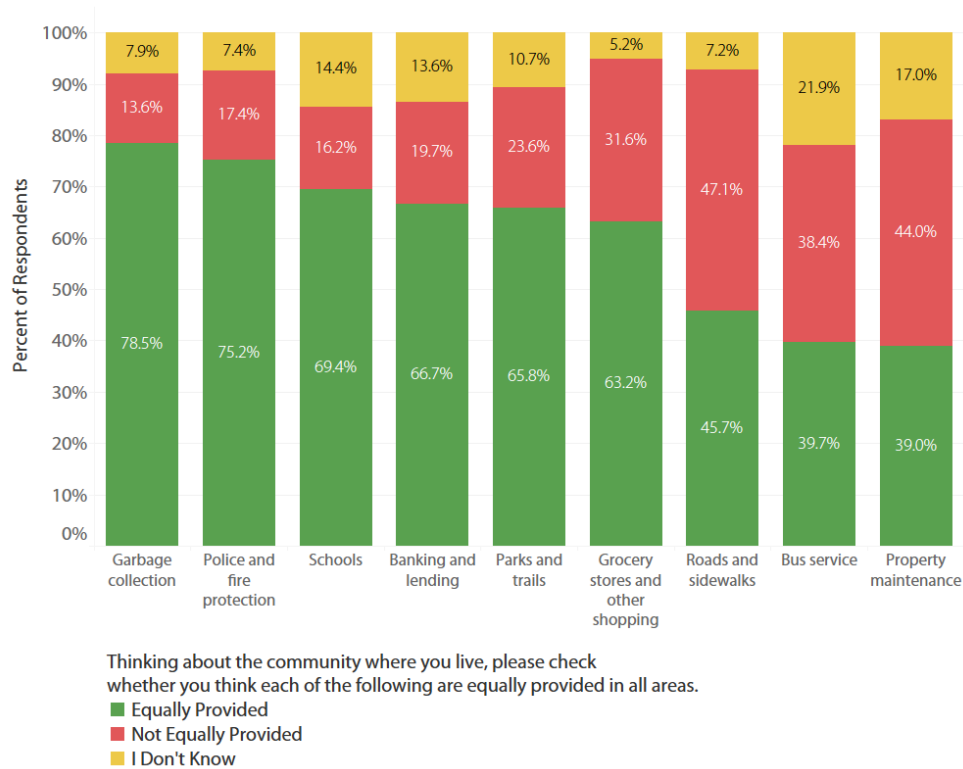
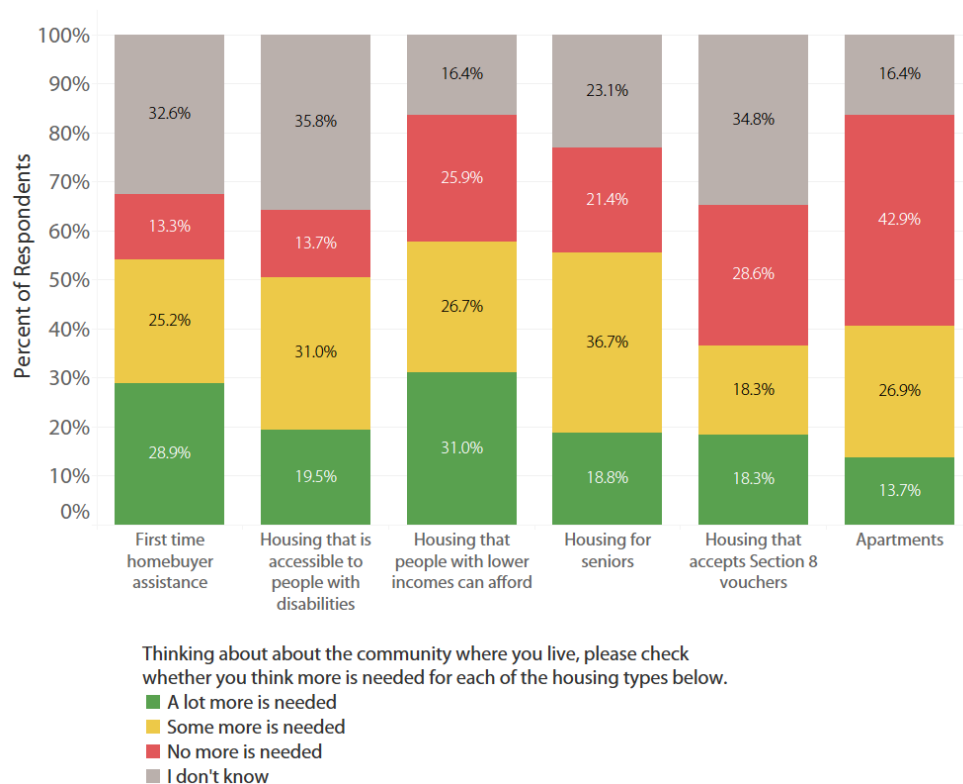


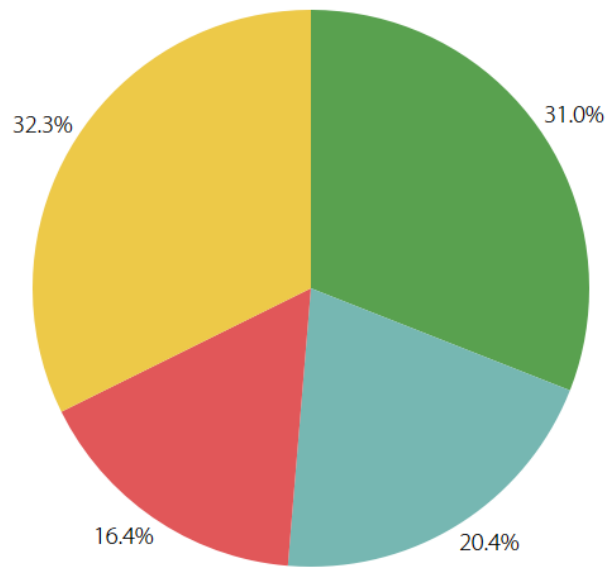
FIGURE 7 – HOUSING NEEDS IN THE REGION AS RATED BY RESIDENTS AND STAKEHOLDERS IN THE COMMUNITY SURVEY



RESPONDENTS' THOUGHTS ABOUT FAIR HOUSING

- Most survey participants reported knowing or somewhat knowing their fair housing rights (50.2% and 34.4%, respectively). While only 15.4% of respondents said that they did not know their fair housing rights, 39.8% said they would not know where to file a housing discrimination complaint.
 - Residents of outer north St. Louis County were most likely to report not knowing their fair housing rights (46.7%), followed by residents of south St. Louis County (25.0%) and residents of Jefferson County (22.0%). Residents of central St. Louis County and St. Charles County were most likely to report knowing or somewhat knowing their fair housing rights (93.5% and 92.7%, respectively).
- Twelve (12) survey participants experienced housing discrimination while living in the region. Of those 12 people:
 - Eight (8) noted that they were discriminated against by a landlord or property manager. One resident was discriminated against by a real estate agent, one by a mortgage lender, and one by a city, county, or housing authority staff person. One participant did not provide a response.
 - Disability was the most common basis for discrimination, cited by five people, followed by race and familial status, which were each noted by 3 people.
 - Only one person filed a report of discrimination. Reasons for not filing discrimination complaints included not knowing what good it would do (identified by five people), not knowing where to file (identified by three people), fear of retaliation (identified by three people), the process not being accessible because of a disability (identified by two people), not having time to file (identified by one person), not knowing it was a violation of the law (identified by one person), and other reasons (identified by three people).
- Residents of west St. Louis County, inner north St. Louis County, and St. Charles County were most likely to note that they had experienced discrimination in the region (15.8%, 7.1%, and 5.6% of residents, respectively).
- Slightly more than one half of respondents (51.3%) said they believe housing discrimination is an issue or may be an issue in the region, while 16.4% said they do not believe housing discrimination is an issue (see Figure 8). South St. Louis County, St. Charles County, and Jefferson County had the greatest shares of residents who said housing discrimination is an issue or may be an issue (62.5%, 53.9%, and 53.1%, respectively).

FIGURE 8 –RESIDENTS’ AND STAKEHOLDERS’ PERCEPTIONS ABOUT HOUSING DISCRIMINATION IN THE REGION



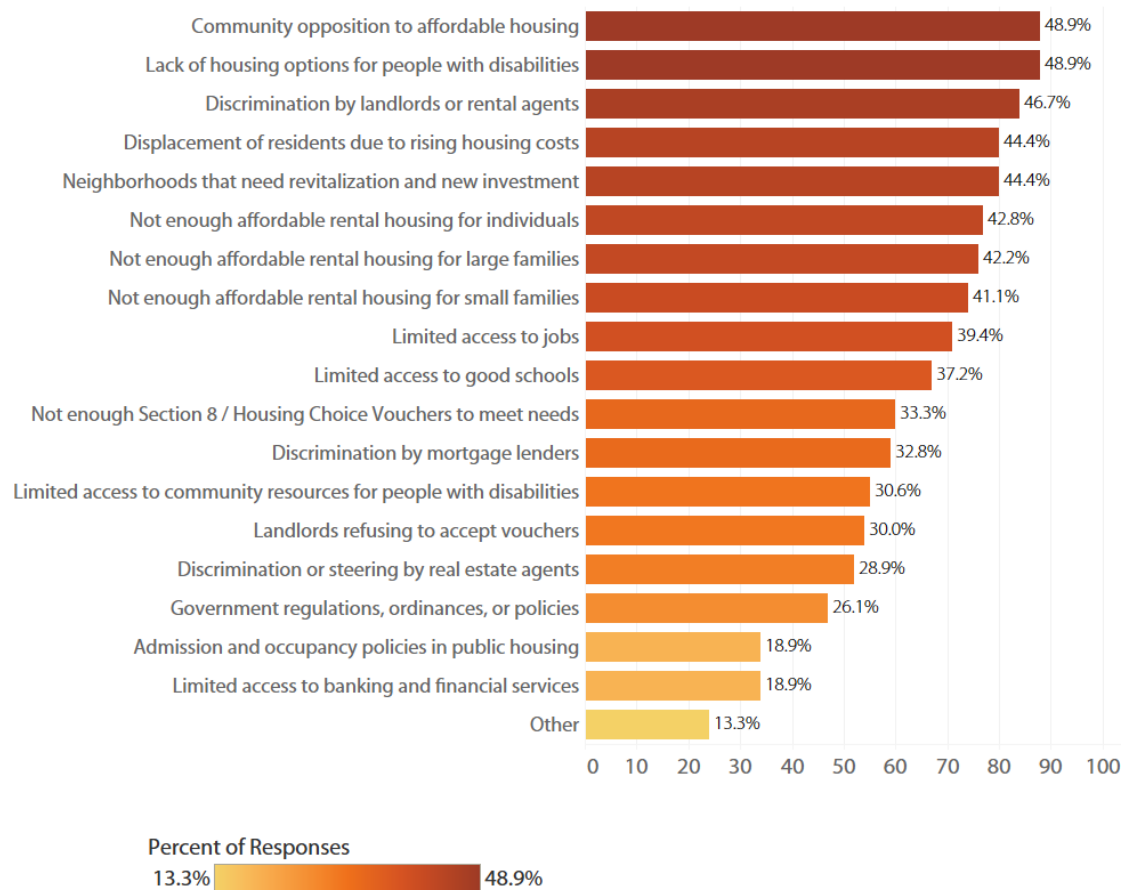
Do you think housing discrimination is an issue in the St. Louis region?

- Yes, housing discrimination is an issue
- Housing discrimination may be an issue
- No, housing discrimination is not an issue
- I don't know if housing discrimination is an issue

- Asked to select any factors that are barriers to fair housing in the region, respondents most often identified the following (see Figure 9):
 - Community opposition to affordable housing (selected by 48.9%);
 - Lack of housing options for people with disabilities (selected by 48.9%);
 - Discrimination by landlords or rental agents (selected by 46.7%);
 - Displacement of residents due to rising housing costs (selected by 44.4%);
 - Neighborhoods that need revitalization and new investment (selected by 44.4%);
 - Not enough affordable rental housing for individuals (selected by 42.8%);
 - Not enough affordable rental housing for large families (selected by 42.4%); and
 - Not enough affordable rental housing for small families (selected by 41.1%).

Notably, responses regarding community opposition to affordable housing, a lack of housing options for people with disabilities and individuals and families in need of affordable housing, and displacement of residents due to rising housing costs were all top responses. Discrimination by landlords or rental agents and neighborhoods that need revitalization and new investment were also identified as barriers to fair housing in the region by more than 40% of survey respondents.

FIGURE 9 – FAIR HOUSING BARRIERS IN THE REGION AS RATED BY RESIDENTS AND STAKEHOLDERS IN THE COMMUNITY SURVEY



- By jurisdiction, the greatest barriers to fair housing noted by residents included:
 - **Outer north St. Louis County:** Not enough affordable housing for individuals (55.6%) and discrimination by landlords or rental agents (55.6%)
 - **Inner north St. Louis County:** Not enough affordable rental housing for individuals, lack of housing options for people with disabilities, not enough affordable rental housing for large families, and neighborhoods that need revitalization and new investment (all identified by 40.0% of residents)
 - **Central St. Louis County:** Not enough affordable rental housing for individuals (52.8%)
 - **West St. Louis County:** Not enough affordable rental housing for small families, not enough affordable rental housing for large families, and displacement of residents due to rising housing costs (all identified by 58.3% of residents)
 - **South St. Louis County:** Neighborhoods that need revitalization and new investment (75.0%) and community opposition to affordable housing (66.7%)
 - **St. Charles County:** Community opposition to affordable housing (identified by 57.1% of residents) and displacement of residents due to rising housing costs (54.8%)
 - **Jefferson County:** Discrimination by landlords or rental agents (55.3%), community opposition to affordable housing (52.6%) and lack of housing options for people with disabilities (52.6%)

CHAPTER 3.

SOCIOECONOMIC PROFILE

The combined population of the cities and counties that comprise the St. Louis HOME Consortium is 1,750,055 according to the most recent estimates from the 2014-2018 5-Year American Community Survey (ACS). St. Louis County is the most populous among the jurisdictions with 998,684 residents, comprising more than half (57.1%) of the Consortium's population. St. Charles County is the second largest county accounting for nearly a quarter (22.3%) of the Consortium with a population of 389,985. Jefferson County represents 12.8% of the Consortium's population with 223,302 residents. The cities of O'Fallon and Florissant represent smaller segments of the Consortium with populations of 86,340 and 51,744, respectively.

With the exception of the City of Florissant, all jurisdictions in the St. Louis Consortium increased in population since 1990. The most significant increase in population occurred in the City of O'Fallon which nearly tripled in size. St. Charles and Jefferson counties also experienced substantial increases in population with growth rates of 48.4% and 27.6%, respectively. St. Louis County's population grew by just 1.0%, while Florissant was the only jurisdiction to decrease (-3.8%) in population. This section more closely examines population characteristics and trends for all five jurisdictions that comprise the St. Louis HOME Consortium using Census and ACS data provided in Tables 1 and 2.

DEMOGRAPHIC PROFILE

Race and Ethnicity

According to 2014-2018 5-Year American Community Survey (ACS) data presented in Table 1 and the historical data in Table 2, both appearing later in the section, approximately three quarters of the population in the St. Louis MSA are non-Hispanic white (75.9%). Black residents represent the second largest group comprising nearly a fifth of the population (18.3%). The Hispanic population is the next largest with a population share of 3.0%. Asian or Pacific Islander and multiracial residents represent slightly smaller segments, 2.6% and 2.2%, respectively, of the MSA population. Multiracial residents comprise 2.2% of the population while Native American residents account for just 0.2% of the total MSA population. The racial and ethnic composition of the five jurisdictions in the St. Louis HOME Consortium reflect similar demographic patterns to those of the MSA.

White residents comprise the majority of the population in all five jurisdictions, however, the population shares range from just over half to nearly 100%. The racial composition of Jefferson County residents is much less diverse, with white residents comprising 96.0% of the population. The populations in St. Charles County and the City of O'Fallon are nearly as homogeneous with almost identical shares of white residents 89.9% and 89.0%, respectively. The City of Florissant has the smallest population share (54.5%) of white residents among Consortium jurisdictions, while over two-thirds (68.4%) of the population in the surrounding St. Louis County is white.

With the exception of Jefferson County, Black residents comprise the second largest racial or ethnic group in jurisdictions in the Consortium. Jurisdictions with a smaller percentage of white residents, like St. Louis County and the City of Florissant, are home to larger population shares of Black residents. The largest population share of Black residents (38.2%) is found in Florissant followed by St. Louis County where nearly a quarter (24.1%) of the population is Black. Following similar patterns of white population shares, the population shares of Black residents in St. Charles County and O’Fallon are nearly identical (4.4% and 4.7%, respectively). The percentage of Black residents in Jefferson County is less than 1%, a smaller population share than Hispanic or Latino and multiracial populations.

Population shares of Hispanic or Latino residents are similar across all five jurisdictions in the Consortium. The largest population share of Hispanic or Latino residents (3.4%) is found in the City of Florissant followed closely by St. Charles County where Hispanic or Latino residents comprise 3.2% of the county’s population. The percentage of Hispanic or Latino residents in the City of O’Fallon and St. Louis County are nearly identical at 2.7% and 2.8%, respectively. Jefferson County has the smallest population share of Hispanic or Latino residents (1.9%), however, Hispanic or Latino residents comprise the second largest racial or ethnic group in the county.

There are no distinguishable patterns of Asian or Pacific Islander population shares when compared to other racial and ethnic groups throughout jurisdictions in the Consortium. Asian or Pacific Islander residents represent the third largest racial or ethnic group in St. Louis County, O’Fallon, and St. Charles County with shares of 4.2%, 3.6%, and 2.5%, respectively. In Jefferson County and Florissant, Asian or Pacific Islander residents represent less than 1% of the population.

Similar to Hispanic or Latino population shares, multiracial populations are represented evenly across the five jurisdictions. The largest population share of multiracial residents is found in Florissant comprising 4.8% of the city’s population. The population share of multiracial residents hovers around 2% in all other jurisdictions with only Jefferson County’s share dropping slightly below 2%.

Native American residents and populations that identify as other race comprise a small segment of the population in all jurisdictions. Florissant is the only jurisdiction where other race residents exceed 1% in population share. Native American residents represent less than 0.5% of total populations in each jurisdiction.

All jurisdictions in the St. Louis HOME Consortium have increased in racial and ethnic diversity between 1990 and 2010. Racial and ethnic minority groups have experienced growth in absolute numbers and population share while shares of white populations have declined across all jurisdictions. Although not as significant when comparing absolute numbers, the rates of change among racial and ethnic minority groups have been more dramatic compared to white populations in each jurisdiction.

The City of Florissant experienced the most significant shift in racial and ethnic composition between 1990 and 2010. The population of white residents experienced a 30.7% decrease in absolute numbers and a loss of 25.9 percentage points in population share. During the same period, the growth in population share of Black residents (24.0 percentage points) coincided with the change in white population share and a significant growth in absolute numbers. St. Louis County also experienced similar, but less dramatic

patterns of decline and growth of white and Black populations. The Hispanic and Asian populations in St. Louis County experienced more significant positive growth compared to Florissant.

Between 1990 and 2010, the number of white residents in Jefferson County increased by 24.2% while population share decreased by 2.6 percentage points. Black, Hispanic, Asian or Pacific Islander, and Native American populations increase exponentially in absolute numbers, however, changes in population share remained minimal with no group exceedingly more than 1 percentage point increase. Racial and ethnic composition in St. Charles County and O'Fallon also experienced similar, but slightly more significant, shifts over time.

National Origin

The population of foreign-born residents nearly doubled in absolute numbers since 1990 in Jefferson County, however, the foreign-born population share increased by only 1 percentage point during the same period. The top countries of origin of the foreign-born population in Jefferson County are Mexico, Bosnia and Herzegovina, Germany, Vietnam, and the Philippines. The populations originating from Mexico is the largest foreign-born group, comprising 0.3% of the total population. Residents from the other four countries each account for 0.2% of the total population.

The foreign-born population in St. Charles County more than quadrupled since 1990 and experienced a 2.1% increase in population share to account for 3.3% of the current population. The increase in population share since 1990 is similar to changes in other jurisdictions in the Consortium, but the growth rate of foreign-born residents is second only to O'Fallon. The top five countries of origin among foreign-born residents in St. Charles County are India, Mexico, China, Vietnam, and the Philippines. The population originating from India is the largest, comprising 0.7% of the total population. Residents from Mexico comprise 0.5% of the total population while residents from China, Vietnam, and the Philippines each account for less than 0.3% of the total population.

St. Louis County's foreign-born population is the largest in size and population share compared to all other jurisdictions in the Consortium. Foreign-born residents account for 6.4% of the population, a 3.6 percentage point growth since 1990. St. Louis County's increase in foreign-born population share was the largest among jurisdictions in the Consortium, but the population grew at a slower rate of about 133.5%. The top countries of origin for St. Louis County's foreign-born population are India, Bosnia and Herzegovina, China, Mexico, and Vietnam. Residents originating from India comprise the largest segment among foreign-born populations, representing 1.1% of the total population. Populations from Bosnia and Herzegovina, China, Mexico, and Vietnam each represent less than 1% of the total population.

Foreign-born residents in Florissant comprise about 2.5% of the city, an increase of one percentage point since 1990. Compared to other jurisdictions in the Consortium, Florissant experienced the slowest growth rate of foreign-born residents between 1990 and 2010. The most common countries of origin for the foreign-born population in order by size is Kenya, Mexico, Dominican Republic, Colombia, and Sudan. All of these populations represent less than 1 percent of the total population.

The foreign-born population in the City of O'Fallon grew significantly, increasing seven-fold in absolute numbers and 2.2 percentage points in population share since 1990. The top countries of origin for O'Fallon's foreign-born population are India, Vietnam, Korea, China, and Germany. Residents originating

from India account for 1.3% of the total population, the largest population share of any foreign-born population among all jurisdictions. Residents originating from Vietnam, Korea, China and Germany each make up less than 1% of the total population.

Limited English Proficiency (LEP)

Population dynamics for residents with limited English proficiency (LEP) often resemble those of foreign-born residents in a community. The population trends of the LEP population in the Consortium follow similar patterns to that of the foreign-born population in each jurisdiction.

The LEP population in Jefferson County accounts for 1.0% of the total population after growing at a rate of 116.9% since 1990. Despite significant growth in absolute numbers, population share of the LEP population in Jefferson County only grew by 0.4 percentage points between 1990 and 2010. The top languages spoken by the LEP population include Spanish or Spanish Creole, Serbo-Croatian, Vietnamese, Tagalog, and Arabic.

The change in the LEP population in St. Charles County generally followed the growth patterns of the foreign-born population, but at a somewhat slower rate. The LEP population in St. Charles County more than tripled in size between 1990 and 2010 to comprise 1.6% of the county's population. The most common language spoken by the LEP population is Spanish or Spanish Creole which comprises 0.7% of the total population. Other top languages spoken by the LEP population include Chinese, Korean, Other Asian languages, and Vietnamese.

Similar to LEP population changes in St. Charles County, the LEP population in St. Louis County tracked changes in the foreign-born population, but at a slower rate. The LEP population in St. Louis County grew at a rate of 113.2% between 1990 and 2010 to comprise 3.0% of the total population, which represents the largest population share of LEP residents among all jurisdictions. Compared to the foreign-born population, the change in population share (1.6 percentage points) was less significant for the LEP population. The top languages spoken by the LEP population in order from most to least common are Spanish or Spanish Creole, Chinese, Serbo-Croatian, Russian, and Vietnamese.

The growth patterns between the LEP population and foreign-born population in the City of Florissant were nearly identical between 1990 and 2010. The LEP population in the City of Florissant grew by 66.2% between 1990 and 2010, the slowest rate among jurisdictions in the Consortium. The LEP population share increased by just 0.8 percentage points to comprise 1.9% of the total population in 2010. The most common languages spoken among the LEP population are Spanish or Spanish Creole, African languages, Arabic, Tagalog, and Vietnamese.

The LEP population in the City of O'Fallon followed patterns of significant growth found among the foreign-born population. The LEP population in 2010 was nearly seven times as large compared to the population in 1990, however, the population share only grew by 0.8 percentage points to represent 1.4% of the city's total population. The most common languages spoken by the LEP population are other Asian languages, Spanish or Spanish Creole, other Indic languages, other Slavic languages, and French.

Disability

According to the 2014-2018 5-Year American Community Survey, approximately 13.1% of the population living in Jefferson County has a disability, slightly higher than the population share in the St. Louis MSA (12.5%) and the highest among other jurisdictions in the Consortium. The most common disability type in Jefferson County is difficulty with ambulatory movement. People experiencing ambulatory difficulties comprise 6.3% of the county's total population. People with disabilities that may require extensive assistance, including independent living or self-care difficulties, make up 4.4% and 2.2% of the county's population, respectively. The population of people with hearing and vision difficulties make up 3.7% and 2.0% of the city's population, respectively.

The population with disabilities in St. Charles County accounts for 10.0% of the total population. The distribution patterns by disability type in St. Charles County are similar to that of the population in the larger MSA. The most common disability type in St. Charles County is difficulty with ambulatory movement: 4.7% of county residents have an ambulatory difficulty. Cognitive, independent living, and hearing difficulties are the next most common types of disabilities, each impacting around 3% of residents in the county. People experiencing difficulties with self-care and vision each comprise less than 2% of the total population.

The population share of residents with disabilities in St. Louis County (11.8%) is slightly lower compared to the St. Louis MSA (12.5%). The distribution by disability types in St. Louis County are nearly identical to population shares found in the MSA. The most common disability type is ambulatory difficulty, which impacts 6.2% of residents in St. Louis County. Cognitive difficulty is the second-most-common disability type affecting 4.4% of residents. Disabilities that require extensive assistance, such as difficulties with independent living or self-care, make up 4.4% and 2.4% of the population, respectively. Hearing difficulties affect 3.0% of the population and vision difficulties impact 1.9% of St. Louis County residents.

The population with disabilities in the City of Florissant accounts for 12.2% of the total population, which is nearly identical to the population share found in the St. Louis MSA. Population shares by disability type in Florissant are also similar to those found in the region. The most common disability type is difficulty with ambulatory movement comprising 6.5% of the city's population. Cognitive and independent living difficulties are experienced by 5.1% and 4.5%, respectively, of residents in the city. People experiencing difficulties with self-care and sensory disabilities (hearing and vision) each comprise around 2% of the total population.

The population share of residents with disabilities (8.4%) in the City of O'Fallon is the lowest among all other jurisdictions in the Consortium. The distribution by disability type in O'Fallon follows general patterns found throughout Consortium jurisdictions, but is also slightly lower in shares of the population across all disability types. Like other jurisdictions, the most common disability type in O'Fallon is difficulty with ambulatory movement. People experiencing ambulatory difficulties comprise 3.7% of the city's total population. Population shares of people with disabilities that may require extensive assistance (independent living, 2.4% or self-care difficulties, 1.0%) are smaller compared to the region. Cognitive difficulty is the second-most-common disability type affecting 2.9% of residents. The population of people with hearing and vision difficulties make up 2.5% and 1.0% of the city's population, respectively.

Sex and Female Householders

Female residents make up a slight majority in all jurisdictions in the Consortium, however, the ratio skews more toward female in St. Louis County and the City of Florissant where 52.6% and 55.0% are female.

The percentage of households with female householders is highest in the City of Florissant and St. Louis County. About 41.5% of households in the City of Florissant have a female householder – 12.7% in family households with children, 8.3% in family households without children, and 20.5% in nonfamily households. In St. Louis County, 34.7% of all households have a female householder with smaller shares in family households with female householders compared to the City of Florissant.

The households with female householder in Jefferson County, St. Charles County, and the City of O’Fallon comprise a quarter (25%) of all households in each jurisdiction, a 10 to 15 percentage point difference compared to St. Louis County and the City of Florissant. Population shares for family and non-family households with female householders are also similar throughout these three jurisdictions.

Household Type

Family households comprise around 64% of all households in both St. Louis County and the City of Florissant. This is around 10% lower than the proportion of family households found in the other jurisdictions in the Consortium. Roughly a third of the households in each of the HOME Consortium jurisdictions are family households with children. The City of O’Fallon has the highest percentage of families with children with 40.8% and St. Louis County has the lowest percentage with 29.1%.

TABLE 1 – DEMOGRAPHIC OVERVIEW

Demographic Indicator	St. Charles County		City of O’Fallon			
	#	%	#	%		
Race/Ethnicity						
Non-Hispanic or Latino						
White	350,757	89.9%	76,808	89.0%		
Black	17,172	4.4%	4,086	4.7%		
Asian or Pacific Islander	9,729	2.5%	3,109	3.6%		
Native American	657	0.2%	108	0.1%		
Other Race	2,063	0.5%	333	0.4%		
Two or More Races	9,607	2.5%	1,896	2.2%		
Hispanic or Latino	12,529	3.2%	2,326	2.7%		
Total Population	389,985	100.0%	86,340	100.0%		
National Origin						
#1 country of origin	India	2,599	0.7%	India	1,118	1.3%
#2 country of origin	Mexico	2,062	0.5%	Vietnam	406	0.5%
#3 country of origin	Vietnam	983	0.3%	Korean	225	0.3%
#4 country of origin	China (excl. Hong Kong & Taiwan)	826	0.2%	China, excl. Hong Kong and Taiwan	177	0.2%
#5 country of origin	Philippines	794	0.2%	Germany	107	0.1%
Limited English Proficiency (LEP) Language*						
#1 LEP Language	Spanish or Spanish Creole	2,434	0.7%	Other Asian languages	287	0.4%
#2 LEP Language	Chinese	369	0.1%	Spanish or Spanish Creole	274	0.4%
#3 LEP Language	Korean	365	0.1%	Other Indic languages	70	<0.1%
#4 LEP Language	Other Asian languages	343	0.1%	Other Slavic languages	68	<0.1%
#5 LEP Language	Vietnamese	290	0.1%	French (incl. Patois, Cajun)	63	<0.1%
Age						
Under 18		92,943	23.8%		23,848	27.6%
18-64		241,560	61.9%		52,747	61.1%
65+		55,482	14.2%		9,745	11.3%
Disability Type						
Hearing difficulty		12,055	3.1%		2,199	2.5%
Vision difficulty		5,787	1.5%		977	1.1%
Cognitive difficulty		14,421	3.7%		2,537	2.9%
Ambulatory difficulty		18,352	4.7%		3,190	3.7%

Demographic Indicator	St. Charles County		City of O'Fallon	
	#	%	#	%
Self-care difficulty	6,386	1.6%	896	1.0%
Independent living difficulty	12,654	3.2%	2,114	2.4%
Total Population with a disability	38,879	10.0%	7,289	8.4%
Sex				
Male	191,641	49.1%	42,573	49.3%
Female	198,344	50.9%	43,767	50.7%
Household Type				
Family Households				
Married Couple, Children	37,601	26.0%	9,528	31.0%
Female Householder, Children	8,442	5.8%	2,304	7.5%
Male Householder, Children	3,537	2.4%	732	2.4%
Married Couple, No Children	47,056	32.5%	9,078	29.5%
Female Householder, No Children	5,230	3.6%	1,154	3.8%
Male Householder, No Children	2,416	1.7%	569	1.8%
Non-Family Households		0.0%		
Female Householder	22,917	15.8%	4,258	13.8%
Male Householder	17,444	12.1%	3,143	10.2%
Total Households	144,643	100.0%	30,766	100.0%

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

Data Sources: 2014-2018 5-Year American Community Survey, Tables B03002, B05006, B01001, B18101 to B18107, and B11005; 2011-2015 5-Year American Community Survey, Table B16001

Demographic Indicator	St. Louis County		City of Florissant			
	#	%	#	%		
Race/Ethnicity						
Non-Hispanic or Latino						
White	682,964	68.4%	28,178	54.5%		
Black	240,312	24.1%	19,791	38.2%		
Asian or Pacific Islander	41,891	4.2%	388	0.7%		
Native American	1,821	0.2%	201	0.4%		
Other Race	8,054	0.8%	700	1.4%		
Two or More Races	23,642	2.4%	2,486	4.8%		
Hispanic or Latino	28,303	2.8%	1,771	3.4%		
Total Population	998,684	100.0%	51,744	100.0%		
National Origin						
#1 country of origin	India	10,703	1.1%	Kenya	354	0.7%
#2 country of origin	Bosnia and Herzegovina	6,620	0.7%	Mexico	274	0.5%
#3 country of origin	China, excluding Hong Kong and Taiwan	6,184	0.6%	Dominican Republic	212	0.4%
#4 country of origin	Mexico	5,824	0.6%	Colombia	97	0.2%
#5 country of origin	Vietnam	3,090	0.3%	Sudan	90	0.2%
Limited English Proficiency (LEP) Language*						
#1 LEP Language	Spanish or Spanish Creole	7,322	0.8%	Spanish or Spanish Creole	217	0.44%
#2 LEP Language	Chinese	4,367	0.5%	African languages	81	0.17%
#3 LEP Language	Serbo-Croatian	3,489	0.4%	Arabic	57	0.12%
#4 LEP Language	Russian	1,443	0.2%	Tagalog	38	<0.1%
#5 LEP Language	Vietnamese	1,326	0.1%	Vietnamese	36	<0.1%
Age						
Under 18	221,598	22.2%	13,752	26.6%		
18-64	604,704	60.6%	31,025	60.0%		
65+	172,382	17.3%	6,967	13.5%		
Disability Type						
Hearing difficulty	29,640	3.0%	1,256	2.4%		
Vision difficulty	18,551	1.9%	827	1.6%		
Cognitive difficulty	44,407	4.4%	2,623	5.1%		
Ambulatory difficulty	61,438	6.2%	3,369	6.5%		
Self-care difficulty	23,962	2.4%	1,183	2.3%		
Independent living difficulty	44,207	4.4%	2,310	4.5%		

Demographic Indicator	St. Louis County		City of Florissant	
	#	%	#	%
Total Population with a disability	117,960	11.8%	6,308	12.2%
Sex				
Male	473,610	47.4%	23,307	45.0%
Female	525,074	52.6%	28,437	55.0%
Household Type				
Family Households				
Married Couple, Children	76,152	18.9%	3,605	18.2%
Female Householder, Children	32,306	8.0%	2,518	12.7%
Male Householder, Children	9,121	2.3%	445	2.2%
Married Couple, No Children	111,551	27.6%	4,045	20.4%
Female Householder, No Children	22,665	5.6%	1,642	8.3%
Male Householder, No Children	7,159	1.8%	411	2.1%
Non-Family Households			0	0.0%
Female Householder	84,930	21.0%	4,065	20.5%
Male Householder	59,663	14.8%	3,093	15.6%
Total Households	403,547	100.0%	19,824	100.0%

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

Data Sources: 2014-2018 5-Year American Community Survey, Tables B03002, B05006, B01001, B18101 to B18107, and B11005; 2011-2015 5-Year American Community Survey, Table B16001

Demographic Indicator	Jefferson County		St. Louis MSA			
	#	%	#	%		
Race/Ethnicity						
Non-Hispanic or Latino						
White	214,439	96.0%	2,130,570	75.9%		
Black	2,034	0.9%	513,025	18.3%		
Asian or Pacific Islander	1,689	0.8%	72,217	2.6%		
Native American	652	0.3%	5,582	0.2%		
Other Race	539	0.2%	21,121	0.8%		
Two or More Races	3,949	1.8%	63,036	2.2%		
Hispanic or Latino	4,251	1.9%	83,787	3.0%		
Total Population	223,302	100.0%	2,805,551	100.0%		
National Origin						
#1 country of origin	Mexico	625	0.3%	India	15,081	0.5%
#2 country of origin	Bosnia and Herzegovina	526	0.2%	Mexico	14,910	0.5%
#3 country of origin	Germany	438	0.2%	China, excluding Hong Kong and Taiwan	9,614	0.3%
#4 country of origin	Vietnam	359	0.2%	Bosnia and Herzegovina	8,538	0.3%
#5 country of origin	Philippines	352	0.2%	Vietnam	7,345	0.3%
Limited English Proficiency (LEP) Language*						
#1 LEP Language	Spanish or Spanish Creole	600	0.3%	Spanish or Spanish Creole	18,570	0.7%
#2 LEP Language	Serbo-Croatian	350	0.2%	Chinese	6,229	0.2%
#3 LEP Language	Vietnamese	208	0.1%	Serbo-Croatian	4,902	0.2%
#4 LEP Language	Tagalog	118	<0.1%	Vietnamese	3,893	0.1%
#5 LEP Language	Arabic	84	<0.1%	Arabic	2,161	<0.1%
Age						
Under 18	52,788	23.6%	630,135	22.5%		
18-64	139,080	62.3%	1,735,681	61.9%		
65+	31,434	14.1%	439,735	15.7%		
Disability Type						
Hearing difficulty	8,230	3.7%	92,152	3.3%		
Vision difficulty	4,414	2.0%	58,620	2.1%		
Cognitive difficulty	11,228	5.0%	132,459	4.7%		
Ambulatory difficulty	14,057	6.3%	184,688	6.6%		
Self-care difficulty	5,014	2.2%	67,918	2.4%		
Independent living difficulty	9,837	4.4%	126,697	4.5%		

Demographic Indicator	Jefferson County		St. Louis MSA	
	#	%	#	%
Total Population with a disability	29,268	13.1%	351,991	12.5%
Sex				
Male	110,887	49.7%	1,359,911	48.5%
Female	112,415	50.3%	1,445,640	51.5%
Household Type				
Family Households				
Married Couple, Children	19,184	22.7%	215,869	19.3%
Female Householder, Children	6,250	7.4%	89,875	8.0%
Male Householder, Children	3,114	3.7%	27,820	2.5%
Married Couple, No Children	27,539	32.6%	310,540	27.8%
Female Householder, No Children	3,539	4.2%	54,447	4.9%
Male Householder, No Children	1,845	2.2%	20,703	1.9%
Non-Family Households		0.0%		0.0%
Female Householder	11,685	13.8%	219,309	19.6%
Male Householder	11,237	13.3%	179,700	16.1%
Total Households	84,393	100.0%	1,118,263	100.0%

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

Data Sources: 2014-2018 5-Year American Community Survey, Tables B03002, B05006, B01001, B18101 to B18107, and B11005; 2011-2015 5-Year American Community Survey, Table B16001

TABLE 2 – DEMOGRAPHIC TRENDS

Demographic Indicator	1990		2000		2010	
	#	%	#	%	#	%
St. Louis County						
Race/Ethnicity						
White, Non-Hispanic	750,662	82.5%	701,207	75.1%	628,375	68.4%
Black, Non-Hispanic	135,117	14.9%	188,742	20.2%	224,598	24.5%
Hispanic	8,905	1.0%	13,484	1.4%	23,548	2.6%
Asian or Pacific Islander, Non-Hispanic	12,483	1.4%	23,900	2.6%	37,241	4.1%
Native American, Non-Hispanic	1,162	0.1%	3,401	0.4%	3,722	0.4%
National Origin						
Foreign-born	25,224	2.8%	39,891	4.3%	58,388	6.4%
Limited English Proficiency						
Limited English proficiency	12,747	1.4%	19,882	2.1%	27,172	3.0%
Age						
Under 18	223,665	24.6%	241,713	25.9%	214,401	23.3%
18-64	567,822	62.4%	562,754	60.3%	568,513	61.9%
65+	118,045	13.0%	128,863	13.8%	135,854	14.8%
Sex						
Male	433,710	47.7%	441,734	47.3%	435,059	47.4%
Female	475,822	52.3%	491,597	52.7%	483,710	52.7%
Household Type						
Families with children	115,082	46.5%	87,721	46.9%	105,442	43.7%

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

Data Sources: U.S. Census 2000 SF1 Tables P027 and P035, U.S. Census 2010 SF1 Tables P29 and P39, HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released Nov 2017, <https://egis.hud.gov/affht/>

Demographic Indicator	1990		2000		2010	
	#	%	#	%	#	%
St. Charles County						
Race/Ethnicity						
White, Non-Hispanic	171,840	95.5%	208,682	93.5%	237,973	89.1%
Black, Non-Hispanic	4,430	2.5%	7,042	3.2%	13,354	5.0%
Hispanic	1,841	1.0%	3,277	1.5%	7,556	2.8%
Asian or Pacific Islander, Non-Hispanic	1,261	0.7%	2,536	1.1%	6,421	2.4%
Native American, Non-Hispanic	369	0.2%	1,127	0.5%	1,396	0.5%
National Origin						
Foreign-born	2,166	1.2%	4,642	2.1%	8,875	3.3%
Limited English Proficiency						
Limited English proficiency	1,234	0.7%	2,926	1.3%	4,130	1.6%
Age						
Under 18	53,543	29.8%	64,054	28.7%	65,315	24.5%
18-64	113,771	63.2%	138,422	62.0%	170,371	63.8%
65+	12,687	7.1%	20,624	9.2%	31,381	11.8%
Sex						
Male	89,361	49.6%	109,947	49.3%	131,181	49.1%
Female	90,641	50.4%	113,153	50.7%	135,885	50.9%
Household Type						
Households with children	27,439	56.0%	19,779	53.2%	32,730	45.4%

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

Data Sources: U.S. Census 2000 SF1 Tables P027 and P035, U.S. Census 2010 SF1 Tables P29 and P39, HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released Nov 2017, <https://egis.hud.gov/affht/>

Demographic Indicator	1990		2000		2010	
	#	%	#	%	#	%
Jefferson County						
Race/Ethnicity						
White, Non-Hispanic	167,962	98.1%	191,771	96.8%	208,570	95.4%
Black, Non-Hispanic	1,166	0.7%	1,660	0.8%	2,708	1.2%
Hispanic	1,130	0.7%	1,992	1.0%	3,405	1.6%
Asian or Pacific Islander, Non-Hispanic	505	0.3%	1,026	0.5%	2,070	1.0%
Native American, Non-Hispanic	385	0.2%	1,425	0.7%	1,634	0.8%
National Origin						
Foreign-born	1,379	0.8%	1,946	1.0%	3,965	1.8%
Limited English Proficiency						
Limited English proficiency	973	0.6%	1,752	0.9%	2,110	1.0%
Age						
Under 18	50,951	29.8%	56,715	28.6%	54,946	25.1%
18-64	106,092	61.9%	123,259	62.2%	139,232	63.7%
65+	14,245	8.3%	18,156	9.2%	24,376	11.2%
Sex						
Male	85,010	49.6%	98,576	49.8%	108,757	49.8%
Female	86,277	50.4%	99,554	50.3%	109,797	50.2%
Household Type						
Families with children	26,052	54.8%	21,342	51.1%	26,937	44.9%

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

Data Sources: U.S. Census 2000 SF1 Tables P027 and P035, U.S. Census 2010 SF1 Tables P29 and P39, HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released Nov 2017, <https://egis.hud.gov/affht/>

Demographic Indicator	1990		2000		2010	
	#	%	#	%	#	%
City of Florissant						
Race/Ethnicity						
White, Non-Hispanic	49,928	92.2%	43,852	81.1%	34,588	66.3%
Black, Non-Hispanic	3,245	6.0%	8,534	15.8%	15,620	30.0%
Hispanic	522	1.0%	736	1.4%	1,016	2.0%
Asian or Pacific Islander, Non-Hispanic	352	0.7%	577	1.1%	606	1.2%
Native American, Non-Hispanic	70	0.1%	228	0.4%	237	0.5%
National Origin						
Foreign-born	807	1.5%	961	1.8%	1,302	2.5%
Limited English Proficiency						
Limited English proficiency	588	1.1%	615	1.1%	977	1.9%
Age						
Under 18	12,770	23.7%	13,800	25.5%	12,426	23.8%
18-64	33,856	62.8%	31,231	57.7%	31,537	60.5%
65+	7,273	13.5%	9,071	16.8%	8,194	15.7%
Sex						
Male	25,713	47.7%	25,419	47.0%	24,391	46.8%
Female	28,187	52.3%	28,683	53.0%	27,767	53.2%
Household Type						
Households with children	6,508	42.7%	5,282	45.7%	6,009	43.9%

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

Data Sources: U.S. Census 2000 SF1 Tables P027 and P035, U.S. Census 2010 SF1 Tables P29 and P39, HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released Nov 2017, <https://egis.hud.gov/affht/>

Demographic Indicator	1990		2000		2010	
	#	%	#	%	#	%
City of O'Fallon						
Race/Ethnicity						
White, Non-Hispanic	27,502	96.5%	50,388	94.5%	71,708	88.9%
Black, Non-Hispanic	380	1.3%	1,269	2.4%	3,559	4.4%
Hispanic	385	1.4%	771	1.5%	2,144	2.7%
Asian or Pacific Islander, Non-Hispanic	86	0.3%	491	0.9%	2,701	3.4%
Native American, Non-Hispanic	95	0.3%	273	0.5%	431	0.5%
National Origin						
Foreign-born	321	1.1%	1,030	1.9%	2,711	3.4%
Limited English Proficiency						
Limited English proficiency	163	0.6%	450	0.8%	1,128	1.4%
Age						
Under 18	9,012	31.7%	17,447	32.7%	23,593	29.3%
18-64	17,780	62.5%	32,167	60.3%	49,336	61.2%
65+	1,643	5.8%	3,692	6.9%	7,727	9.6%
Sex						
Male	14,185	49.9%	26,177	49.1%	39,471	48.9%
Female	14,249	50.1%	27,129	50.9%	41,185	51.1%
Household Type						
Families with children	4,649	58.6%	6,589	59.4%	11,716	53.3%
Households with female householders	N/A	N/A	3,718	8.1%	8,666	10.9%

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

Data Sources: U.S. Census 2000 SF1 Tables P027 and P035, U.S. Census 2010 SF1 Tables P29 and P39, HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released Nov 2017, <https://egis.hud.gov/affht/>

Demographic Indicator	1990		2000		2010	
	#	%	#	%	#	%
St. Louis Region						
Race/Ethnicity						
White, Non-Hispanic	2,080,458	81.2%	2,083,286	77.9%	2,088,985	74.9%
Black, Non-Hispanic	423,169	16.5%	488,227	18.3%	536,855	19.3%
Hispanic	26,338	1.0%	40,120	1.5%	71,764	2.6%
Asian or Pacific Islander, Non-Hispanic	23,036	0.9%	43,970	1.6%	72,181	2.6%
Native American, Non-Hispanic	4,586	0.2%	12,781	0.5%	14,329	0.5%
National Origin						
Foreign-born	49,529	1.9%	81,389	3.0%	115,659	4.2%
Limited English Proficiency						
Limited English proficiency	30,573	1.2%	49,122	1.8%	58,792	2.1%
Age						
Under 18	672,441	26.3%	720,176	26.9%	664,781	23.9%
18-64	1,556,286	60.8%	1,607,631	60.1%	1,751,191	62.8%
65+	331,745	13.0%	347,520	13.0%	371,729	13.3%
Sex						
Male	1,225,129	47.9%	1,286,819	48.1%	1,349,532	48.4%
Female	1,335,344	52.2%	1,388,507	51.9%	1,438,169	51.6%
Household Type						
Households with children	331,790	48.6%	256,867	48.5%	321,583	44.3%
Households with female householders	N/A	N/A	N/A	N/A	435,017	15.5%

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

Data Sources: U.S. Census 2000 SF1 Tables P027 and P035, U.S. Census 2010 SF1 Tables P29 and P39, HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released Nov 2017, <https://egis.hud.gov/affht/>

RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (RECAPs). These areas are defined as census tracts that have an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-white population of 50% or more. Using a metric that combines demographic and economic indicators helps to identify a jurisdiction's most vulnerable communities.

The racial and ethnic composition of neighborhoods with concentrations of poverty is disproportionate relative to the U.S. population overall. According to the U.S. Department of Health and Human Services, Black and Hispanic populations comprise nearly 80% of the population living in areas of concentrated poverty in metropolitan areas, but only account for 42.6% of the total poverty population in the U.S.⁴ Overrepresentation of these groups in areas of concentrated poverty can exacerbate disparities related to safety, employment, access to jobs and quality education, and conditions that lead to poor health.

Identification of RECAPs is significant in determining priority areas for reinvestment and services to ameliorate conditions that negatively impact RECAP residents and the larger region. Since 2000, the prevalence of concentrated poverty in America has expanded by nearly 75% in both population and number of neighborhoods. The majority of concentration of poverty is within the largest metro areas, but suburban regions have experienced the fastest growth rate.⁵

There are currently 2 census tracts that are designated as RECAPs in the study area. Both RECAP census tracts are located in the northeast section of St. Louis County. The number of RECAP census tracts has slightly fluctuated since 1990 but locations have been geographically isolated to northeastern St. Louis County.

The population residing in RECAP tracts in the study area is 7,643, which accounts for just a small fraction of St. Louis County's total population. The Black population accounts for a significant majority (92.6%) of the population in RECAP communities. The discrepancy between population share of Black residents in the RECAP census tracts and St. Louis County (24.1%) and the St. Louis MSA (18.3%) clearly indicates disproportionate representation of Black residents in these communities of concentrated poverty. All other racial and ethnic groups comprise smaller shares of the RECAP population than their shares of the population in the associated jurisdiction.

The foreign-born population makes up a small fraction of the population in RECAP census tracts in the study area. Residents originating from Vietnam comprise the largest share and represent only 0.7% of the RECAP population.

⁴ United States, Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. "Overview of Community Characteristics in Areas with Concentrated Poverty." ASPE Issue Brief, May 2014, https://aspe.hhs.gov/system/files/pdf/40651/rb_concentratedpoverty.pdf.

⁵ Kneebone, Elizabeth. "The Growth and Spread of Concentrated Poverty, 2000 to 2008-2012." *The Brookings Institution*, 29 July 2016, www.brookings.edu/interactives/the-growth-and-spread-of-concentrated-poverty-2000-to-2008-2012/.

TABLE 3 – RECAP CENSUS TRACTS IN NORTH ST. LOUIS COUNTY

Demographic Indicator	St. Louis HOME Consortium RECAP Tracts	
	#	%
Race/Ethnicity		
Total Population in RECAPs	7,643	-
White, Non-Hispanic	391	5.1%
Black or African American, Non-Hispanic	7,076	92.6%
Hispanic	43	0.6%
Asian or Pacific Islander, Non-Hispanic	11	0.1%
Native American, Non-Hispanic	12	0.2%
Other, Non-Hispanic	9	0.1%
National Origin		
Foreign-Born Population		
Vietnam	52	0.68%
Western Africa	14	0.18%
Eastern Africa	6	0.08%

Data Sources: 2014-2018 5-Year American Community Survey, Tables B03002, B17001, and B05006

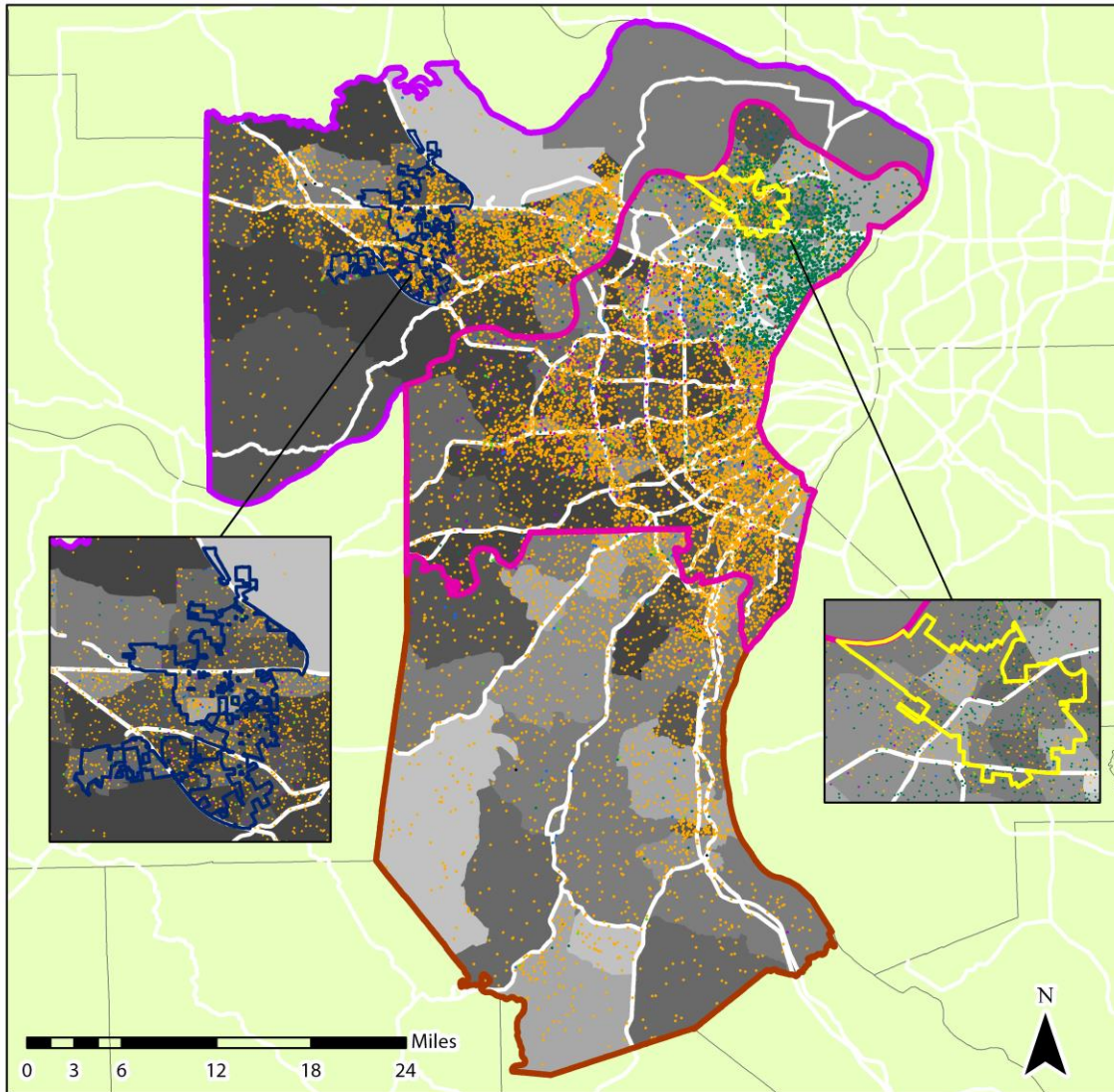
Figures 10 and 11 on the following pages map poverty rates across the jurisdictions of the Consortium overlaid with dots representing the race/ethnicity and the national origin of residents, respectively. In both figures, shading on the maps indicated poverty levels, with lighter colors representing higher poverty rates. The highest levels of poverty in St. Louis County occur generally south and east of Lambert International Airport in the vicinity of Pagedale, Jennings, and Ferguson. The map below indicates that this area coincides with a resident population that is predominantly Black. Florissant’s areas of greatest poverty include Old Town Florissant and also the several blocks on each side of Mullanphy Road. These neighborhoods have relatively diverse populations, with Old Town Florissant composed primarily of Black residents but with a sizeable white population as well. The Mullanphy Road corridor has significant Black and white populations. While the city as a whole shows some clustering of Mexican immigrants, these residents generally reside in lower-poverty areas of the city.

In St. Charles County, the area of highest poverty lies between the Mississippi River and State Highways 79 and 370. This is not a populous area, but the majority of the residents here are white, with some noteworthy clustering of Mexican immigrants. The highest poverty rates within the City of O’Fallon are found in the neighborhoods generally between Mexico Road and Feise Road. The majority of these residents are white and/or of Mexican descent.

Jefferson County’s areas of highest poverty are found in the south and west portions of the county, including the communities of Morse Mill and Ware as well as an area extending from the eastern edge of De Soto to US-67. The populations of these high poverty areas are overwhelmingly white and without measurable immigrant populations. These observations generally mirror the demographics of the county as a whole.

FIGURE 10 – POVERTY RATES WITH RACE AND ETHNICITY IN THE ST. LOUIS HOME CONSORTIUM, 2014-2018

Poverty + Race/ Ethnicity



Source: American Community Survey 5-Year Estimates, 2014-2018

Percent of Population Below Poverty Level in Past 12 Months

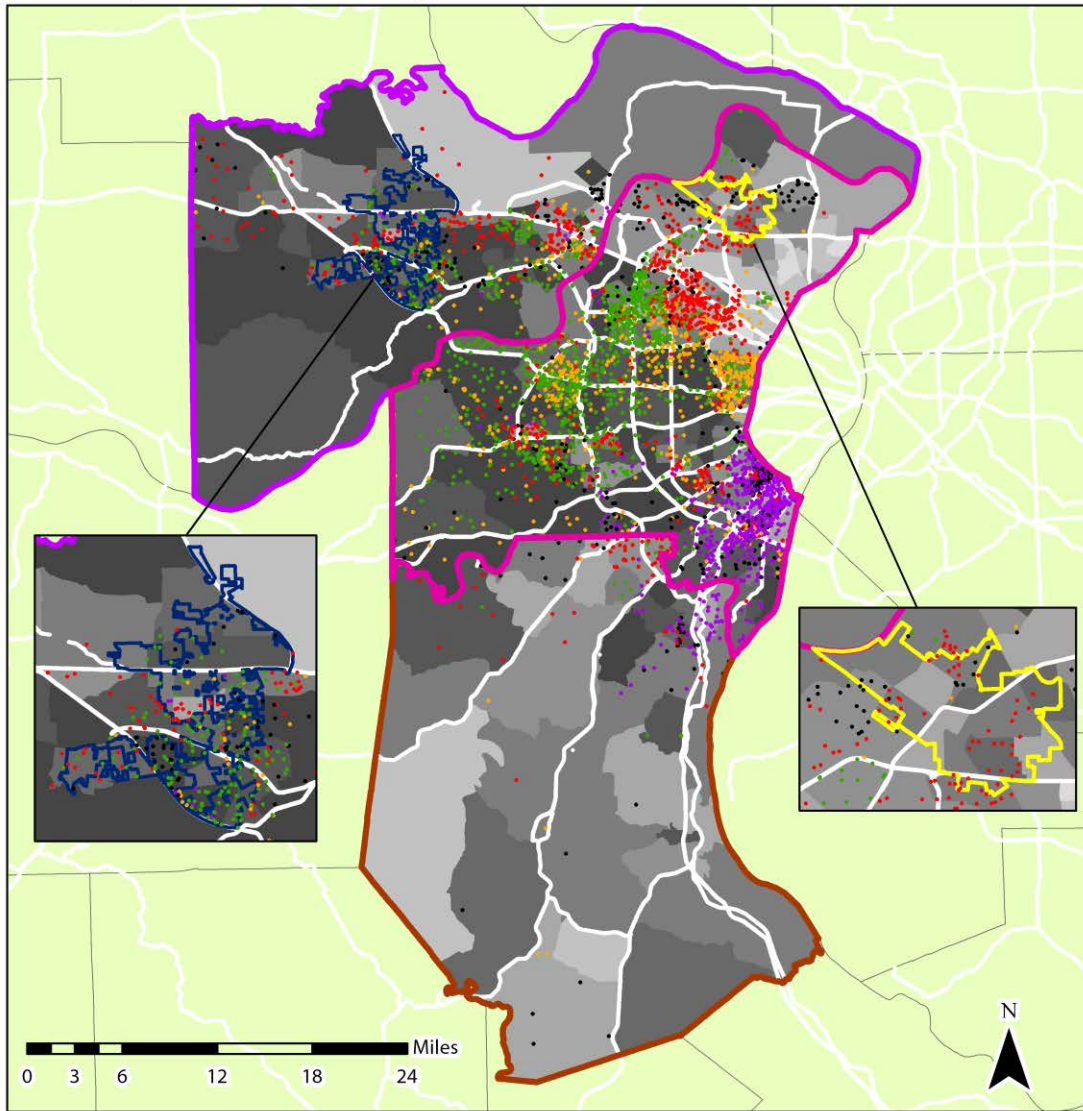


Race + Ethnicity 1 Dot = 100 People



FIGURE 11 – POVERTY RATES AND NATIONAL ORIGIN IN THE ST. LOUIS HOME CONSORTIUM, 2014-2018

Poverty + National Origin



Source: American Community Survey 5-Year Estimates, 2014-2018

Percent of Population Below Poverty Level in Past 12 Months



National Origin (Top 5 Most Populous)

1 Dot = 10 People



CHAPTER 4.

SEGREGATION AND INTEGRATION

Communities experience varying levels of segregation between different racial, ethnic, and socioeconomic groups. High levels of residential segregation often lead to conditions that exacerbate inequalities among population groups within a community. Increased concentrations of poverty and unequal access to jobs, education, and other services are some of the consequences of high residential segregation.⁶

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

RACE AND ETHNICITY

To illustrate demographic trends over time, Figures 12 through 14 map the St. Louis HOME Consortium's population by race and ethnicity using data from the 2000 Census and the 5-Year American Community Survey datasets from 2006-2010 and 2014-2018. The most densely populated areas are located in St. Louis and St. Charles counties and the cities within the boundaries, Florissant and O'Fallon. Population distribution patterns by race and ethnicity throughout the study area show strong concentrations of white and Black populations, while other non-white populations are more evenly distributed. Historic data indicates an increase in non-white populations since 2000, but geographic distribution of racial and ethnic groups has remained mostly unchanged.

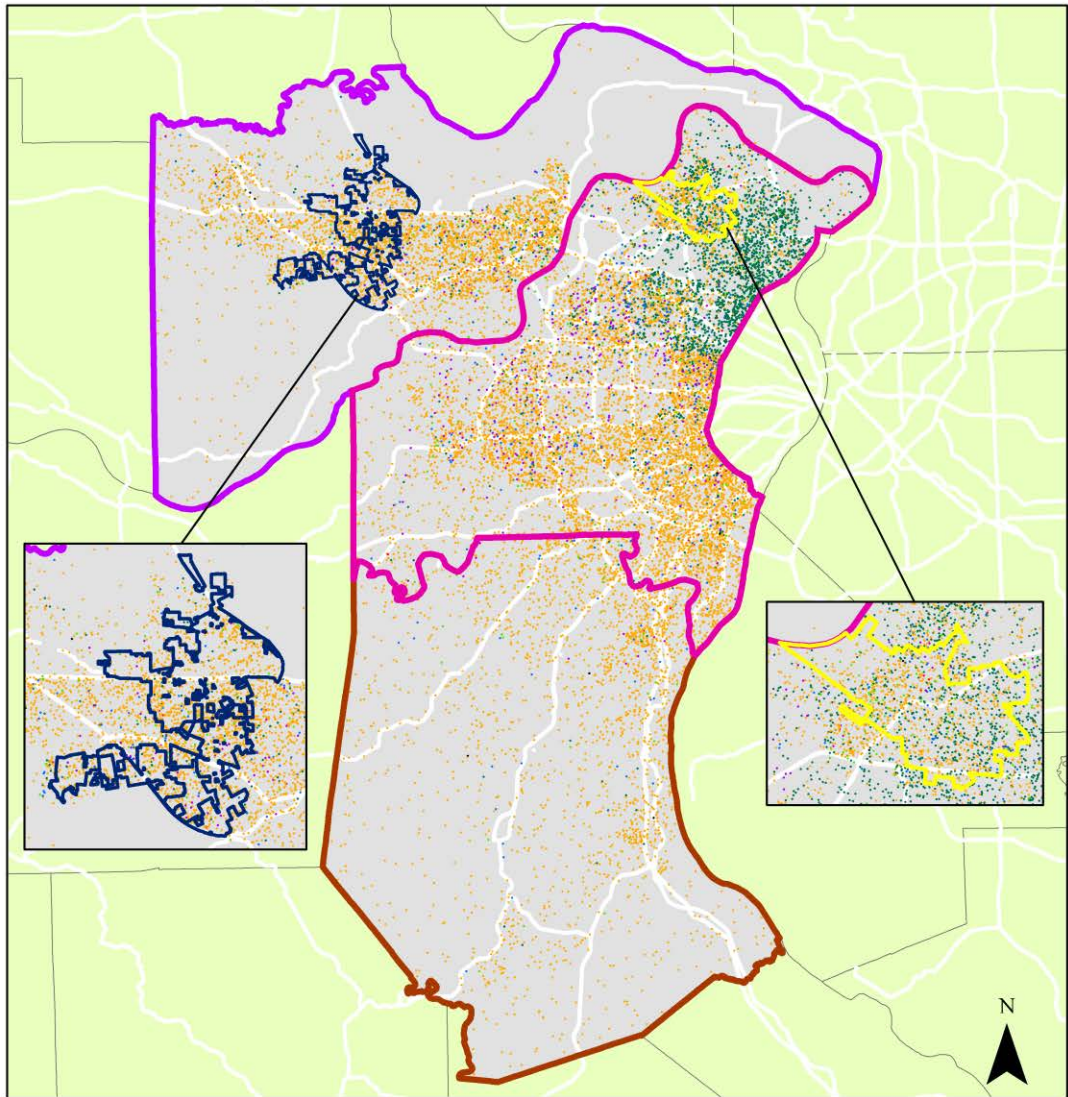
There are strong patterns shown in Figures 12 to 14 that suggest high levels of segregation between white and Black populations in St. Louis County since 2000. Population distribution patterns by race and ethnicity show a strong concentration of Black residents in the northeast region of St. Louis County and in the City of Florissant. Spatial patterns over time also suggest increasing levels of segregation in the northeast section of St. Louis County and the City of Florissant. There is evidence of increasing population density since 2000, but there is no visual indication of a significant shift in spatial distribution by race or ethnicity.

⁶ Massey, D. (1990). American Apartheid: Segregation and the Making of the Underclass. *American Journal of Sociology*, 96(2), 329-357. Retrieved from <http://www.jstor.org/stable/2781105>

Outside of the northeast region of St. Louis County, all other racial and ethnic groups appear to be relatively evenly distributed consistent with patterns of population density through the Consortium. There are patterns to suggest a loose concentration of Asian or Pacific Islander population in central St. Louis County, however, there is no visual indication of segregation from other racial and ethnic groups aside from the overall segregation of the Black population. In general, the Consortium's population has become more diverse since 2000 with an influx of people of color across all jurisdictions, however, Jefferson County remains more homogeneous than other jurisdictions with spatial patterns that indicate far less racial and ethnic diversity.

FIGURE 12 – POPULATION BY RACE AND ETHNICITY IN ST. LOUIS HOME CONSORTIUM, 2014-2018

Race/Ethnicity, St. Louis HOME Consortium, 2014-2018



0 3 6 12 18 24 Miles

Source: American Community Survey 5-Year Estimates, 2014-2018

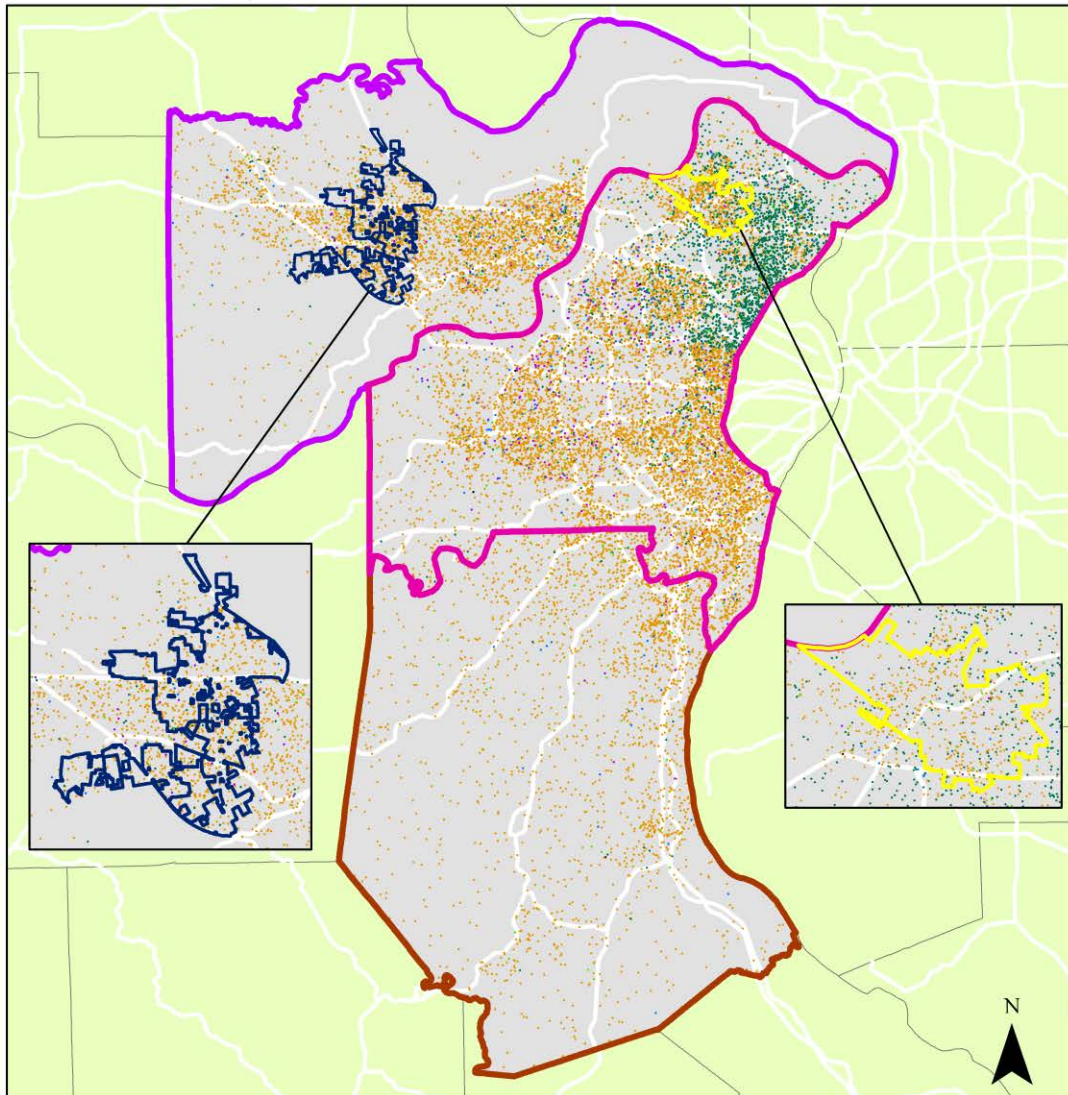
Race + Ethnicity 1 Dot = 100 People

- White, Non-Hispanic
- Black, Non-Hispanic
- Hispanic or Latino (of any race)
- Asian/ Pacific Islander, Non-Hispanic
- Multi-Racial, Non-Hispanic
- Other, Non-Hispanic
- Native American, Non-Hispanic

- St Louis County
- St. Charles County
- Jefferson County
- City of Florissant
- City of O'Fallon

FIGURE 13 – POPULATION BY RACE AND ETHNICITY IN ST. LOUIS HOME CONSORTIUM, 2006-2010

Race/Ethnicity, St. Louis HOME Consortium, 2006 - 2010



0 3 6 12 18 24 Miles

Source: American Community Survey 5-Year Estimates, 2006-2010

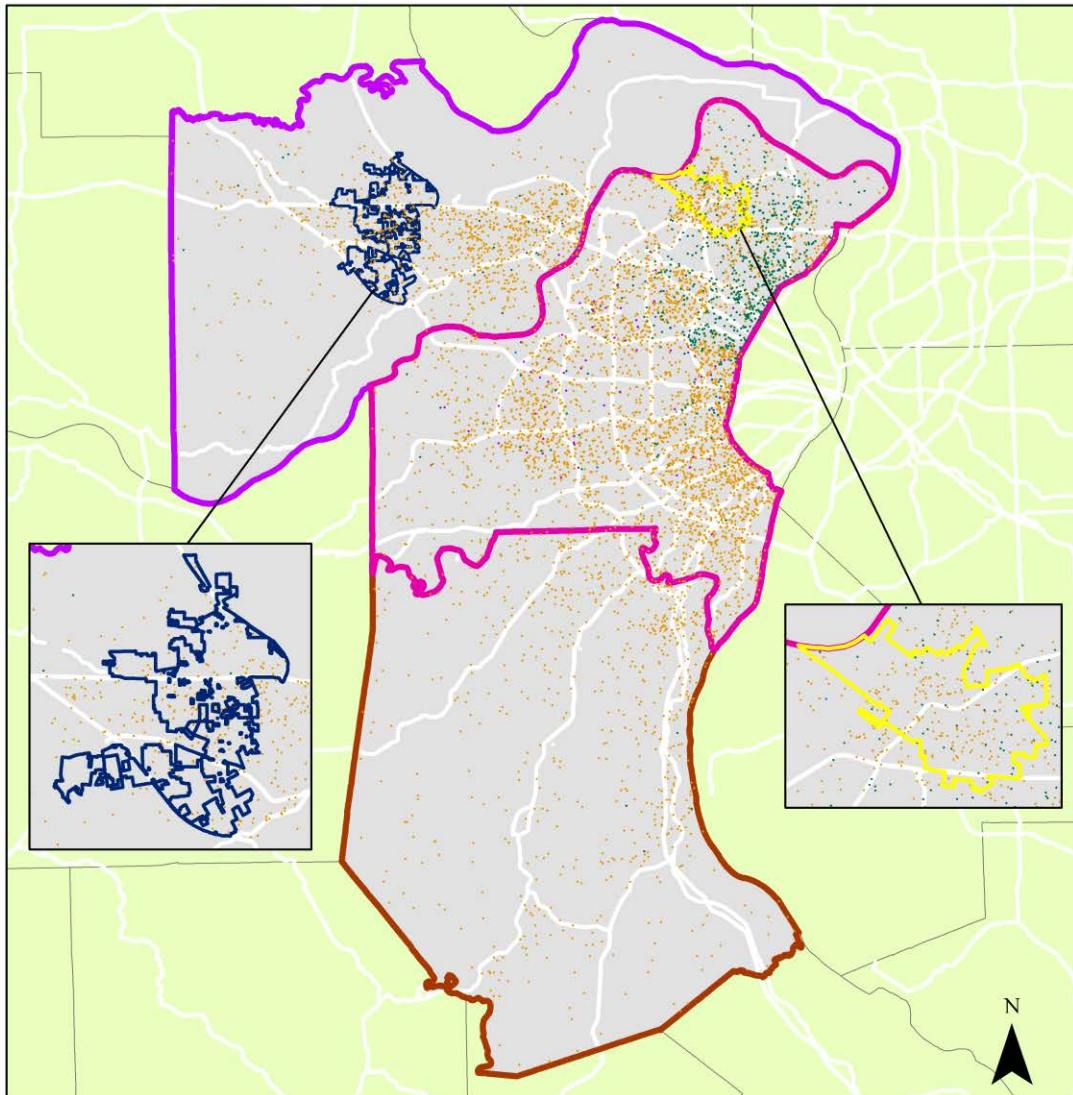
Race + Ethnicity 1 Dot = 100 People

- White, Non-Hispanic
- Black, Non-Hispanic
- Hispanic or Latino (of any race)
- Asian/ Pacific Islander, Non-Hispanic
- Multi-Racial, Non-Hispanic
- Other, Non-Hispanic
- Native American, Non-Hispanic

- St Louis County
- St. Charles County
- Jefferson County
- City of Florissant
- City of O'Fallon

FIGURE 14 – POPULATION BY RACE AND ETHNICITY IN ST. LOUIS HOME CONSORTIUM, 2000

Race/Ethnicity, St. Louis HOME Consortium, 2000



0 3 6 12 18 24 Miles

Source: Decennial Census, 2000

Race + Ethnicity 1 Dot = 100 People

- White, Non-Hispanic
- Black, Non-Hispanic
- Hispanic or Latino (of any race)
- Asian/ Pacific Islander, Non-Hispanic
- Other, Non-Hispanic
- Native American, Non-Hispanic

- St Louis County
- St. Charles County
- Jefferson County
- City of Florissant
- City of O'Fallon

SEGREGATION LEVELS

In addition to visualizing the racial and ethnic composition of the area with the preceding maps, this study also uses a statistical analysis – referred to as dissimilarity – to evaluate how residential patterns vary by race and ethnicity, and how these patterns have changed since 1990. The Dissimilarity Index (DI) indicates the degree to which two groups living in a region are similarly geographically distributed. Segregation is lowest when the geographic patterns of each group are the same. For example, segregation between two groups in a city or county is minimized when the population distribution by census tract of the first group matches that of the second. Segregation is highest when no members of the two groups occupy a common census tract. The proportion of the minority population group can be small and still not segregated if evenly spread among tracts or block groups.

Evenness is not measured in an absolute sense, but is scaled relative to the other group. Dissimilarity Index values range from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation. The DI represents the proportion of one group that would have to change its area of residence to match the distribution of the other.

The table below shares the dissimilarity indices for three pairings in each of the individual Consortium jurisdictions (St. Louis County, St. Charles County, Jefferson County, Florissant, O’Fallon), in the Consortium as a whole, and in the wider St. Louis region. This table presents values for 1990, 2000, and 2010, all calculated using census tracts as the area of measurement. The “block group” figure is calculated using block groups as the area of measurement. Because block groups are smaller geographies, they measure segregation at a finer grain than analyses that use census tracts and, as a result, often indicate slightly higher levels of segregation than tract-level calculations.⁷ This assessment begins with a discussion of segregation at the tract-level from 1990 through 2010, and then examines the 2010 figure calculated using block groups.

The dissimilarity indices calculated for each pairing in St. Louis County show very high levels of segregation between Black and white populations throughout the period between 1990 and 2010. DI values increased slightly from 69.3 in 1990 to 71.3 in 2010 indicating increasing segregation. Hispanic/white and Asian or Pacific Islander/white pairings indicate low levels of segregation, however, the DI value for Hispanic/white pairing nearly doubled from 14.3 to 28.5 between 1990 and 2010.

All DI values for St. Charles County indicate low levels of segregation for all pairings between 1990 and 2010. Although not exceeding the threshold for low segregation, the DI value for the Hispanic/white pairing in St. Charles County nearly doubled, similar to the changes in DI value for the same pairing in St.

⁷ Iceland, John and Erika Steinmetz. 2003. *The Effects of Using Block Groups Instead of Census Tracts When Examining Residential Housing Patterns*. U.S. Census Bureau, Washington DC: US. Accessed via https://www.census.gov/hhes/www/housing/resseg/pdf/unit_of_analysis.pdf.

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

Louis County. The DI value for the Black/white pairing decreased by nearly a point while the DI value for the Asian or Pacific Islander/white pairing increased about 5 points.

DI values for all pairings in Jefferson County indicate low levels of segregation in 2010, however, Jefferson County experienced significant changes to DI value for the Black/white pairing between 1990 and 2010. In 1990, the DI value for the Black/white pairing was 61.8 to suggest high levels of segregation. The DI value calculated for 2010 was 34 points lower that suggests a dramatic reduction in segregation between Black and white populations in Jefferson County.

DI values indicate low levels of segregation of City of Florissant historically between 1990 and 2010, however, the DI value for the Black/white pairing increased by 10.8 points to 31.4 during this period. DI values have also increased for Hispanic/white and Asian or Pacific Islander/white pairings between 1990 and 2010, but still remain at very low levels.

DI calculations in the City of O'Fallon in 2010 indicate low levels of segregation for all pairings and a significant drop in DI value for the Black/white pairing from 32.8 in 1990 to 9.1 in 2010. DI values for the Hispanic/white and Asian or Pacific Islander/white pairings increased slightly over this period but remained at low levels.

Considering all five jurisdictions together, the dissimilarity indices calculated for each pairing in the Consortium's study area show very high levels of segregation among Black and white populations. The DI value for the Black/white pairing increased slightly since 1990 to a value of 70.7 in 2010. The DI value of 25.2 calculated for the Hispanic/white pairing is an increase of about 10 points since 1990. Similar to DI values for the Black/white pairing, DI value for the Asian or Pacific Islander/white pairing remained virtually unchanged during this period.

DI values calculated for the greater St. Louis Region show similar patterns to those found in the Consortium's study area, however, DI values show increased levels of segregation for Hispanic/white and Asian or Pacific Islander/white pairings. The Asian or Pacific Islander/white pairing in St. Louis Region surpassed the threshold to indicate moderate levels of segregation in the region.

Block group level analysis for dissimilarity indices show higher levels of segregation for all pairings in all jurisdictions. Higher DI values on the block group level cause some pairings to exceed threshold values to indicate higher levels of segregation. The Black/white pairing has the highest DI (75.2) in St. Louis County, about 4 points higher than the census tract level DI value in 2010. Block group DI values for the Black/white pairings in Jefferson County and Florissant are also significantly higher than census tract level values calculated for the same pairing in each jurisdiction. Block group DI values for Black/white pairings in Jefferson County and Florissant exceed the threshold to indicate moderate levels of segregation. Analysis at the block level also pushes the DI value for Asian or Pacific Islander/white pairings past the threshold for moderate segregation in the study area and the region.

TABLE 4 – RACIAL AND ETHNIC DISSIMILARITY TRENDS

Race/Ethnicity	Census Tracts			Block Groups 2010
	1990	2000	2010	
St. Louis County				
Black/White	69.3	70.6	71.3	75.2
Hispanic/White	14.3	20.2	28.5	32.8
Asian or Pacific Islander/White	31.7	31.2	31.4	38.7
St. Charles County				
Black/White	22.1	17.4	21.0	25.1
Hispanic/White	10.2	15.3	19.9	23.8
Asian or Pacific Islander/White	19.9	17.3	25.0	31.2
Jefferson County				
Black/White	61.8	46.1	27.8	40.8
Hispanic/White	11.6	9.9	14.5	18.2
Asian or Pacific Islander/White	18.4	17.3	18.7	31.6
City of Florissant				
Black/White	20.6	23.7	31.4	41.5
Hispanic/White	8.1	10.0	11.4	17.8
Asian or Pacific Islander/White	14.3	7.9	18.7	36.2
City of O'Fallon				
Black/White	32.8	10.9	9.1	13.7
Hispanic/White	9.0	8.8	10.6	14.8
Asian or Pacific Islander/White	16.7	13.3	19.8	29.3
St. Louis HOME Consortium				
Black/White	69.6	71.6	70.7	74.4
Hispanic/White	14.6	19.4	25.2	29.0
Asian or Pacific Islander/White	35.9	37.5	35.7	42.7
St. Louis Region				
Black/White	77.2	73.3	70.6	74.4
Hispanic/White	23.4	27.7	30.5	33.9
Asian or Pacific Islander/White	39.9	41.9	40.7	47.3

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

NATIONAL ORIGIN AND LIMITED ENGLISH PROFICIENCY POPULATION

Settlement patterns of immigrants significantly impact the composition and landscape of communities across the United States. Large central cities have the largest population of foreign-born residents, but suburban areas are experiencing rapid growth of foreign-born populations recently.⁸ Clusters of immigrants of the same ethnicity form for a variety of reasons. Social capital in the form of kinship ties, social network connections, and shared cultural experiences often draw new immigrants to existing communities. Settling in neighborhoods with an abundance of social capital is less financially burdensome for immigrants and provides opportunities to accumulate financial capital through employment and other resources that would otherwise be unattainable.⁹

Populations with limited English proficiency (LEP) are typically composed of foreign-born residents that originate from countries where English is not the primary language, however, a substantial portion (19%) of the national LEP population is born in the United States. Nationally, the LEP population has lower levels of education and is more likely to live in poverty compared to the English proficient population.¹⁰ Recent studies have also found that areas with high concentrations of LEP residents have lower rates of homeownership.¹¹

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

Figure 15 shows distinct concentrations of foreign-born residents throughout all jurisdictions in the Consortium. There are strong concentrations of residents originating from India, Mexico, Bosnia and Herzegovina, China, and Vietnam. The majority of these populations reside in St. Louis County, however there are also strong patterns of concentration in other jurisdictions.

There are several concentrations throughout St. Louis County, particularly south of St. Louis Lambert International Airport. Residential patterns of people from India show a heavy concentration in Maryland Heights with looser concentrations over a wider geographic area in the central region of the county. There is a concentration of residents from Mexico in neighborhoods southeast of the airport. Residents from Bosnia and Herzegovina almost exclusively reside in unincorporated areas in the southeast segment of the county immediately south of the border between the city of St. Louis. This area is also home to a concentration of Vietnamese residents. There are smaller concentrations of residents from Vietnam in neighborhoods in the northeast area of St. Louis County surrounding the City of Florissant. There are

⁸ James, F., Romine, J., & Zwanzig, P. (1998). The Effects of Immigration on Urban Communities. *Cityscape*, 3(3), 171-192.

⁹ Massey, D. (1999). Why Does Immigration Occur?: A Theoretical Synthesis. In Hirschman C., Kasinitz P., & DeWind J. (Eds.), *Handbook of International Migration, The: The American Experience* (pp. 34-52). Russell Sage Foundation.

¹⁰ Zong, J. & Batalova, J. (2015). "The Limited English Proficient Population in the United States" *Migration Information Source*. Retrieved: <http://www.migrationpolicy.org/article/limited-english-proficient-population-united-states>

¹¹ Golding, E., Goodman, L., & Strohach, S. (2018). "Is Limited English Proficiency a Barrier to Homeownership." Urban Institute. Retrieved: <https://www.urban.org/research/publication/limited-english-proficiency-barrier-homeownership>

several, smaller concentrations of residents from China along the eastern border shared with the city of St. Louis and west of Interstate 270.

Although less pronounced, there are concentrations of foreign-born residents in St. Charles County. Residents from India and Mexico reside in neighborhoods primarily along Interstate 70 and Route 94. Small concentrations of Vietnamese residents are dispersed through the county with a distinct concentration between Little Hills Expressway and North 3rd Street. Residents from China mostly reside in neighborhoods along Interstate 70 closer to the border of St. Louis County.

The foreign-born population in Jefferson County is small, however, there are distinct concentrations of specific populations. There are loose concentrations of residents from Mexico and Vietnam along the northern border of the county. There is also a small presence of residents from India in the same general area. The strongest concentration is found in the general area of Liguori where people from Bosnia and Herzegovina and Vietnam reside. Residents from Mexico, China, and Vietnam also have a presence in less densely populated areas in the western and southern parts of the county.

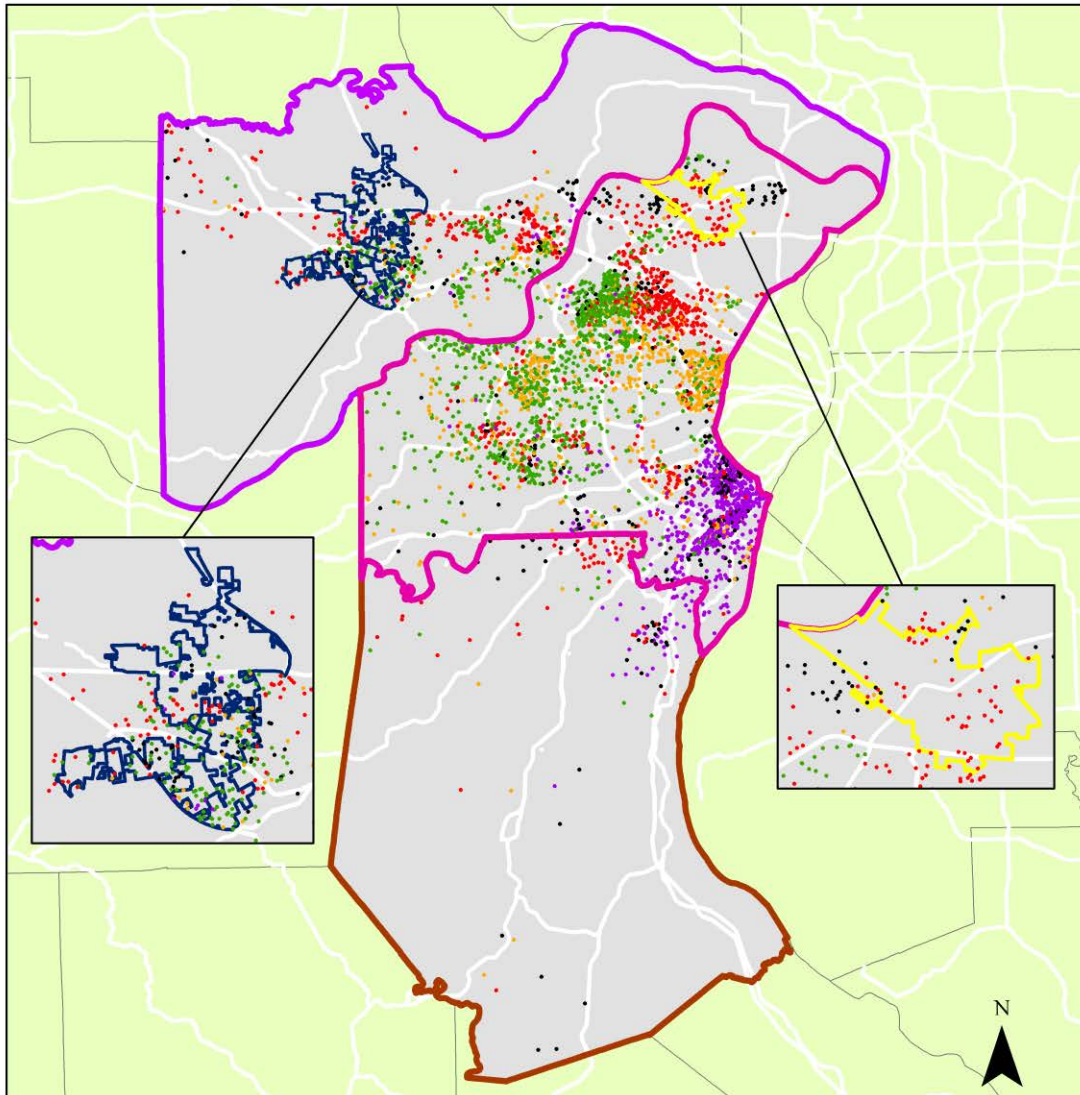
According to Figure 15, the majority of the foreign-born population in the City of Florissant originate from Mexico. Residential patterns indicate residents from Mexico tend to reside in the outskirts of the city in neighborhoods along the borders.

Distinguishing residential patterns of foreign-born residents is difficult in the City of O'Fallon because of irregular borders, however, concentrations of residents from India are dispersed throughout the city.

The residential patterns displayed in Figure 16 illustrate that the geographic distribution of residents with limited English proficiency (LEP) coincides with the locations of the foreign-born population in all jurisdictions. The residential patterns of the Spanish-speaking LEP populations closely mirror that of foreign-born residents originating from Mexico. Residential patterns for residents that speak Chinese, Serbo-Croatian, and Vietnamese are the same as corresponding foreign-born populations. The lack of an LEP population that coincides with the concentrations of foreign-born residents from India is an indication of the population's proficiency with the English language.

FIGURE 15 – NATIONAL ORIGIN

National Origin



0 3 6 12 18 24 Miles

Source: American Community Survey 5-Year Estimates, 2014-2018

National Origin (Top 5 Most Populous)

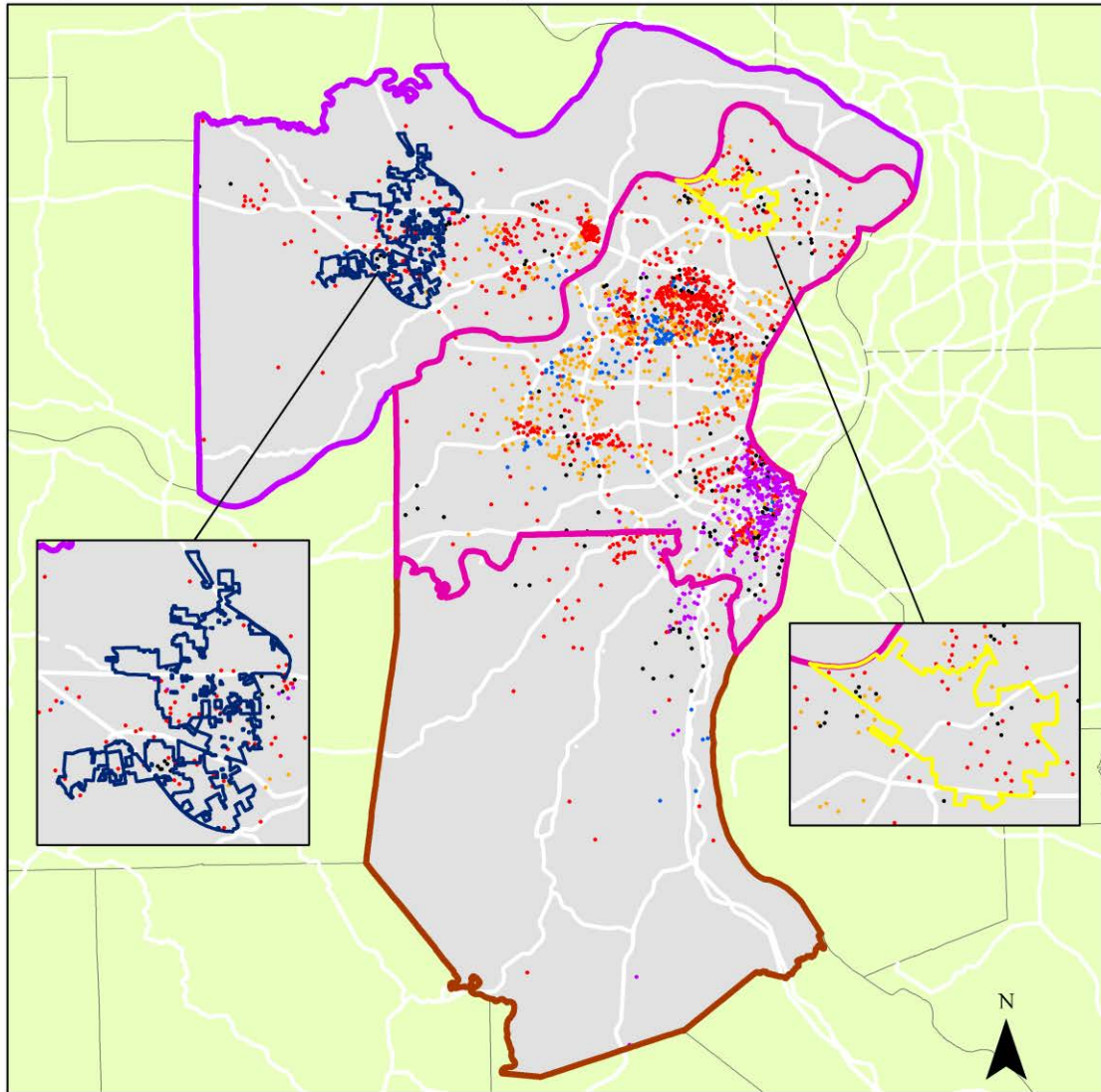
1 Dot = 10 People

- India
- Mexico
- Bosnia and Herzegovina
- China (excluding Hong Kong and Taiwan)
- Vietnam

- St. Louis County
- St. Charles County
- Jefferson County
- City of Florissant
- City of O'Fallon

FIGURE 16 – POPULATION WITH LIMITED ENGLISH PROFICIENCY

Population with Limited English Proficiency



0 3 6 12 18 24 Miles

Source: American Community Survey 5-Year Estimates, 2014-2018

LEP Population by Language Spoken (Top 5 Most Populous)

1 Dot = 10 People

- Spanish or Spanish Creole
- Chinese
- Serbo-Croatian
- Vietnamese
- Russian

- St Louis County
- St. Charles County
- Jefferson County
- City of Florissant
- City of O'Fallon

CHAPTER 5.

ACCESS TO OPPORTUNITY

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

It is important to understand opportunity, as used in this context, as a subjective quality. Typically, it refers to access to resources like employment, quality education, healthcare, childcare, and other services that allow individuals and communities to achieve a high quality of life. However, research on this subject has found perceptions of opportunity follow similar themes but are prioritized differently by different groups. Racial and ethnic minorities, low-income groups, and residents of distressed neighborhoods identified job access, employment, and training as important opportunities while white residents, higher income groups, and residents of wealthier neighborhoods more often identified sense of community, social connections among neighbors, freedom of choice, education, and retirement savings.¹²

Proximity is often used to indicate levels of access to opportunity; however, it would be remiss to consider proximity as the only factor in determining level of access. Access to opportunity is also influenced by social, economic, and cultural factors, thus making it difficult to accurately identify and measure. HUD conducted research regarding Moving to Opportunity for Fair Housing (MTO) to understand the impact of increased access to opportunity. Researchers found residents who moved to lower-poverty neighborhoods experienced safer neighborhoods and better health outcomes, but there was no significant change in educational outcomes, employment, or income.¹³ However, recent studies show the long-term effects of MTO on the educational attainment of children who were under the age of 13 are overwhelmingly positive, including improved college attendance rates and higher incomes. On the other hand, children who were over the age of 13 show negative long-term impacts from MTO.¹⁴

The strategy to improve access to opportunities through housing and community development programs has been two-pronged. Tenant-based housing vouchers allow recipients mobility to locate in lower-

¹² Lung-Amam, Willow S., et al. "Opportunity for Whom? The Diverse Definitions of Neighborhood Opportunity in Baltimore." *City and Community*, vol. 17, no. 3, 27 Sept. 2018, pp. 636-657, doi:10.1111/cico.12318.

¹³ *Moving to Opportunity for Fair Housing Demonstration Program: Final Impacts Evaluation*. U.S. Department of Housing and Urban Development, Office of Policy Development and Research, www.huduser.gov/portal/publications/pdf/MTOFHD_fullreport_v2.pdf.

¹⁴ Chetty, Raj, Nathaniel Hendren, and Lawrence F. Katz. 2016. "The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment." *American Economic Review*, 106 (4): 855-902. https://scholar.harvard.edu/files/hendren/files/mto_paper.pdf

poverty areas, while programs such as the Community Development Block Grant and Choice Neighborhoods Initiative provide funds to increase opportunities in disadvantaged neighborhoods.

EMPLOYMENT AND WORKFORCE DEVELOPMENT

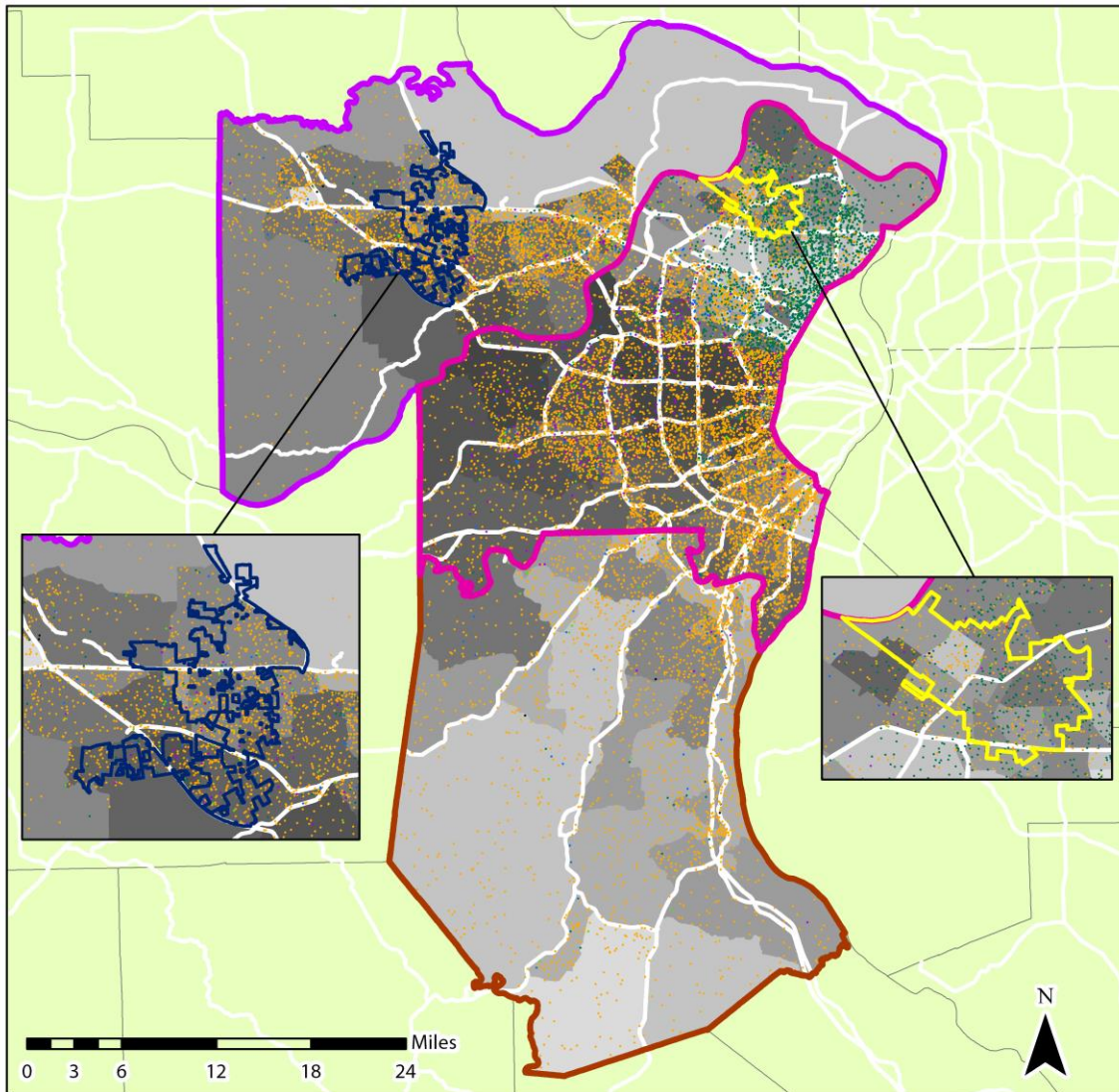
Neighborhoods with high numbers of jobs nearby are often assumed to have good access to those jobs. However, other factors--transportation options, the types of jobs available in the area, or the education and training necessary to obtain them--may also shape residents' access to available jobs. For example, residents of a neighborhood in close proximity to a high number of living-wage jobs may not have the skills or education required for those jobs, and thus may continue to experience high levels of unemployment, work in low-wage positions, or need to commute long distances to access employment. This section analyzes indicators of both labor market engagement and jobs proximity, which, when considered together, offer a better indication of how accessible jobs are for residents.

Labor Market Engagement

Educational attainment, labor force participation, and unemployment are indicators of residents' engagement with the labor market. In St. Louis, St. Charles, and Jefferson counties, 43.2%, 37.8%, and 20.2% of residents aged 25 and over have bachelor's degrees or higher, respectively. Residents in central and west St. Louis County tend to have the highest levels of educational attainment, while educational attainment tends to be lowest in north St. Louis County and south Jefferson County (see Figure 17). The percent of residents with bachelor's degrees or higher ranges from about 24% to 57% in census tracts that comprise the City of O'Fallon, and from about 11% to 36% in the City of Florissant.

FIGURE 17 – EDUCATIONAL ATTAINMENT + RACE/ ETHNICITY

Educational Attainment + Race/ Ethnicity



Source: American Community Survey 5-Year Estimates, 2014-2018

Percent of Population Aged 25+ with Bachelor's Degree or Higher

7% - 10%	20% - 25%	45% - 55%
10% - 15%	25% - 35%	55% - 70%
15% - 20%	35% - 45%	70% - 90%

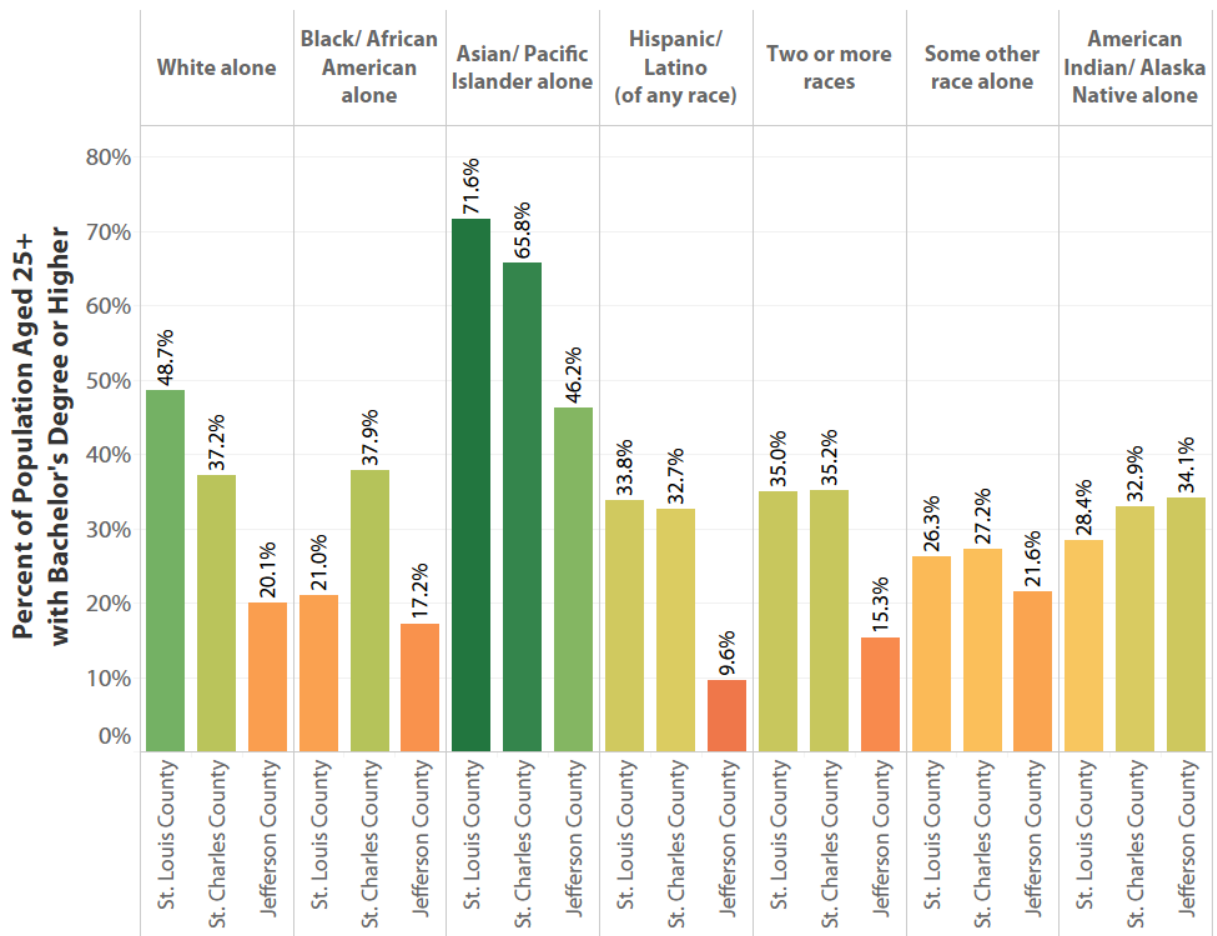
St Louis County	City of Florissant
St. Charles County	City of O'Fallon
Jefferson County	

Race + Ethnicity 1 Dot = 100 People

- White, Non-Hispanic
- Black, Non-Hispanic
- Hispanic or Latino (of any race)
- Asian/ Pacific Islander, Non-Hispanic
- Multi-Racial, Non-Hispanic
- Other, Non-Hispanic
- Native American, Non-Hispanic

Data on educational attainment by race and ethnicity also show that education varies by race, ethnicity, and geography (see Figure 18). Asian or Pacific Islander residents have the highest levels of educational attainment across the counties (71.6%, 65.8%, and 46.2% with bachelor’s degrees or higher in St. Louis, St. Charles, and Jefferson counties, respectively). The share of residents with bachelor’s degrees or higher is lowest among residents of Jefferson County who are Hispanic/ Latino, two or more races, or Black (9.6%, 15.3%, and 17.2% of residents with a bachelor’s degree or higher, respectively). In St. Louis County, Black residents are the least likely of all racial and ethnic groups to have a bachelor’s degree or higher, coinciding with lower levels of educational attainment in areas of north St. Louis County.

FIGURE 18 – EDUCATIONAL ATTAINMENT BY RACE/ ETHNICITY



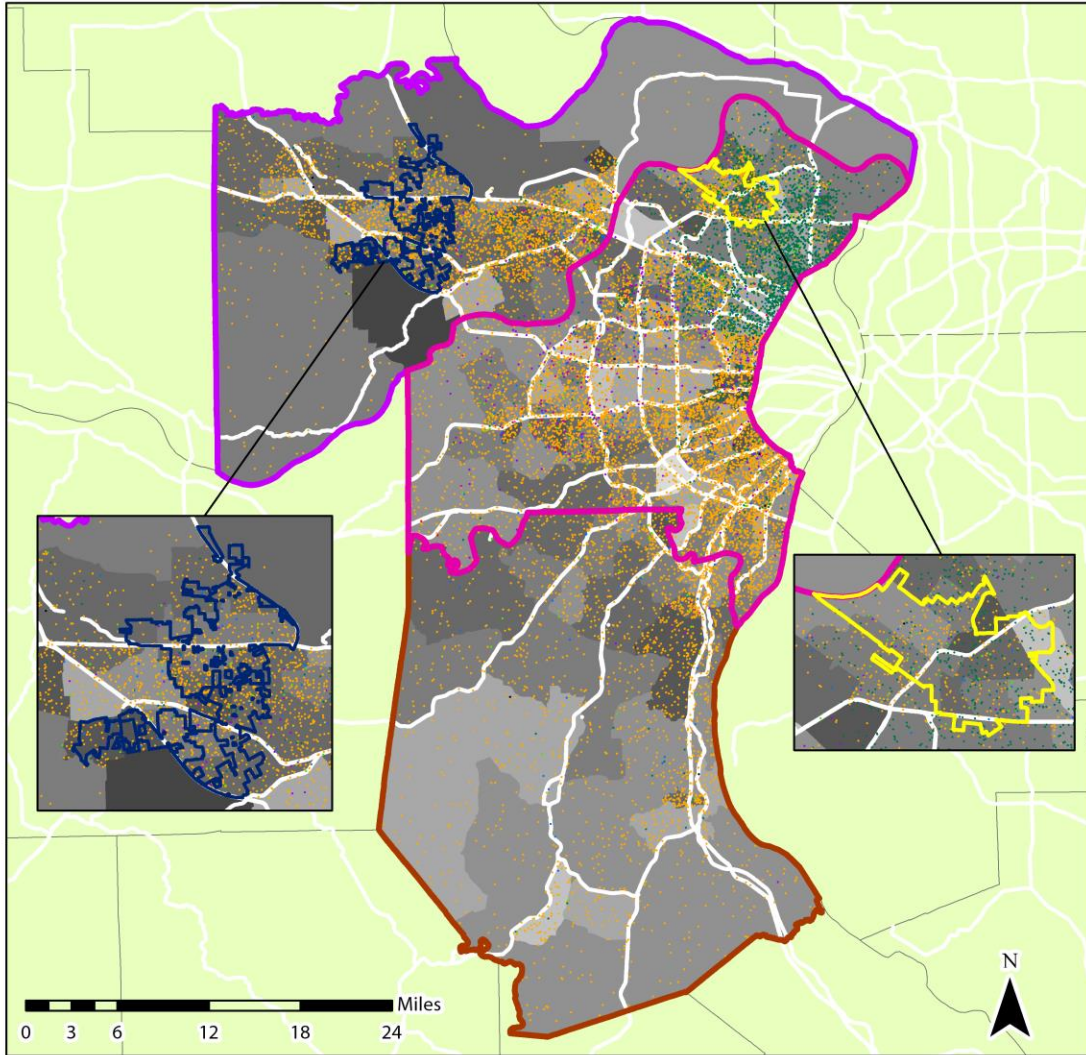
Data Source: American Community Survey 5-Year Estimates, 2014-2018

An estimated 65.3% of the population in St. Louis County, 70.2% of the population in St. Charles County, and 66.3% of the population in Jefferson County participates in the labor force (ACS 5-Year Estimates, 2014-2018, for population aged 16 and over). As with educational attainment, geographic disparities exist, with the labor force participation rate typically ranging from 44.9% to 84.6% in census tracts across the region. Residents in parts of central St. Louis County and St. Charles County tend to participate in the labor force at the highest levels, while participation tends to be lowest in parts of central and north St. Louis County (see Figure 19). In census tracts that comprise the City of O’Fallon, labor force participation ranges

from about 67% to 78%, while labor force participation in Florissant census tracts ranges from about 54% to 76%.

FIGURE 19 – LABOR FORCE PARTICIPATION + RACE/ ETHNICITY

Labor Force Participation + Race/ Ethnicity



Source: American Community Survey 5-Year Estimates, 2014-2018

Percent of Population Aged 16+ in Labor Force

- 45% - 50% 60% - 65% 75% - 80%
- 50% - 55% 65% - 70% 80% - 100%
- 55% - 60% 70% - 75%

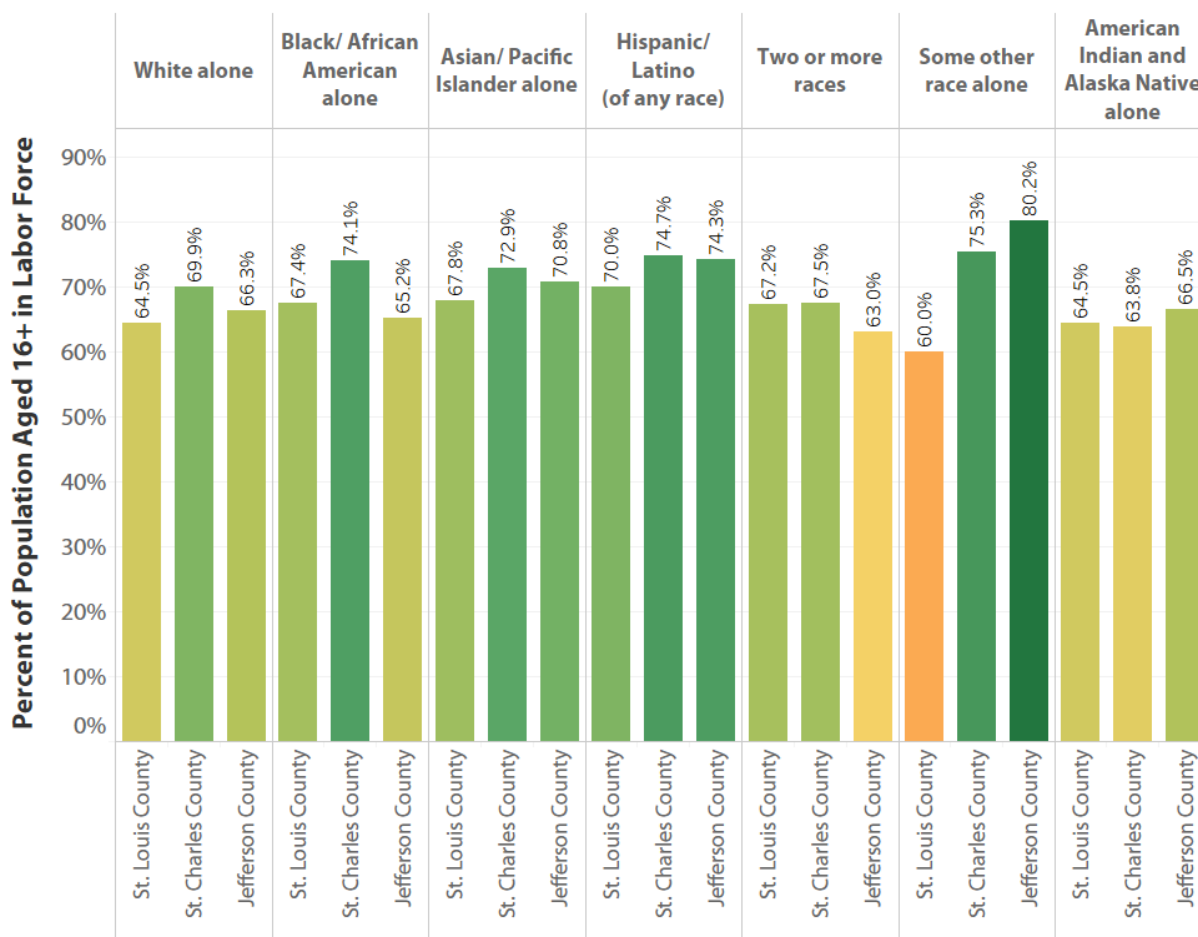
- St Louis County
- St. Charles County
- Jefferson County
- City of Florissant
- City of O'Fallon

Race + Ethnicity 1 Dot = 100 People

- White, Non-Hispanic
- Black, Non-Hispanic
- Hispanic or Latino (of any race)
- Asian/ Pacific Islander, Non-Hispanic
- Multi-Racial, Non-Hispanic
- Other, Non-Hispanic
- Native American, Non-Hispanic

Some variation exists in labor force participation by race and ethnicity across the region. Labor force participation is highest among residents of Jefferson and St. Charles counties who identify as some other race alone or Hispanic/ Latino (of any race), and among Black residents in St. Charles County. Labor force participation is lowest among residents of St. Louis County who identify as some other race alone, Native American residents of St. Charles County, and residents of two or more races in Jefferson County (see Figure 20).

FIGURE 20 – LABOR FORCE PARTICIPATION BY RACE/ ETHNICITY



Data Source: American Community Survey 5-Year Estimates, 2014-2018

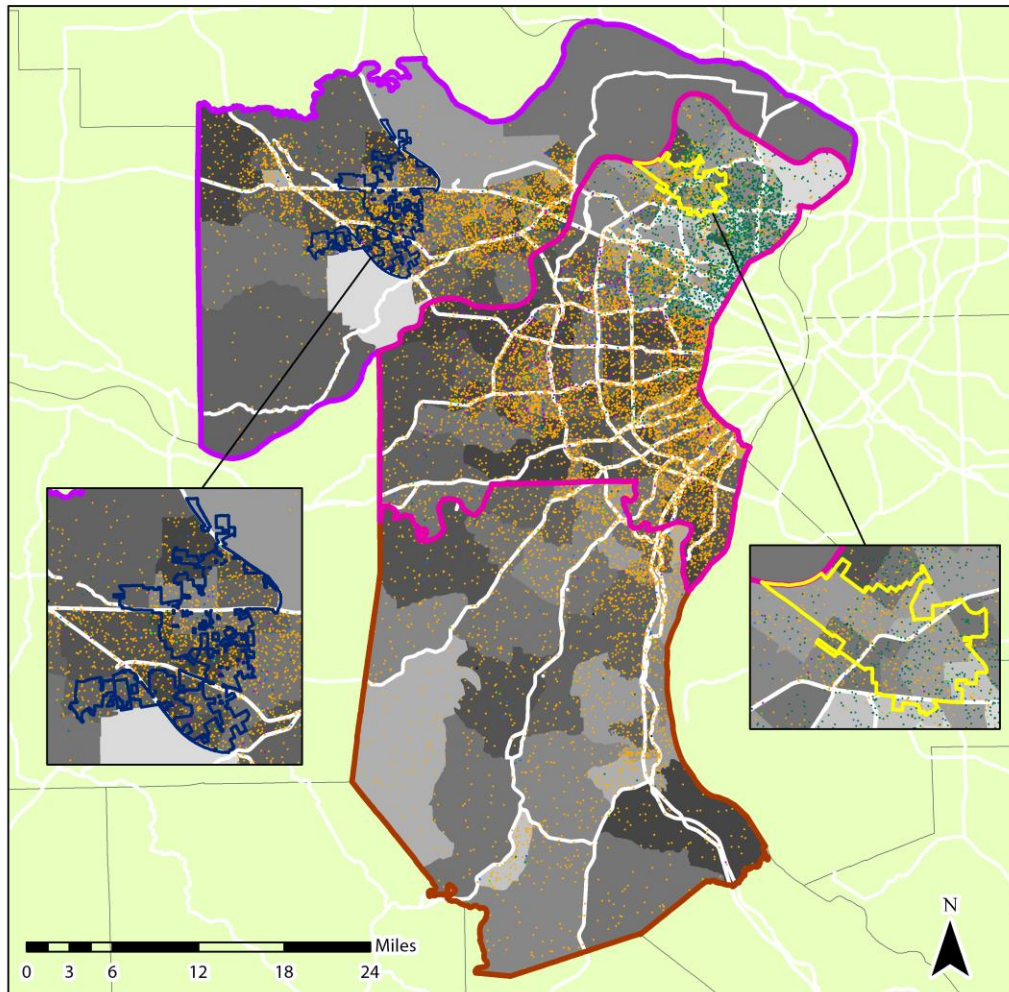
An estimated 5.2% of the population in St. Louis County, 3.3% of the population in St. Charles County, and 5.7% of the population in Jefferson County was unemployed as of the American Community Survey five-year estimates for 2014-2018 (population aged 16 and over). More recent data from the Missouri Department of Labor show unemployment rates for St. Louis County, St. Charles County, and Jefferson County at 4.9%, 3.4%, and 4.2%, respectively, as of September 2020.¹⁵ As with educational attainment

¹⁵ Missouri Department of Labor. (September 2020). Unemployment Benefits by County. Retrieved from: https://laborwebapps.mo.gov/ui_stats

and labor force participation, unemployment varies across the region, ranging from less than 1% in many tracts in central and south St. Louis County and parts of St. Charles County, to more than 15% in several tracts in north St. Louis County (see Figure 21). Unemployment rates in O’Fallon census tracts ranges from about 1% to 5%, while rates in the tracts that comprise the City of Florissant range from about 4% to 14%.

FIGURE 21 – UNEMPLOYMENT RATE + RACE/ ETHNICITY

Unemployment Rate + Race/ Ethnicity



Source: American Community Survey 5-Year Estimates, 2014-2018

**Unemployment Rate,
Population Aged 16+**

- | | | |
|---------|----------|-------------|
| 0% - 2% | 4% - 5% | 10% - 12% |
| 2% - 3% | 5% - 7% | 12% - 15% |
| 3% - 4% | 7% - 10% | 15% or more |

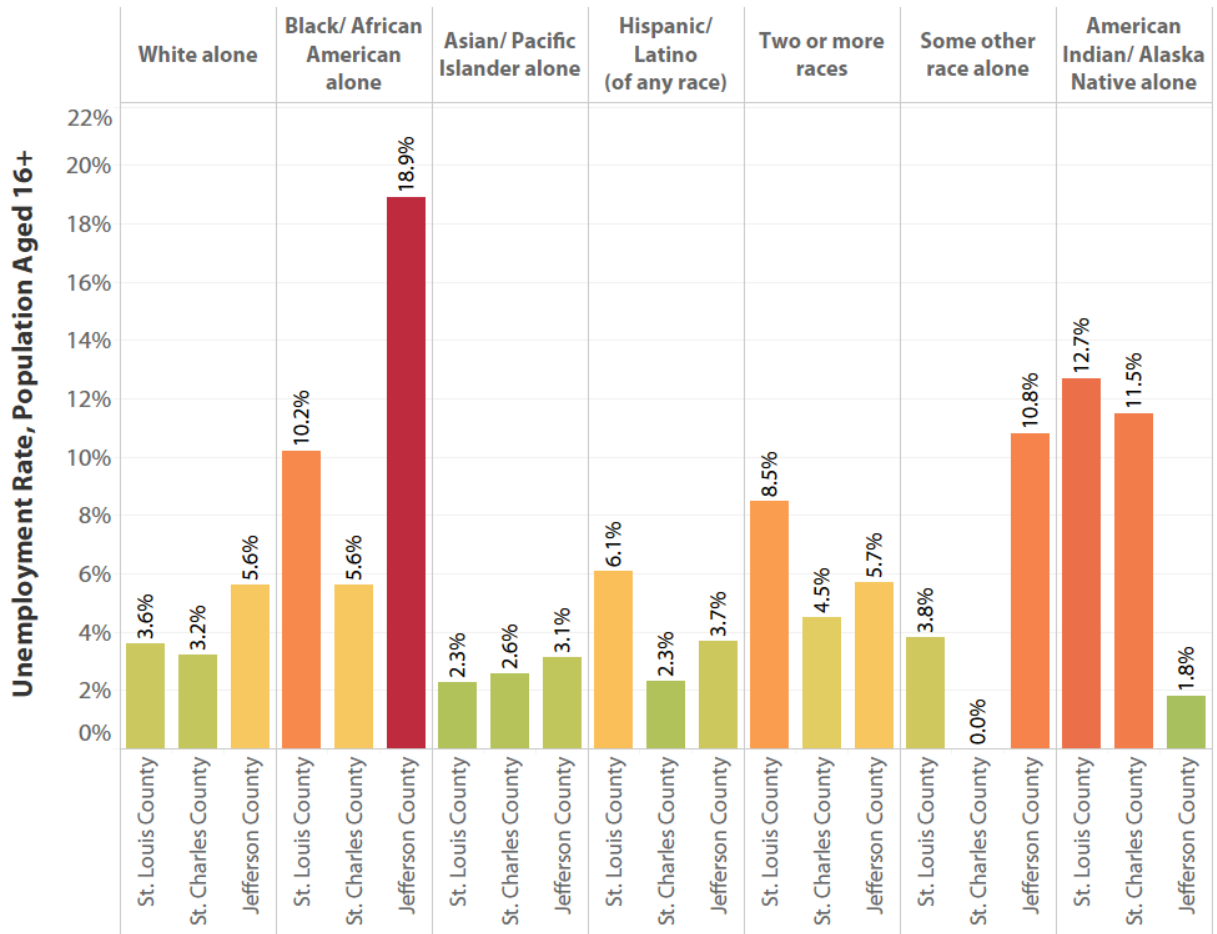
- | | |
|--------------------|--------------------|
| St Louis County | City of Florissant |
| St. Charles County | City of O'Fallon |
| Jefferson County | |

Race + Ethnicity 1 Dot = 100 People

- White, Non-Hispanic
- Black, Non-Hispanic
- Hispanic or Latino (of any race)
- Asian/ Pacific Islander, Non-Hispanic
- Multi-Racial, Non-Hispanic
- Other, Non-Hispanic
- Native American, Non-Hispanic

Variations in unemployment rates exist across racial and ethnic groups. In particular, Black residents in Jefferson and St. Louis counties, Native American residents of St. Louis and St. Charles counties, and residents of some other race alone in Jefferson County tend to experience the highest rates of unemployment.

FIGURE 22 – UNEMPLOYMENT BY RACE/ ETHNICITY

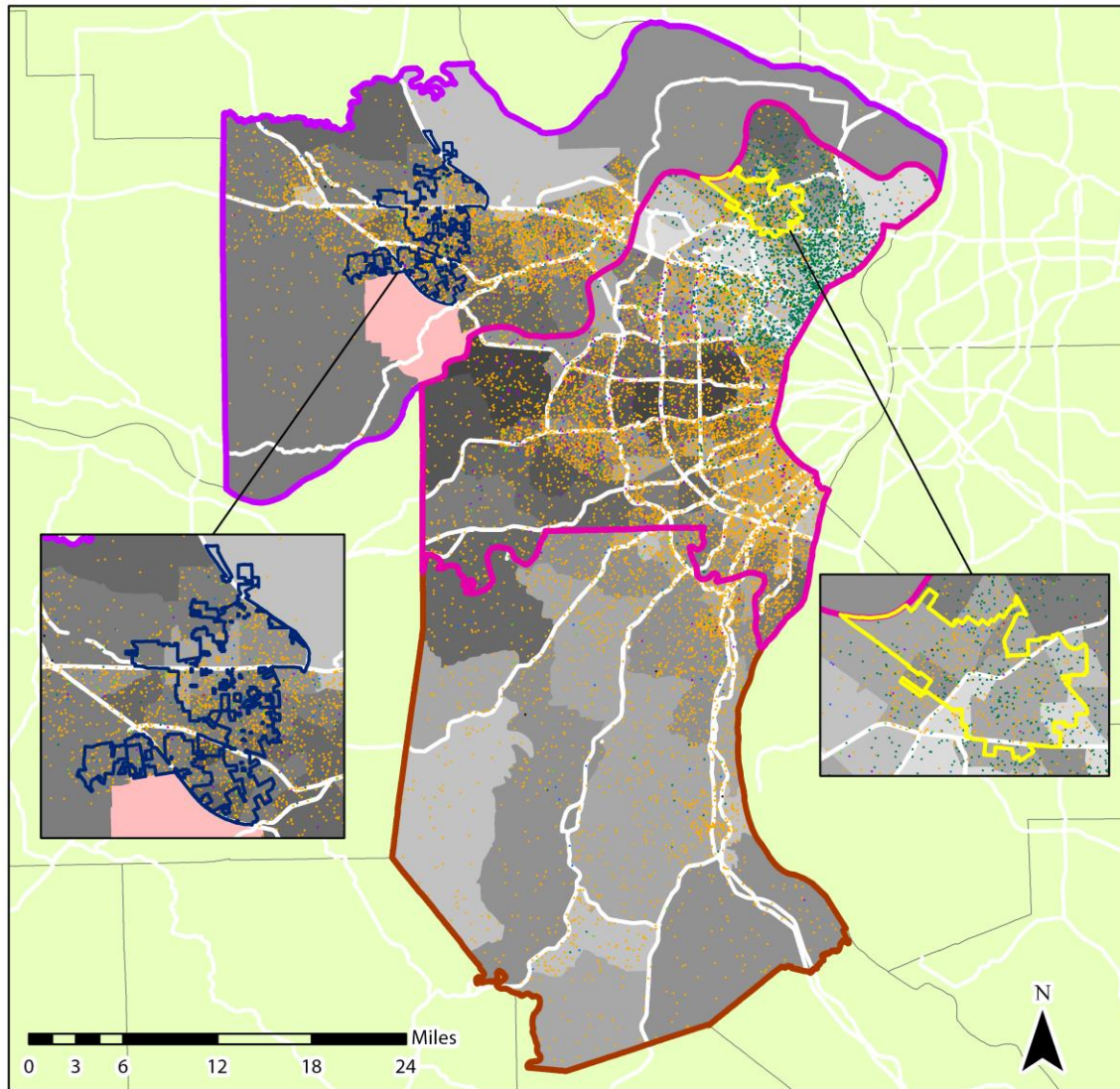


Data Source: American Community Survey 5-Year Estimates, 2014-2018

Household income is another indicator of access to employment and jobs that pay living wages. The American Community Survey estimates median household income at \$67,420 in St. Louis County, \$84,798 in St. Charles County, \$65,454 in Jefferson County, \$54,978 in the City of Florissant, and \$90,025 in the City of O’Fallon. Median household incomes in the region tend to be lowest in north St. Louis County and highest central and west St. Louis County and parts of St. Charles County. Tracts with the highest median incomes tend to have high percentages of white residents and lower percentages of residents of other races (see Figure 23).

FIGURE 23 – MEDIAN HOUSEHOLD INCOME + RACE/ ETHNICITY

Median Household Income + Race/ Ethnicity



Source: American Community Survey 5-Year Estimates, 2014-2018

Median Household Income

Lightest Gray	\$22,000 - \$40,000	Dark Gray	\$80,000 - \$100,000
Light Gray	\$40,000 - \$50,000	Medium-Dark Gray	\$100,000 - \$125,000
Medium Gray	\$50,000 - \$65,000	Very Dark Gray	\$125,000 - \$150,000
Dark Gray	\$65,000 - \$80,000	Black	\$150,000 - \$210,000
Lightest Gray	No Data		

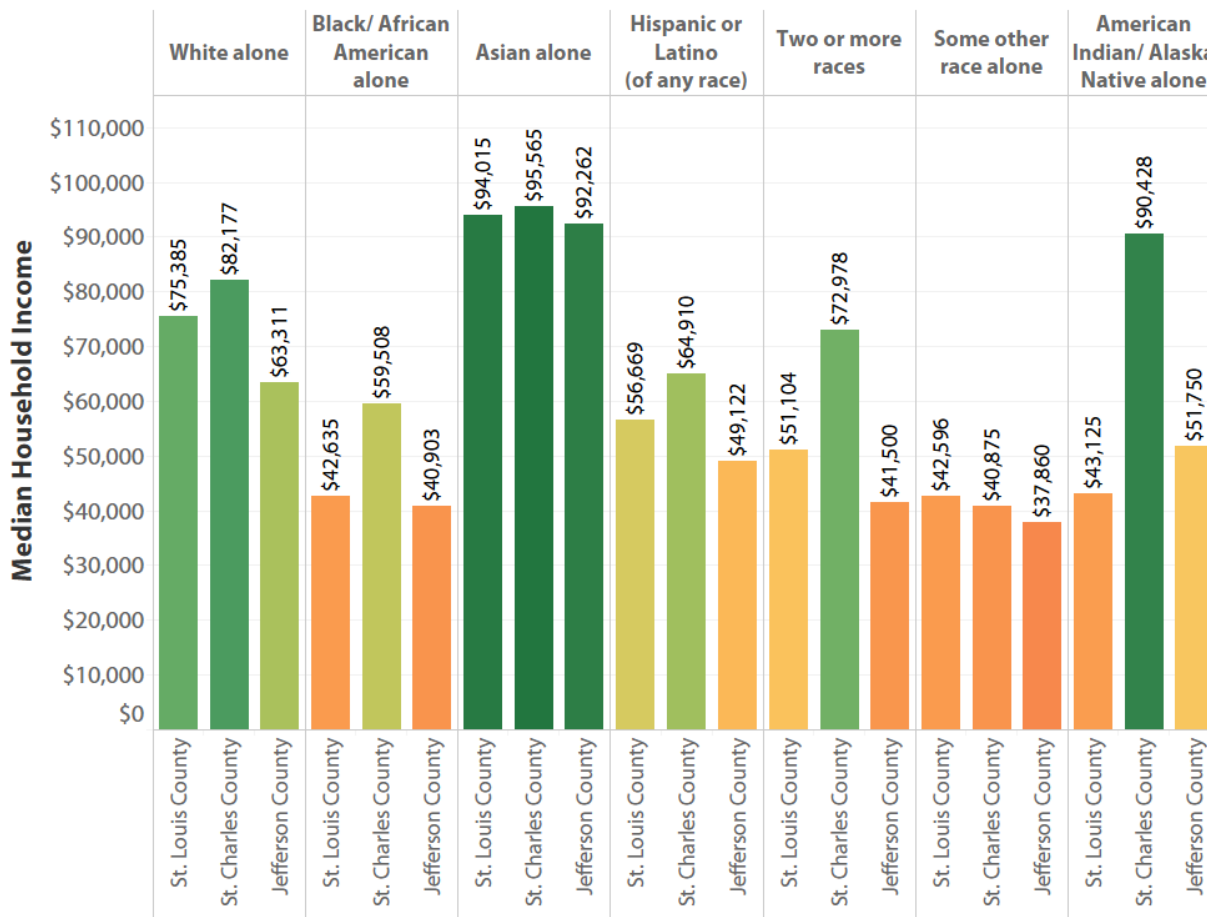
Red outline	St. Louis County	Yellow outline	City of Florissant
Purple outline	St. Charles County	Blue outline	City of O'Fallon
Brown outline	Jefferson County		

Race + Ethnicity 1 Dot = 100 People

- Yellow dot: White, Non-Hispanic
- Green dot: Black, Non-Hispanic
- Blue dot: Hispanic or Latino (of any race)
- Purple dot: Asian/ Pacific Islander, Non-Hispanic
- Light Green dot: Multi-Racial, Non-Hispanic
- Red dot: Other, Non-Hispanic
- Black dot: Native American, Non-Hispanic

Household incomes tend to be highest for Asian residents, and lowest for residents of some other race alone (across counties), Black residents in St. Louis and Jefferson counties, residents of two or more races in Jefferson County, and Native American residents in St. Louis County (see Figure 24).

FIGURE 24 – MEDIAN HOUSEHOLD INCOME BY RACE/ ETHNICITY



Data Source: American Community Survey 5-Year Estimates, 2014-2018
 Note: Median household income data is not available for Native Hawaiian and other Pacific Islander residents in Jefferson and St. Charles counties. The median household income for Native Hawaiian and other Pacific Islander residents in St. Louis County is \$81,006.

Low median household incomes in many of the region’s census tracts highlight the fact that a high proportion of households do not have sufficient incomes to afford basic needs. Costs for a family of two working adults and one child in St. Louis, St. Charles, and Jefferson counties, including housing, childcare, healthcare, food, transportation, taxes, and other miscellaneous costs, are estimated at \$4,536 per month (or \$54,435 annually).¹⁶

¹⁶ MIT Living Wage Calculator. (2018). Retrieved from: <https://livingwage.mit.edu/>

Yet, 18.7% of primary jobs held by St. Louis County residents, 17.0% of jobs held by St. Charles County residents, and 18.1% of jobs held by Jefferson County residents pay \$1,250 per month or less (\$15,000 or less per year). An estimated 30.6% of primary jobs held by St. Louis County residents, 27.4% of jobs held by St. Charles County residents, and 33.6% of jobs held by Jefferson County residents pay between \$1,251 and \$3,333 (between \$15,000 and \$39,996 per year),¹⁷ indicating that a high proportion of residents may have difficulty affording basic living expenses.

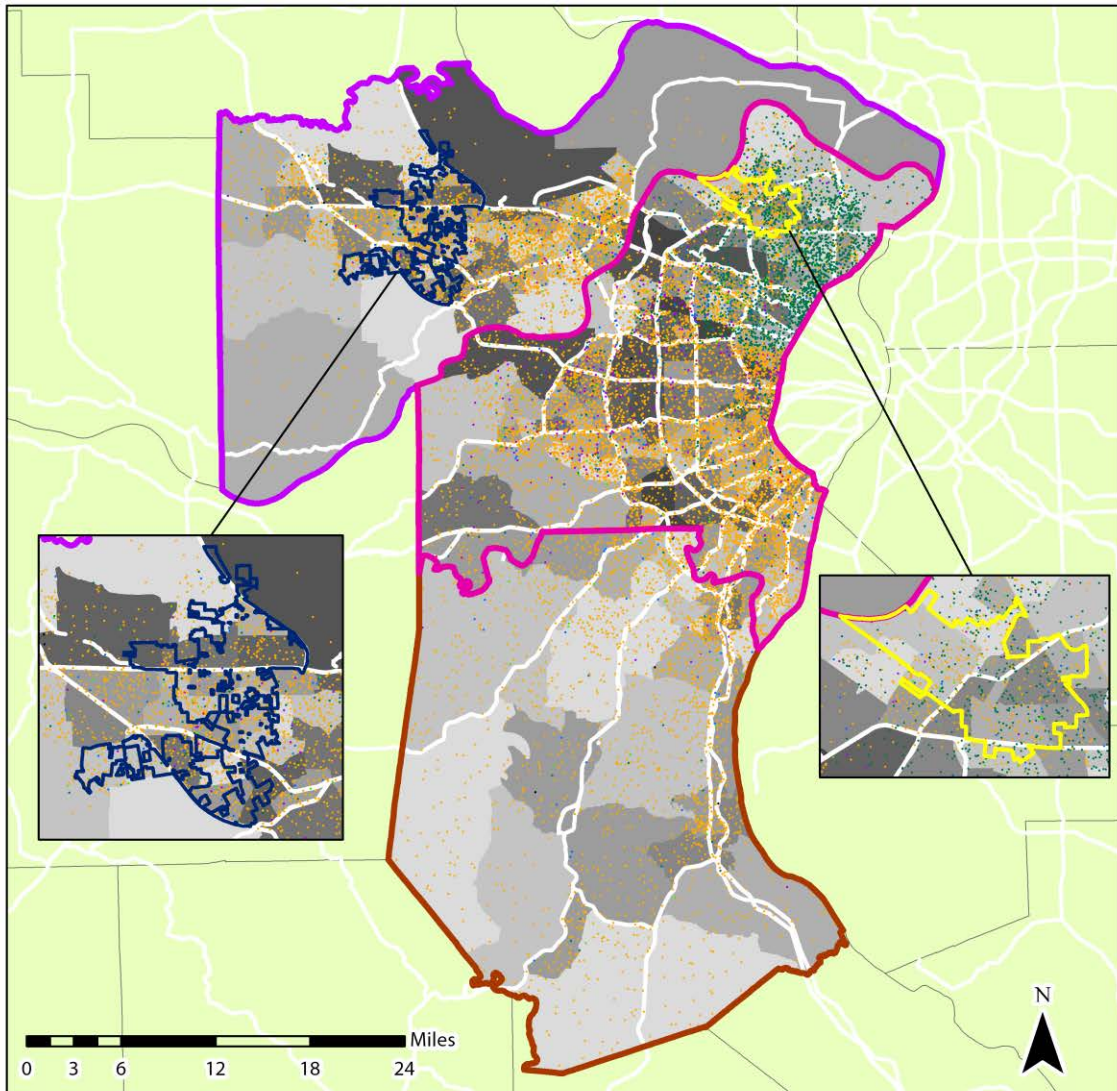
Jobs Proximity

Mapping locations of jobs in the region shows that jobs tend to be clustered in parts of central St. Louis County and St. Charles County and that fewer jobs exist in north St. Louis County, Jefferson County, and less densely populated areas of St. Charles County (see Figure 25).

¹⁷ Longitudinal Employer-Household Dynamics data. Home Area Profile Analysis. Retrieved from: <https://onthemap.ces.census.gov/>

FIGURE 25: JOBS PROXIMITY IN THE ST. LOUIS HOME CONSORTIUM REGION

Jobs Proximity + Race/ Ethnicity



Source: U.S. Census Bureau, Center for Economic Studies (CES). (2017). OnTheMap. Work Area Comparison Analysis by Census Tracts.

Number of Jobs by Census Tract (All Jobs)



Race + Ethnicity 1 Dot = 100 People



Residents and stakeholders who participated in this planning process noted that a lack of public transportation in parts of the region such as St. Charles County is often a barrier for residents in accessing employment. In particular, residents and stakeholders noted that employers in St. Charles County often have difficulty attracting and maintaining employees because of the lack of affordable housing and public transportation in the county, which makes it difficult for lower-income residents to move to the area or commute in for work.

Longitudinal Employer-Household Dynamics data also indicates that a high proportion of workers living in each jurisdiction work outside of their county or city of residence. An estimated 35.2% of workers living in St. Louis County, 64.0% of workers living in St. Charles County, and 75.8% of workers living in Jefferson County work outside of the county in which they live. Out-commuting is higher among the cities: an estimated 92.3% of workers living in Florissant and 85.4% of workers living in O'Fallon work outside of the city they live in.

Similarly, high proportions of jobs in each jurisdiction are held by workers who live outside the area. An estimated 52.5% of workers who hold jobs in St. Louis County live outside of the county, and 50.2% of workers who hold jobs in St. Charles County live outside the county. As estimated 47.2% of workers employed in Jefferson county live in other counties. These percentages are even higher for the cities of Florissant and O'Fallon.

This data further demonstrates that lack of access to vehicles and low levels of public transportation access may be barriers for a high proportion of residents in accessing employment, which for many residents includes commutes across county lines. Overall, labor market engagement and job proximity indicators, combined with data on cost of living in the region, indicate disparities in access to opportunity among protected classes.

TABLE 5 – INFLOW AND OUTFLOW OF WORKERS (PRIMARY JOBS), 2017

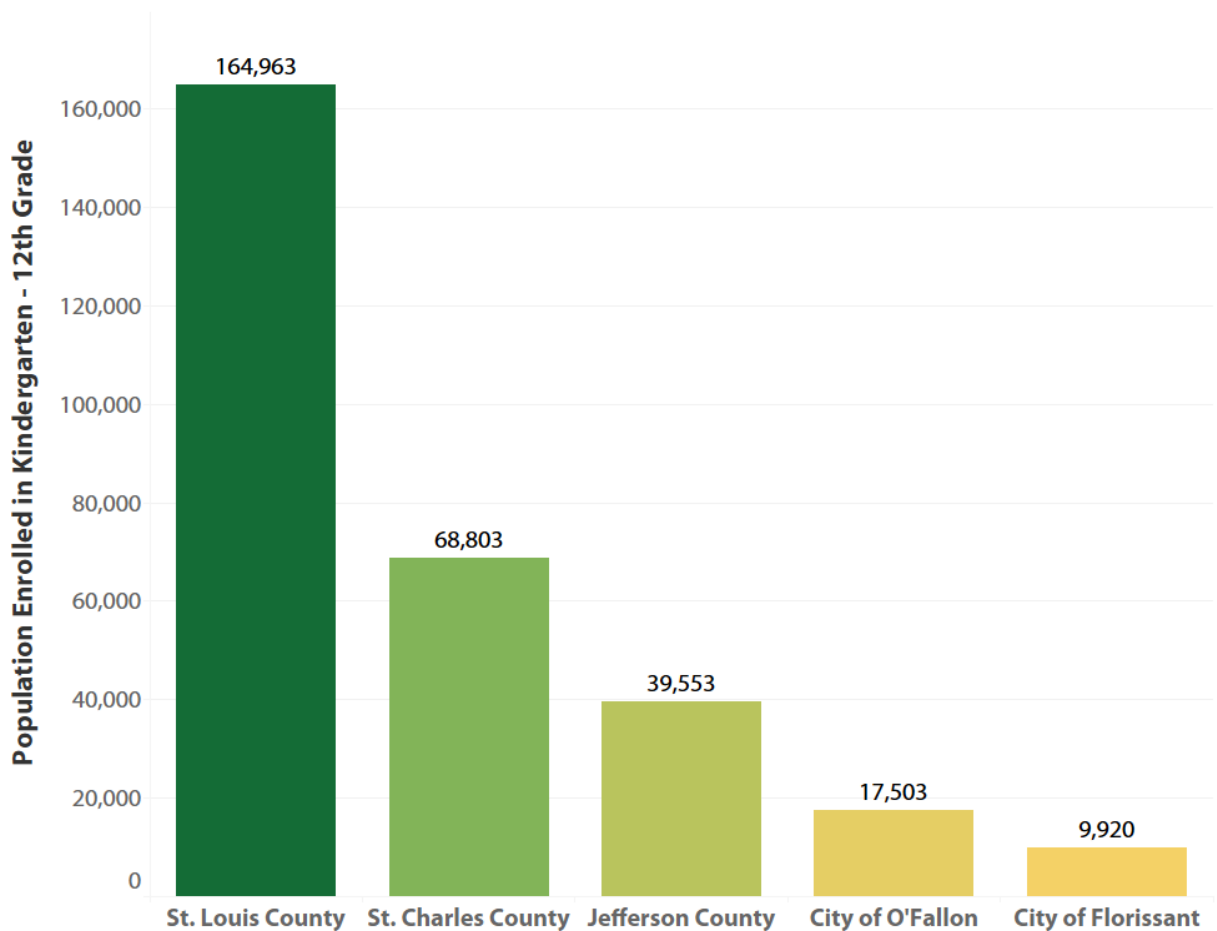
Inflow and Outflow of Workers	Number	Percent
Living in St. Louis County	436,460	100.0%
Living in the County but Employed Outside of the County	153,435	35.2%
Living and Employed in St. Louis County	283,025	64.8%
Employed in St. Louis County	595,818	100.0%
Employed in the County but Living Outside of the County	312,793	52.5%
Employed and Living in St. Louis County	283,025	47.5%
Living in St. Charles County	193,564	100.0%
Living in the County but Employed Outside of the County	123,875	64.0%
Living and Employed in St. Charles County	69,689	36.0%
Employed in St. Charles County	139,872	100.0%
Employed in the County but Living Outside of the County	70,183	50.2%
Employed and Living in St. Charles County	69,689	49.8%
Living in Jefferson County	101,208	100.0%
Living in the County but Employed Outside of the County	76,728	75.8%
Living and Employed in Jefferson County	24,480	24.2%
Employed in Jefferson County	46,355	100.0%
Employed in the County but Living Outside of the County	21,875	47.2%
Employed and Living in Jefferson County	24,480	52.8%
Living in City of Florissant	23,492	100.0%
Living in the City but Employed Outside of the City	21,901	93.2%
Living and Employed in City of Florissant	1,591	6.8%
Employed in City of Florissant	12,469	100.0%
Employed in the City but Living Outside of the City	10,878	87.2%
Employed and Living in City of Florissant	1,591	12.8%
Living in City of O'Fallon	42,987	100.0%
Living in the City but Employed Outside of the City	36,722	85.4%
Living and Employed in City of O'Fallon	6,265	14.6%
Employed in City of O'Fallon	35,533	100.0%
Employed in the City but Living Outside of the City	29,268	82.4%
Employed and Living in City of O'Fallon	6,265	17.6%

Source: Longitudinal Employer-Household Dynamics (LODES) data, 2017

EDUCATION

School proficiency is an indication of the quality of educational opportunities available to residents of an area. High-quality education is a vital community resource that can lead to more opportunities--such as employment and increased earnings--and improve quality of life. Public schools in the region fall within 38 school districts, including 23 districts in St. Louis County, 11 in Jefferson County, and five in St. Charles County. Students living in the City of O'Fallon are served by the Frances Howell, Ft. Zumwalt, and Wentzville school districts, and students living in the City of Florissant are served by the Hazelwood and Ferguson-Florissant school districts. Of the jurisdictions, St. Louis County has the greatest numbers of residents enrolled in schools serving kindergarten through 12th grade (see Figure 26).

FIGURE 26: SCHOOL ENROLLMENT IN THE ST. LOUIS HOME CONSORTIUM



Data Source: American Community Survey 5-Year Estimates, 2014-2018

Enrollment in kindergarten through 12th grade declined by 8.9% in St. Louis County and 3.1% in Jefferson County between the American Community Survey's 2006-2010 five-year estimates and the 2014-2018 estimates. St. Charles County and the cities of O'Fallon and Florissant experienced increases in kindergarten through 12th grade enrollment over the same period (2.1%, 5.6%, and 6.2%, respectively).

School performance varies by district in the region, and districts vary significantly in their demographics, including students' race and ethnicity, household income, English proficiency, and need for special education services (see Table 6). In particular, high levels of segregation by race and income exist by district and by county. Notably, white students make up the vast majority of all students in all Jefferson and St. Charles County school districts. The percentage of students who are white ranges from 89.3% to 97.2% in Jefferson County school districts and from 70.5% to 82.2% in St. Charles County. Districts in St. Louis County, in contrast, vary more widely in racial composition, although many districts are still highly segregated by race. Jefferson County districts tend to have the lowest percentages of students with limited English proficiency (0.2% to 1.7% in districts with data available), while in multiple districts in St. Louis County, an estimated 5% to 19% of students have limited proficiency. The shares of students in special education programs is more consistent across districts, with the exception of the Special School District of St. Louis County, which provides special education services across all school districts in St. Louis County.

Students' household income, as measured by the percentage of students eligible for free or reduced-price lunch, also varies by district. This percentage tends to be lowest in districts in St. Charles County, while seven districts in St. Louis County report that 96% or more of students are eligible, indicating high levels of segregation by household income among school districts in the region.

The average ratio of students to classroom teachers is lowest among St. Louis County districts (excluding the Special School District of St. Louis County) at 15.7 students per teacher. Districts in St. Charles and Jefferson counties average slightly higher student-teacher ratios of 17.2 and 17.8, respectively. On average, school districts in St. Louis (excluding the Special School District of St. Louis County) and St. Charles counties spend more per pupil (\$12,285 and \$12,038 on average, respectively) than districts in Jefferson County (\$9,954 on average).

School districts in St. Charles and Jefferson counties tend to have the lowest percentages of students scoring below the basic level on 3rd grade math and the highest graduation rates, indicators of overall district performance. The percentages of students scoring below the basic level on 3rd grade math is highest in the Riverview Gardens, Normandy Schools Collaborative, Ferguson-Florissant, Hazelwood, and Ritenour school districts, which are clustered in and around north St. Louis County and have high proportions of Black students, indicating high levels of disparities in school proficiency by race and geographic area. Normandy Schools Collaborative and Riverview Gardens school districts are both 'provisionally accredited' by the Missouri State Board of Education, based on academic performance, graduation and attendance. While the majority of districts in St. Louis County have graduation rates above 90%, five districts (including the Special School District of St. Louis County) have rates below 85%. These districts tend to have relatively low proportions of white students, indicating that students of color-- and Black students in particular--are more likely to attend school in districts in the region that have lower graduation rates.

Overall, data on school district performance in the region indicates high levels of segregation by race and income, and disparities in access to proficient schools by race and income among school districts and counties. Residents of north St. Louis County, who are predominantly Black and low-income, have the

lowest levels of access to proficient schools in the region. As housing choices—and therefore school choices—are limited by income, the availability of affordable housing, transportation, and other factors, residents’ ability to access more proficient schools in other locations is often limited. These issues point to a need to develop policies and strategies to invest in schools and districts experiencing challenges and to develop housing and other strategies to increase integration by race and income, particularly in highly segregated districts.

TABLE 6: DEMOGRAPHICS, RESOURCES, AND OUTCOMES BY SCHOOL DISTRICT

School District	% White	% LEP	% Special Education	% Eligible for Free or Reduced-Price Lunch	Students to Classroom Teachers	Expenditures Per Pupil	% Below Basic 3rd Grade Math	Four-Year Graduation Rate
Jefferson County								
Crystal City	89.3%	N/A	12.9%	45.0%	15	\$10,636	27.3%	97.6%
Desoto	95.4%	0.4%	16.8%	47.8%	20	\$9,689	27.3%	93.6%
Dunklin	90.2%	N/A	15.5%	53.7%	18	\$10,747	26.8%	87.5%
Festus	90.7%	N/A	8.8%	37.4%	19	\$8,726	2.5%	97.5%
Fox	91.2%	1.7%	17.8%	30.5%	20	\$9,362	15.1%	91.0%
Grandview	95.6%	N/A	14.9%	43.4%	16	\$11,740	9.8%	94.4%
Hillsboro	95.0%	0.2%	15.4%	33.5%	20	\$9,032	17.2%	93.4%
Jefferson County	93.6%	N/A	9.8%	27.8%	16	\$10,843	31.7%	N/A
Northwest	91.7%	1.6%	12.8%	37.9%	20	\$9,714	21.7%	92.1%
Sunrise	97.2%	N/A	18.8%	50.0%	14	\$9,461	25.8%	N/A
Windsor	94.1%	0.5%	12.8%	33.7%	18	\$9,548	15.8%	93.0%
St. Charles County								
Frances Howell	79.6%	2.8%	11.7%	17.6%	18	\$11,227	11.8%	97.0%
Ft. Zumwalt	79.3%	3.0%	15.0%	20.6%	17	\$11,732	16.8%	93.9%
Orchard Farm	79.0%	2.7%	14.2%	28.8%	18	\$12,532	21.0%	96.8%
St. Charles	70.5%	6.8%	17.4%	40.4%	14	\$14,329	13.4%	86.7%
Wentzville	82.2%	1.4%	13.6%	14.1%	19	\$10,368	18.2%	95.6%
St. Louis County								
Affton	75.0%	9.3%	13.9%	37.0%	18	\$10,792	20.7%	90.7%
Bayless	66.2%	19.0%	17.5%	62.7%	18	\$10,460	15.7%	92.5%
Brentwood	60.7%	5.6%	12.8%	24.6%	11	\$19,036	9.7%	98.4%

School District	% White	% LEP	% Special Education	% Eligible for Free or Reduced-Price Lunch	Students to Classroom Teachers	Expenditures Per Pupil	% Below Basic 3rd Grade Math	Four-Year Graduation Rate
Clayton	60.3%	4.2%	11.4%	10.3%	12	\$18,016	7.1%	89.6%
Ferguson-Florissant	8.8%	1.2%	16.8%	100.0%	16	\$12,020	48.4%	91.8%
Hancock Place	61.1%	7.4%	15.2%	100.0%	17	\$11,688	10.4%	96.9%
Hazelwood	15.5%	1.3%	16.1%	63.5%	16	\$10,488	40.8%	86.4%
Jennings	0.4%	0.3%	16.5%	100.0%	18	\$10,677	29.0%	92.3%
Kirkwood	78.3%	0.8%	14.2%	11.8%	16	\$11,148	8.6%	97.9%
Ladue	57.2%	5.2%	11.8%	10.0%	14	\$13,565	9.9%	98.9%
Lindbergh Schools	84.8%	4.5%	14.1%	13.8%	18	\$9,533	13.4%	96.2%
Maplewood-Richmond Heights	63.0%	3.5%	13.6%	36.1%	13	\$12,917	27.0%	100.0%
Mehlville	80.3%	10.6%	15.5%	25.6%	16	\$9,500	23.1%	94.2%
Normandy Schools Collaborative	1.5%	2.0%	12.9%	96.6%	15	\$12,801	56.5%	77.6%
Parkway	59.7%	5.9%	15.2%	19.6%	16	\$12,442	15.3%	95.7%
Pattonville	43.2%	8.3%	16.2%	46.2%	16	\$14,044	25.1%	88.3%
Ritenour	27.4%	12.0%	16.9%	100.0%	17	\$9,993	38.2%	74.0%
Rockwood	76.1%	2.8%	13.7%	13.4%	17	\$10,556	16.8%	95.5%
Riverview Gardens	1.1%	0.7%	15.5%	99.7%	17	\$10,135	66.7%	83.5%
Special School District St. Louis County	53.6%	0.4%	64.9%	64.3%	49	\$205,480	85.7%	61.5%
University City	11.3%	2.8%	14.5%	99.1%	15	\$15,192	33.3%	80.0%
Valley Park	66.3%	3.4%	13.5%	42.2%	14	\$13,592	33.3%	97.5%
Webster Groves	76.8%	0.6%	13.4%	13.6%	15	\$11,683	12.7%	93.2%

Source: Missouri Department of Elementary & Secondary Education. (2019). District Report Cards.

TRANSPORTATION

Affordable, accessible transportation makes it easier for residents to access a range of opportunities, providing connections to employment, education, fresh food, healthcare, and other services. Low-cost public transportation can facilitate access to these resources, while a lack to access to affordable transportation poses barriers to meeting key needs, particularly in areas with low walkability and a lack of access to vehicles.

Access to Affordable Transportation

St. Louis County is served by the Metro transit system, which includes the MetroLink light-rail system and MetroBus routes. The light rail system runs west from the city of St. Louis to the Lambert Airport and to some of the county's inner-ring suburbs, including University City, Clayton, and Richmond Heights (see Figure 27). The bus system provides greater coverage throughout St. Louis County, although greater distances between routes exist in less dense areas in the western portion of the county further from the city of St. Louis (see Figure 28). Stakeholders interviewed as part of this planning process emphasized that the MetroLink system is not a complete system and that better-paying jobs may be located further out in the county, which may create challenges for residents in accessing those jobs.

FIGURE 27: METROLINK LIGHT RAIL SYSTEM



FIGURE 28: MISSOURI METROLINK AND METROBUS SYSTEMS



St. Charles County does not have a public transportation system, and stakeholders interviewed during this planning process emphasized that county residents and workers generally have to rely on vehicles. The City of O’Fallon offers limited transportation for seniors and persons with disabilities. The City of St. Charles provides in-town bus service, on-demand transportation services that prioritize seniors and people with disabilities, a trolley, and connections to Metro buses. OATS Transit provides limited transportation services in certain areas of the county, with priority given to those with medical appointments. Historically, voters in St. Charles County have opposed adding sales taxes to support the

expansion of the MetroLink system into the county, rejecting proposals put forward in 1996 to become part of the MetroLink system.

Jefferson county has a public transit system through OATS Transit, including limited fixed route bus service and on-demand transportation services. The system serves eastern and central Jefferson county.

Estimates of transportation spending are high throughout most of the region’s census tracts. Figure 29 estimates transportation expenses for a three-person single-parent family with income at 50% of the regional median income for renters. Estimates of transportation spending as a percentage of household income for this family range from 24% to 44% in census tracts across the region.¹⁸ Residents in the central inner-ring suburbs of St. Louis County, which have the greatest access to the MetroLink system, tend to have the lowest transportation costs relative to income. Transportation costs tend to make up a greater share of income in the western portions of the three counties, areas with the lowest levels of access to transit. Residents in parts of north St. Louis County also spend a high proportion of income on transportation costs. In these areas of the region, a combination of low proximity to jobs and a high proportions of residents’ incomes spent on transportation may present barriers to obtaining and maintaining employment.



“THERE ARE SO MANY EMPLOYERS IN ST. CHARLES COUNTY THAT CAN’T GET EMPLOYEES BECAUSE PEOPLE HAVE DIFFICULTY AFFORDING HOUSING IN THE COUNTY, AND THERE IS A LACK OF PUBLIC TRANSPORTATION.”

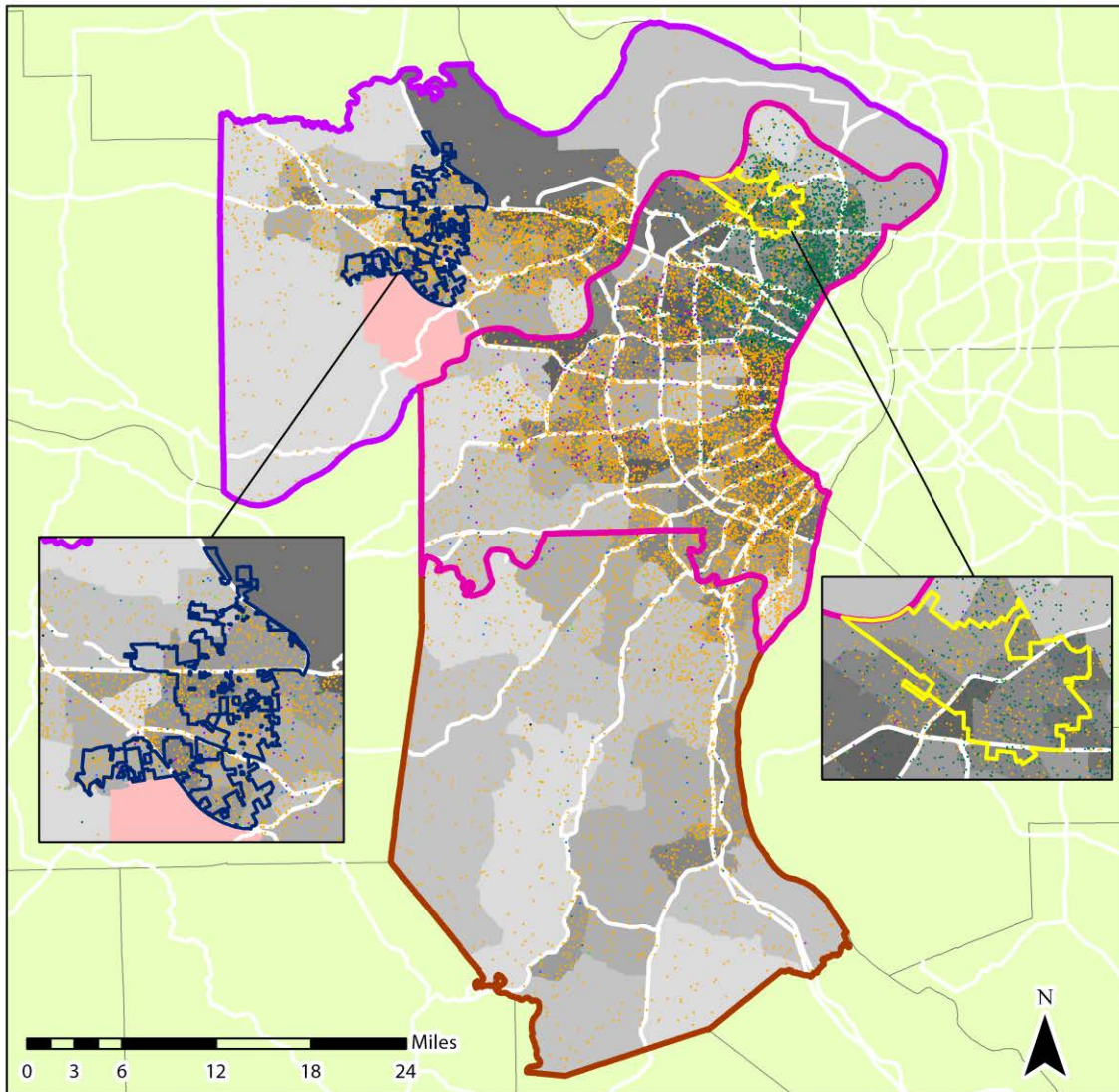
-STAKEHOLDER

Residents and stakeholders who participated in this planning process emphasized that the combination of a lack of affordable housing and lack of public transportation in St. Charles County is a primary barrier for residents in the region in accessing the variety of employment, job training, and educational opportunities available in St. Charles County.

¹⁸ Based on Location Affordability Index estimates of transportation expenses as a percent of income for a 3-person single-parent family with income at 50% of the median income for renters in the region for 2012 to 2016 (household type 6 (hh_type6_) for renters (t_rent), as noted in the LAI data dictionary).

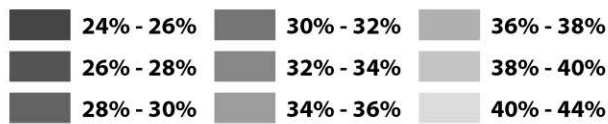
FIGURE 29 – LOW-COST TRANSPORTATION ACCESS + RACE/ ETHNICITY

Low-Cost Transportation Access + Race/ Ethnicity



Transportation Costs as Percent of Household Income

(Low-Income Renter Households*)



Source: Location Affordability Index v. 3 (2012-2016)

Race + Ethnicity 1 Dot = 100 People



*Based on estimates of transportation costs for a 3-person single-parent family with income at 50% of the median income for renters in the region

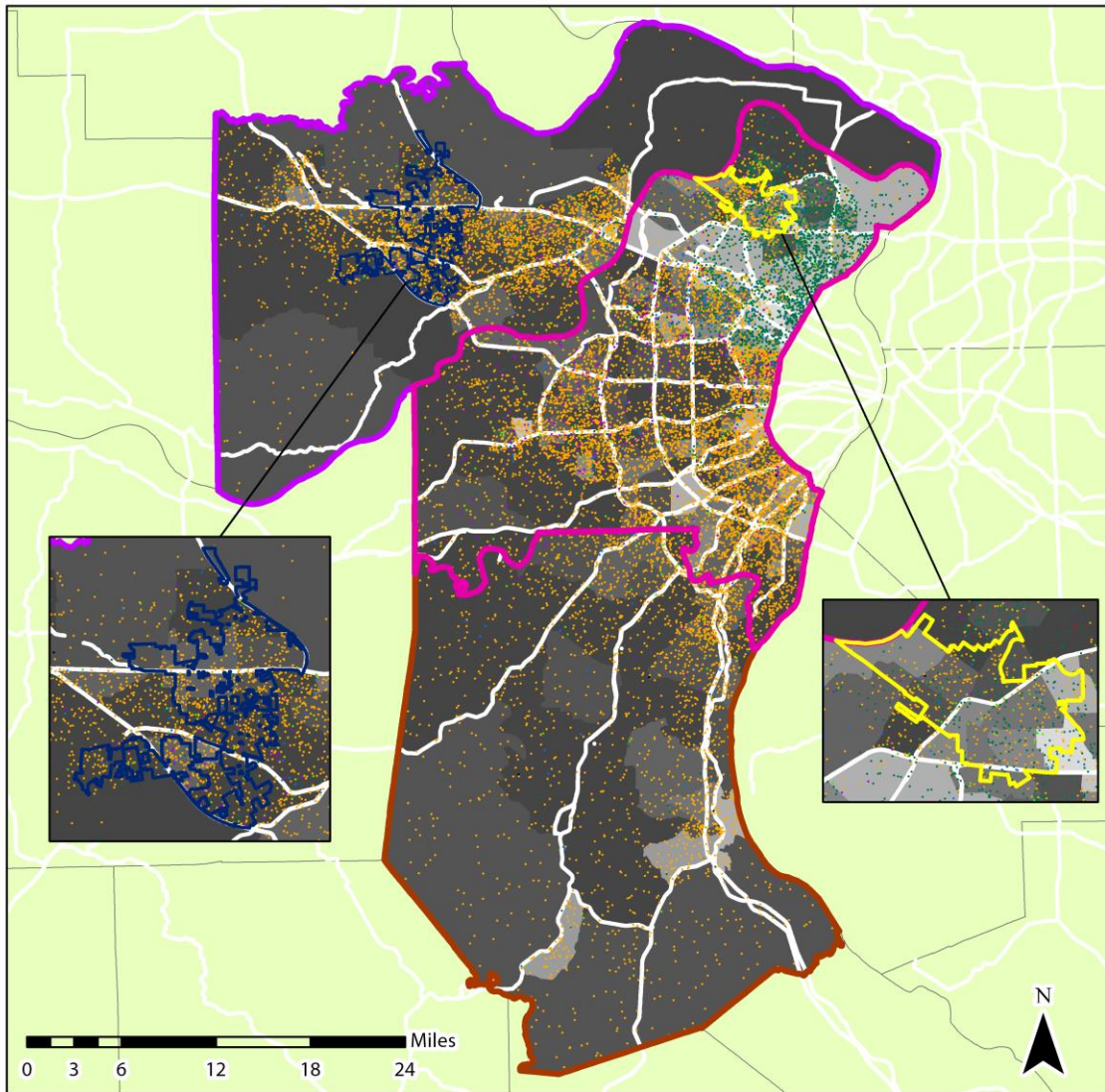
Vehicle Access

Access to vehicles is another indicator of residents' access to transportation, particularly in areas with limited access to public transit. An estimated 6.8% of households in St. Louis County, 3.6% of households in Jefferson County, and 2.8% of households in St. Charles County do not have access to a vehicle, according to American Community Survey 5-Year Estimates for 2014 to 2018. Residents in north St. Louis County tend to have the lowest levels of vehicle access in the region; in 13 of the area's census tracts, between 20% and 34% of households do not have a vehicle. In contrast, in most of Jefferson and St. Charles counties and western St. Louis County, almost all households have access to vehicles.

Stakeholders who participated in this planning process emphasized that a lack of access to vehicles is often a barrier to employment for residents living in areas with low proximity to jobs and without access to public transportation. A lack of access to vehicles also creates barriers to accessing needed services in areas in which those services are not located within walking distance and transit access is limited. In this way, residents without access to vehicles often find their housing choices limited to locations where public transportation is available.

FIGURE 30 – VEHICLE ACCESS + RACE/ ETHNICITY

Vehicle Access + Race/ Ethnicity



Source: American Community Survey 5-Year Estimates, 2014-2018

Percent of Households with No Vehicle

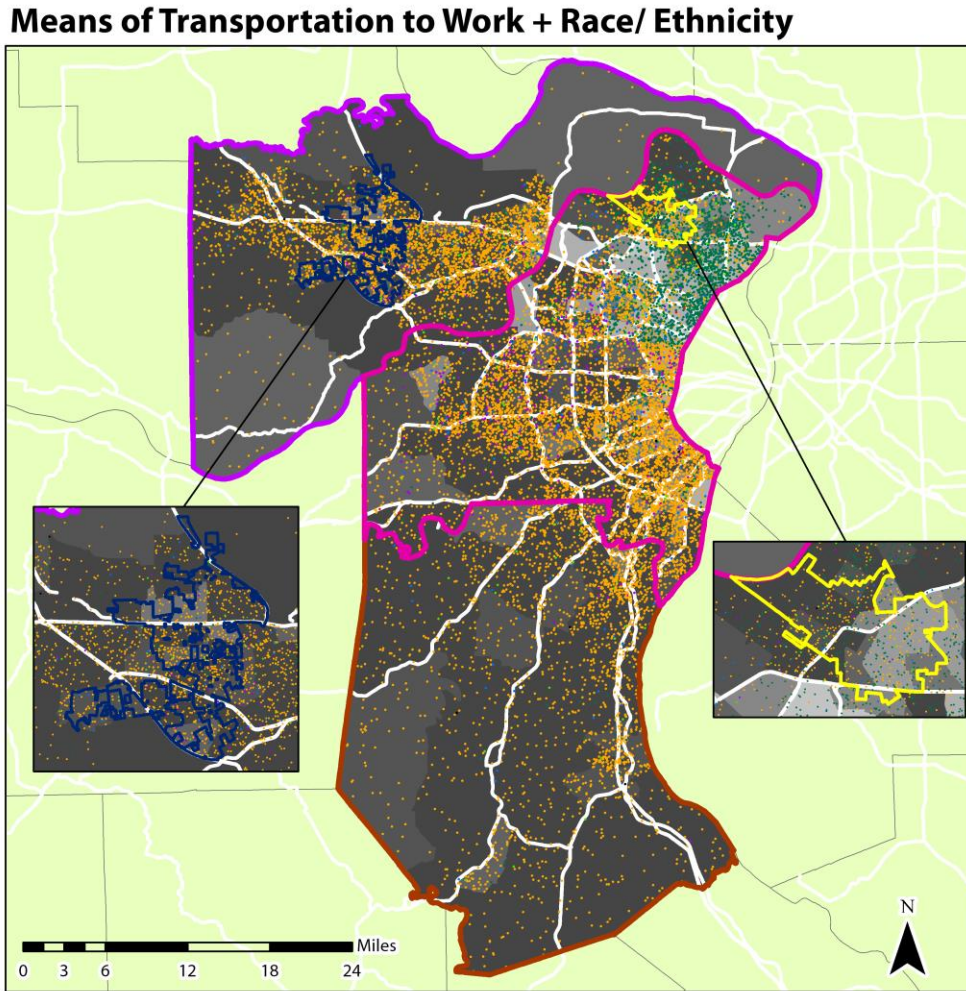


Race + Ethnicity 1 Dot = 100 People



As would be expected, areas with lower levels of vehicle access tend to have higher proportions of residents who take public transportation, walk, bike, or take taxis to work (see Figure 31). In some census tracts in central and north St. Louis County adjacent to the city of St. Louis, between 20% and 40% of residents use these forms of transportation, the highest proportions in the region. In most of St. Charles County, Jefferson County, and western St. Louis County, 2% or less of residents use these forms of transportation.

FIGURE 31 – MEANS OF TRANSPORTATION TO WORK + RACE/ ETHNICITY



Source: American Community Survey 5-Year Estimates, 2014-2018

Percent of Workers Aged 16+ Who Take Public Transportation, Walk, Bike, or Taxi to Work

- 0% - 2%
- 2% - 3%
- 3% - 4%
- 4% - 5%
- 5% - 7%
- 7% - 10%
- 10% - 15%
- 15% - 20%
- 20% - 40%

- St Louis County
- St. Charles County
- Jefferson County
- City of Florissant
- City of O'Fallon

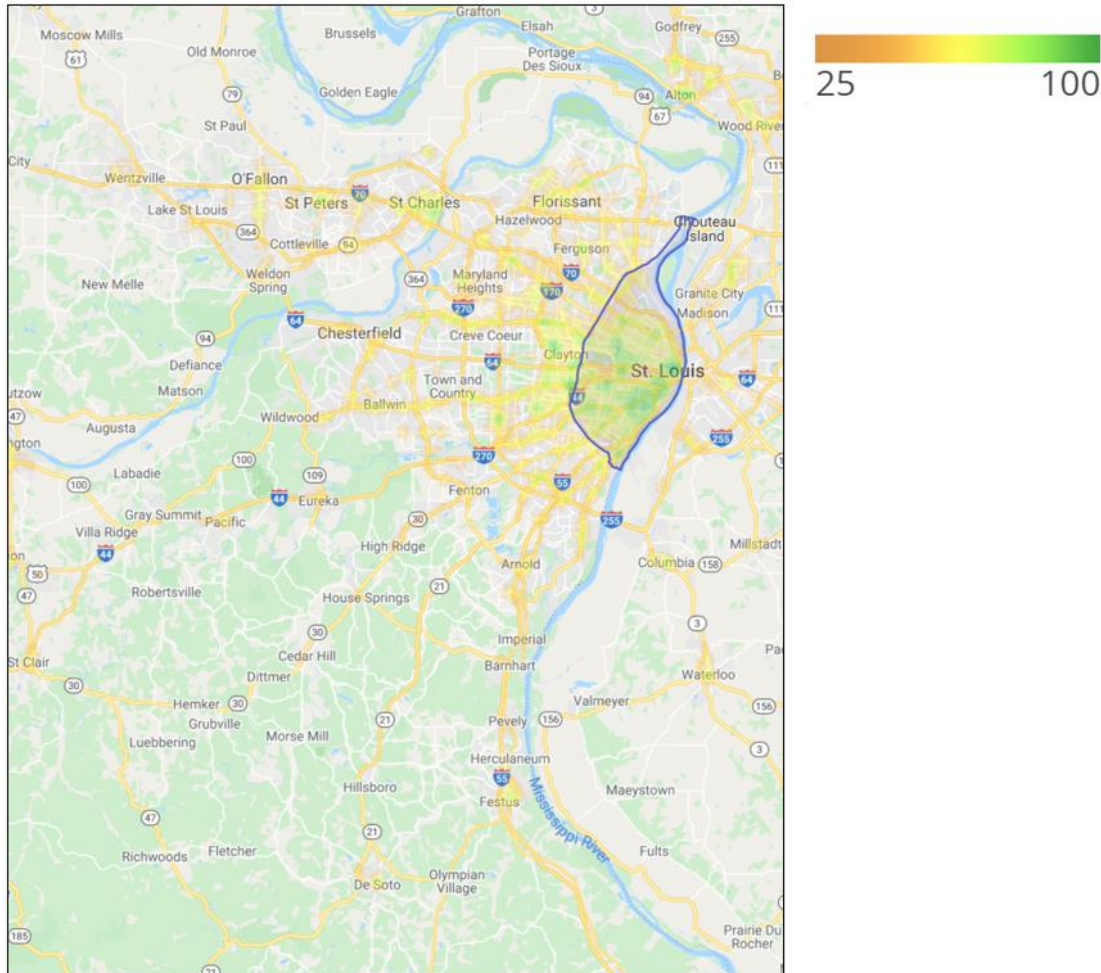
Race + Ethnicity 1 Dot = 100 People

- White, Non-Hispanic
- Black, Non-Hispanic
- Hispanic or Latino (of any race)
- Asian/ Pacific Islander, Non-Hispanic
- Multi-Racial, Non-Hispanic
- Other, Non-Hispanic
- Native American, Non-Hispanic

Walkability

Along with access to transit and low-cost transportation, walkability shapes the extent to which residents are able to access employment, resources, and services. The region is generally car-dependent, with the highest levels of walkability existing in the inner-ring suburbs around the city of St. Louis.

FIGURE 32: WALKABILITY, ST. LOUIS REGION



The City of Florissant scores 38 out of 100 on Walk Score’s walkability index,¹⁹ indicating that most errands require a car (see Figure 33). The City of O’Fallon scores a 21, indicating that almost all errands require a car (see Figure 34).

¹⁹ Walk Score measures the walkability of any address by analyzing hundreds of walking routes to nearby amenities using population density and road metrics such as block length and intersection density. Data sources include Google, Education.com, Open Street Map, the U.S. Census, Localeze, and places added by the Walk Score user community. Points are awarded based on the distance to amenities in several categories including grocery stores, parks, restaurants, schools, and shopping. The measure is useful in showing not only walkability but also access to critical facilities.

FIGURE 33: WALKABILITY, CITY OF FLORISSANT

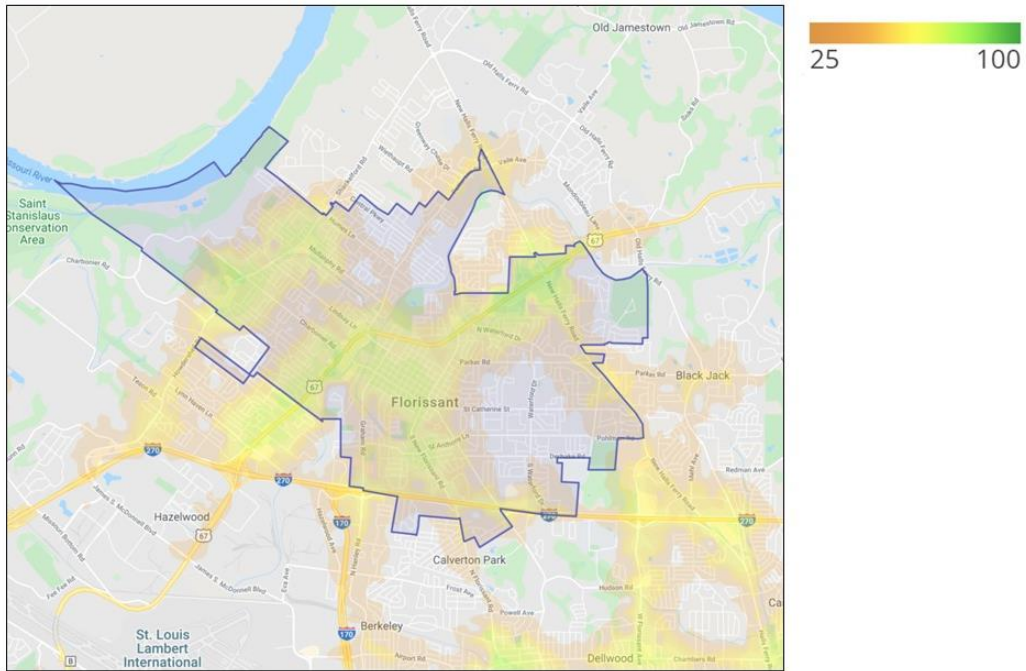
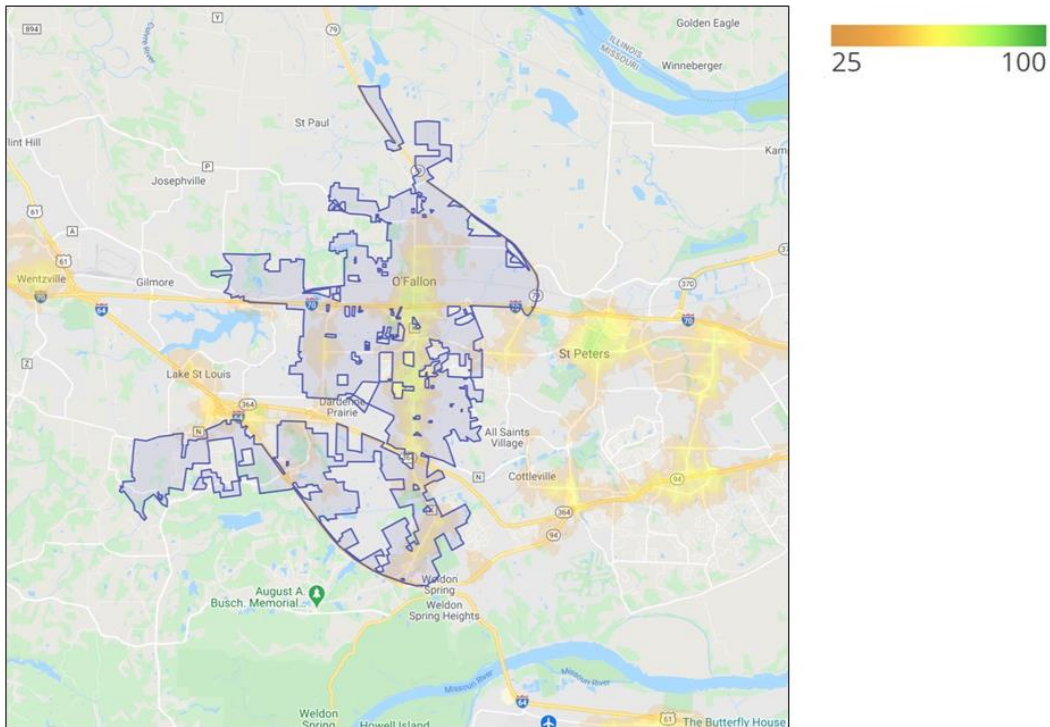


FIGURE 34: WALKABILITY, CITY OF O'FALLON



Residents and stakeholders emphasized that many areas of the region lack sidewalks, making accessing resources and services via walking more difficult and less safe, particularly for residents with disabilities. In this way, low levels of transit and vehicle access may pose a more significant barrier to accessing jobs and services for residents living in areas with low levels of walkability. Overall low levels of walkability in the region combined with low levels of access to low-cost transportation point to challenges for residents without access to vehicles in accessing employment, resources, and services.

ENVIRONMENTAL QUALITY

Environmental quality and access to environmental amenities also shape the opportunities available to residents. Access to parks and other green infrastructure in counties, cities, and neighborhoods provides a range of environmental, social, and health benefits, including access to nature and recreation opportunities; cleaner air and water; alternative transportation options; improvements in physical and mental health and wellbeing; and opportunities for food production and other local economic development. At the same time, environmental hazards, such as poor air quality and toxic facilities, are associated with negative health effects including increased respiratory symptoms, hospitalization for heart or lung diseases, cancer and other serious health effects, and even premature death. Certain population groups, such as children, have a greater risk of adverse effects from exposure to pollution.²⁰

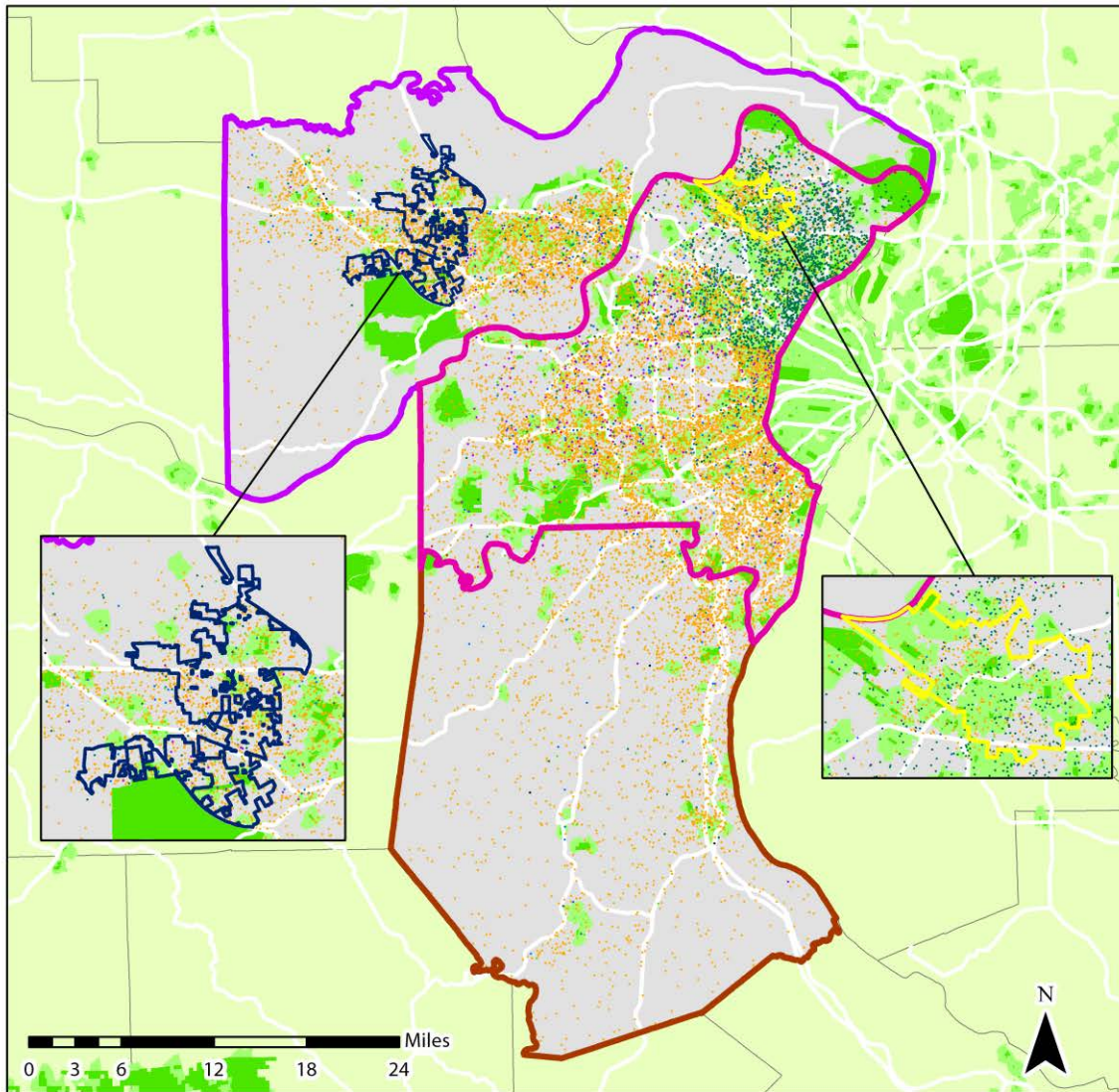
Access to Parks and Environmental Amenities

Access to environmental amenities is an important component of environmental health. In the St. Louis region, these amenities are most accessible in the city of St. Louis and the inner-ring suburbs adjacent to the city, areas in which most residents live within a 10-minute walk of a park (see Figure 35). In St. Charles and Jefferson counties, parks tend to be clustered in the most densely populated areas, with lower levels of access in less dense areas, such as south and west Jefferson County and north St. Charles County.

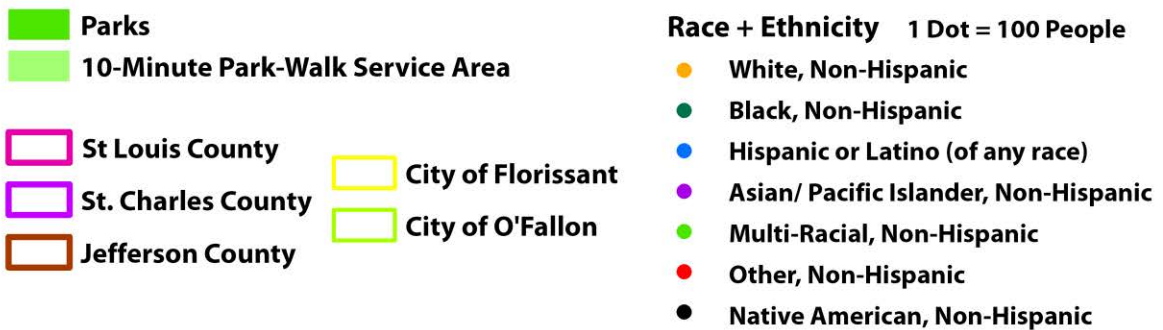
²⁰ U.S. Environmental Protection Agency. (n.d.). Managing Air Quality - Human Health, Environmental and Economic Assessments. Retrieved from: <https://www.epa.gov/air-quality-management-process/managing-air-quality-human-health-environmental-and-economic>

FIGURE 35: PARK ACCESS + RACE/ETHNICITY

Park Access + Race/ Ethnicity



Source: Trust for Public Land ParkScore (2020)



While the counties' inner-ring suburbs have the highest levels of access to parks, stakeholders emphasized that significant variation exists between lower- and upper-income areas with regard to the quality of parks, available amenities, and maintenance.

About 66% of survey respondents noted that parks and trails are equally provided in their communities, while about 24% stated that they are not equally available. Similarly, about 64% of respondents noted that parks and trails are equally maintained, while about 22% said that they are not equally maintained. Residents of central and west St. Louis County were most likely to say they have access to parks and trails (83.3% and 82.4% of residents, respectively), while residents of Jefferson County and outer north St. Louis County reported the lowest levels of access (50.0% and 53.3% respectively). Survey respondents who have someone with a disability in their household reported having slightly less access to parks and trails (63.2% said they have access) than those without a household member with a disability (68.6%).

“I THINK IF YOU WERE TO LOOK AT THE INNER-RING AREAS, THE RECREATIONAL AMENITIES, THERE IS A DISTINCTION IN QUALITY. THERE MAY BE A POCKET PARK IN THE LOW-INCOME AREAS, BUT THE UPPER INCOME AREAS HAVE MANY MORE AMENITIES- BALL FIELDS, FISHING, TRAILS-MORE THAN A SMALL PARK WITH SOME GRASS AND A LITTLE PLAYGROUND EQUIPMENT.”

-STAKEHOLDER

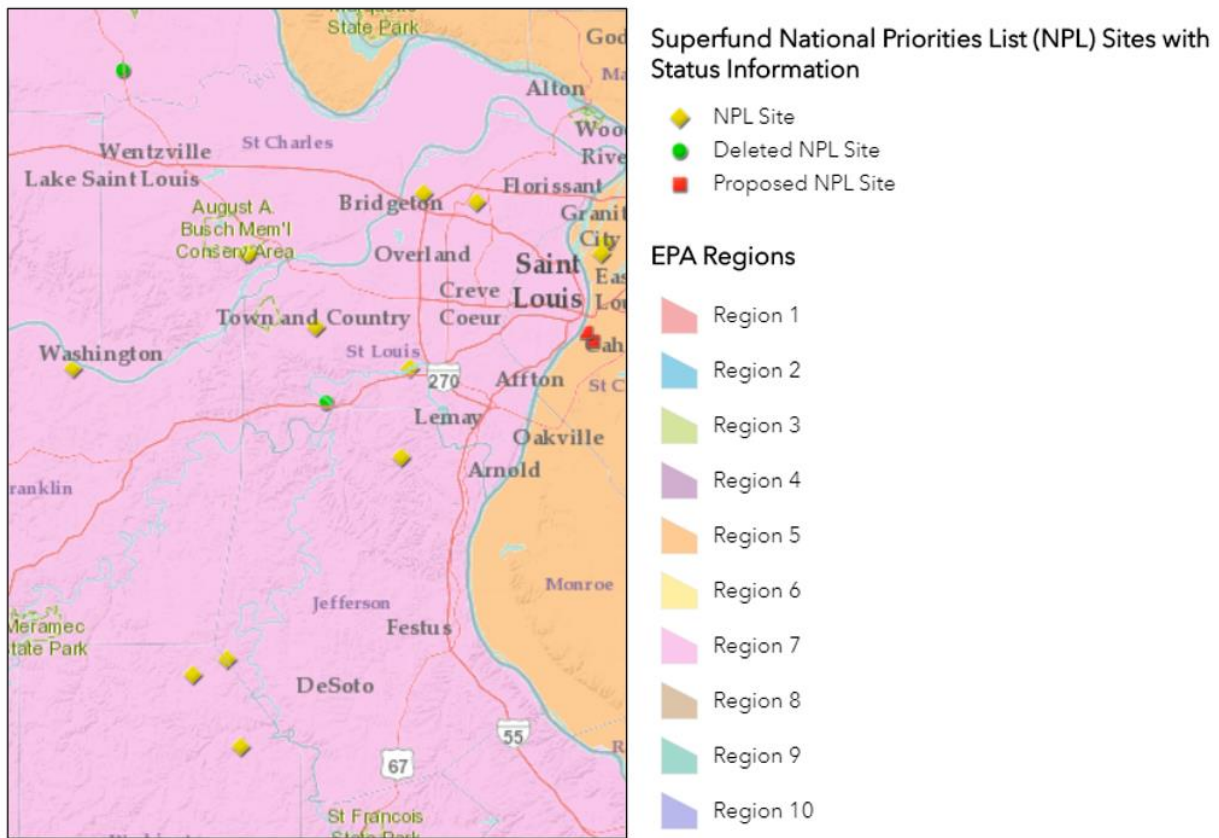
Environmental Hazards

SUPERFUND AND OTHER HAZARDOUS WASTE SITES

Toxic sites may pose risks to residents living nearby and thus may constitute fair housing concerns if they disproportionately impact protected classes. A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment. These sites are placed on the National Priorities List (NPL). In the St. Louis HOME Consortium region, there are two NPL sites located in St. Charles County, four in St. Louis County, and two in Jefferson County (see Figure 36).²¹ One deleted NPL site is located in St. Louis County.

²¹ U.S. EPA. (n.d.). Search for Superfund Sites Where You Live. Retrieved from: <https://www.epa.gov/superfund/search-superfund-sites-where-you-live>

FIGURE 36 – SUPERFUND NATIONAL PRIORITIES LIST (NPL) SITES, ST. LOUIS HOME CONSORTIUM REGION

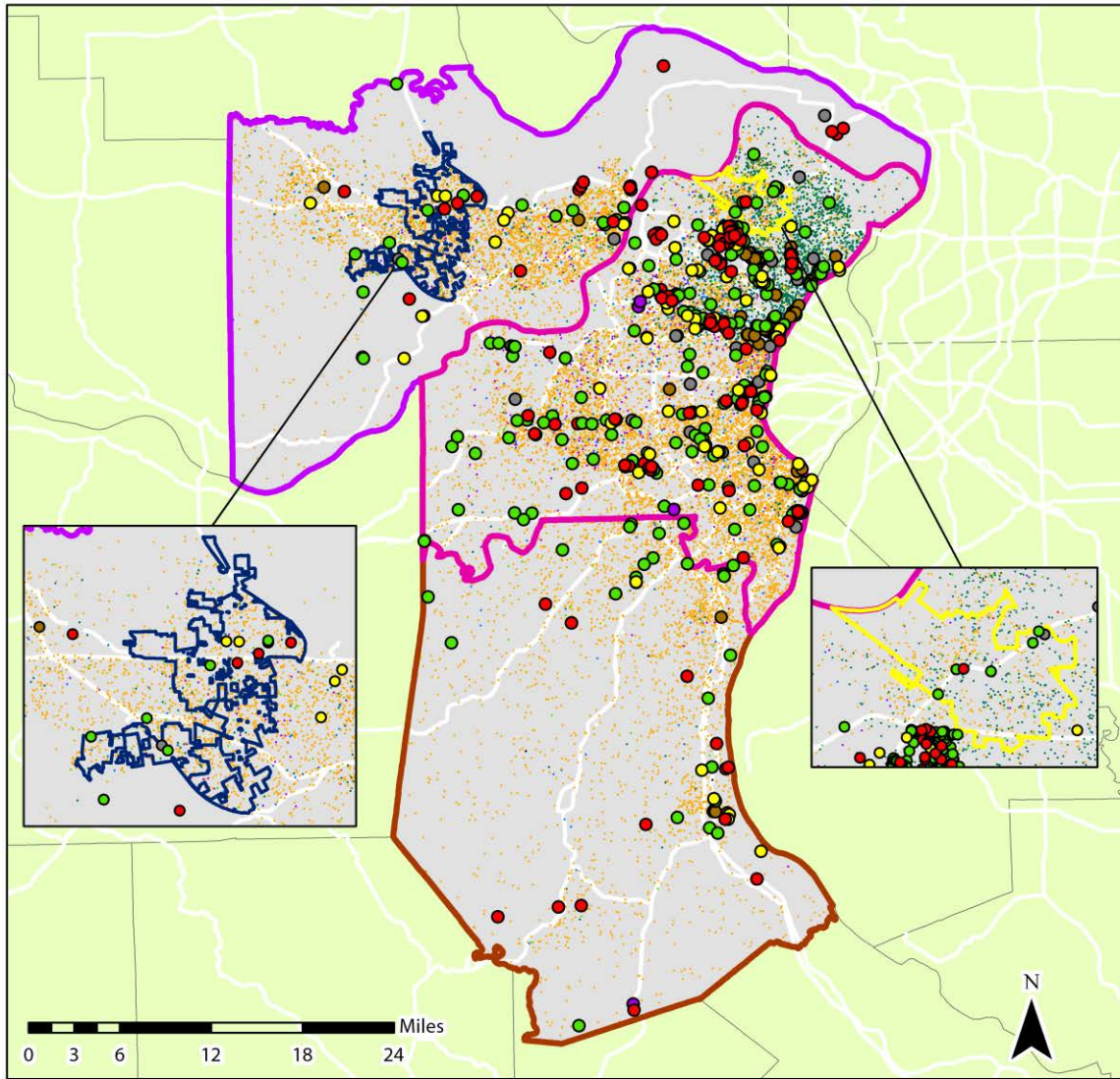


Source: U.S. EPA

The Missouri Department of Natural Resources also tracks hazardous waste sites and remediation processes in the counties. An estimated 124 active hazardous waste sites fall within the three counties, including 85 in St. Louis County, 20 in St. Charles County, and 19 in Jefferson County (see Figure 37). Active sites tend to be clustered in the inner-ring suburbs of St. Louis County, particularly in north St. Louis County around the airport.

FIGURE 37 – HAZARDOUS WASTE CLEANING SITE LOCATIONS + RACE/ ETHNICITY, ST. LOUIS HOME CONSORTIUM REGION

Hazardous Waste + Race/ Ethnicity



Source: Missouri Department of Natural Resources

Status of Missouri Department of Natural Resources Hazardous Waste Program Cleaning Sites

- | | |
|---|--|
| ● Active | ● Environmental Notice |
| ● Long-Term Stewardship | ● Brownfield Assessment |
| ● Completed | ● Inactive |
-
- | | |
|--|--|
| St Louis County | City of Florissant |
| St. Charles County | City of O'Fallon |
| Jefferson County | |

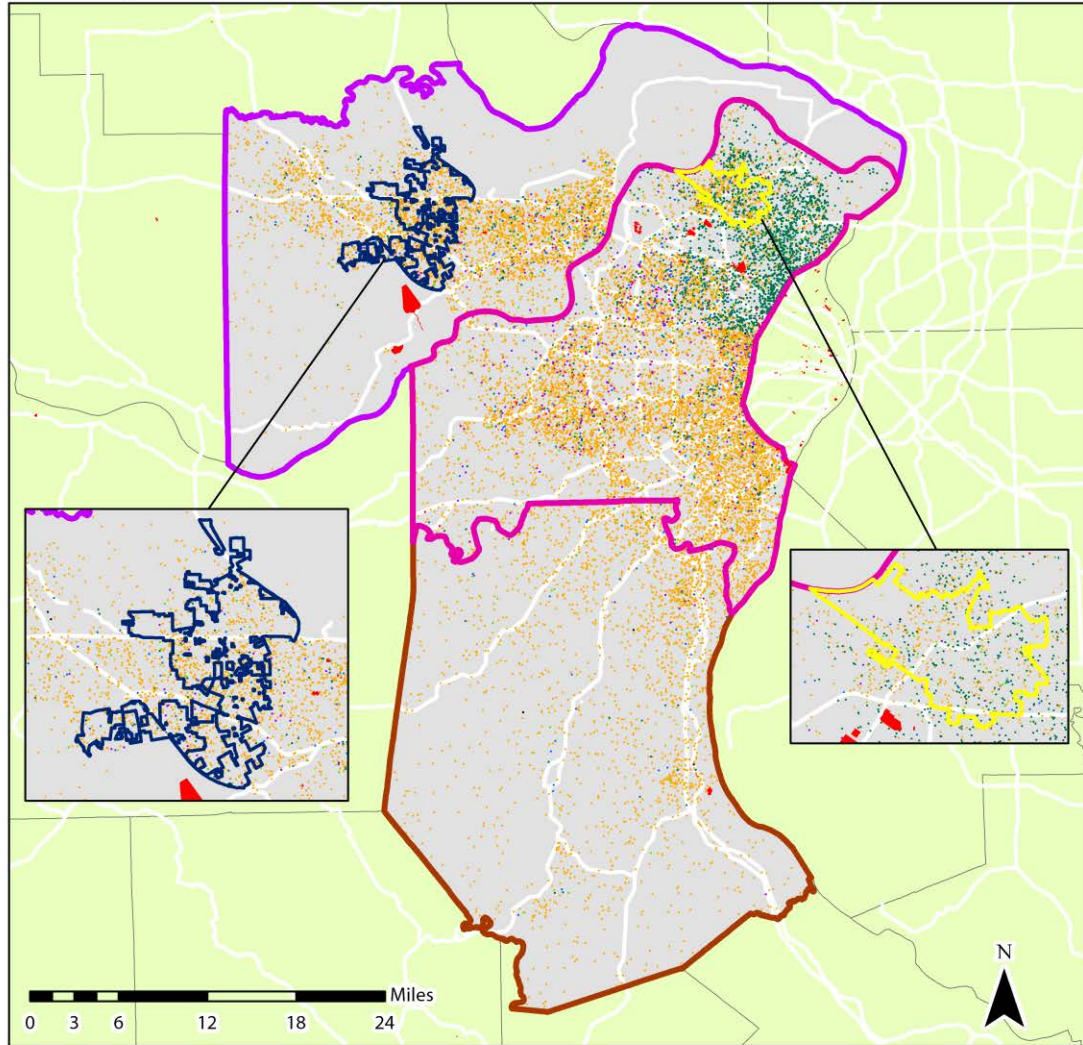
Race + Ethnicity 1 Dot = 100 People

- White, Non-Hispanic
- Black, Non-Hispanic
- Hispanic or Latino (of any race)
- Asian/ Pacific Islander, Non-Hispanic
- Multi-Racial, Non-Hispanic
- Other, Non-Hispanic
- Native American, Non-Hispanic

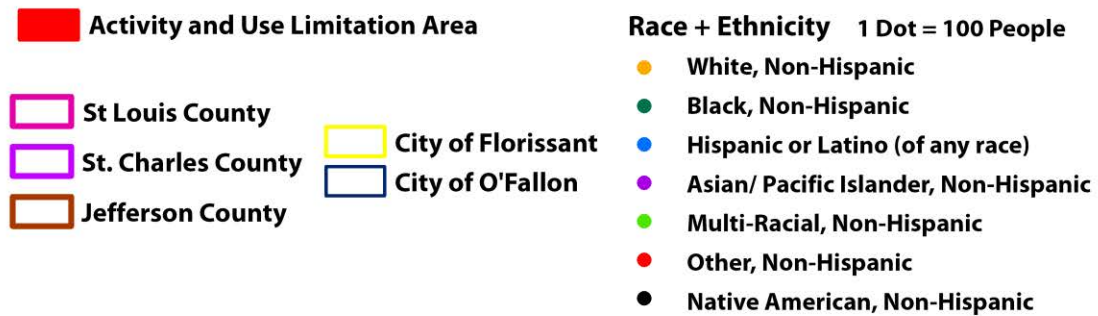
Sites with activity and use limitations in the region tend to be clustered in the city of St. Louis, north St. Louis County, and west St. Charles County (Weldon Spring disposal site).

FIGURE 38 – ACTIVITY AND USE LIMITATION AREAS + RACE/ ETHNICITY, ST. LOUIS HOME CONSORTIUM REGION

Activity and Use Limitation Areas + Race/ Ethnicity



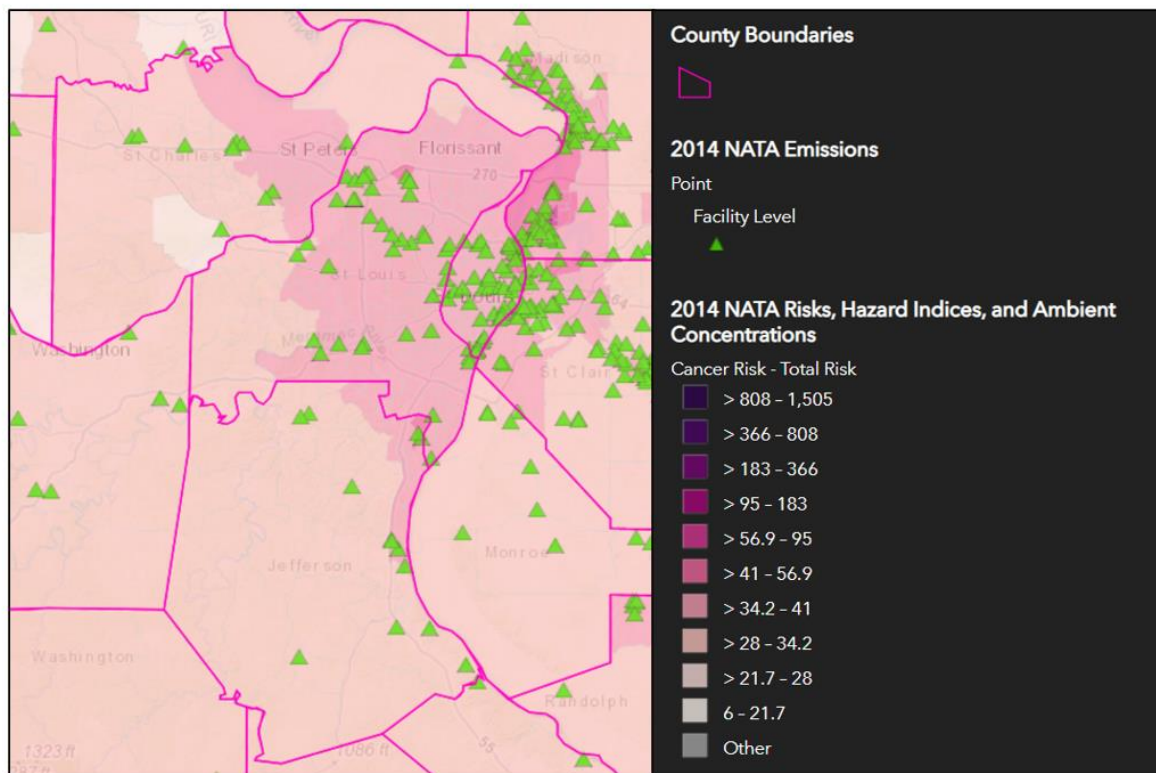
Source: Missouri Department of Natural Resources



AIR TOXICS AND TOXIC RELEASE FACILITIES

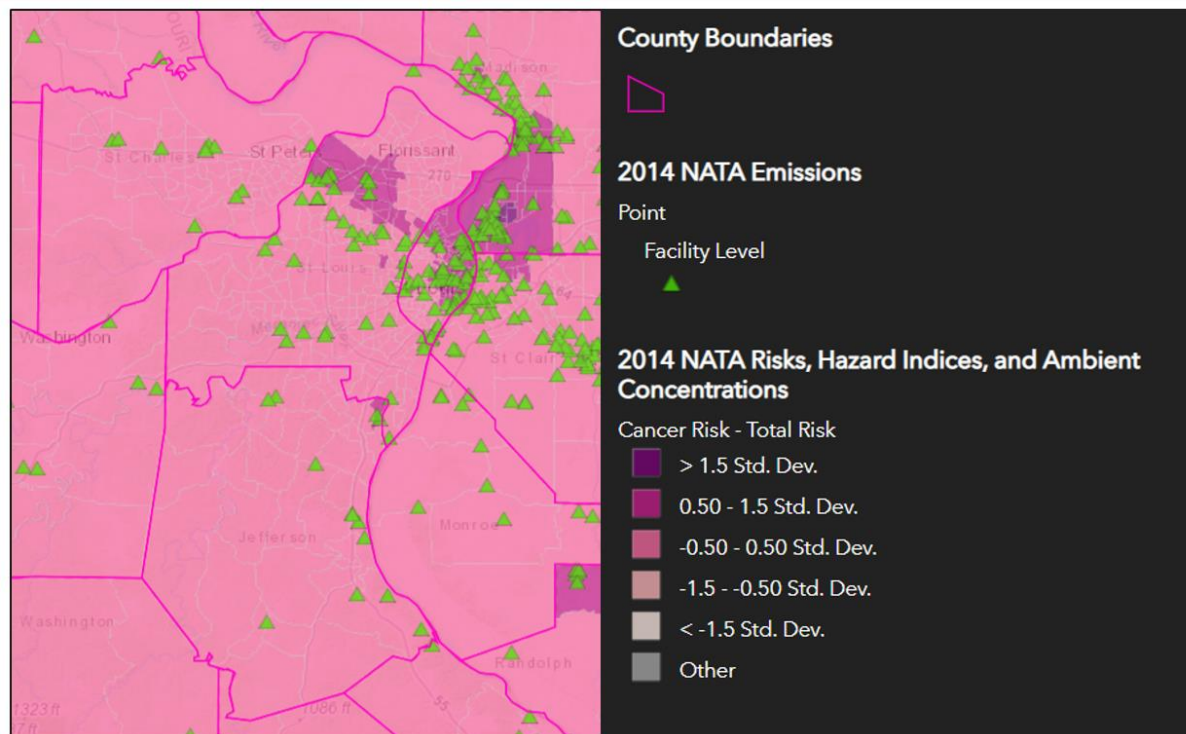
The EPA’s National Air Toxics Assessment (NATA) estimates health risks from air toxics. The most recent assessment, released in 2018, uses data from 2014 to examine cancer risk from ambient concentrations of pollutants. Areas in the region with the highest cancer risk include a large portion of St. Louis County, central St. Charles County, and east Jefferson County, which have risks falling in the range of 34 to 41 per million population (see Figure 39). Several tracts in north St. Louis County, in particular, fall between 0.5 and 1.5 standard deviations above the cancer risk level of United States as a whole, indicating elevated levels of risk (see Figure 40). Point sources of emissions are clustered in the city of St. Louis and north St. Louis County, with fewer facilities dispersed across St. Charles and Jefferson counties.

FIGURE 39 – AIR TOXICS AND CANCER RISK (PER MILLION POPULATION), ST. LOUIS COUNTY HOME CONSORTIUM REGION



Source: Environmental Protection Agency National Air Toxics Assessment (NATA)

FIGURE 40 – AIR TOXICS AND CANCER RISK (STANDARD DEVIATION), ST. LOUIS COUNTY HOME CONSORTIUM REGION

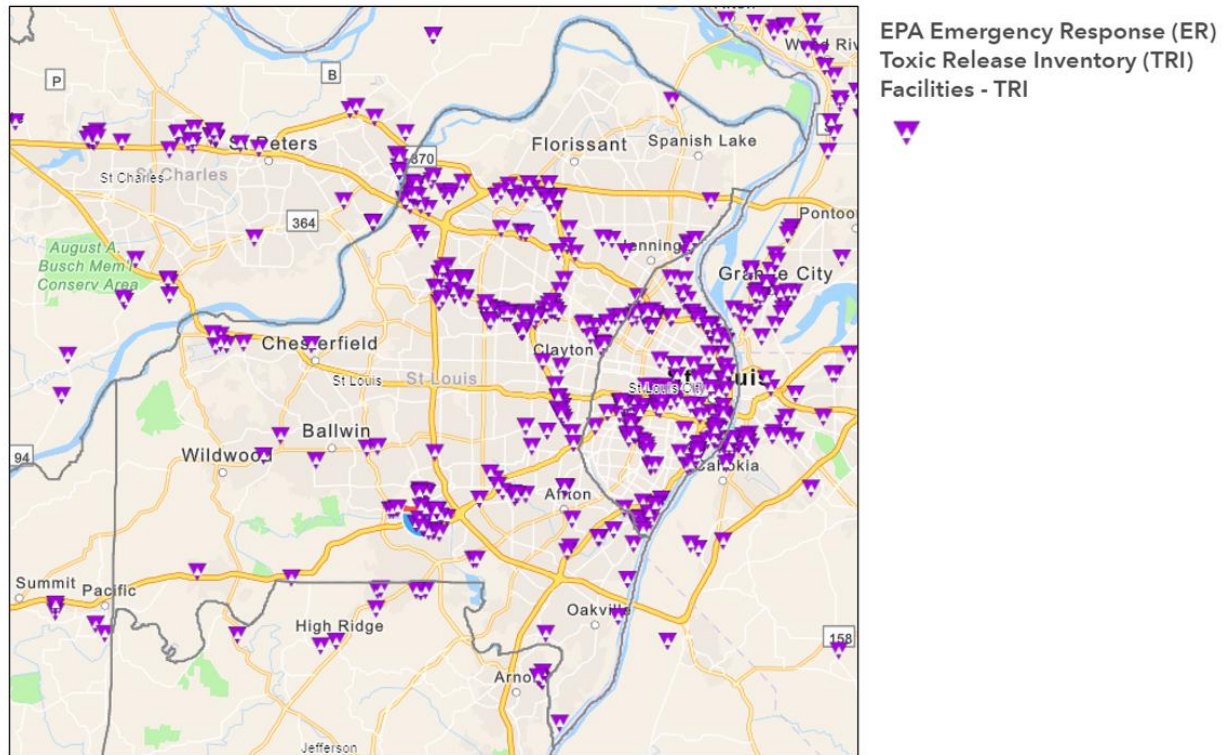


Source: Environmental Protection Agency National Air Toxics Assessment (NATA)

The Environmental Protection Agency’s Toxics Release Inventory (TRI) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment.²² Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site. Toxic release inventory sites in the region are clustered in the city of St. Louis, along major roads in the inner-ring suburbs in St. Louis County, and along I-70 in St. Charles County (see Figure 41). Sites in Jefferson County are more dispersed, although some sites are clustered along I-55 in east Jefferson County.

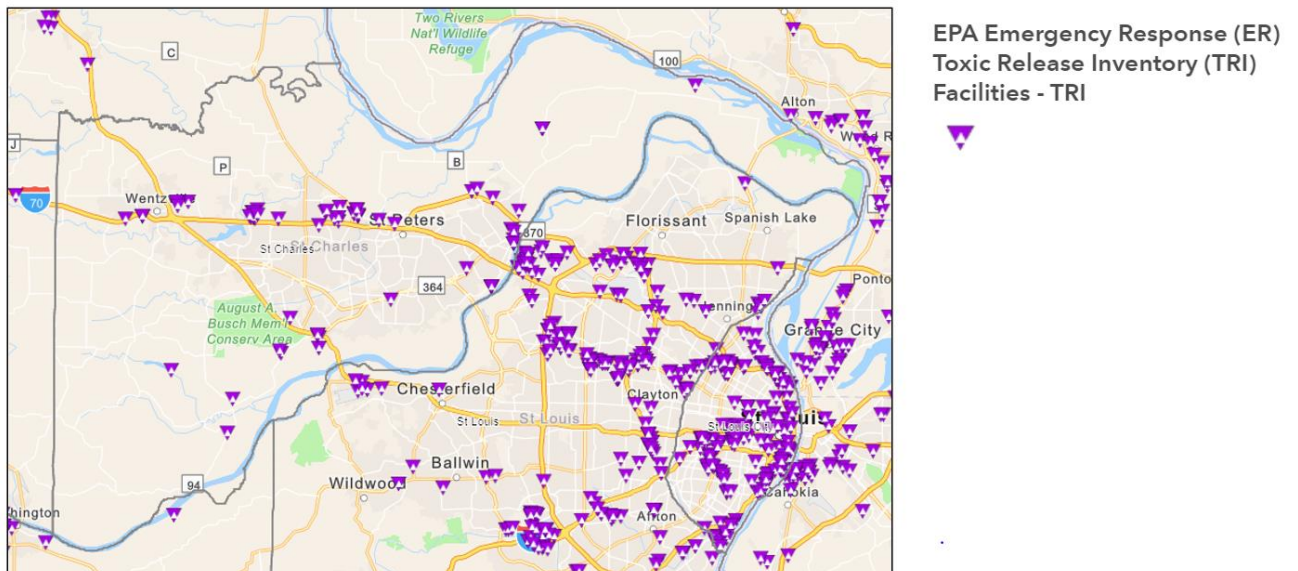
²² U.S. EPA. (n.d.) Toxic Release Inventory Program. Retrieved from: <https://www.epa.gov/toxics-release-inventory-tri-program/what-toxics-release-inventory>. Data retrieved from: <https://www.arcgis.com/home/item.html?id=2c4a0b5f85b945f8a67125e6a93fa7fe>

FIGURE 41 – TOXICS RELEASE INVENTORY, ST. LOUIS COUNTY



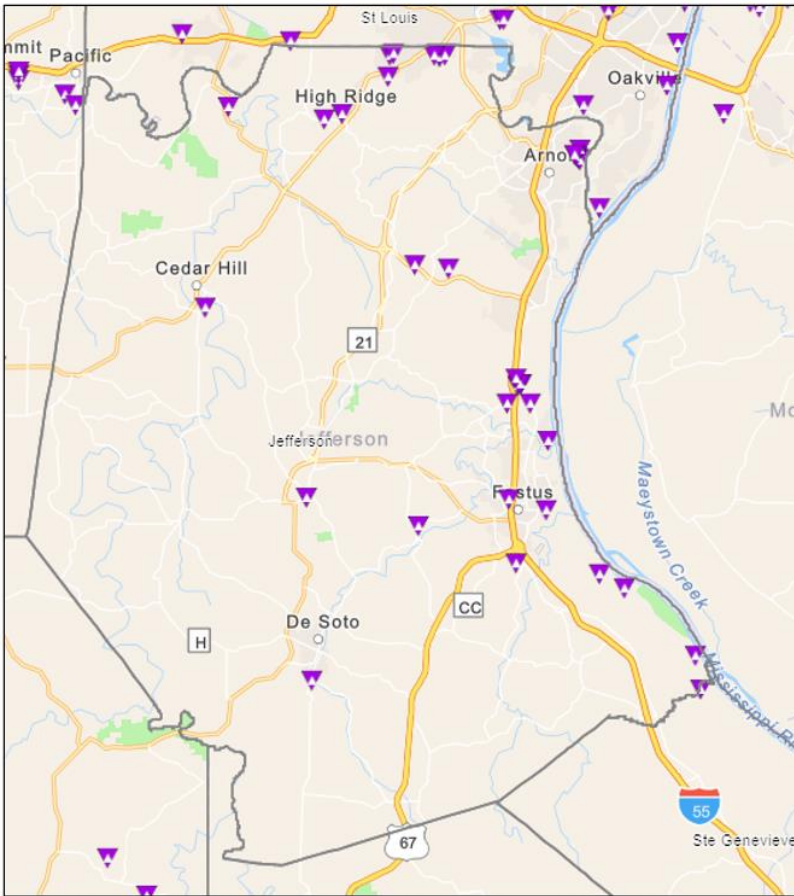
Source: U.S. EPA

FIGURE 42 – TOXICS RELEASE INVENTORY, ST. CHARLES COUNTY



Source: U.S. EPA

FIGURE 43 – TOXICS RELEASE INVENTORY, JEFFERSON COUNTY



EPA Emergency Response (ER)
Toxic Release Inventory (TRI)
Facilities - TRI



Source: U.S. EPA


FOOD

Access to food that is both affordable and nutritious is a challenge for many individuals and families in the United States. In neighborhoods in which the nearest grocery store is many miles away, transportation costs and lack of vehicle access may present particular challenges for low-income households, who may be forced to rely on smaller stores that are often unaffordable and may not offer a full range of healthy food choices. Even in areas in close proximity to food outlets, the higher cost of healthy foods such as produce often present barriers to healthy food access.²³

Analysis of the most recently available USDA Food Research Atlas data, from 2015, indicates that the proportion of residents who have low incomes and live further than ½ mile from a supermarket tends to be highest in census tracts in north St. Louis County (see Figure 44). In 11 census tracts in north St. Louis County, more than 50% of residents have low incomes and live more than ½ mile from a supermarket. In six additional tracts in north St. Louis County, between 40% and 50% of residents meet the USDA definition of low income and low access at ½ mile. In 2018, several Shop 'n Save grocery stores in north St. Louis County closed, further reducing food access in the north county area.²⁴ Other areas in with particularly low levels of food access include four tracts in Jefferson County, in which 40% to 50% of residents are low income and low access at ½ mile.

In contrast, tracts in central St. Louis County and in some of the more populated areas of St. Charles County tend to have highest levels of food access in the region, with the lowest proportions of residents with low incomes who live more than ½ mile from a supermarket. In many tracts in these areas, 5% or fewer of residents are considered low income and low access.

Stakeholders interviewed during this planning process also noted lower levels of food access in north St. Louis County, particularly with the recent closures of the Stop 'n Save stores. Survey respondents echoed concerns surrounding food access, with 34.9% noting that grocery stores and



“THERE HAVE BEEN RAPID CLOSURES IN GROCERY STORES IN NORTH ST. LOUIS COUNTY...LARGE PARTS OF NORTH COUNTY DO NOT HAVE A GROCERY STORE FOR MANY MILES...THERE ARE SOME NONPROFITS WORKING IN THAT AREA. I SEE THAT AS A VALUABLE ACTIVITY, BUT IT DOESN'T SOLVE THE PROBLEM OF SUSTAINABLE AND SCALED ACCESS TO FOOD THROUGHOUT THOSE COMMUNITIES.”

-STAKEHOLDER

²³ Valdez Z, Ramírez AS, Estrada E, Grassi K, Nathan S. Community Perspectives on Access to and Availability of Healthy Food in Rural, Low-Resource, Latino Communities. *Prev Chronic Dis* 2016;13:160250.

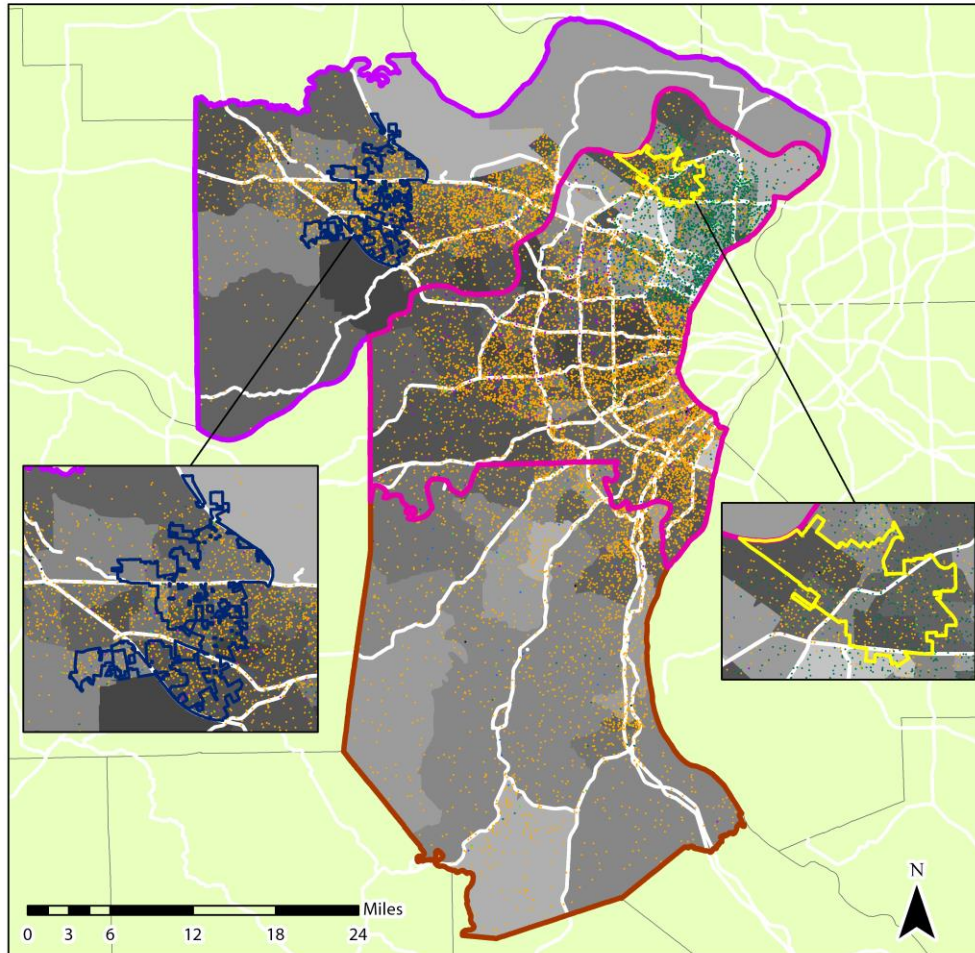
²⁴ St. Louis Public Radio. (2019). Shop 'n Save's Exit From St. Louis Region Creates New Food Desert In North County. Retrieved from: <https://news.stlpublicradio.org/economy-business/2019-01-15/shop-n-saves-exit-from-st-louis-region-creates-new-food-desert-in-north-county#stream/0>

other shopping opportunities are not equally available in their communities.

In addition to distance from food outlets, the quality and affordability of fresh food available at those outlets are important factors in considering food access. Much of north St. Louis County is served primarily by dollar stores or smaller food outlets, indicating that many residents need may access to vehicles to access one of the area’s larger supermarkets.

FIGURE 44. FOOD ACCESS + RACE/ ETHNICITY

Food Access + Race/ Ethnicity



Source: USDA Food Access Research Atlas, 2015

Percent of Population Who Are Low-Income and Live More Than 1/2 Mile from a Supermarket

0% - 5%	15% - 20%	40% - 50%
5% - 10%	20% - 30%	50% - 60%
10% - 15%	30% - 40%	60% - 90%

St Louis County	City of Florissant
St. Charles County	City of O'Fallon
Jefferson County	

Race + Ethnicity 1 Dot = 100 People

- White, Non-Hispanic
- Black, Non-Hispanic
- Hispanic or Latino (of any race)
- Asian/ Pacific Islander, Non-Hispanic
- Multi-Racial, Non-Hispanic
- Other, Non-Hispanic
- Native American, Non-Hispanic

FIGURE 45: SCHNUCKS FOOD & PHARMACY IN THE CITY OF FERGUSON IN NORTH ST. LOUIS COUNTY



Schnucks Food & Pharmacy in the city of Ferguson in north St. Louis County
Source: Google Maps

Poverty and a lack of access to vehicles also contribute to food insecurity in the region. An estimated 10.3% of residents in Jefferson County, 9.7% of residents in St. Louis County, and 5.6% of residents in St. Charles County were living below the federal poverty level as of the 2014-2018 American Community Survey Five-Year Estimates, indicating that low incomes are a substantial barrier for a substantial portion of residents in accessing fresh food. Disparities in poverty exist by race: 19.3% of St. Louis County's Black residents --who make up the majority of the population in north St. Louis County-- were living below the poverty level in 2014-2018, a rate almost double the county's overall poverty rate of 9.7%. North St. Louis County tends to have the highest rates of poverty in the region, with poverty rates greater than 20% in many census tracts.

Further, in many north St. Louis County census tracts, between 20% and 30% of residents do not have access to a vehicle, indicating that barriers to food access exist in areas of the region with limited access to public transportation and low levels of walkability. In this way, the combination of uneven distribution of food outlets across the region, the substantial proportions of households with low incomes, and a lack of access to vehicles create barriers to food access and security.

HEALTHCARE

Access to high-quality, affordable physical and mental healthcare shapes community health outcomes, including both length and quality of life. The ratios of clinical care providers to population across the region vary by county. Residents of St. Louis County tend to have the lowest (best) ratios of population to healthcare providers, including one primary care physician per 820 residents, one dentist per 1,160 residents, and one mental health provider per 350 residents, indicating overall higher levels of access than in the state of Missouri overall (see Table 7). Residents of Jefferson County tend to have the highest ratios of population to providers, with ratios significantly higher than those in the state overall, pointing to lower levels of access to healthcare providers in rural areas of the region.

TABLE 7. RATIOS OF POPULATION TO HEALTHCARE PROVIDERS, ST. LOUIS COUNTY, ST. CHARLES COUNTY, JEFFERSON COUNTY, AND STATE OF MISSOURI

	St. Louis County	St. Charles County	Jefferson County	Missouri
Primary Care Physicians	820:1	2,290:1	4,140:1	1,430:1
Dentists	1,160:1	1,730:1	2,640:1	1,720:1
Mental Health Providers	350:1	660:1	1,190:1	510:1

Source: County Health Rankings, 2020

While overall St. Louis County has better ratios of residents to health care providers, geographic disparities exist in access to healthcare across the county. The St. Louis Regional Health Commission (2018) notes that north St. Louis County has large numbers of uninsured users of safety net primary care, but that significant gaps in safety net primary care service exist in multiple zip codes, including 63031 (Florissant), 63114 (Overland), and 63136 (Jennings).²⁵ Additionally, North County has the largest numbers and highest rates of emergency care utilization by uninsured individuals in the St. Louis City/ County region,²⁶ with the highest rates in zip codes 63133 (Pagedale), 63134 (Berkeley), 63135 (Ferguson), 63136, 63138 (Spanish Lake), and 63145 (Berkeley). South St. Louis County has low rates of safety net primary care utilization by uninsured individuals, leading to gaps in safety net primary care service. In contrast, the commission notes that central and west St. Louis County have relatively low rates of uninsured residents and relatively low unmet medical need compared to the rest of the region. Finally, the study emphasizes that transportation is likely a significant barrier to accessing safety net primary care services for uninsured individuals in the St. Louis region, as north and south St. Louis County have fewer community health center locations and less access to timely public transportation.

Healthcare facilities in Jefferson and St. Charles counties are distributed across the counties' most populated areas, although the counties have overall higher ratios of residents to health care providers,

²⁵ Saint Louis Regional Health Commission. (2018). Geography Matters: The Impact of Regionality on Safety Net Access Trends in St. Louis.

²⁶ The Saint Louis Regional Health Commission's study 'Geography Matters' focuses on the region of St. Louis County and the city of St. Louis.

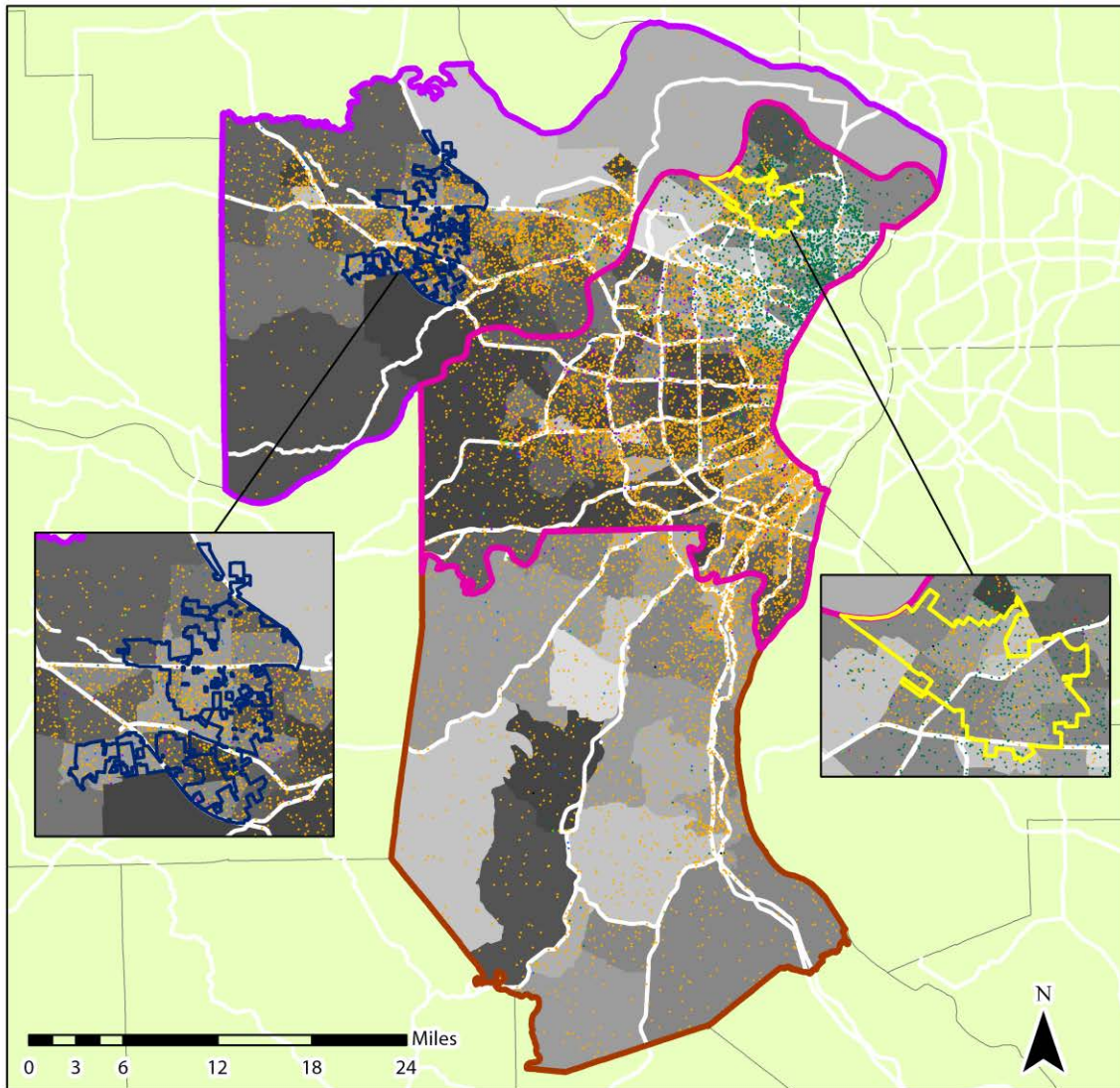
indicating that residents in some areas may have to travel long distances to access available healthcare facilities.

Disparities also exist across the region regarding access to health insurance. Residents in north St. Louis County tend to be uninsured at the highest rates in the region (15% to 23% uninsured residents in 17 North County census tracts), and central and west St. Louis County have the lowest percentage of insured residents (see Figure 46).

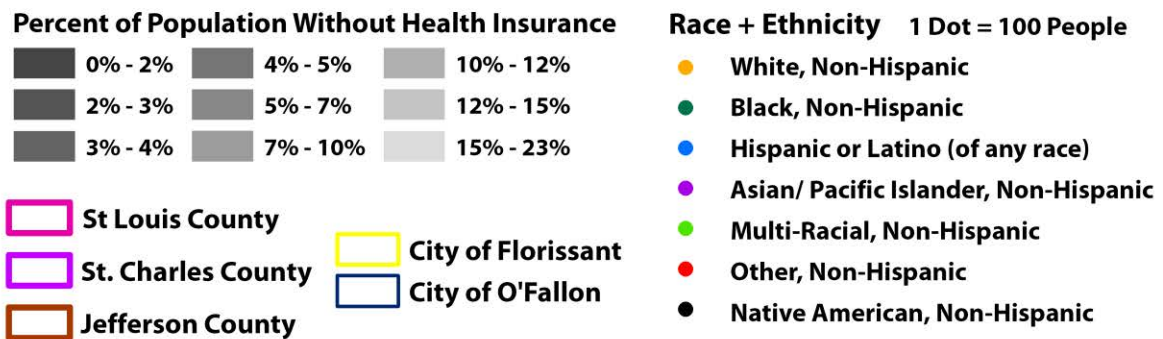
In this way, residents of north St. Louis County may have reduced access to healthcare due to several factors, including gaps in safety net service in some zip codes, lower levels of health insurance coverage, and lack of access to vehicles or other transportation options. Programs designed to support access to healthcare may help increase access. These may include mobile clinics, development of community-based clinics in underserved areas, transportation assistance to support access to healthcare, community health workers, and sliding scale services for low-income uninsured residents, among others.

FIGURE 46. ACCESS TO HEALTH INSURANCE + RACE/ ETHNICITY

Health Insurance + Race/ Ethnicity



Source: American Community Survey 5-Year Estimates, 2014-2018



CHAPTER 6.

HOUSING PROFILE

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

Beyond providing fair housing options, the social, economic, and health benefits of providing quality affordable housing are well-documented. National studies have shown affordable housing encourages diverse, mixed-income communities, which result in many social benefits. Affordable housing also increases job accessibility for low and middle income populations and attracts a diverse labor force critical for industries that provide basic services for the community. Affordable housing is also linked to improvements in mental health, reduction of stress, and decreased cases of illnesses caused by poor-quality housing.²⁷ Developing affordable housing is also a strategy used to prevent displacement of existing residents when housing costs increase due to economic or migratory shifts.

Conversely, a lack of affordable housing eliminates many of these benefits and increases socioeconomic segregation. High housing costs are linked to displacement of low-income households and an increased risk of homelessness.²⁸ Often lacking the capital to relocate to better neighborhoods, displaced residents tend to move to socioeconomically disadvantaged neighborhoods where housing costs are most affordable.²⁹

This section discusses the existing supply of housing in the study area. It also reviews housing costs, including affordability and other housing needs by householder income. Homeownership rates and access to lending for home purchases and mortgage refinancing are also assessed.

²⁷ Maqbool, Nabihah, et al. "The Impacts of Affordable Housing on Health: A Research Summary." *Insights from Housing Policy Research*, Center for Housing Policy, www.rupco.org/wp-content/uploads/pdfs/The-Impacts-of-Affordable-Housing-on-Health-CenterforHousingPolicy-Maqbool.etal.pdf.

²⁸ "State of the Nation's Housing 2015." Joint Center for Housing Studies of Harvard University, <http://www.jchs.harvard.edu/sites/default/files/jchs-sonhr-2015-full.pdf>

²⁹ Deirdre Oakley & Keri Burchfield (2009) Out of the Projects, Still in the Hood: The Spatial Constraints on Public-Housing Residents' Relocation in Chicago." *Journal of Urban Affairs*, 31:5, 589-614.

HOUSING SUPPLY SUMMARY

According to the 2014-2018 American Community Survey (ACS), there are 682,824 housing units in Jefferson, St. Louis, and St. Charles Counties. Of those housing units, 90,489 are in Jefferson County, 152,117 are in St. Charles County, and 440,218 units are in St. Louis County. The cities of Florissant and O'Fallon have 21,984 units and 31,798 units, respectively. Among the three counties, the fastest rate of growth has taken place in St. Charles County, where the number of housing units has increased by 44.2% since the year 2000. The slowest rate of growth has taken place in St. Louis County, where housing units have increased 3.9% since 2000. Jefferson County fell in the middle, growing by 19.7% over that period. Housing unit data for the cities indicates that O'Fallon has grown the fastest, doubling since 2000 (up 99.7%), while housing units in Florissant have increased only 4.9%.

Of the five jurisdictions, the City of Florissant has the greatest vacancy rate (9.8%), which is similar to the vacancy rate in St. Louis County (8.3%). Vacancies are lowest in St. Charles County (4.9%), where the City of O'Fallon has the lowest vacancy rate of all five jurisdictions (3.2%). Jefferson County falls in the middle at 6.7%. The vacancy rate, calculated from ACS data, includes housing that is available for sale or rent, housing that has been rented or sold but not yet occupied, seasonal housing, and other vacant units. Therefore, the actual number of rental and for-sale units that are available for occupancy are likely lower than these figures indicate.

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

Table 9 shows housing units by structure types in the five jurisdictions. Single-family detached homes make up the largest share of housing units in all five jurisdictions, as well as in the St. Louis MSA. Single-family detached units make up 78.5% of the housing stock in Jefferson County and Florissant, 76.3% in O'Fallon, and 75.3% in St. Charles County. In St. Louis County, single-family detached units make up 72.3% of all housing, which falls closest to the rate in the wider St. Louis MSA (70.1%). The second most common housing type varies in each jurisdiction and gives insight into the development histories of each place. For example, small multifamily developments are the second most prominent structure type in St. Louis County (11.3%) and Florissant (9.3%). In St. Charles County, small multifamily developments occur at nearly the same rate as single-family attached units (7.2% and 7.0%, respectively). In O'Fallon, single-family attached units account for 7.9% of all housing, while in Jefferson County mobile homes make up 10.5% of all housing. Looking regionally, the MSA has a larger share of duplexes, triplexes and quadraplexes than the five jurisdictions (9.4%) and also contains a larger share of small multifamily developments (8.2%). Large multifamily developments occur at the greatest rate in the MSA (5.2%) and St. Louis County (5.1%).

TABLE 8 – HOUSING UNITS BY OCCUPANCY STATUS

	2000	2010	2014-2018	2000-2018 Change
St. Charles County				
Total Housing Units	105,514	141,016	152,117	44.2%
Occupied Housing Units	101,663	134,274	144,643	42.3%
Vacant Housing Units	3,851	6,742	7,474	94.1%
Vacancy Rate	3.6%	4.8%	4.9%	+1.3% points
City of O'Fallon				
Total Housing Units	15,920	29,376	31,798	99.7%
Occupied Housing Units	15,389	28,234	30,766	99.9%
Vacant Housing Units	531	1,142	1,032	94.4%
Vacancy Rate	3.3%	3.9%	3.2%	-0.1% points
St. Louis County				
Total Housing Units	423,749	438,032	440,218	3.9%
Occupied Housing Units	404,312	404,765	403,547	-0.2%
Vacant Housing Units	19,437	33,267	36,671	88.6%
Vacancy Rate	4.6%	7.6%	8.3%	+3.7% points
City of Florissant				
Total Housing Units	21,027	22,632	21,984	4.5%
Occupied Housing Units	20,399	21,247	19,824	-2.8%
Vacant Housing Units	628	1,385	2,160	244.0%
Vacancy Rate	3.0%	6.1%	9.8%	+6.8% points
Jefferson County				
Total Housing Units	75,586	87,626	90,489	19.7%
Occupied Housing Units	71,499	81,700	84,393	18.0%
Vacant Housing Units	4,087	5,926	6,096	49.2%
Vacancy Rate	5.4%	6.8%	6.7%	+1.3% points

Data Source: U.S. Census 2000 SF1 Table H003 and 2010 SF1 Table H3 and 2014-2018 5-Year American Community Survey Table B25002

TABLE 9 – HOUSING UNITS BY STRUCTURE TYPE

Units in Structure	St. Charles County		City of O'Fallon	
	Number	Percent	Number	Percent
1, detached	114,611	75.3%	24,256	76.3%
1, attached	10,608	7.0%	2,504	7.9%
2-4	6,010	4.0%	760	2.4%
5-19	10,975	7.2%	2,050	6.4%
20 or more	5,540	3.6%	1,351	4.2%
Mobile home	4,315	2.8%	859	2.7%
Other (RV, boat, van, etc.)	58	>0.1%	18	>0.1%
Total	152,117	100.00%	31,798	100.0%

Units in Structure	St. Louis County		City of Florissant	
	Number	Percent	Number	Number
1, detached	318,546	72.3%	17,267	78.5%
1, attached	20,518	4.7%	921	4.2%
2-4	27,662	6.3%	956	4.3%
5-19	49,754	11.3%	2,112	9.6%
20 or more	22,511	5.1%	679	3.1%
Mobile home	1,105	0.3%	10	>0.1%
Other (RV, boat, van, etc.)	122	>0.1%	39	0.2%
Total	440,218	100.0%	21,984	100.00%

Units in Structure	Jefferson County		St. Louis MSA	
	Number	Percent	Number	Percent
1, detached	71,032	78.5%	877,211	70.1%
1, attached	1,339	1.5%	47,195	3.8%
2-4	3,495	3.9%	117,665	9.4%
5-19	4,266	4.7%	102,019	8.2%
20 or more	828	0.9%	65,503	5.2%
Mobile home	9,529	10.5%	41,530	3.3%
Other (RV, boat, van, etc.)	0	0.0%	374	>0.1%
Total	90,489	100.0%	1,251,497	100.00%

Data Source: 2014-2018 5-Year American Community Survey, Table B25024

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

TABLE 10 – HOUSING UNITS BY SIZE AND TENURE

Number of Bedrooms	St. Charles County		City of O’Fallon	
	Number	Percent	Number	Percent
Owner-Occupied Housing Units				
Zero	102	>0.1%	12	>0.1%
One	979	0.8%	109	0.4%
Two or three	71,356	61.4%	14,804	58.5%
Four or more	43,841	37.7%	10,378	41.0%
Total	116,278	100.0%	25,303	100.0%
Renter-Occupied Housing Units				
Zero	708	2.5%	138	2.5%
One	5,715	20.1%	1,049	19.2%
Two or three	19,496	68.7%	3,805	69.7%
Four or more	2,446	8.6%	471	8.6%
Total	28,365	100.0%	5,463	100.0%

Number of Bedrooms	St. Louis County		City of Florissant	
	Number	Percent	Number	Percent
Owner-Occupied Housing Units				
Zero	350	0.1%	36	0.3%
One	3,962	1.4%	116	0.9%
Two or three	178,293	64.0%	10,220	78.9%
Four or more	95,765	34.4%	2,582	19.9%
Total	278,370	100.0%	12,954	100.0%
Renter-Occupied Housing Units				
Zero	3,319	2.6%	76	1.1%
One	31,805	25.4%	1,234	18.0%
Two or three	83,243	66.5%	5,009	72.9%
Four or more	6,810	5.4%	551	8.0%
Total	125,177	100.0%	6,870	100.0%
Number of Bedrooms	Jefferson County		St. Louis MSA	
	Number	Percent	Number	Percent
Owner-Occupied Housing Units				
Zero	81	0.1%	1,252	>0.1%
One	809	1.2%	15,883	2.1%
Two or three	51,053	75.9%	526,872	68.4%
Four or more	15,278	22.7%	225,926	29.3%
Total	67,221	100.0%	769,933	100.0%
Renter-Occupied Housing Units				
Zero	276	1.6%	13,033	3.7%
One	2,104	12.3%	92,666	26.6%
Two or three	13,574	79.0%	221,172	63.5%
Four or more	1,218	7.1%	21,459	6.2%
Total	17,172	100.0%	348,330	100.0%

Note: Total add to the total number of occupied housing units in each geography. Unoccupied units are not included in this table because tenure data is not available for these units.

Data Source: 2014-2018 5-Year American Community Survey, Table B25042

Table 10 shows housing units by the number of bedrooms and resident tenure (whether the occupants are renters or owners). Two- to three-bedroom units account for approximately 60-80% of owner-occupied housing units in the five subject jurisdictions and the MSA. O’Fallon has the smallest share of two to three-bedroom owner-occupied units (59%), while Florissant has the largest share (79%). Shares

of two- to three-bedroom owner-occupied units for the three counties and the MSA fall between the two cities.

Units with four or more bedrooms typically make up the second largest share of owner-occupied housing. In contrast to its smaller share of two- to three-bedroom owner units, O'Fallon has the largest share of owner-occupied 4+ bedroom units (41%), followed by St. Charles County (38%). Florissant has the smallest share of owner-occupied 4+ bedroom units amongst the five jurisdictions (20%). One-bedroom owner-occupied units are rare in all jurisdictions and occur most frequently in the wider St. Louis MSA (2.1%). Florissant's nearly negligible share of owner-occupied studios (0.3%) represents the greatest percentage of this housing type in all jurisdictions.

Renter-occupied units, like owner-occupied units, predominately contain two- to three-bedrooms in the five jurisdictions and throughout the metro area. Jefferson County has the largest share of two- to three-bedroom rentals (79%), followed by the City of Florissant (73%). The smallest shares of two- to three-bedroom rentals occur in the MSA (64%) and St. Louis County (67%). Conversely, St. Louis County and the MSA have the greatest shares of one-bedroom rental units (25% and 27%, respectively). The smallest shares of one-bedroom rentals are in Jefferson County (12%) and Florissant (18%). 4+ bedroom rentals are less common than units with fewer bedrooms, with O'Fallon and St. Charles County providing the greatest share of large rental units (8.6%). On the other hand, studio rentals are more common in the MSA (3.6%) than in these five jurisdictions where studio rentals do not exceed 2.6% (St. Louis County).

Assessing housing conditions in an area can provide a basis for developing policies and programs to maintain and preserve the quality of the housing stock. The age of an area's housing can have substantial impact on housing conditions and costs. As housing ages, maintenance costs rise, which can present significant affordability issues for low- and moderate-income homeowners. Aging rental stock can lead to rental rate increases to address physical issues or deteriorating conditions if building owners defer or ignore maintenance needs. Deteriorating housing can also depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. Additionally, homes built prior to 1978 present the potential for lead exposure risk due to lead-based paint or lead pipes carrying drinking water.

Age of housing across the jurisdictions making up the HOME consortium is shown in Figure 47 below. Census records indicate that the oldest housing stock among the five jurisdictions is found in Florissant, where 41% of all residential structures were built before 1960 and another 33% of structures were built between 1960 and 1969. Together, 74% of Florissant's housing stock is over 50 years old. Only 3% of the city's housing was built between 1990 and 2009. St. Louis County, too, has an older housing stock, with 35% of structures built before 1960 and an additional 19% built between 1960 and 1969. Across the county, only 15% of the housing stock was built between 1990 and 2009. These jurisdictions generally reflect development patterns in the wider MSA, where 49% of housing was built before 1969 and only 24% was built between 1990 and 2009.

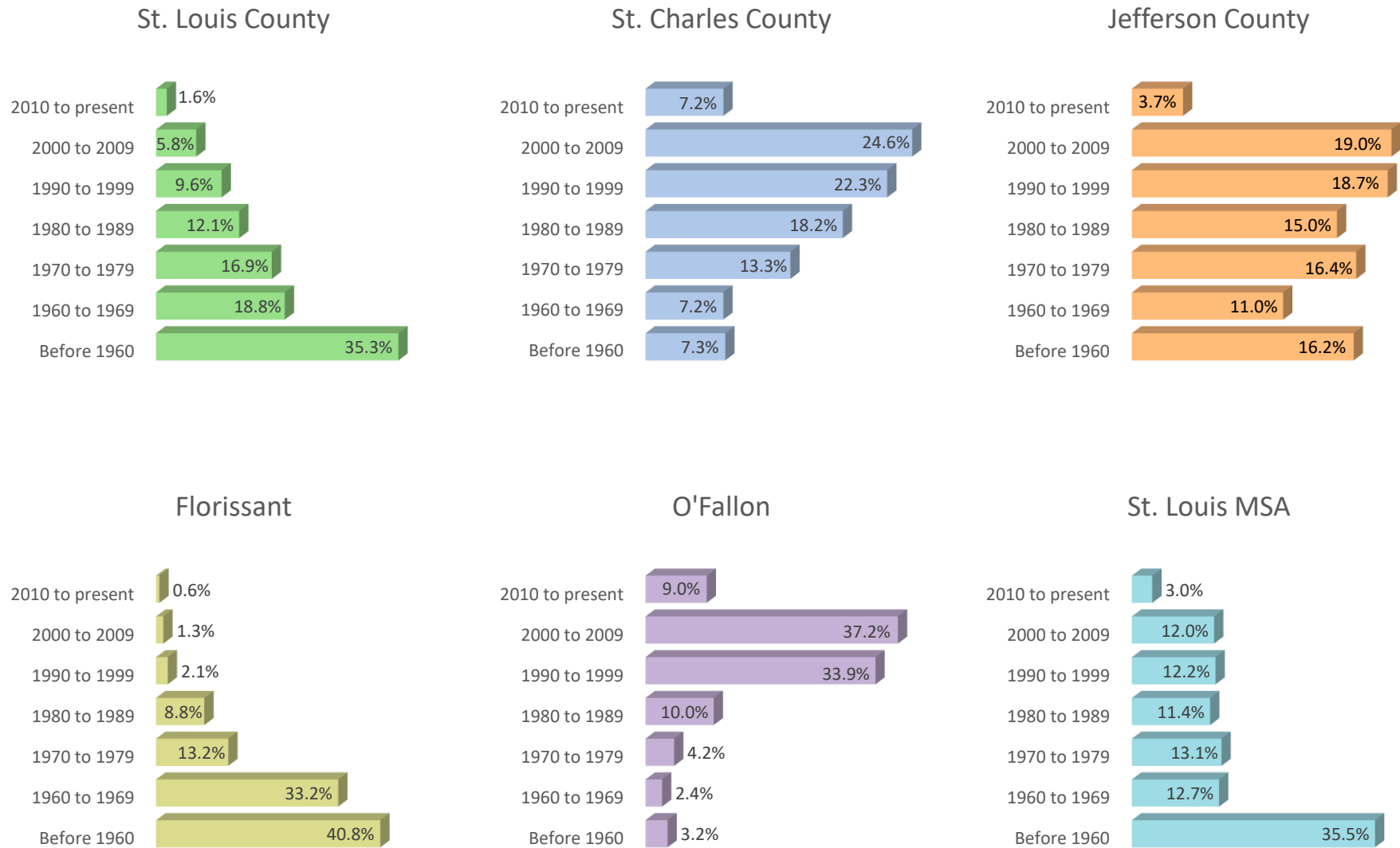
The report *Segregation in St. Louis* identifies the aging structures in St. Louis County as problematic for residents, noting that smaller single-family units and older apartment complexes have become sub-

standard in north and south St. Louis County. Due to the general age and condition of residential structures, some landlords do not invest in these properties by making necessary repairs. Where residents cannot afford to make these repairs themselves, the deterioration creates a perpetuating cycle of disinvestment.³⁰

Newer housing stock is primarily located in St. Charles County. Here, 25% of the total housing stock was built between 2000 and 2009 and 22% built between 1990 and 1999, totaling 47%. Only 15% of the county's housing stock was built before 1969. O'Fallon's housing stock is the newest of all five jurisdictions, with 71% of all housing built between 1990 and 2009. Jefferson County's housing represents the most even distribution of development, with its greatest shares of housing built in later decades. Of Jefferson's housing stock, 17% was built before 1969, 31% was built between 1970 and 1989, and 38% was built between 1990 and 2009.

³⁰ Segregation in St. Louis – Recommendations. https://cpb-us-w2.wpmucdn.com/sites.wustl.edu/dist/3/1454/files/2018/06/SegregationinSTL_DismantlingDivideRecs_5.7.18-2o2bmhj.pdf, p. 3

FIGURE 47 – AGE OF HOUSING IN THE ST. LOUIS HOME CONSORTIUM AND THE ST. LOUIS MSA



Data Source: 2014-2018 5-Year American Community Survey, Table B25034

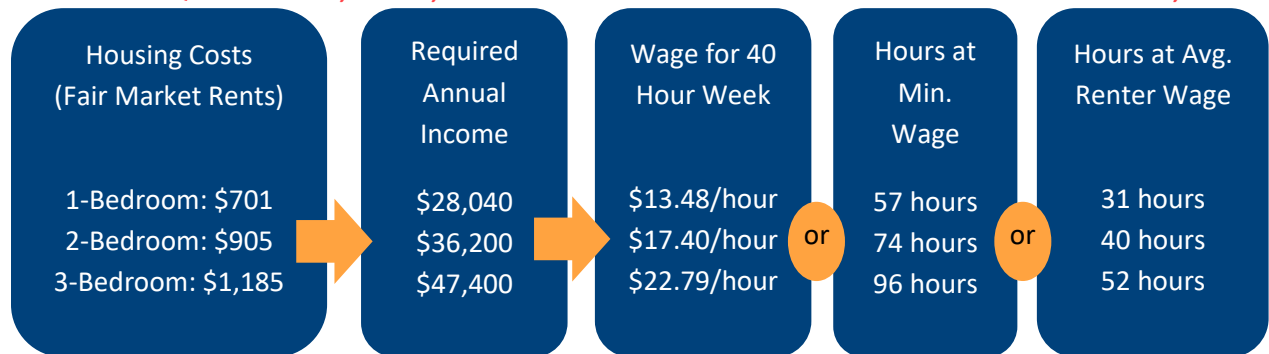
HOUSING COSTS AND AFFORDABILITY

The most common housing needs identified by stakeholders are related to affordability, particularly for low- and moderate-income households. Affordable housing is considered a “key factor in determining the health and well-being of the entire region,” according to the report *Segregation in St. Louis*.³¹

Housing Cost by Unit Size

The National Low Income Housing Coalition’s annual *Out of Reach* report examines rental housing rates relative to income levels for counties throughout the U.S. Figure 48 below shows annual household income and hourly wages needed to afford Fair Market Rents (FMRs) in the St. Louis HMFA (HUD Metro Fair Market Rent Area) for one, two, and three-bedroom rental units.

FIGURE 48– REQUIRED INCOME, WAGES, AND HOURS TO AFFORD FAIR MARKET RENTS IN THE ST. LOUIS HMFA, 2020



Note: Required income is the annual income needed to afford Fair Market Rents without spending more than 30% of household income on rent. Minimum wage in the St. Louis HMFA is \$9.45. Average renter wages are \$17.61 in the St. Louis HMFA.

Source: National Low Income Housing Coalition Out of Reach 2020, Accessed from <https://reports.nlihc.org/oor/missouri>

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

A three-bedroom rental unit – one of the predominate rental unit types in all five jurisdictions – would cost a household \$1,185 per month. To afford this rent without being cost burdened (i.e. spending more than 30% of income on housing), a household would require an annual income of at least \$47,400. This amount translates to a 40-hour work week at an hourly wage of \$22.79. For a single minimum wage worker earning \$9.45 per hour, it would take a 96-hour work week to afford a three-bedroom unit. The average renter wage in the St. Louis HMFA is \$17.61, which is less than the hourly wage needed to afford

³¹ Segregation in St. Louis – Recommendations. https://cpb-us-w2.wpmucdn.com/sites.wustl.edu/dist/3/1454/files/2018/06/SegregationinSTL_DismantlingDivideRecs_5.7.18-2o2bmhj.pdf, p. 2

a three-bedroom unit at fair market rent.³² Even at average renter wages, a worker would need to work 52 hours per week to afford this unit.

A household earning average renter wages could afford a two-bedroom unit, if available at the fair market rent of \$905. To cover the cost of the unit, the household would need an annual income of \$36,200 or higher or must work a 40-hour work week at an hourly wage of at least \$17.40. However, if a worker earned minimum wage, he or she would need to work 74 hours per week to afford a two-bedroom unit.

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

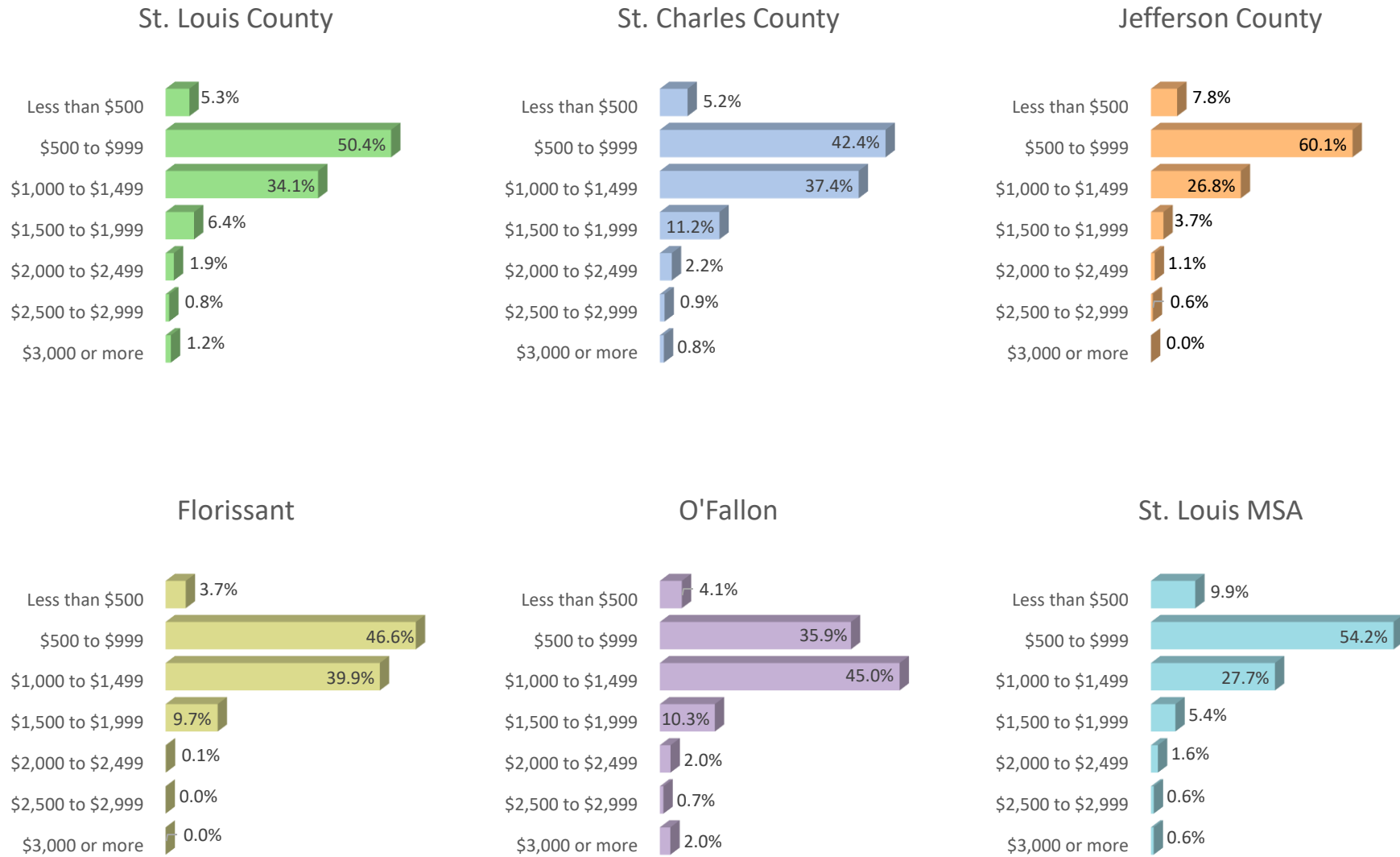
Housing Cost by Jurisdiction

The U.S. Census provides estimates of rents and monthly owner costs by jurisdiction. Looking at rental costs among the counties, Jefferson County contains the largest number of households spending between \$500 and \$999 per month on rent (60%). Half of St. Louis County households and 42% of St. Charles County households also spend between \$500 and \$999 on rent. Among the counties, St. Charles County has the highest share of renters paying over \$1,000 (53%), while Jefferson has the highest share of renters paying less than \$500 per month (8%). In the cities, the largest percentage of renters in Florissant (47%) spend between \$500 and \$999 on rent, while in O'Fallon 45% spend between \$1,000 and \$1,499 on rent. Across the board, rents in the larger St. Louis MSA are most like those in Jefferson County. Compared to the St. Louis MSA, Florissant, O'Fallon and St. Charles County have disproportionately higher rates of renters paying over \$1,000 per month.

Homeowner costs also vary across the region. Florissant has the largest share of homeowners spending less than \$1,499 on monthly housing costs (91%). Jefferson County, too, has a large share of homeowners spending less than \$1,499 per month (77%). In contrast, 45% of O'Fallon homeowners, 39% of St. Charles homeowners and 34% of St. Louis County homeowners spend more than \$1,500 per month on housing costs. By comparison, only 29% of homeowners across the St. Louis MSA spend more than \$1,500 per month on housing.

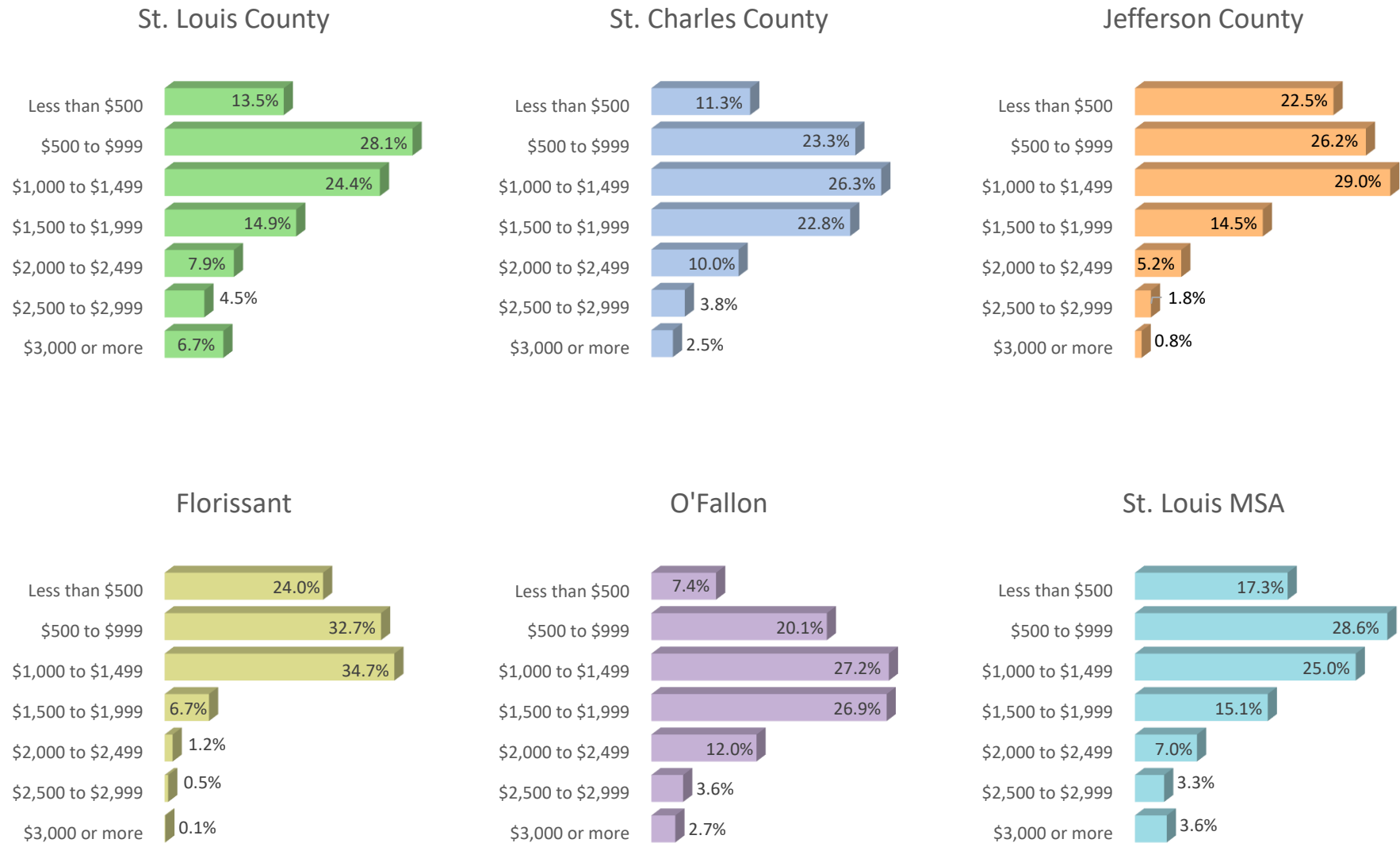
³² It should be noted that the average renter wage referenced here was derived by the National Low Income Housing Coalition from the Bureau of Labor Statistics' Quarterly Census of Employment and Wages data for the purpose of evaluating local housing affordability.

FIGURE 49 – GROSS RENT FOR HOUSEHOLDS IN THE ST. LOUIS HOME CONSORTIUM AND THE ST. LOUIS MSA



Data Source: ACS 5-Year Estimates, 2014-2018, Table B25034

FIGURE 50 – MONTHLY OWNER COSTS FOR HOUSEHOLDS IN THE ST. LOUIS HOME CONSORTIUM AND THE ST. LOUIS MSA



Data Source: ACS 5-Year Estimates, 2014-2018, Table B25094

HOUSING NEEDS

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


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

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

To assess housing need, HUD receives a special tabulation of data from the U. S. Census Bureau's American Community Survey (ACS) that is largely not available through standard Census products. This data, known as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combination of HUD-specified criteria, such as housing needs by race and ethnicity. CHAS data for each of the Consortium jurisdictions, as well as for the region as a whole, is provided in the tables that follow.

Approximately one-fifth of all households in O'Fallon (20%) and St. Charles County (21%) have at least one housing problem. This share increases to 24% in Jefferson County, 27% in Florissant and 28% across St. Louis County. Severe housing problems affect 8% of O'Fallon and St. Charles County households, 11% of Florissant and Jefferson County households and 13% of St. Louis County households. Comparatively, these jurisdictions have fewer housing and severe housing problems than in the wider St. Louis MSA, where 28% of households have a housing problem and 13% have a severe housing problem.

Although housing problems affect all racial and ethnic groups in HOME Consortium area, some groups experience a disproportionately greater rate of housing need. HUD defines a group as having a



IN ST. LOUIS COUNTY, HOUSEHOLDS OF COLOR ARE MORE LIKELY TO HAVE A HOUSING NEED THAN WHITE HOUSEHOLDS.

ACROSS ALL JURISDICTIONS, BLACK OR HISPANIC HOUSEHOLDS ARE MORE LIKELY TO HAVE DISPROPORTIONATE RATES OF HOUSING NEED.

disproportionate need if its members experience housing needs at a rate that is ten percentage points or more above that of white households. Florissant and St. Louis County have both the highest rates of disproportionate housing need, but also the greatest number of racial and ethnic groups with disproportionate needs. For example, only about one in five white households in Florissant (22%) have a housing problem. Comparatively, 32% of Other, non-Hispanic households, 36% of Black households, 40% of Hispanic households, and 50% of Asian households have a housing problem. Similarly, while 23% of white St. Louis County households have a housing problem, these problems disproportionately affect 33% of Native American and Other, non-Hispanic households, 35% of Hispanic households and 42% of Black households.

In St. Charles County, 36% of Black households and 35% of Other, non-Hispanic households have a housing problem compared to 20% of white households. O'Fallon sees 34% of Hispanic households and 33% of Other, non-Hispanic households with housing problems compared to 20% of white households. Finally, in Jefferson County, Black households alone experience housing problems at a disproportionate rate of 39% compared to 24% for white households. In the St. Louis MSA, nearly all non-white groups experience disproportionate rates of housing problems. While nearly one-quarter (23%) of white households have a housing problem, about one-third of Native American (33%), Other, non-Hispanic (33%) and Hispanic (34%) households have a housing problem, as do 45% of all Black households.

Housing problems also affect households based on family size and type. In every jurisdiction, including the St. Louis MSA, non-family households experience the highest rates of housing problems. Census estimates state that over one-third of all non-family households in O'Fallon (33%), St. Charles County (34%), Florissant (34%), Jefferson County (35%), and St. Louis County (38%) have at least one housing problem. Large families in Jefferson County (31%) and Florissant (36%) also experience uniquely high rates of housing problems. Small families with fewer than 5 members tend to have the highest rates of housing problems in St. Louis County and Florissant, where 21% of small families are affected. Across the board, households in the five jurisdictions experience equivalent or smaller rates of housing problems than those experienced in the St. Louis MSA, with one exception. Families of 5 or more people in Florissant exceed the share households with housing problems in the MSA (36% to 30%), indicating the significant burden experienced by this particular group.

In addition to housing problems, severe housing problems also affect households throughout the region. However, St. Louis County and St. Charles County in particular have non-white populations who are disproportionately affected by severe housing problems. In St. Louis County, for example, 21% of Black households and Hispanic households have at least one severe housing problem, compared to 10% of white households. In St. Charles County, 18% of Native American households and 19% of Other, non-Hispanic households have a severe housing problem, compared to 8% of white households. Jefferson County, as well as O'Fallon and Florissant do not show disproportionate rates of severe housing problems for non-white households. Across the wider St. Louis MSA, severe housing problems are most similar to those in St. Louis County. Nearly one quarter (24%) of Black households and one fifth (21%) of Hispanic households have severe housing problems compared to 10% of white households in the St. Louis MSA.

Looking specifically one severe housing problem - severe housing costs – sheds light on those households who spend more than 50% of their monthly income on housing costs. Overall, severe housing cost burdens occur most frequently in St. Louis County, where 12% of all households are affected (see Table 12). Severe

housing cost burdens occur less frequently in St. Charles County and O'Fallon, where 7-8% of all households are affected. Racial and ethnic groups within the five jurisdiction experience some disproportionality in their rates of severe housing cost burdens. For example, in St. Charles County, 17% of Other, non-Hispanic households have a severe housing cost burden compared to 7% of white households. Black households in St. Louis County also experience severe housing cost burdens at a disproportionately higher rate (19%) than white households (9%). In the St. Louis MSA, Black households also experience severe cost burdens at disproportionately greater rates than in the five jurisdictions (22% Black, 9% white).

Households of various sizes and types experience severe cost burdens at or below those of the St Louis MSA. In the St. Louis MSA, for example, 19% of non-family households and 8-9% of small and large families spend more than 50% of their monthly income on housing costs. St. Louis County is most similar to the region, with nearly identical statistics on severe cost burden for those groups. Florissant, O'Fallon, Jefferson County and St. Charles County households experience lower rates of severe housing cost burden, with the lowest rates for small families occurring in St. Charles County (5%), the lowest rates for large families occurring in O'Fallon (3%), and the lowest rates for non-family households occurring in Florissant (14%).

TABLE 5A – DEMOGRAPHICS OF HOUSEHOLDS WITH DISPROPORTIONATE HOUSING NEEDS

Disproportionate Housing Needs	St. Charles County			City of O’Fallon		
Households Experiencing any of the Four Housing Problems	# with housing problems	Total # of households	% with housing problems	# with housing problems	Total # of households	% with housing problems
Race and Ethnicity						
White, Non-Hispanic	25,565	128,545	19.9%	5,385	27,155	19.8%
Black, Non-Hispanic	2,165	6,030	35.9%	334	1,234	27.1%
Hispanic	960	3,290	29.2%	224	669	33.5%
Asian or Pacific Islander, Non-Hispanic	485	2,650	18.3%	125	909	13.8%
Native American, Non-Hispanic	69	249	27.7%	0	65	0.0%
Other, Non-Hispanic	620	1,770	35.0%	100	300	33.3%
Total	29,864	142,534	20.9%	6,168	30,332	20.3%
Household Type and Size						
Family households, <5 People	13,890	89,855	15.5%	3,250	19,825	16.4%
Family households, 5+ People	2,625	13,730	19.1%	595	3,325	17.9%
Non-family households	13,370	38,970	34.3%	2,335	7,195	32.5%
Disproportionate Housing Needs	St. Louis County			City of Florissant		
Households Experiencing any of the Four Housing Problems	# with housing problems	Total # of households	% with housing problems	# with housing problems	Total # of households	% with housing problems
Race and Ethnicity						
White, Non-Hispanic	65,150	285,195	22.8%	2,845	12,900	22.1%
Black, Non-Hispanic	37,675	89,490	42.1%	2,430	6,680	36.4%
Hispanic	2,600	7,479	34.8%	145	365	39.7%
Asian or Pacific Islander, Non-Hispanic	3,309	13,579	24.4%	44	88	50.0%
Native American, Non-Hispanic	238	728	32.7%	4	59	6.8%
Other, Non-Hispanic	1,910	5,840	32.7%	140	435	32.2%
Total	110,882	402,311	27.6%	5,608	20,527	27.3%
Household Type and Size						
Family households, <5 People	47,870	229,680	20.8%	2,310	11,025	21.0%
Family households, 5+ People	8,190	29,225	28.0%	680	1,870	36.4%
Non-family households	54,820	143,395	38.2%	2,625	7,640	34.4%

Disproportionate Housing Needs	Jefferson County			St. Louis Region		
Households Experiencing any of the Four Housing Problems	# with housing problems	Total # of households	% with housing problems	# with housing problems	Total # of households	% with housing problems
Race and Ethnicity						
White, Non-Hispanic	19,500	80,625	24.2%	197,693	854,892	23.1%
Black, Non-Hispanic	203	518	39.2%	89,034	196,566	45.3%
Hispanic	295	1,145	25.8%	7,777	22,789	34.1%
Asian or Pacific Islander, Non-Hispanic	85	369	23.0%	6,252	22,738	27.5%
Native American, Non-Hispanic	64	229	27.9%	733	2,253	32.5%
Other, Non-Hispanic	225	855	26.3%	4,513	13,702	32.9%
Total	20,372	83,741	24.3%	306,002	1,112,940	27.5%
Household Type and Size						
Family households, <5 People	10,035	53,170	18.9%	130,985	633,146	20.7%
Family households, 5+ People	2,585	8,405	30.8%	25,793	87,182	29.6%
Non-family households	7,760	22,170	35.0%	149,245	392,617	38.0%

Note: All % represent a share of the total population, except household type and size, which is out of total households.

Source: CHAS 2013-2017 ACS 5-year average data, Tables 1, 4

TABLE 6B – DEMOGRAPHICS OF HOUSEHOLDS WITH DISPROPORTIONATE SEVERE HOUSING NEEDS

Disproportionate Housing Needs	St. Charles County			City of O’Fallon		
Households Experiencing any of the Four Severe Housing Problems	# with severe housing problems	Total # of households	% with severe housing problems	# with severe housing problems	Total # of households	% with severe housing problems
Race and Ethnicity						
White, Non-Hispanic	10,110	128,540	7.9%	2,205	27,165	8.1%
Black, Non-Hispanic	805	6,040	13.3%	175	1,230	14.2%
Hispanic	490	3,295	14.9%	88	673	13.1%
Asian or Pacific Islander, Non-Hispanic	224	2,654	8.4%	60	909	6.6%
Native American, Non-Hispanic	44	249	17.7%	0	65	0.0%
Other, Non-Hispanic	330	1,770	18.6%	50	300	16.7%
Total	12,003	142,548	8.4%	2,578	30,342	8.5%
Disproportionate Housing Needs	St. Louis County			City of Florissant		
Households Experiencing any of the Four Severe Housing Problems	# with severe housing problems	Total # of households	% with severe housing problems	# with severe housing problems	Total # of households	% with severe housing problems
Race and Ethnicity						
White, Non-Hispanic	29,430	285,185	10.3%	1,095	12,905	8.5%
Black, Non-Hispanic	18,520	89,485	20.7%	1,085	6,675	16.3%
Hispanic	1,565	7,479	20.9%	30	370	8.1%
Asian or Pacific Islander, Non-Hispanic	1,840	13,579	13.6%	4	88	4.5%
Native American, Non-Hispanic	100	729	13.7%	0	59	0.0%
Other, Non-Hispanic	1,030	5,850	17.6%	50	435	11.5%
Total	52,485	402,307	13.0%	2,264	20,532	11.0%

Disproportionate Housing Needs	Jefferson County			St. Louis Region		
Households Experiencing any of the Four Severe Housing Problems	# with severe housing problems	Total # of households	% with severe housing problems	# with severe housing problems	Total # of households	% with severe housing problems
Race and Ethnicity						
White, Non-Hispanic	9,105	80,620	11.3%	89,372	854,871	10.5%
Black, Non-Hispanic	84	523	16.1%	48,038	196,590	24.4%
Hispanic	205	1,150	17.8%	4,707	22,794	20.7%
Asian or Pacific Islander, Non-Hispanic	45	370	12.2%	3,491	22,751	15.3%
Native American, Non-Hispanic	14	234	6.0%	358	2,267	15.8%
Other, Non-Hispanic	110	850	12.9%	2,476	13,739	18.0%
Total	9,563	83,747	11.4%	148,442	1,113,012	13.3%

Note: All % represent a share of the total population, except household type and size, which is out of total households.

Source: CHAS 2013-2017 ACS 5-year average data, Table 2

TABLE 12 – DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING COST BURDENS

	St. Charles County			City of O'Fallon		
	# with severe cost burden	Total # of households	% with severe cost burden	# with severe cost burden	Total # of households	% with severe cost burden
Race and Ethnicity						
White, Non-Hispanic	9,110	128,545	7.1%	1,925	27,165	7.1%
Black, Non-Hispanic	775	6,035	12.8%	160	1,230	13.0%
Hispanic	385	3,295	11.7%	85	675	12.6%
Asian or Pacific Islander, Non-Hispanic	170	2,655	6.4%	30	920	3.3%
Native American, Non-Hispanic	10	260	3.8%	0	65	0.0%
Other, Non-Hispanic	305	1,770	17.2%	50	305	16.4%
Total	10,755	142,560	7.5%	2,250	30,360	7.4%
Household Type and Size						
Family households, <5 People	4,554	90,800	5.0%	1,150	20,030	5.7%
Family households, 5+ People	470	12,785	3.8%	80	3,125	2.6%
Non-family households	5,725	36,210	15.8%	1,010	6,575	15.4%
	St. Louis County			City of Florissant		
	# with severe cost burden	Total # of households	% with severe cost burden	# with severe cost burden	Total # of households	% with severe cost burden
Race and Ethnicity						
White, Non-Hispanic	26,870	285,190	9.4%	900	12,915	6.9%
Black, Non-Hispanic	16,945	89,485	18.9%	950	6,675	14.2%
Hispanic	940	7,480	12.6%	15	370	4.1%
Asian or Pacific Islander, Non-Hispanic	1,375	13,585	10.1%	0	95	0.0%
Native American, Non-Hispanic	100	730	13.7%	0	55	0.0%
Other, Non-Hispanic	865	5,840	14.8%	50	435	11.5%
Total	47,095	402,310	11.7%	1,915	20,545	9.3%
Household Type and Size						
Family households, <5 People	19,454	232,185	8.4%	765	11,325	6.8%
Family households, 5+ People	2,390	26,725	8.9%	110	1,560	7.1%
Non-family households	25,250	132,495	19.1%	1,030	7,245	14.2%

	Jefferson County			St. Louis MSA		
	# with severe cost burden	Total # of households	% with severe cost burden	# with severe cost burden	Total # of households	% with severe cost burden
Race and Ethnicity						
White, Non-Hispanic	7,420	80,620	9.2%	78,300	854,880	9.2%
Black, Non-Hispanic	80	530	15.1%	43,837	196,569	22.3%
Hispanic	120	1,150	10.4%	3,279	22,773	14.4%
Asian or Pacific Islander, Non-Hispanic	35	365	9.6%	2,670	22,763	11.7%
Native American, Non-Hispanic	14	230	6.1%	317	2,268	14.0%
Other, Non-Hispanic	105	850	12.4%	2,171	13,690	15.6%
Total	7,774	83,745	9.3%	130,574	1,112,943	11.7%
Household Type and Size						
Family households, <5 People	4,004	54,385	7.4%	53,502	641,287	8.3%
Family households, 5+ People	344	7,190	4.8%	6,714	79,071	8.5%
Non-family households	3,429	21,320	16.1%	70,399	364,160	19.3%

Note: Severe housing cost burden is defined as greater than 50% of income. All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Source: 2013-2017 CHAS, Tables 7 and 9

HOMEOWNERSHIP AND LENDING

Homeownership is vital to a community's economic well-being. It allows the opportunity to build wealth, is generally associated with higher levels of civic engagement,³³ and is correlated with positive cognitive and behavioral outcomes among children.³⁴

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968, along with continuing impediments to access, have had significant impacts on the homeownership rates of racial and ethnic minorities, particularly Black and Hispanic populations. The gap between the white and Black homeownership rate is the largest among racial and ethnic groups. In 2017, the U.S. Census Bureau reported a 21.6 percentage point gap in homeownership rate between white and Black households; just a 2.9 percentage point decrease since 1997.³⁵

Homeownership trends have changed in recent years because of significant events in the housing market and labor force. The homeownership rate for Millennials (the generation born between 1981 and 1997) is 8 percentage points lower than the two previous generations, controlling for age. This discrepancy can be attributed to a multitude of factors ranging from preference to urban areas, cost of education and associated debt, changes in marriage and childbearing patterns, rising housing costs, and the current supply of affordable houses.³⁶

Table 13 below shows the number of homeowner and renter households in the five jurisdictions, as well as their homeownership rates by race and ethnicity. The highest homeownership rates are found in O'Fallon, where homeowner households make up 82% of all households. Florissant has the lowest overall homeownership rate of the five jurisdictions (67%), which is only slightly lower than the homeownership rate in the MSA (69%). Homeownership by race and ethnicity in the MSA gives some indication about trends across the region. Over three-fourths (77%) of white households in the MSA are homeowner households, compared to 57% of Native American households, 56% of Asian households, 52% of Hispanic and Other, non-Hispanic households and 41% of Black households.

Homeownership rates for nearly all racial and ethnic groups in the five jurisdictions are higher than in the MSA. White homeownership rates range from 78% in St. Louis County to 84% in O'Fallon. Hispanic homeownership rates range from 55% in St. Louis County to 79% in O'Fallon. Other, non-Hispanic homeownership rates span from 54% in St. Louis County to 66% in Jefferson County. Asian, Black, and Native American households hold some exceptions to this general rule. For example, Asian homeownership rates in O'Fallon (48%) fall below rates in the MSA (56%), although in other jurisdictions

³³ Manturuk K, Lindblad M, Quercia R. "Homeownership and civic engagement in low-income urban neighborhoods: a longitudinal analysis." *Urban Affairs Review*. 2012;48(5):731–60.

³⁴ Haurin, Donald R. et al. "The Impact of Homeownership on Child Outcomes." *Low-Income Homeownership Working Paper Series*. Joint Center for Housing Studies of Harvard University. October 2001, <http://www.jchs.harvard.edu/sites/default/files/liho01-14.pdf>.

³⁵ U.S. Census Bureau. Homeownership Rates by Race and Ethnicity of Householder: 1994 to 2017.

³⁶ Choi, Jung et al. "Millennial Homeownership: Why Is It So Low, and How Can We Increase It?" The Urban Institute. February 2000. https://www.urban.org/sites/default/files/publication/98729/millennial_homeownership_0.pdf

such as Jefferson County and Florissant, Asian households have high rates of homeownership (80% and 90% respectively). Black homeowner rates hit 29% in Jefferson County compared to 41% in the MSA. However, Black homeownership rates approximate the MSA rates in Florissant (41%) and exceed MSA rates in St. Charles County (56%) and O'Fallon (82%). Native American households, too, have lower homeownership rates in some jurisdictions, including Florissant (36%) and St. Louis County (47%) when compared to the MSA (57%). However, these rates rise to 69% in O'Fallon and 75% in St. Charles County.

2014-2018 ACS data, mapped in Figures 50 and 51, provides a visual representation on how homeowners and renters are distributed geographically in the three counties. Between the three counties, homeownership rates are significantly higher than renter rates, as shown in Figure 51. Approximately 60 census tracts in the 3-county area have homeowner rates above 90%. In St. Charles County, 62% of all census tracts have homeowner rates at or above 80%. More than half of all census tracts in Jefferson County have homeownership rates over 80%. By comparison, only 24% of tracts in St. Louis County have homeowner rates above 80%. In the City of Florissant, one census tract (2109.26) that sits east of Patterson Road and west of Coldwater Creek, has a homeownership rate of 83%. In O'Fallon 15 of the city's 23 tracts, primarily in the eastern and southern portions of the city, have a homeownership rate at or above 80%.

Conversely, Figure 52 indicates that renter households are more common in St. Louis County than in Jefferson or St. Charles Counties. In Jefferson County, census tract 7012, which contains a large portion of the city of De Soto, has the county's highest rate of renter households (46.2%). In St. Charles County, only five of the county's 79 census tracts have renter rates at or above 45%. Four of these tracts with high renter rates are found in the city of St. Charles. In Wards 2, 3, and 9 in St. Charles, renters living along I-70 make up between 45% to 75% of all households. The fifth tract in St. Charles County with a high renter rate (tract 3121.95) is in the center of Wentzville and has a renter rate of 45%. Renter rates in O'Fallon do not exceed one-third of all households. Tract 3111.53 in O'Fallon, which is north of I-64 and covers part of Winghaven Blvd, has the city's highest renter rate of 34%.

Comparatively, a large share of St. Louis County census tracts has a renter rate above 45%. Nearly a quarter (48) of the county's 199 census tracts have renter rates above 45%. These tracts are located primarily in central and north St. Louis County, with the highest renter rates occurring in parts of Ferguson and unincorporated county (83%) and southern Hazelwood (76%). There are also high renter rates in unincorporated south county, where 74% of households in tract 2203 (south of Lemay) are renters. The highest renter rates in Florissant occur in the eastern part of the city (near Derhake Road), reaching 52%.

TABLE 13 – HOMEOWNERSHIP AND RENTAL RATES BY RACE AND ETHNICITY

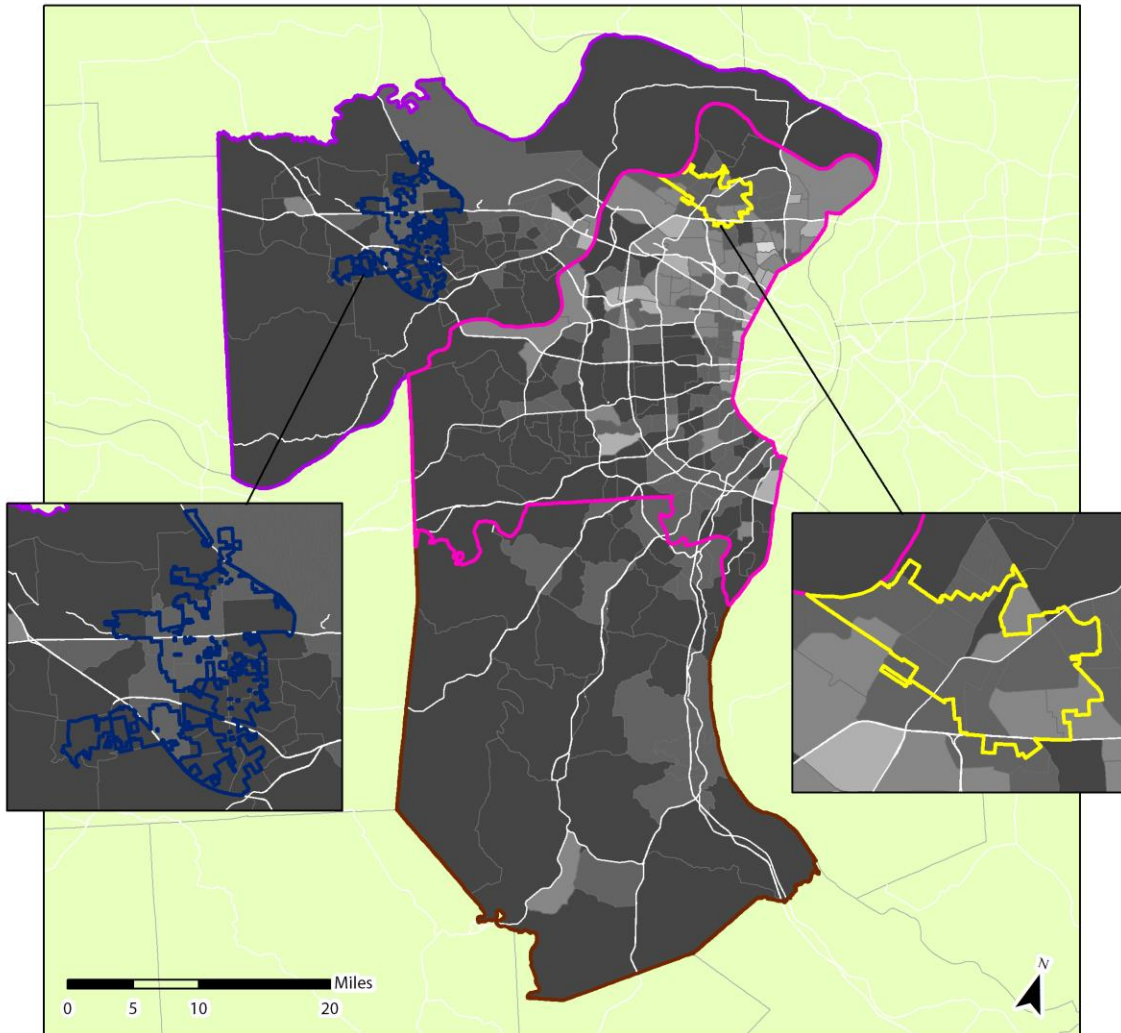
Householder Race/Ethnicity	St. Charles County			City of O’Fallon		
	Owner Households	Renter Households	Home-ownership Rate	Owner Households	Renter Households	Home-ownership Rate
Non-Hispanic						
White	106,005	22,540	82.5%	22,770	4,395	83.8%
Black	3,405	2,630	56.4%	1,005	225	81.7%
Asian	1,755	900	66.1%	440	480	47.8%
Native American	195	65	75.0%	45	20	69.2%
Other	1,035	735	58.5%	195	110	63.9%
Hispanic	1,885	1,410	57.2%	535	140	79.3%
Total	114,280	28,280	80.2%	24,990	5,370	82.3%
Householder Race/Ethnicity	St. Louis County			Florissant		
	Owner Households	Renter Households	Home-ownership Rate	Owner Households	Renter Households	Home-ownership Rate
Non-Hispanic						
White	222,470	62,720	78.0%	10,460	2,455	81.0%
Black	41,830	47,655	46.7%	2,750	3,925	41.2%
Asian	7,885	5,700	58.0%	85	10	89.5%
Native American	345	385	47.3%	20	35	36.4%
Other	3,130	2,710	53.6%	260	175	59.8%
Hispanic	4,110	3,370	54.9%	240	130	64.9%
Total	279,770	122,540	69.5%	13,815	6,730	67.2%
Householder Race/Ethnicity	Jefferson County			St. Louis MSA		
	Owner Households	Renter Households	Home-ownership Rate	Owner Households	Renter Households	Home-ownership Rate
Non-Hispanic						
White	65,080	15,540	80.7%	655,960	198,920	76.7%
Black	155	375	29.2%	79,769	116,800	40.6%
Asian	290	75	79.5%	12,698	10,065	55.8%
Native American	130	100	56.5%	1,284	984	56.6%
Other	565	285	66.5%	7,160	6,530	52.3%
Hispanic	685	465	59.6%	11,959	10,814	52.5%
Total	66,905	16,840	79.9%	768,830	344,113	69.1%

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

Source: 2012-2016 CHAS, Table 9

FIGURE 51 – SHARE OF HOUSEHOLDS THAT ARE HOMEOWNERS IN THE ST. LOUIS HOME CONSORTIUM

Homeowners



Source: American Community Survey 2014-2018 5-Year Estimates

Percent of Owners by Census Tract

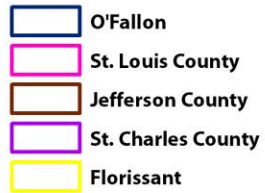
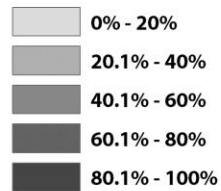
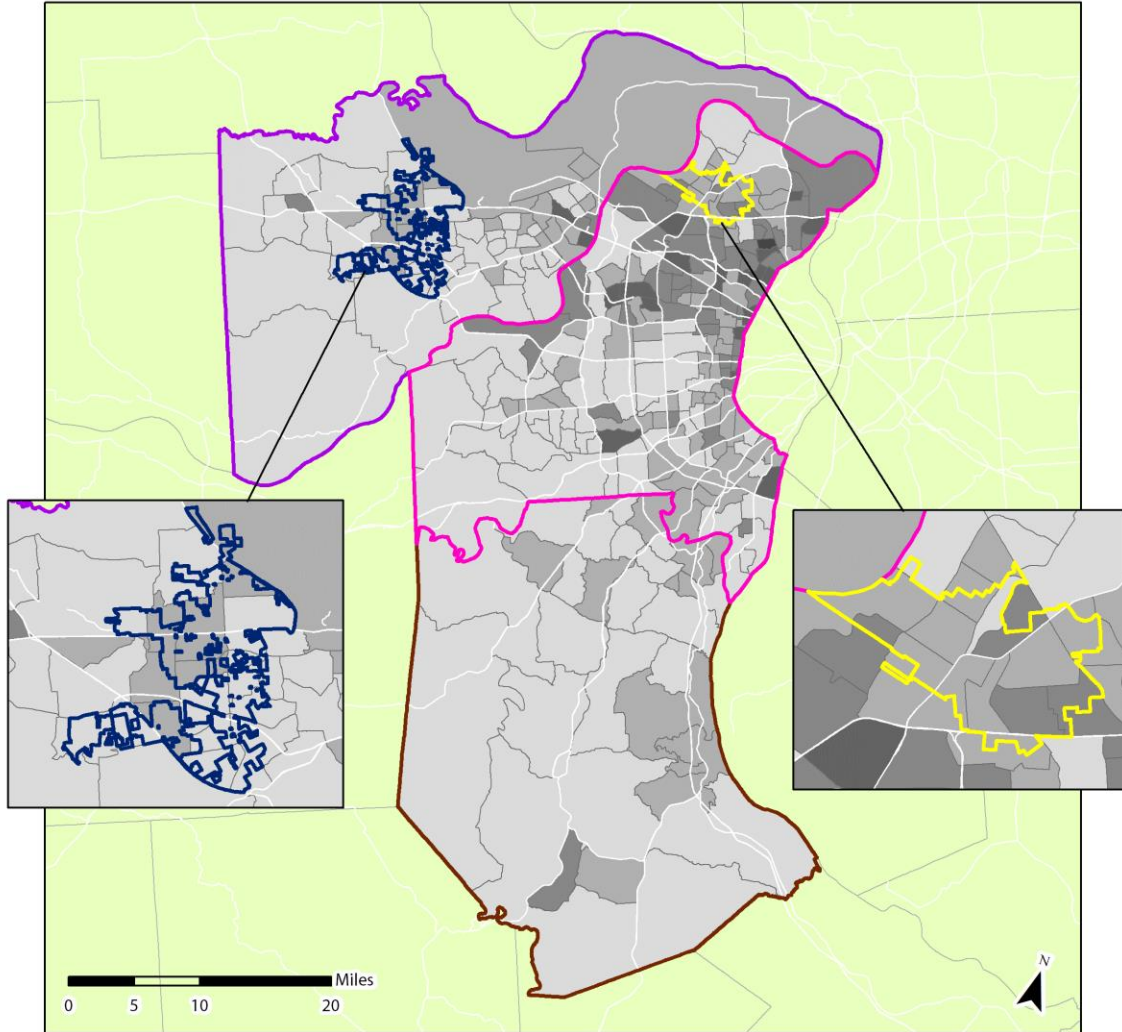


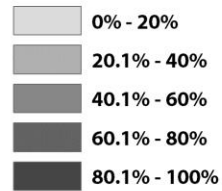
FIGURE 52 – SHARE OF HOUSEHOLDS THAT ARE RENTERS IN THE ST. LOUIS HOME CONSORTIUM

Renters



Source: American Community Survey 2014-2018 5-Year Estimates

Percent of Renters by Census Tract



Mortgage Lending

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

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market. The national 2017 HMDA data consists of information for 12.1 million home loan applications reported by 5,852 home lenders, including banks, savings associations, credit unions, and mortgage companies.³⁷ HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and information about loan applicants such as sex, race, ethnicity, and income. For the analysis below, the column labeled “Other” represents Native American, Native Hawaiian or Pacific Islander applicants whose application numbers tend to be small, concurrent with their share of the population.

The source for this analysis is 2017 tract-level HMDA data for census tracts in Jefferson, St. Charles and St. Louis Counties and the cities of Florissant and O’Fallon. Within each record, some data variables are 100% reported: “Loan Type,” “Loan Amount,” and “Action Taken,” for example, but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, Internet, or phone in which the applicant declined to identify their sex, race and/or ethnicity. Missing race, ethnicity, and sex data are potentially problematic for an assessment of discrimination. Records where race/ethnicity information was not provided by the applicant in a mail, internet or telephone application have been included in the “all applicants” column but omitted from race and ethnicity columns. Where no applicant income was indicated, these records have been omitted from the low, middle- and high-income rows but included in the final “all applicants” row.

The total number of home purchase loan applications for each jurisdiction is as follows: Jefferson County, 7,562; St. Charles County, 14,991; St. Louis County, 27,971; Florissant, 1,996; and O’Fallon, 4,774. In 2017, the largest share of mortgage loan denials occurred in Florissant, where 21.2% of all applications were denied. Rates of denial in Jefferson County and St. Louis County were less than in Florissant (15.7% and 15.3%, respectively), but higher than in St. Charles County (11.3%) and O’Fallon (10.7%). The following paragraphs will look at mortgage loan denials by jurisdiction.

In 2017, the highest rates of mortgage loan denial among the five jurisdictions occurred in Florissant. Complete information about race, ethnicity and income is available for 86% of Florissant’s mortgage loan applications. 43% of Florissant’s mortgage loan applicants were white, while 40% were Black, 2% were Hispanic, and 1% were either Asian or Other, non-Hispanic. Nearly 14% of Florissant applicants did not

³⁷ Consumer Financial Protection Bureau. “FFIEC Announces Availability of 2017 Data on Mortgage Lending.” May 7, 2018. <https://www.consumerfinance.gov/about-us/newsroom/ffiec-announces-availability-2017-data-mortgage-lending/>

provide information on their race or ethnicity. Overall, 21% of Florissant loan applicants were denied a loan. Non-white groups including Black, Hispanic, and Asian applicants exceeded the city's average denial rate, with 25% of Black and Asian applicants and 27% of Hispanic applicants being denied a mortgage.

At low incomes, 24% of all applicants were denied a mortgage. Breaking down denial figures by race and ethnicity, 41% of Asian applicants, 30% of Hispanic applicants and 25% of Black applicants were denied mortgages, compared to 20% of white applicants and 13% of Other, non-Hispanic applicants. At middle incomes, mortgage denial rates dropped slightly to 23% overall. However, 25% of middle-income Black and Hispanic applicants and 50% of Other, non-Hispanic applicants were denied mortgages, as well as 18% of white applicants. At high incomes, 18% of all applicants were denied mortgages. By comparison, 19% of white applicants, 24% of Black applicants and 33% of Hispanic applicants were denied mortgages at this income level.

Looking at St. Louis County, there is complete information about race, ethnicity and income available for 90% of mortgage loan applicants. 70% of St. Louis County's mortgage loan applicants were white, 13% were Black, 4% were Asian, 2% were Hispanic and less than 1% were Other, non-Hispanic. Approximately 10% of applicants did not provide their race or ethnicity. The overall denial rate for all applicants was 15.3%. All non-white groups, except for Asian applicants, exceeded the county's average denial rate. 19% of Hispanic applicants, as well as 31% of Black applicants and 33% of Other, non-Hispanic applicants were denied a mortgage.

Approximately 23% of all low-income applicants in St. Louis County were denied a mortgage. Low-income Black and Other, non-Hispanic applicants were denied at the highest rates (33% and 38%, respectively). Low-income white applicants were denied at the lowest rate of all groups (17%). These trends continue at middle and high incomes, where Black and Other, non-Hispanic applicants have denial rates that are disproportionately higher than the county average. For example, at middle incomes, Black and Other, non-Hispanic applicants were denied at rates of 30% and 32%, compared to 15% for the county. At high incomes, Black and Other, non-Hispanic applicants were denied at rates of 25% and 27%, compared to 11% for the county. Hispanic applicants were denied at rates slightly above the county average (15% at middle incomes, 14% at high incomes). Asian applicants were denied at slightly higher rates at middle incomes (16%) and lower rates at high incomes (10%). White applicants were denied at below average rates at all income levels.

In Jefferson County, 90% of all applicants were white, 1% were Hispanic, 0.9% were Asian, 0.5% were Black, and 0.5% were "Other." 6.7% of applicants did not indicate their race or ethnicity. Looking at overall denial rates, approximately 16% of all Jefferson County applicants were denied a mortgage. White applicants were denied at a below-average rate of 15%, while non-white groups were all denied at above-average rates (Hispanic - 22%, Black - 23%, Other - 24%, Asian - 25%).

Approximately 20% of all low-income Jefferson County mortgage loan applicants were denied. Low-income white applicants had the lowest mortgage denial rate (18.5%) of all groups. All non-white groups had above-average denial rates. Low-income Hispanic applicants had the highest denial rate (33%), which was only slightly higher than Asian applicants (32%), Black applicants (31%) and Other applicants (28%). At middle incomes, nearly all groups were at or below the average denial rate of 14%. Black applicants had the lowest denial rate (12.5%), followed by white applicants (13%) and Hispanic and Asian applicants

(14%). Only Native American and Pacific Islander applicants had above average denial rates at middle incomes (23%). At high incomes, 10% of white applicants were denied mortgages. However, 17% of high income Asian and Hispanic applicants, one-fifth (20%) of high-income Black applicants, and one-third (33%) of high-income Other applicants were denied mortgages.

St. Charles County had 14,991 mortgage loan applicants in 2017. Complete information about race, ethnicity and income were available for 93.6% of all applicants. Of all mortgage loan applicants in the county, approximately 86% were white, 4% were Black, 2% were Asian, 2% were Hispanic and 1% was "Other." The county's overall mortgage loan denial rate was 11.3%. Using the overall denial rate as a barometer, Asian and white mortgage applicants were denied mortgages at below average rates (8.6% and 10.2% respectively). Black, Hispanic, and Other, non-Hispanic groups were denied mortgages at above-average rates, with Other applicants denied at a rate of 13%, Hispanic applicants denied at a rate of 14% and Black applicants denied at a rate of 20%.

At low incomes, approximately 15% of St. Charles County residents were denied a mortgage in 2017. Low-income Black and Hispanic applicants had above-average denial rates, with 17% of low-income Hispanic applicants and 30% of low-income Black applicants denied mortgages. All other low-income groups experienced below average denial rates. At middle incomes, Black and Hispanic applicants again were denied at higher rates, with 12% of Hispanic and 24% of Black middle-income applicants denied mortgages, compared to 10% of all applicants. Non-white applicants earning high incomes also experienced higher rates of mortgage loan denial. 14% of Hispanic applicants, 13% of Black applicants and 12% of Other, non-Hispanic applicants were denied mortgages, compared to 9% of white applicants and 8% of Asian applicants.

Finally, in O'Fallon, there is complete information on 94% of mortgage loan applications. White applicants made up 85% of all mortgage loan applicants, followed by Black applicants (3.8%), Asian applicants (2.4%), Hispanic (2.2%) and Other, non-Hispanic applicants (0.4%). About 6% of applicants did not indicate their race or ethnicity. Looking at the city's average denial rate of 11%, Asian, white, and Hispanic applicants were denied at below average rates (8%, 9%, and 10% respectively). Black applicants were denied at the highest rates (22%) with Other, non-Hispanic applicants denied at a rate of 18%.

At all income levels, Black applicants in O'Fallon were denied at the highest rate of all racial and ethnic groups. Twenty-six percent of low-income Black applicants, 23% of middle-income Black applicants and 18% of high-income Black applicants were denied mortgages. Comparatively, only 13% of all low-income applicants, 9% of middle-income, and 10% of high-income applicants were denied overall. Other, non-Hispanic applicants experienced above average denial rates at middle and high incomes (22% and 20%, respectively). Asian and Hispanic applicants had above average denials at middle incomes (10% and 19%, respectively). White applicants experienced below average denial rates at all income levels.

In summary, mortgage loan denials occurred at higher rates for non-white applicants than white applicants across the five jurisdictions. Black applicants had the highest rates of mortgage denial overall, ranging from 21% in St. Charles County to 31% in St. Louis County. Denial rates for Hispanic applicants ranged from 10% in O'Fallon to 27% in Florissant. Other, non-Hispanic applicants had the widest variation in denial rates, which ranged from 13% in St. Charles County to 33% in St. Louis County. Asian applicants, too, experienced a range of denial rates but were the most likely of all non-white groups to have below

average denial rates. For example, in O'Fallon, St. Louis County and St. Charles County, denial rates for Asian applicants ranged from 8% to 13%. However, these numbers jumped to 25% in Jefferson County and Florissant, indicating significant differences in denials across the region. White applicants experienced the lowest rates of mortgage denial in all jurisdictions, ranging from 9% in O'Fallon to 18% in Florissant.

2017 HMDA data does not include a borrower's total financial qualifications, such as an actual credit score, property type and value, loan-to-value ratio, or loan product choices. Furthermore, there is no requirement for reporting reasons for a loan denial, and this information was not provided for a significant share of applicants in all five jurisdictions: Jefferson County (41.4%), Florissant (36.9%), St. Louis County (36.8%), St. Charles County (36.6%), and O'Fallon (34.8%). The remaining records which indicate the reason for mortgage loan denial have been tabulated in Table 15.

Across the board, the most common reasons for mortgage loan denial were lack of collateral, incomplete credit applications, poor credit history and high debt-to-income ratios. Where reasons for denial were provided for non-white applicants, this information points to areas where policy interventions might help increase mortgage loan acceptance. Asian applicants experienced the greatest rates of mortgage loan denial in Florissant and Jefferson County. In these two jurisdictions, 15 loan applications provided the reasons for denial. Of these 15 applications, seven (46%) were due to the applicant's debt-to-income ratio. Six of the seven applicants denied due to their high debt-to-income ratio were low income.

Black applicants, who experienced the highest denial rates overall, had varying reasons for mortgage loan denial by jurisdiction. In Jefferson County, of the three denials where the reason was reported, two denials were due to the applicant's lack of collateral. In St. Charles County, 23 applicants (37%) were denied due to their debt-to-income ratio - 18 of which were low income. In St. Louis County, 205 denials for Black applicants (33%) were due to credit history, followed by 126 (20%) due to debt-to-income ratio. Florissant, too, listed approximately one-third (34%) of Black applicant denials due to credit history. Finally, in O'Fallon, 38% of listed denial reasons named the applicant's debt-to-income ratio.

Hispanic applicants experienced above average rates of mortgage loan denial in four of the five jurisdictions. In Jefferson County, Hispanic applicants experienced loan denials due to credit history, employment history, insufficient cash, and other reasons at equal rates (20%). Similarly, in Florissant, of the four loan denials where a reason was provided, Hispanic applicants were affected equally by incomplete credit applications, credit history, debt-to-income ratio, and other reasons (25%). In St. Charles County, the top denial reasons provided for Hispanic applicants were collateral (19%), incomplete credit application (19%) and credit history (19%). In St. Louis County, the top denial reasons listed were debt-to-income ratio (26%) and credit history (25%).

Other, non-Hispanic applicants also experienced above average loan denial rates in four of five jurisdictions. In Jefferson County, two of the six denials where a reason was provided named credit history; another two named debt-to-income ratios. In St. Charles County, only two applications for Other, non-Hispanic applicants listed a denial reason, and both were denied due to the applicant's collateral. In St. Louis County, 13 (45%) were denied due to their credit history. Of the 17 mortgage loan denials in O'Fallon, no denial reason was listed for any denied application.

TABLE 14 – HOME PURCHASE LOAN APPROVAL RATES BY RACE AND ETHNICITY, 2017

St. Charles County							
Applicant Income		Applicant Race and Ethnicity					All Applicants
		Non-Latino				Latino/ Hispanic	
		White	Black	Asian	Other		
Low Income	Completed Applications	3,540	134	61	18	72	4,002
	Denial Rate	13.1%	29.9%	9.8%	11.1%	16.7%	14.5%
Middle Income	Completed Applications	3,453	171	70	21	86	3,963
	Denial Rate	9.0%	24.0%	7.1%	9.5%	11.6%	10.2%
High Income	Completed Applications	5,363	205	179	25	109	6,221
	Denial Rate	8.5%	13.2%	7.8%	12.0%	13.8%	9.7%
All Applicants	Completed Applications	12,828	542	315	71	279	14,991
	Denial Rate	10.2%	21.2%	8.6%	12.7%	14.0%	11.3%

City of O'Fallon							
Applicant Income		Applicant Race and Ethnicity					All Applicants
		Non-Latino				Latino/ Hispanic	
		White	Black	Asian	Other		
Low Income	Completed Applications	1,058	46	18	2	23	1,203
	Denial Rate	12.0%	26.1%	5.5%	0.0%	8.7%	13.2%
Middle Income	Completed Applications	1,066	52	20	9	32	1,224
	Denial Rate	7.8%	23.1%	10.0%	22.2%	18.8%	9.3%
High Income	Completed Applications	1,792	73	75	5	47	2,109
	Denial Rate	8.3%	17.8%	8.0%	20.0%	6.4%	9.8%
All Applicants	Completed Applications	4,078	181	114	17	106	4,774
	Denial Rate	9.4%	21.5%	7.9%	17.6%	10.4%	10.7%

St. Louis County							
Applicant Income		Applicant Race and Ethnicity					All Applicants
		Non-Latino				Latino/ Hispanic	
		White	Black	Asian	Other		
Low Income	Completed Applications	5,740	2,003	240	58	218	8,774
	Denial Rate	17.2%	33.4%	20.0%	37.9%	26.1%	22.9%
Middle Income	Completed Applications	4,206	728	201	28	93	5,609
	Denial Rate	10.7%	30.2%	16.4%	32.1%	15.1%	14.9%
	Completed Applications	9,074	594	763	39	198	11,445

High Income	Denial Rate	8.4%	24.6%	9.7%	25.6%	13.6%	10.5%
All Applicants	Completed Applications	19,684	3,648	1,232	134	528	27,971
	Denial Rate	11.7%	30.9%	13.2%	32.8%	19.3%	15.3%

City of Florissant

Applicant Income		Applicant Race and Ethnicity					All Applicants
		Non-Latino				Latino/ Hispanic	
		White	Black	Asian	Other		
Low Income	Completed Applications	459	497	12	8	27	1,070
	Denial Rate	19.8%	24.9%	41.7%	12.5%	29.6%	23.9%
Middle Income	Completed Applications	186	151	4	2	4	380
	Denial Rate	17.7%	25.2%	0.0%	50.0%	25.0%	23.4%
High Income	Completed Applications	171	85	8	1	3	293
	Denial Rate	19.3%	23.5%	12.5%	0.0%	33.3%	18.4%
All Applicants	Completed Applications	859	790	24	11	37	1,996
	Denial Rate	18.3%	24.7%	25.0%	18.2%	27.0%	21.2%

Jefferson County

Applicant Income		Applicant Race and Ethnicity					All Applicants
		Non-Latino				Latino/ Hispanic	
		White	Black	Asian	Other		
Low Income	Completed Applications	2,831	19	28	18	30	3,088
	Denial Rate	18.5%	31.6%	32.1%	27.8%	33.3%	19.9%
Middle Income	Completed Applications	1,816	8	14	13	21	1,973
	Denial Rate	13.2%	12.5%	14.3%	23.1%	14.3%	14.4%
High Income	Completed Applications	1,911	10	24	3	23	2,096
	Denial Rate	9.7%	20.0%	16.7%	33.3%	17.4%	11.2%
All Applicants	Completed Applications	6,844	39	68	37	76	7,562
	Denial Rate	14.5%	23.1%	25.0%	24.3%	22.4%	15.7%

Note: "Completed applications" includes applications that were approved but not accepted, denied, and approved with a loan originated. It does not include applications withdrawn by the applicant or closed for incompleteness. The "All Applications" row includes applications where income was not listed, but where applications were otherwise accepted or denied.

Data Source: FFIEC 2017 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda

TABLE 15 – DENIAL REASONS, BY RACE AND ETHNICITY

		St. Charles County								
		Collateral	Credit Application Incomplete	Credit History	Debt-to-Income Ratio	Employment History	Insufficient Cash (Down payment, Closing Costs)	Mortgage Insurance Denied	Other	Unverifiable Information
White	Low income	39	47	64	93	7	6	0	25	10
	Middle income	33	38	51	52	1	7	0	13	4
	High income	53	52	70	37	3	13	1	21	16
Black	Low income	0	1	4	18	1	0	0	0	2
	Middle income	3	5	7	5	1	1	0	4	0
	High income	2	2	2	0	0	2	0	4	0
Asian	Low income	0	0	1	2	1	0	0	1	0
	Middle income	1	0	0	1	0	0	0	0	0
	High income	3	4	1	0	1	1	0	1	1
Other	Low income	1	0	0	0	0	0	0	0	0
	Middle income	0	0	0	0	0	0	0	0	0
	High income	1	0	0	0	0	0	0	0	0
Hispanic	Low income	3	2	0	2	0	1	0	0	0
	Middle income	0	1	2	0	0	0	0	1	0
	High income	1	1	2	0	0	1	0	1	3

		City of O'Fallon								
		Collateral	Credit Application Incomplete	Credit History	Debt-to-Income Ratio	Employment History	Insufficient Cash (Down payment, Closing Costs)	Mortgage Insurance Denied	Other	Unverifiable Information
White	Low income	11	15	18	30	3	2	0	8	3
	Middle income	8	9	14	18	0	1	0	3	2
	High income	16	16	23	12	0	6	1	7	1
Black	Low income	0	1	1	7	0	0	0	0	0
	Middle income	0	1	3	1	1	0	0	0	0
	High income	1	1	1	0	0	1	0	2	0
Asian	Low income	0	0	0	1	0	0	0	0	0
	Middle income	0	0	0	1	0	0	0	0	0
	High income	1	2	0	0	0	1	0	1	1
Other	Low income	0	0	0	0	0	0	0	0	0
	Middle income	0	0	0	0	0	0	0	0	0
	High income	0	0	0	0	0	0	0	0	0
Hispanic	Low income	0	0	0	1	0	1	0	0	0
	Middle income	0	1	0	0	0	0	0	1	0
	High income	1	0	0	0	0	0	0	0	0

		St. Louis County								
		Collateral	Credit Application Incomplete	Credit History	Debt-to-Income Ratio	Employment History	Insufficient Cash (Down payment, Closing Costs)	Mortgage Insurance Denied	Other	Unverifiable Information
White	Low income	95	68	140	211	9	19	0	49	28
	Middle income	54	36	70	61	4	4	0	30	7
	High income	114	88	90	80	9	16	1	53	37
Black	Low income	63	26	128	96	7	14	0	35	4
	Middle income	26	17	46	21	1	3	0	12	4
	High income	21	6	31	10	2	1	1	9	7
Asian	Low income	2	1	5	18	0	1	0	1	2
	Middle income	3	2	6	8	0	1	0	2	2
	High income	11	12	5	10	1	5	0	5	5
Other	Low income	4	1	6	3	0	0	0	0	0
	Middle income	2	0	5	0	0	0	0	0	0
	High income	2	0	2	1	1	1	0	1	0
Hispanic	Low income	7	2	8	10	1	1	0	0	3
	Middle income	2	1	3	2	0	0	0	1	0
	High income	2	3	4	4	0	1	0	2	4

		Florissant								
		Collateral	Credit Application Incomplete	Credit History	Debt-to-Income Ratio	Employment History	Insufficient Cash (Down payment, Closing Costs)	Mortgage Insurance Denied	Other	Unverifiable Information
White	Low income	15	6	12	14	2	2	0	9	3
	Middle income	7	2	3	1	0	2	0	4	1
	High income	5	2	4	3	0	0	0	3	0
Black	Low income	8	4	15	27	3	6	0	6	1
	Middle income	1	1	16	1	0	2	0	3	1
	High income	1	1	6	1	0	0	0	2	2
Asian	Low income	1	0	0	3	0	0	0	0	0
	Middle income	0	0	0	0	0	0	0	0	0
	High income	0	0	0	0	0	0	0	0	0
Other	Low income	0	0	0	0	0	0	0	0	0
	Middle income	0	0	1	0	0	0	0	0	0
	High income	0	0	0	0	0	0	0	0	0
Hispanic	Low income	0	1	1	1	0	0	0	0	0
	Middle income	0	0	0	0	0	0	0	1	0
	High income	0	0	0	0	0	0	0	0	0

		Jefferson County								
		Collateral	Credit Application Incomplete	Credit History	Debt-to-Income Ratio	Employment History	Insufficient Cash (Down payment, Closing Costs)	Mortgage Insurance Denied	Other	Unverifiable Information
White	Low income	41	47	67	90	5	14	1	17	8
	Middle income	25	27	32	28	2	4	1	9	5
	High income	32	19	32	12	4	2	0	7	2
Black	Low income	2	0	0	1	0	0	0	0	0
	Middle income	0	0	0	0	0	0	0	0	0
	High income	0	0	0	0	0	0	0	0	0
Asian	Low income	0	0	2	3	0	0	0	1	0
	Middle income	0	0	0	0	0	1	0	0	0
	High income	1	1	1	1	0	0	0	0	0
Other	Low income	0	1	1	1	0	0	0	0	0
	Middle income	0	0	0	1	0	1	0	0	0
	High income	0	0	1	0	0	0	0	0	0
Hispanic	Low income	0	0	2	0	0	1	0	1	0
	Middle income	0	0	0	0	0	1	0	1	0
	High income	0	0	0	0	2	0	0	0	0

ZONING, AFFORDABILITY, AND HOUSING CHOICE

Comprehensive land use planning is a critical process by which communities address a myriad of public policy issues such as housing, transportation, health, recreation, environmental protection, commercial and retail services, and land values, and address how the interconnection and complexity of these issues can ultimately impact the entire municipality. “The land use decisions made by a community shape its very character – what it’s like to walk through, what it’s like to drive through, who lives in it, what kinds of jobs and businesses exist in it, how well the natural environment survives, and whether the community is an attractive one or an ugly one.”³⁸ Likewise, decisions regarding land use and zoning have a direct and profound impact on affordable housing and fair housing choice, shaping a community or region’s potential diversity, growth, and opportunity for all. Zoning determines where housing can be built, the type of housing that is allowed, and the amount and density of housing that can be provided. Zoning also can directly or indirectly affect the cost of developing housing, making it harder or easier to accommodate affordable housing. The following sections will explore how the zoning and land use codes in Jefferson County, St. Louis County, St. Charles County, Florissant and O’Fallon impact housing affordability and fair housing choice.

Local Zoning Ordinance Review

The Federal Fair Housing Act and the Missouri Human Rights Act prohibit discrimination in housing based on race, color, religion, national origin, ancestry, sex, disability, and familial status. The Fair Housing Act, in particular, takes precedence over local and state laws. Therefore, where conflicts arise between local laws and the Fair Housing Act, those instances will be indicated below. Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. Examples of zoning provisions that most commonly result in barriers to fair housing choice include:

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

The treatment of these issues in Jefferson County, St. Charles County, St. Louis County, Florissant and O’Fallon is explored in Table 16 below.

³⁸ John M. Levy. Contemporary Urban Planning, Eighth Edition. Upper Saddle River, NJ: Pearson Prentice Hall, 2009.

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

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

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

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

The zoning code review presented below is limited to an analysis only of the codes of the individual members of the Consortium, however, this effectively covers only a portion of the study area as the counties contain numerous municipalities, most with zoning codes of their own. In St. Louis County alone, there are approximately 90 municipalities with their own zoning and land use controls, making a comprehensive review of these codes beyond the scope of this report. As with any zoning measures, the codes of these municipalities likely have fair housing implications or warrant further analysis, as proposed in the recommendations at the conclusion of this report.

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

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

TABLE 16 – ZONING CODE RISK SCORES

	Jefferson County	St. Charles County	St. Louis County	Florissant	O’Fallon
Issue	Score				
<p>1a. Does the jurisdiction’s definition of “family” have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive?</p> <p>1b. Does the definition of “family” discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?</p>	1	1	1	1	1
<p>2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.?</p> <p>2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?</p>	3	3	1	1	1
<p>3a. Do the jurisdiction’s policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or</p>	2	2	2	2	2

	Jefferson County	St. Charles County	St. Louis County	Florissant	O'Fallon
Issue	Score				
reasonable accommodations to zoning, land use, or other regulatory requirements? 3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?					
4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?	3	2	1	1	1
5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?	3	2	3	3	2
6. Does the jurisdiction's zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?	2	2	2	2	2
7. Does the zoning ordinance fail to provide residential districts where multi-family housing is permitted as of right? Are multifamily dwellings	2	2	1	2	1

	Jefferson County	St. Charles County	St. Louis County	Florissant	O'Fallon
Issue	Score				
excluded from all single-family dwelling districts? 7b. Do multi-family districts restrict development only to low-density housing types?					
8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?	1	2	2	2	1
9a. Are the jurisdiction's design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act's accessibility standards for design and construction? 9b. Is there any provision for monitoring compliance?	1	1	1	1	1
10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?	2	2	2	2	1
Average Risk Score	2.0	1.9	1.6	1.7	1.3

In Table 16 above, the City of O'Fallon had the lowest zoning code risk score of the five jurisdictions (1.3). St. Louis County had the second lowest score (1.6), followed by Florissant (1.7), St. Charles County (1.9) and Jefferson County (2.0).

Questions 1a and 1b in the table inquire about each jurisdiction's definition of family. Jefferson County, St. Louis County, Florissant, and O'Fallon use a definition of family that includes both related and unrelated persons living together. In St. Louis County, three unrelated persons can live together in a single housekeeping unit. Jefferson County and Florissant allow four unrelated persons to live together as a family; O'Fallon allows five. St. Charles County limits the definition of family to related persons, however,

the county allows three unrelated adults to live together under the definition of “household.” Among the five jurisdictions, Florissant has the most permissive definition of “family,” which includes not only related and unrelated individuals, but also up to 9 physically or mentally handicapped persons living together in a group home.

Definitions of “family” and “household” impact how each jurisdiction treats persons with disabilities living together in group homes, as discussed in Questions 2a and 2b. The Departments of Justice and Housing and Urban Development have jointly established that persons with disabilities must be allowed to live together in single-family districts, even if they live in group homes. Any definition of “family” or “household” that permits unrelated individuals to live together but subjects group homes of the same size to a more rigorous review process or prohibits group homes altogether is facially discriminatory.³⁹ Of the five jurisdictions, Florissant, O’Fallon, and St. Louis County are the most permissive, allowing group homes for up to 8 residents by right in both single family and multi-family residential districts. St. Louis County requires a conditional use permit for group homes of 9 residents or more in single family districts. However, a group home serving 9 or more residents exceeds the number of unrelated individuals who can live together under the county’s definition of “family” (3 persons), and therefore does not establish a different standard than for unrelated persons living together without disabilities. On the other hand, St. Charles County allows group homes by right in its R3A Medium Density District, but a conditional use permit is required for group homes in its single-family districts. Jefferson County, too, allows group homes in its larger single-family districts by conditional use permit only. These additional restrictions on housing for persons with disabilities may have the effect of limiting fair housing choice for this protected class.

Questions 3a and 3b inquire about each jurisdiction’s reasonable modification or accommodation processes to improve housing accessibility for persons with disabilities. None of the five jurisdictions currently has a reasonable accommodation process in their zoning ordinance. However, most jurisdictions give some discretion to staff to allow minor encroachments into the setback, which could allow applicants adding exterior modifications to complete an administrative process, rather than enduring the variance process. The Fair Housing Act does not require jurisdictions to adopt reasonable accommodation processes, but strongly encourages this practice for the benefit of local government staff and the public.⁴⁰

Jefferson County and St. Charles County place spacing requirements on group homes, which are considered protected housing types (as discussed in Question 4). In Jefferson County, group homes for persons with disabilities must be 1,000 feet away from other group homes, halfway homes, convalescent homes, nursing homes, schools, churches, nurseries, and day care facilities. These extensive spacing requirements may also have the effect of limiting housing for persons with disabilities. St. Charles County requires 600 feet between group homes, which may have a lesser effect on group home siting than

³⁹ Department of Justice and the Department of Housing and Urban Development. (November 2016) “State and Local Land Use Laws and Practices and the Application of the Fair Housing Act,” p.7-8. <https://www.justice.gov/crt/page/file/909956/download>

⁴⁰ *Ibid.*, p. 17

Jefferson County’s ordinance. St. Louis County, Florissant and O’Fallon do not impose spacing requirements on this protected housing type.

Question 5 explores each jurisdiction’s zoning requirements for residential substance abuse treatment facilities. Persons in recovery from alcohol or substance abuse are considered persons with disabilities under the Fair Housing Act.⁴¹ The Act therefore requires housing for persons in recovery to be treated in the same manner as other persons with disabilities. Jefferson and St. Louis Counties omit any reference to housing for persons in recovery. This omission is compounded by additional ordinances, such as Section 400.1640 in Jefferson County’s ordinance which states that “any use not shown as a permitted use in a zoning district is specifically prohibited in that district.” St. Louis County, too, limits permitted uses to those that have been set forth in the zoning ordinance (see Section 1003.050). Therefore, the omission of this residential type as a permitted use in any zoning district has the effect of prohibiting this use. Florissant restricts the location of alcohol and/or drug treatment residential facilities to its B-3 Extensive Business District, where this use is required to be 1,000 feet from any other substance abuse treatment facility, church, school, or park. St. Charles County permits Oxford Homes as a use that falls under its definition of “group home facility.” Oxford Homes are drug-free residences for persons recovering from drug and alcohol addiction and may accommodate up to 15 persons. However, St. Charles County’s definition of “group home facility” also excludes halfway houses that accommodate “persons who use or are addicted to a controlled substance” (see “Definitions,” Section 405.060). Conflicting statements within the definition of group home can be clarified to provide the most concise meaning for permissible group home types. O’Fallon has the least restrictive housing requirements for this protected class, allowing persons in recovery to fall under its definition of handicapped persons, and therefore allowing persons in recovery to live in a group home setting. Despite being the most permissive, O’Fallon adds one discriminatory clause to its definition of “handicap.” O’Fallon’s definition of “handicap” only includes those persons who are no longer addicted to controlled substances, or who have participated in a supervised rehab program (see Section 240.010). The Fair Housing Act does not require a person to have participated in or currently be participating in a treatment program to be considered a person with a disability.⁴²

Academic and market research have proven what also is intuitive: land use regulations can directly limit the supply of housing units within a given jurisdiction, and thus contribute to making housing more expensive, i.e. less affordable.⁴³ Exclusionary zoning is understood to mean zoning regulations which impose unreasonable residential design regulations that are not congruent with the actual standards necessary to protect the health and safety of current average household sizes and prevent overcrowding.

⁴¹ Ibid., p. 7

⁴² Ibid. p.7

⁴³ Gyourko, Joseph, Albert Saiz, and Anita A. Summers (2007) “A New Measure of the Local Regulatory Environment for Housing Markets: The Wharton Residential Land Use Regulatory Index,” real.wharton.upenn.edu; Randal O’Toole. (2006) “The Planning Penalty: How Smart Growth Makes Housing Unaffordable,” at independent.org/pdf/policy_reports/2006-04-03-housing.pdf; Edward L. Glaeser and Joseph Gyourko. (2002) “The Impact of Zoning on Housing Affordability,” law.yale.edu/system/files/documents/pdf/hier1948.pdf; The White House’s Housing Development Toolkit, 2016, available at whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf.

Zoning policies that impose barriers to housing development by making developable land and construction costlier than they are inherently can take different forms and may include: high minimum lot sizes, low density allowances, wide street frontages, large setbacks, low floor area ratios, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, low maximum building heights, restrictions against infill development, restrictions on the types of housing that may be constructed in certain residential zones, arbitrary or antiquated historic preservation standards, minimum off-street parking requirements, restrictions against residential conversions to multi-unit buildings, lengthy permitting processes, development impact fees, and/or restrictions on accessory dwelling units.

The Brookings Institution has found that “[o]n roughly 75% of land in most cities today, it is illegal to build anything except single-family detached houses. The origins of single-family zoning in America are not benign: Many housing codes used density as a proxy for separating people by income and race.”⁴⁴ Although today it may be difficult to prove that a zoning ordinance’s preference for single family zoning is facially (or intentionally) discriminatory in direct violation of fair housing laws, such land use regulations still may have the effect of artificially limiting the supply of housing units in a given area and disproportionately reducing housing choice for moderate to low-income families, minorities, persons with disabilities on fixed incomes, families with children, and other protected classes by making the development of affordable housing cost prohibitive. Legitimate public objectives, such as maintaining the residential character of established neighborhoods, environmental protection, or public health, must be balanced with housing needs and availability.

Looking at other regulatory barriers, Questions 6 and 7 inquire about exclusionary zoning tactics impose unreasonable design regulations or preclude the development of housing types that serve a variety of protected classes. All five jurisdictions allow multifamily residential uses by right in at least one zoning district. Looking specifically at multifamily zoning districts, all five jurisdictions have permissive setbacks, lot sizes and building minimums. Building height poses the sole challenge in some jurisdictions, such as Florissant, where even the densest multifamily district does not allow buildings with more than 3 stories. Here, St. Louis County is the most permissive, allowing duplexes, triplexes, and multifamily dwellings in the R-6A, R-6AA, R-6, R-7, and R-8 districts by right. St. Louis County also allows a maximum building height of 200’ in the R-7 and R-8 districts. Other jurisdictions add restrictions to multifamily uses. Florissant, for example, limits multifamily buildings to 3 stories. St. Charles County does not explicitly allow triplexes or quadrplexes in any district. The highest density allowed in Jefferson County is 18 units per acre. Facially, these ordinances do not appear to be discriminatory toward multifamily uses. However, an observation of each jurisdiction’s zoning map may indicate that there are a limited number of parcels currently zoned for multifamily use. As an example, Jefferson County’s interactive zoning map allows the user to calculate the number of acres designated in each zoning district. Three-family and four-family dwelling units in Jefferson County are restricted to the PR-1 and PR-2 zoning districts, which make up approximately 0.6%

⁴⁴ Baca, Alex. (December 4, 2019) “Gentle” Density Can Save Our Neighborhoods,” <https://www.brookings.edu/research/gentle-density-can-save-our-neighborhoods>.

of residentially zoned land. All five jurisdictions can expand access to a variety of housing types by planning for additional areas where two-family, three-family, four-family, and multifamily units can be sited.

Another way to improve access to housing for protected classes is through the provision of alternative housing types, such as accessory dwelling units and mobile/manufactured homes. These housing types are observed in Question 8. St. Charles County and O’Fallon allow mobile homes by right in their RM Manufactured/Mobile Home Residential District and R-5 Mobile/Manufactured Home Park District, respectively. Jefferson County allows mobile homes as accessory dwellings in its RA-5 and LR-2 districts, where parcels contain at least two acres. St. Louis County only allows mobile homes, called house trailers, in its NU Non-Urban District. Florissant, on the other hand, prohibits trailers, campers and house cars from being used as residences in the city (see Section 340.200). Florissant does allow accessory dwellings, which are no further than 20 feet from the main building. O’Fallon, too, allows accessory dwelling units called carriage houses in its Mixed-Use Traditional Development District. Jefferson County allows accessory dwelling units in all its residential districts, including the PM Planned Mixed Use District. St. Charles County and St. Louis County exclude dwelling units from their lists of accessory uses, essentially prohibiting accessory dwelling units since these uses are not identified as permitted accessory uses.

Questions 9 and 10 complete the regulatory review, inquiring about building codes and inclusionary zoning policies. Jefferson County, St. Louis County, St. Charles County and O’Fallon use the 2015 International Building Code, while Florissant utilizes the 2018 International Building Code. Both building codes are compliant with the Fair Housing Act. Monitoring compliance with these codes is not required but is a good practice for ensuring safe and accessible housing products. Lastly, Jefferson, St. Louis, and St. Charles Counties and the City of Florissant do not currently have any inclusionary zoning incentives or provisions listed in the zoning code. O’Fallon, however, does have an inclusionary zoning incentive. Section 400.170(2) of O’Fallon’s zoning code promotes the rehabilitation of deteriorating areas through incentives such as reduced adherence to the zoning code. Targeted planned developments would benefit from reduced minimum lot areas, lot widths, lot depths, and setbacks, as well as increased height allowances and modifications to the city’s landscaping and off-street parking restrictions.

Local Fair Housing Ordinances

All five jurisdictions have adopted fair housing ordinances or ordinances on unlawful housing practices, which prohibit housing discrimination practices within the jurisdiction (see Jefferson County chapter 220; St. Charles County chapter 225; St. Louis County chapter 717; Florissant section 235.030; O’Fallon section 240.020). All of the fair housing ordinances, except for that of Jefferson County, prohibit the following activities explicitly:

- Refusing to sell or rent a dwelling unit, or to make a dwelling unit unavailable, based on a person’s race, color, religion, national origin, ancestry, sex, disability, or familial status (described from here on as “protected class status”).
- Discriminating in the terms, conditions, or privileges of sale or rental of a dwelling based on the person’s protected class status.
- Advertising the sale or rental of a dwelling in such a way that indicates preference or discrimination based on a person’s protected class status.

- Representing a dwelling unit as unavailable based on a person’s protected class status, when the unit is in fact available.
- Inducing a person to sell or rent a dwelling based on the entry of persons with protected class status into the neighborhood.
- Discriminating in the sale or rental of a dwelling unit due to the buyer’s/renter’s disability, the disability of anyone associated with the buyer/renter, or the disability of the proposed tenant.
- Refusing to make reasonable accommodations for persons with disabilities or construct multifamily dwellings in such a way that would be accessible and usable to a person with a disability. These accommodations should cover accessible routes into the building, light switches and other environmental controls, kitchen, and bathroom features.
- Banks and insurance companies denying loans or other financial assistance to purchase, construct, improve, repair, or maintain a dwelling based on protected class status.
- Real estate agents, brokers or other employees soliciting any person, including the occupant, to sell, rent, move from, or dispose of a dwelling. (St. Louis County only)
- Steering a prospective buyer or tenant away from a dwelling based on their protected class status or discriminate against a buyer or seller by offering different amounts of information, services or facilities due to their protected class status. (St. Louis County only)

These local fair housing ordinances provide exceptions for the sale or rental of single-family homes by private individuals who do not use a real estate broker, agent, or salesperson in any portion of the sales process. These ordinances also exempt the sale or rental of units in a duplex, triplex, or quadraplex, where the owner is currently a resident. Neither O’Fallon nor Florissant identify how these ordinances are administered or enforced in their given sections. However, county ordinances provide more robust response to fair housing complaints.

In its fair housing ordinance, St. Louis County includes sexual orientation and gender identity as protected classes. Here, the St. Louis County Commission on Human Relations is charged with accepting complaints. A person filing a complaint must make their complaint in writing within 6 months of the discriminatory incident. The Commission has 30 days to determine if the complaint has just cause. If just cause is found, Commission members may issue a complaint against the accused party. The Commission may then take up informal methods of addressing the complaint, such as a conference or conciliation. However, if these efforts fail, the Commission will hold a hearing in accordance with the Commission’s Rules of Procedure. Within 20 days, the Commission will either issue a finding of discriminatory practice and issue an order to cease and desist or will issue a finding of no discrimination and dismiss the case. Penalties for violating the county’s fair housing ordinance include a fine of \$50 to \$1,000.

Unlike St. Louis County, St. Charles County omits sexual orientation and gender identity as protected classes under its local fair housing policy but includes recipients of public assistance. In St. Charles County, complaints are made to the county’s Director of the Department of Community Development, who is responsible for investigating discrimination complaints. Again, the Director is charged with using conference or conciliation to address discrimination complaints and can forward complaints to the County Counselor if negotiation tactics fail. Any person conviction of violating the county’s fair housing ordinance can be charged between \$1,000 and \$5,000 and/or be imprisoned for up to one year.

Jefferson County's Fair Housing Resolution states that the county will accept complaints, through its Fair Housing Officer, and will offer conferences and conciliation to help resolve claims of discriminatory practice. While Jefferson County offers no specific enforcement or penalties for violating fair housing laws, the ordinance states that the county will maintain records of alleged violations of fair housing law.

Nuisance Ordinances

A 2017 lawsuit filed against the City of Maplewood, MO alleged that Maplewood used its nuisance ordinance to penalize residents for making multiple police calls. In the lawsuit, a former Maplewood resident stated that her occupancy permit, which allowed her to live in the city, was revoked after she made four calls to the police between September 2011 and February 2012. The plaintiff's calls were distress calls made in response to domestic abuse perpetrated by her boyfriend. An ACLU article reported that city officials were aware of the repeated domestic abuse, but chose to revoke her occupancy permit for 180 days, forcing her to leave the city. In 2018, the city of Maplewood settled with the plaintiff and changed its nuisance laws to exclude any persons calling the law enforcement as victims of a crime.⁴⁵

Nuisance ordinances in the five jurisdictions are not generally as punitive as those in Maplewood. On the whole, public nuisances identified by the local ordinances cover common property maintenance issues. In Florissant, examples of public nuisances include tall grass of eight inches or more, overgrown vegetation, litter, inoperable motor vehicles or vehicle parts, household fixtures stored outdoors (such as toilets and sinks), flammable materials, blighted property, and the storage of dirt, gravel, or concrete in an unsafe manner. Florissant's ordinance states that it will not revoke occupancy permits or take other abatement measures against individuals for making police calls during an emergency.

O'Fallon's nuisance ordinance (see Section 220.010) prohibits a wide range of property maintenance issues, which are resolved through the city's Code Official. The ordinance states that these nuisances may be remedied by revoking a business license, where applicable, or through permanent injunction to prevent the continuation of the nuisance. However, nuisance abatement does not affect a resident's occupancy. St. Louis County, St. Charles County and Jefferson County also focus their nuisance ordinances on property maintenance or petty offenses. For example, St. Louis County uses the term "public nuisance" to refer to offenses such as the illegal sale or manufacture of drugs and illegal gambling. While St. Charles County requires occupancy permits, nuisance ordinances for the three counties do not regulate the number of calls to law enforcement, nor do they tie residents' occupancy permits to nuisance abatement.

⁴⁵ ACLU. (April 10, 2017) "Rosetta Watson v. Maplewood." <https://www.aclu.org/cases/rosetta-watson-v-maplewood>

CHAPTER 7.

PUBLICLY SUPPORTED HOUSING

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

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

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

The now-defunct HOPE VI program was introduced in the early 1990s to revitalize and rebuild dilapidated public housing projects and create mixed-income communities. Although HOPE VI achieved some important successes, the Choice Neighborhoods Initiative program was developed to improve on the



“IN ST. CHARLES COUNTY, IT’S GOTTEN TO WHERE PEOPLE WITH VOUCHERS CAN’T FIND HOUSING. THERE IS NOT A LOT OF QUALITY AFFORDABLE SINGLE-FAMILY HOMES WITH A YARD FOR KIDS. THAT HAS ALMOST ALL BUT GONE AWAY...BECAUSE THEY ARE PRICED ABOVE WHAT THE SUBSIDY AMOUNTS ARE SO THAT PEOPLE CAN’T QUALIFY.”

-STAKEHOLDER

lessons learned from HOPE VI. The scope of Choice Neighborhoods spans beyond housing and addresses employment access, education quality, public safety, health, and recreation.⁴⁶

Current publicly supported housing programs signify a general shift in ideology toward more comprehensive community investment and de-concentration of poverty. However, studies have shown a tendency for subsidized low-income housing developments and residents utilizing housing vouchers to continue to cluster in disadvantaged, low-income neighborhoods. Programmatic rules and the point allocation systems for LIHTC are thought to play a role in this clustering and recent years have seen many states revising their allocation formulas to discourage this pattern in new developments.⁴⁷ The reasons for clustering of HCVs is more complicated since factors in decision-making vary greatly by individual household. However, there are indications that proximity to social networks, difficulties searching for housing, and perceived or actual discrimination contribute to clustering.⁴⁸ This section will review the current supply and occupancy characteristics of publicly supported housing types and its geographic distribution across the region.

SUPPLY AND OCCUPANCY

Low-income residents in Jefferson, St. Charles, and St. Louis Counties receive publicly supported housing through several public housing agencies. These agencies include the Housing Authority of St. Louis County (HASLC), the St. Charles County Housing Assistance, the Housing Authority of the City of St. Charles, the Jefferson Franklin Community Action Corporation (JFCAC) which operates through the Franklin County Public Housing Authority, and the Housing Authority of the City of Festus. The Housing Authority of St. Louis County also manages publicly supported housing for the Hillsdale Housing Authority, the Olivette Housing Authority, the Pagedale Housing Authority and the Wellston Housing Authority.

Housing authorities within the three-county area manage nearly 9,400 housing choice vouchers and over 850 traditional public housing units – some of which are being converted to tenant-based rental assistance. The HASLC is the largest provider of publicly supported housing in the three-county area, with 723 public housing units and 7,264 housing choice vouchers. St. Charles County Housing Assistance and JFCAC also manage larger housing authorities in the region, providing more than 1,800 housing choice vouchers combined. The Housing Authorities of the Cities of Festus and St. Charles are the region’s remaining qualified PHAs (apart from those PHAs managed by the HASLC in Pagedale, Hillsdale, Kirkwood and Wellston) with a total of 126 traditional public housing units and 270 housing choice vouchers.

⁴⁶ Department of Housing and Urban Development. *Evidence Matters: Transforming Knowledge Into Housing and Community Development Policy*. 2011. www.huduser.gov/portal/periodicals/em/EM-newsletter_FNL_web.pdf.

⁴⁷ Dawkins, Casey J. *Exploring the Spatial Distribution of Low Income Housing Tax Credit Properties*. US Department of Housing and Urban Development, www.huduser.gov/publications/pdf/dawkins_exploringliht_assistedhousingrcr04.pdf.

⁴⁸ Galvez, Martha M. *What Do We Know About Housing Choice Voucher Program Location Outcomes? A Review of Recent Literature*. What Works Collaborative, 2010. www.urban.org/sites/default/files/publication/29176/412218-What-Do-We-Know-About-Housing-Choice-Voucher-Program-Location-Outcomes-.PDF.

TABLE 17 – UNITS BY PUBLIC HOUSING AUTHORITY

Housing Units	Public Housing Units	Housing Choice Vouchers
Housing Authority of St. Louis County	509	7,264
Housing Authority of the City of Olivette	14	0
Housing Authority of the City of Kirkwood	100	0
Housing Authority of the City of Pagedale	81	0
Housing Authority of the City of Hillside	22	0
St. Charles County Housing Assistance Program	0	769
Housing Authority of the City of St. Charles	70	270
Franklin County Public Housing Agency	0	1,075
Housing Authority of the City of Festus	56	0

Source: A Picture of Subsidized Housing, 2020

TABLE 18 – PUBLICLY SUPPORTED HOUSING UNITS BY PROGRAM CATEGORY

Housing Type	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Jefferson County								
Public Housing	53	95.0%	3	5.0%	0	0.0%	0	0.0%
Project-Based Section 8	498	90.0%	28	5.0%	6	1.0%	6	1.0%
HCV Program	594	87.0%	75	11.0%	7	1.0%	0	0.0%
0-30% AMI	8,605	96.8%	144	1.6%	120	1.3%	20	0.2%
0-50% AMI	17,740	96.8%	219	1.2%	330	1.8%	45	0.2%
0-80% AMI	33,655	97.3%	329	1.0%	555	1.6%	59	0.2%
Total Households	80,625	97.5%	518	0.6%	1,145	1.4%	369	0.4%
St. Louis County								
Public Housing	116	16.0%	596	82.0%	7	1.0%	7225	1.0%
Project-Based Section 8	1,574	42.0%	1,911	51.0%	37	1.0%	112	3.0%
HCV Program	503	6.0%	7,789	93.0%	84	1.0%	0	0.0%
0-30% AMI	22,040	52.8%	17,145	41.1%	1,129	2.7%	1,430	3.4%
0-50% AMI	48,370	55.9%	33,515	38.7%	2,049	2.4%	2,634	3.0%
0-80% AMI	92,970	59.9%	54,600	35.2%	3,729	2.4%	3,909	2.5%
Total Households	285,195	72.1%	89,490	22.6%	7,479	1.9%	13,579	3.4%
St. Charles County								
Public Housing	34	49.0%	35	50.0%	0	0.0%	1	1.0%
Project-Based Section 8	314	58.0%	206	38.0%	5	1.0%	5	1.0%
HCV Program	594	61.0%	341	35.0%	19	2.0%	0	0.0%
0-30% AMI	7,555	84.9%	665	7.5%	470	5.3%	205	2.3%
0-50% AMI	17,140	86.7%	1,375	7.0%	970	4.9%	295	1.5%
0-80% AMI	36,770	89.0%	2,575	6.2%	1,380	3.3%	580	1.4%
Total Households	128,545	91.5%	6,030	4.3%	3,290	2.3%	2,650	1.9%

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

Source: Decennial Census; CHAS; APSH

Table 18 shows the residents of publicly supported housing in the three counties by race and ethnicity. White residents make up the largest shares of publicly supported housing in Jefferson County, where 95% of traditional public housing residents are white, as are 90% of project-based Section 8 tenants and 87% of housing choice voucher holders. In St. Charles County (including O’Fallon), white residents make up 50%-60% of all publicly supported housing types. In St. Louis County (including Florissant), the share of white residents drops significantly. Here, while 42% of Project-Based Section 8 renters are white, only 16% of public housing residents and 6% of HCV holders are white. In Jefferson County, the share white residents living in publicly assisted housing reflects the shares of white households with low-to-moderate incomes. In St. Charles and St. Louis Counties, white households are underrepresented in publicly supported housing compared to their share of each jurisdiction’s low-to-moderate income families.

Black residents live in publicly-supported housing at the highest rates in St. Louis County, where black residents make up 92% of HCV holders, 82% of traditional public housing and 51% of Project-Based Section 8 tenants. Black renters make up the second largest share of publicly supported housing residents in St. Charles and Jefferson Counties, although in Jefferson County, black residents living in these housing types make up no more than 11% of all residents. Despite their relatively small share of publicly supported housing units in Jefferson County, Black residents are overrepresented in these housing types compared to the population of low-to-moderate Black households. Hispanic and Asian renters make up no more than 3% of any publicly supported housing type in the three jurisdictions. However, these groups are slightly underrepresented in these housing types, compared to Black households.

Table 19 indicates that publicly supported housing represents a very small share of all housing units in the three jurisdictions. In Jefferson and St. Charles Counties, the number of housing choice vouchers come second to LIHTC units in these jurisdictions. LIHTC units make up 1.8% of all housing units in Jefferson County and 1.4% of housing units in St. Charles County. While LIHTC units make up approximately 1% of all units in St. Louis County, the housing choice voucher program represents the largest share of affordable housing units for low-to-moderate income households in the county (1.9% of all units).

TABLE 19 - PUBLICLY SUPPORTED HOUSING UNITS BY PROGRAM CATEGORY AND COUNTY

Housing Units	Jefferson County		St. Charles County		St. Louis County	
	#	%	#	%	#	%
Total housing units	92,150	--	158,414	--	442,243	--
Public housing	56	>0.1%	70	>0.1%	727	0.2%
Project-Based Section 8	553	0.6%	542	0.3%	3,748	0.8%
Other Multifamily	0	0.0%	244	0.2%	1,192	0.3%
HCV program	683	0.7%	974	0.6%	8,375	1.9%
LIHTC	1,645	1.8%	2,193	1.4%	4,754	1.1%

Source: 2014-2018 ACS 5-Year Estimates, Table DP04; APSH

GEOGRAPHY OF SUPPORTED HOUSING

In the maps that follow, the locations of publicly supported housing types in Jefferson County, St. Louis County, Florissant, St. Charles County, and O’Fallon are represented. Publicly supported housing types mapped below include traditional public housing, housing choice vouchers, project-based Section 8, and Section 202 and 811 developments. As the maps indicate, the largest shares of public housing are found in north St. Louis County.

There are a small number of traditional public housing developments remaining in the region, primarily located in St. Louis County. The largest cluster of traditional public housing is found in tract 2139, located in the City of Wellston, and has 200 traditional public housing units. Under the HASLC, these units will be converted to tenant-based rental assistance in coming years. St. Louis County tract 2132.04 (in the City of Maryland Heights) has 130 traditional public housing units and contains two public housing developments, Arbor Hill and Villa Lago. There are also 100 traditional public housing units in tract 2186, located in the City of Kirkwood. Outside of St. Louis County, the Park Ridge development in the City of St. Charles has approximately 69 residences. Lastly, the Festus Housing Authority in southeast Jefferson County contains approximately 55 units.

Housing choice vouchers are the most common type of publicly supported housing available in St. Louis County and the second most common type in Jefferson and St. Charles Counties. North St. Louis County has over 7,000 housing vouchers in the area extending between Overland and Spanish Lake. Nearly 400 vouchers are in use in tract 2119, which sits between the cities of Dellwood, Moline Acres and Ferguson. The second highest rate of voucher use occurs in the Glasgow Village (334 vouchers). This small community is one of the furthest northeast communities in St. Louis County. In St. Charles County, the largest cluster of housing choice vouchers can be found in west O’Fallon, where 131 households in census tract 3119.07 have a voucher. In Jefferson County, the greatest number of vouchers in use in the county (86 vouchers) are found in tract 7006.05. This tract covers a largely unincorporated area in eastern Jefferson County, which also includes the community of Horine and western Pevely.

Project Based Section 8 units provide another form voucher to residents in the region, however, the voucher is vested in the unit instead of the tenant. Several project-based Section 8 projects exist in the region, with the highest clustering of units occurring in the northern portion of the Spanish Lake community in north St. Louis County. Census tract 2107.03 in Spanish Lake is home to the Meadowglen Apartment complex (a PBRA property) and the tract has an estimated 454 PBRA units. Tract 2150.04 which covers the lower portion of Maryland Heights also contains approximately 316 PBRA units.

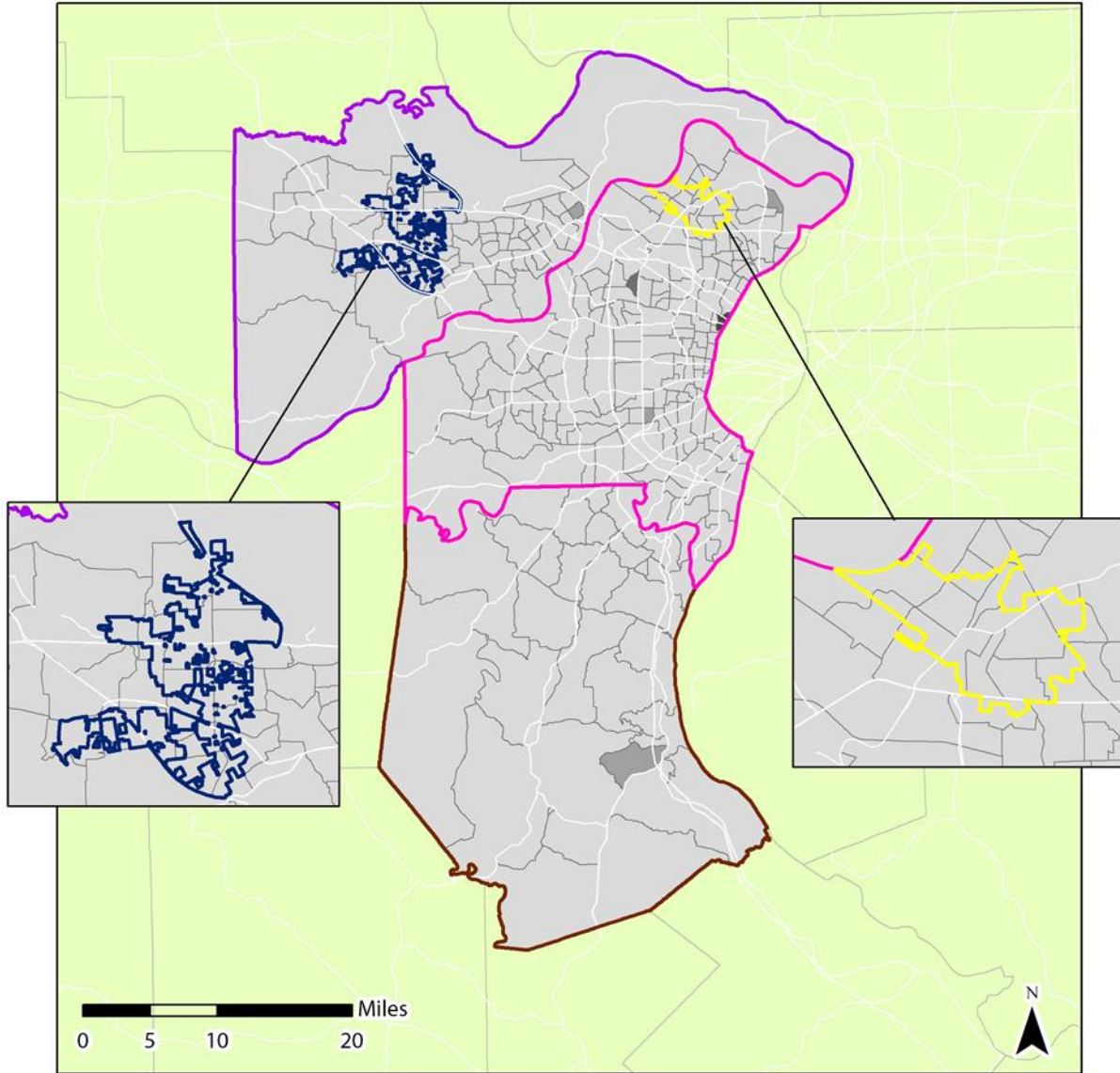
Other publicly supported housing types, including Section 202 housing designed for seniors and Section 811 housing built for persons with disabilities, exists in small numbers throughout the three-county area. Larger shares of Section 202 senior housing are located at the Hilltop Manor in southwest St. Louis County (tract 2215.02) and in Brigdeton at the Holy Angels Apartments (north St. Louis County). Several smaller senior housing sites are scattered in St. Louis County cities such as Florissant, Kirkwood, Concord, Lemay and Oakville, among others. A handful of Section 202 developments are found in St. Charles County near west O’Fallon (Mill Pond Senior Housing), Dardenne Prairie, St. Peters, and St. Charles. Section 811 housing, such as the Gateway Accessible Housing developments in Mehlville and University City offer

small housing facilities for persons with disabilities. However, these units also tend to be located within St. Louis County. The maps discussed here demonstrate that areas outside of St. Louis County have a limited supply of publicly supported housing. This shortage may indicate regulatory and discriminatory impediments which preclude the expansion of these housing types into a wider variety of communities.

LIHTC units (not shown below) offer the remaining form of publicly supported housing in the three-county region. The LIHTC program is the primary source of subsidy for development of affordable housing by the private market. Created by the Federal Tax Reform Act of 1986, the LIHTC program makes available an indirect federal subsidy for investors in affordable rental housing. The value of the tax credits awarded to a project may be syndicated by the recipient to generate equity investment, offsetting a portion of the development cost. As a condition of the LIHTC subsidy received, the resulting housing must meet certain affordability conditions. In Jefferson County, LIHTC units are primarily found in cities such as Festus (384 units), Pevely (376 units) and Imperial (312 units) with smaller LIHTC developments found in Arnold, Crystal City, De Soto, Hillsboro and House Springs. In St. Charles County, the City of St. Charles has the largest number of LIHTC units (761), followed by Wentzville (622 units), St. Peters (434 units) O'Fallon (421 units), and Lake St. Louis (3 units). In St. Louis County, most LIHTC properties are found in unincorporated areas (approximately 1,800 units). Cities in St. Louis County with the largest shares of LIHTC units include Jennings (650 units), University City (320 units), St. Ann (285 units) and Pacific (228 units).

FIGURE 53 – DISTRIBUTION OF PUBLIC HOUSING IN THE ST. LOUIS HOME CONSORTIUM

Traditional Public Housing



Source: A Picture of Subsidized Housing, 2019

Traditional Public Housing Units

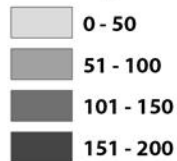
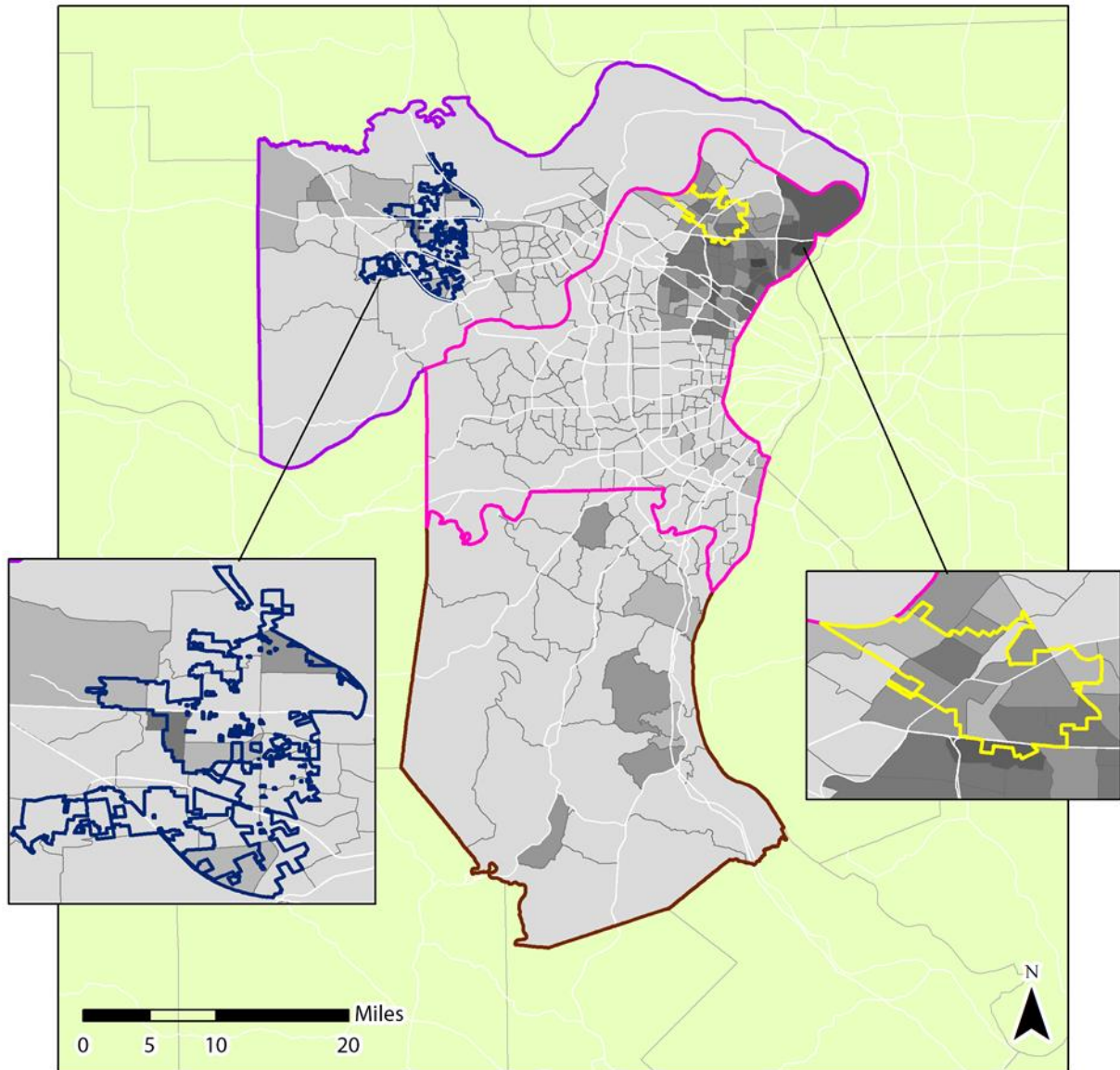


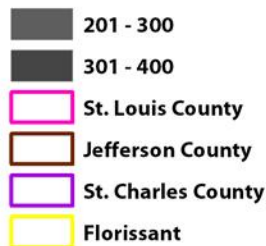
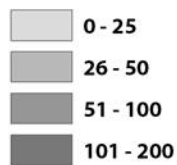
FIGURE 54 – DISTRIBUTION OF HOUSING CHOICE VOUCHERS IN THE ST. LOUIS HOME CONSORTIUM

Housing Choice Vouchers



Source: A Picture of Subsidized Housing, 2019

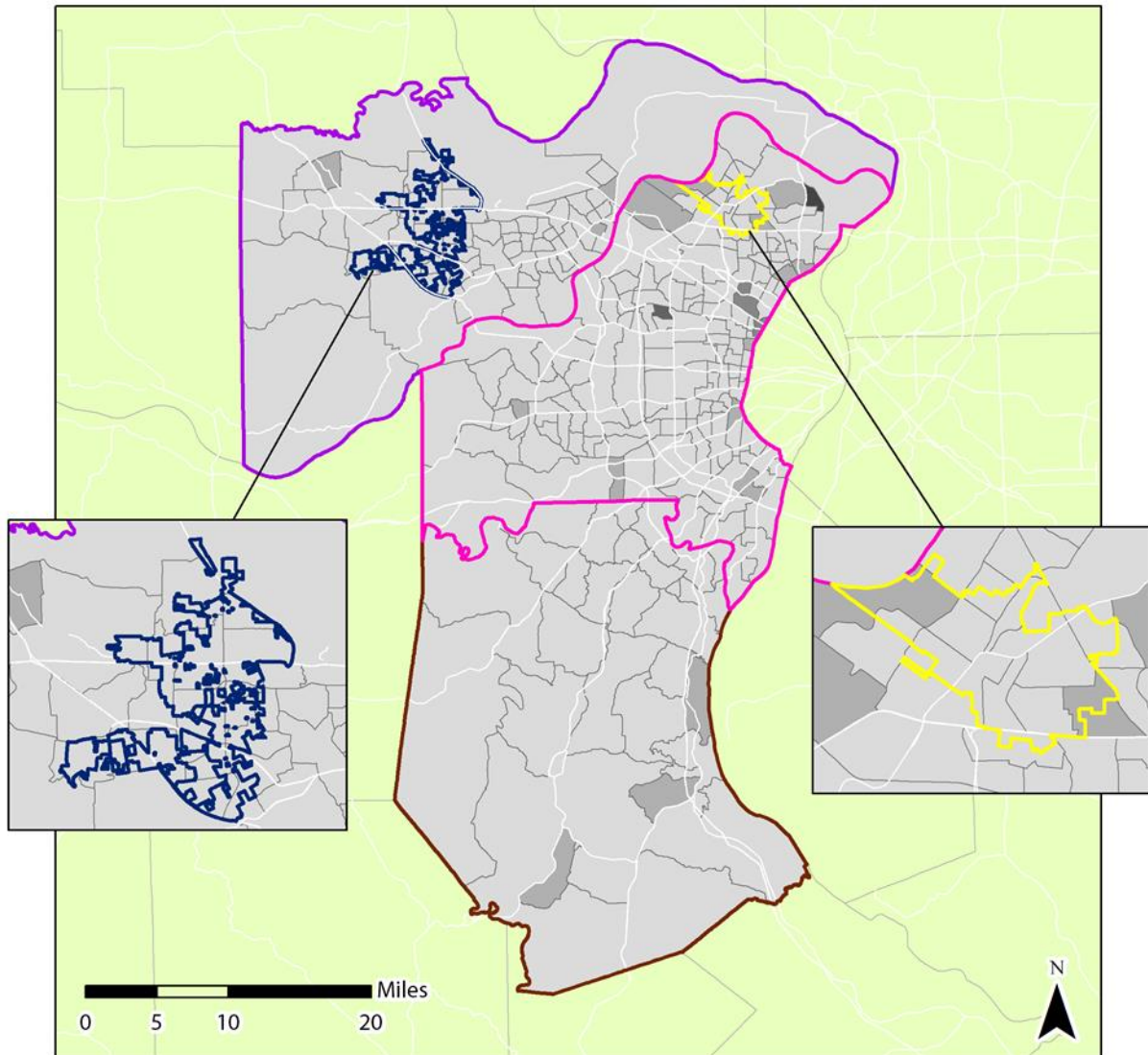
Number of Housing Choice Vouchers



O'Fallon

FIGURE 55 – DISTRIBUTION OF PROJECT BASED SECTION 8 UNITS IN THE ST. LOUIS HOME CONSORTIUM

Project Based Section 8



Source: A Picture of Subsidized Housing, 2019

Project Based Section 8 Units

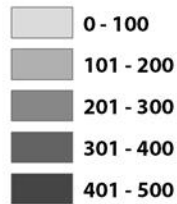
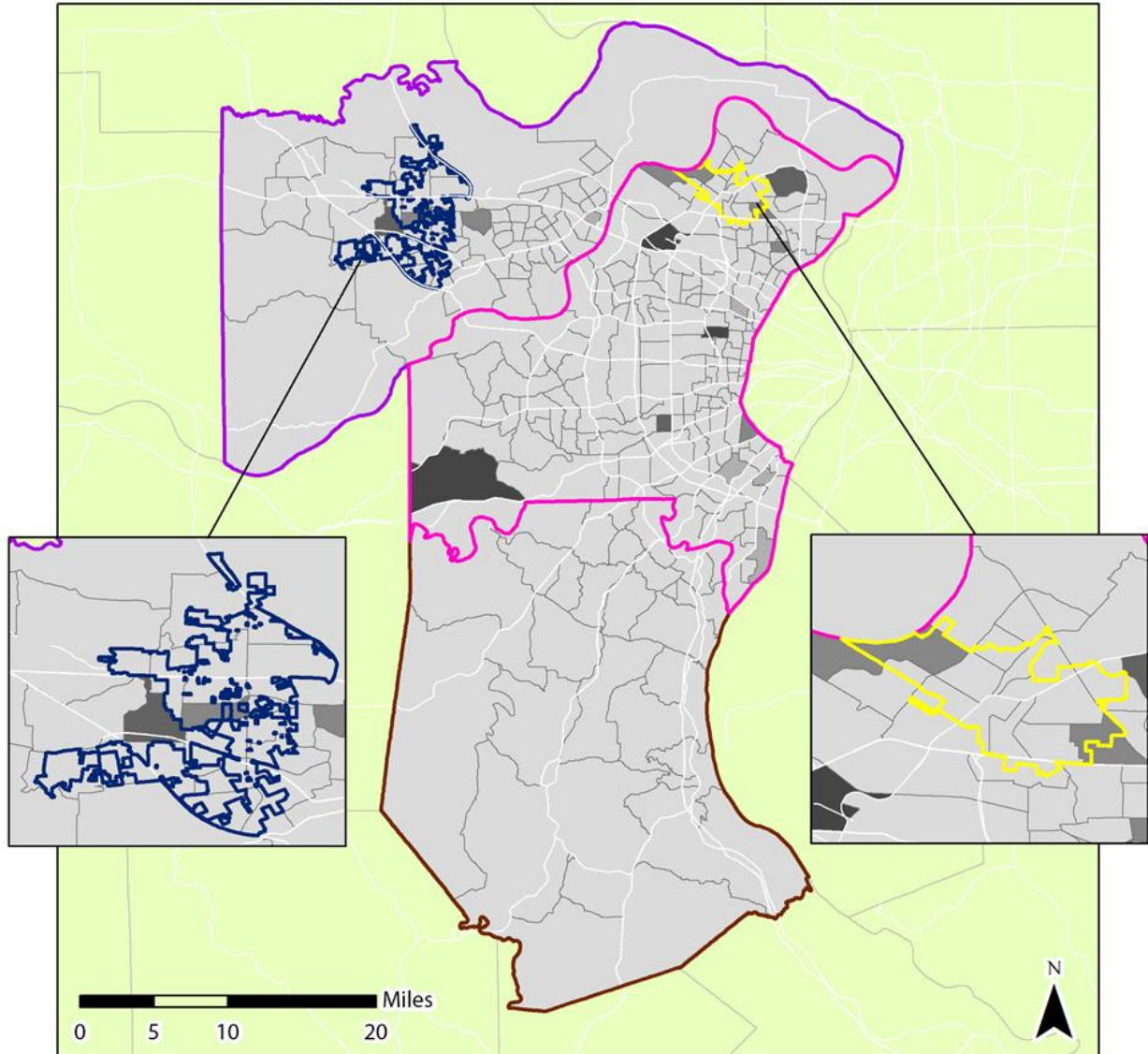


FIGURE 56 – DISTRIBUTION OF SECTION 202 UNITS IN THE ST. LOUIS HOME CONSORTIUM

Section 202 Senior Housing



Source: A Picture of Subsidized Housing, 2019

Section 202 Units

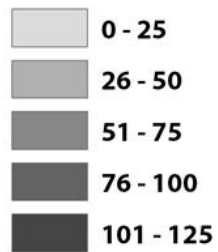
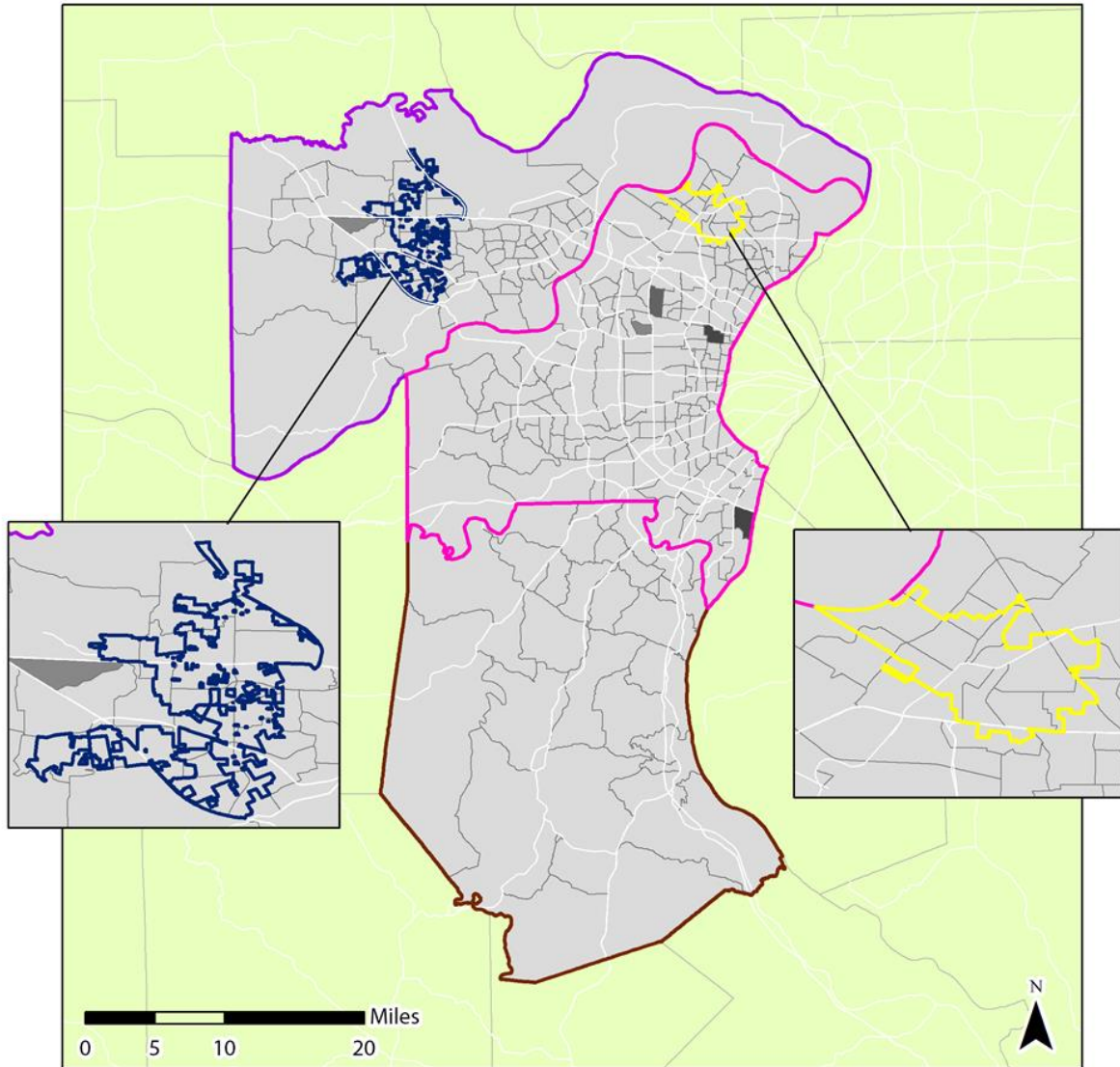


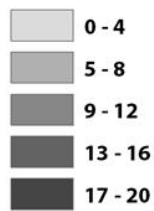
FIGURE 57 – DISTRIBUTION OF SECTION 811 UNITS IN THE ST. LOUIS HOME CONSORTIUM

Section 811 Housing for Persons with Disabilities



Source: A Picture of Subsidized Housing, 2019

Section 811



PHA POLICY REVIEW

Housing Authority of St. Louis County

As required by HUD, the Housing Authority of St. Louis County (HASLC) maintains comprehensive Five-Year Plans with annual plan updates, as well as other program-specific policies. The most pertinent of these policies for review in this analysis is the Admissions and Continued Occupancy Policy (ACOP). These documents set policy for who may be housed by the housing authority and how those tenant households are selected. Four different aspects of these policy documents are examined here: tenant selection, local preference, tenant screening and subsidy standards. These four policy types all allow local determination by HASLC and are among the most central to matters of fair housing choice.

The Housing Authority of St. Louis County's ACOP provides the process by which the housing authority accepts new residents. In screening tenants for selection, the HASLC requires few documents for eligibility. The basic documents for being placed on the HASLC waitlist include income eligibility, based on 80% AMI for the applicant's household size, and information on the applicant's family composition. The housing authority also requests a copy of the social security numbers for all household members. No additional documentation is required until the applicant is scheduled to attend an interview.

Local preference is given to those applicants who have been displaced from other public development or redevelopment projects or have been victims of fire, flood, government condemnation or another major incident not caused by a member of the household. The HASLC may utilize the local preference process to house individuals in the witness protection program or to reach de-concentration and income mixing targets. Applicants seeking local preference can obtain preference based on their substantial employment history or age (62 and older). The ACOP notes that elderly, disabled, and displaced persons receive preference over other single persons.

Eligible applicants are invited to participate in an interview with a site housing manager. During this interview process, the applicant must bring additional information, including documentation on income, assets, family size, disability (if eligible) and any documentation associated with local preference. The HASLC does not require all members of a household to attend an interview. Applicants are accepted into housing after a screening of their income, family composition, elderly/disabled status, local preference, citizenship, criminal history, assets, and other applicable deductions.

The HASLC uses a computer algorithm to match tenants to available units. Per the ACOP, subsidy standards require that households receive the fewest number of bedrooms to accommodate the family size. For example, a single parent with a child under 2 years old of the same sex will be offered a one-bedroom unit. Children of the same sex are required to share a bedroom regardless of age. The largest unit offered to residents will be no larger than one bedroom for every two residents. This subsidy standard is common among housing authorities and poses few regulatory barriers to entry into public housing.

St. Charles County Housing Assistance Program

The St. Charles County Housing Assistance Program (SCCHAP) provides housing choice vouchers throughout St. Charles County outside of the City of St. Charles. SCCHAP policies on tenant screening and selection, local preference, and subsidy standards are outlined in its Administrative Plan.

To be eligible for a housing choice voucher with SCCHAP, applicants must be very low income, have been “continuously assisted” under the 1937 Housing Act, must already live in HUD housing or have been displaced from housing under specific circumstances. Applicant families must also have one family member that is either a US citizen, a US national or a non-citizen with an eligible immigration status. All applicants are screened prior to admission. SCCHAP staff conduct a background check for every adult family member aged 17 and over. Families may be denied a voucher for certain criminal histories including the production and sale of methamphetamine, drug-related or violent criminal activity, placement on a lifetime sex offender registration, or eviction from federally assisted housing.

Tenants are selected to the housing choice voucher program on first-come, first served basis, depending on the date and time of their application. After meeting eligibility requirements, applicants must participate in an eligibility interview. Spouses are encouraged to attend the interview together, but one spouse may also attend the interview as a representative for the family. Tenant selection may also be impacted by local preferences, for example to families that live or work in St. Charles County and to elderly or disabled persons.

Once admitted, voucher holders must select a unit that is appropriate to their family size. For every bedroom, SCCHAP allows a maximum of two additional residents in the household. SCCHAP follows the common practice of requiring persons of the opposite sex (other than spouses), residents of different generations, and unrelated adults to have separate bedrooms.

SCCHAP’s Administrative Plan also includes a Reasonable Accommodation policy, allowing the agency to adequately meet the unique needs of persons with disabilities. Some reasonable accommodations for persons with disabilities include conducting home visits, allowing residents to send applications by mail, permitting higher voucher payment standards to help the tenant find a suitable unit, and posting signs at a height that accommodates wheelchair users. The SCCHAP may also provide accommodations for deaf or blind persons through sign language interpretation, oral explanations, and providing agency materials to third party individuals on the tenant’s behalf.

The Administrative Plan also accommodates families whose first language is not English. For those families needing translation and interpretation, the Admin Plan states that the SCCHAP will consult with grassroots and faith-based organizations to provide these services. If a threshold is met where 50 residents, or 5% of all tenants have a common first language besides English, the SCCHAP plans to print agency materials in that language.

CHAPTER 8.

HOUSING FOR PEOPLE WITH DISABILITIES

According to the U.S. Census Bureau, 19% of the U.S. population had a disability as of 2010. Research has found an inadequate supply of housing that meets the needs of people with disabilities and allows for independent living. The U.S. Department of Housing and Urban Development identified that approximately one third of the nation’s housing stock can be modified to accommodate people with disabilities, but less than 1% is currently accessible by wheelchair users.⁴⁹

Identifying and quantifying existing accessible housing for all disabilities is a difficult task because of varying needs associated with each disability type. People with hearing difficulty require modifications to auditory notifications like fire alarms and telecommunication systems while visually impaired individuals require tactile components in design and elimination of trip hazards. Housing for people that have difficulty with cognitive functions, self-care, and independent living often require assisted living facilities, services, and staff to be accessible.

Studies have found that 55% of renter households that have a member with a disability have housing cost burdens, compared with 45% of those with no disabilities, suggesting that renters with disabilities experience greater affordability challenges than the general renter population, even before accounting for the added costs of accessibility modifications and assisted living arrangements that are often necessary.⁵⁰

In Jefferson County, an estimated 29,268 persons have a disability comprising 13.1% of the county’s population. Older adults (age 65 or older) have the highest disability rate at 38.4%, which is the highest among all jurisdictions in the Consortium. 11.6% of residents age 18 to 64 and 6.8% of children under age 18 have a disability.

The most common disability type in Jefferson County is difficulty with ambulatory movement. People experiencing ambulatory difficulties comprise 6.3% of the county’s total population. People with disabilities that may require extensive assistance, including independent living or self-care difficulties,



“HABITAT FOR HUMANITY HAS MOVED TOWARD UNIVERSAL DESIGN, BUT DEVELOPERS HAVE NOT. THERE ARE MANY PEOPLE WITH DISABILITIES WHO CAN AFFORD TO BUY A HOME, BUT THE DEVELOPERS DON’T DO UNIVERSAL DESIGN. WE NEED PROACTIVE STRATEGIES TO PROMOTE [IT] IF WE WANT TO SEE IT HAPPEN.”

-STAKEHOLDER

⁴⁹ Chan, S., Boshier, L., Ellen, I., Karfunkel, B., & Liao, H. . L. (2015). Accessibility of America’s Housing Stock: Analysis of the 2011 American Housing Survey. U.S. Department of Housing and Urban Development: Office of Policy Development and Research.
⁵⁰ America's Rental Housing 2017. (2017). Joint Center for Housing Studies of Harvard University.

make up 4.4% and 2.2% of the county's population, respectively. The population of people with hearing and vision difficulties make up 3.7% and 2.0% of the county's population, respectively.

There are an estimated 38,879 residents with a disability in St. Charles County, which represents 10.0% of the total population. Like the other jurisdictions in the Consortium, older adults (age 65 or older) have the highest disability rate (30.1%) compared to other age groups, but the disability rate of older adults is the lowest among all jurisdictions in the Consortium. The disability rate for younger age groups is much lower, at 8.0% of residents age 18 to 64, and 4.0% of children under age 17 experiencing one or more disabilities.

The most common disability type in St. Charles County is difficulty with ambulatory movement: 4.7% of county residents have an ambulatory difficulty. Cognitive, independent living, and hearing difficulties are the next most common types of disabilities, each impacting around 3% of residents in the county. People experiencing difficulties with self-care and vision each comprise less than 2% of the total population.

The population with disabilities in St. Louis County is 117,960 and comprises 17.3% of the total population. The population share of persons with disabilities is the highest among all jurisdictions in the Consortium. 30.2% of older adults over the age of 65, 9.1% of people between the ages of 18 and 64, and 5.5% of children under the age of 18 have a disability in St. Louis County.

The most common disability type is ambulatory difficulty, which impacts 6.2% of residents in St. Louis County. Cognitive difficulty is the second-most-common disability type affecting 4.4% of residents. Disabilities that require extensive assistance, such as difficulties with independent living or self-care, make up 4.4% and 2.4% of the population, respectively. Hearing difficulties affect 3.0% of the population and vision difficulties impact 1.9% of St. Louis County residents.

There are 6,308 residents with disabilities in the City of Florissant. Residents with disabilities in the City of Florissant account for 12.2% of the city's total population. Older adult populations over age 65 have the highest disability rate with 31.8% of the older adults experiencing a disability. With a disability rate of 11.1%, residents between the age of 18 and 64 are more likely to have a disability in the City of Florissant compared to other jurisdictions in the Consortium. Similarly, children under the age of 18 are more likely to experience a disability in Florissant with a disability rate of 7.3%, highest among all jurisdictions in the Consortium.

The most common disability type is difficulty with ambulatory movement comprising 6.5% of the City of Florissant's population. Cognitive and independent living difficulties are experienced by 5.1% and 4.5%, respectively, of residents in the city. People experiencing difficulties with self-care and sensory disabilities (hearing and vision) each comprise around 2% of the total population.

The City of O'Fallon has the lowest overall rate of disability (8.4%) among all jurisdictions in the Consortium. Of the 7,289 residents with disabilities, around a third of older adults age 65 and over have a disability. In younger population groups, 10.5% of residents between the age of 18 and 64 and 5.5% of children under age 18 have disabilities.

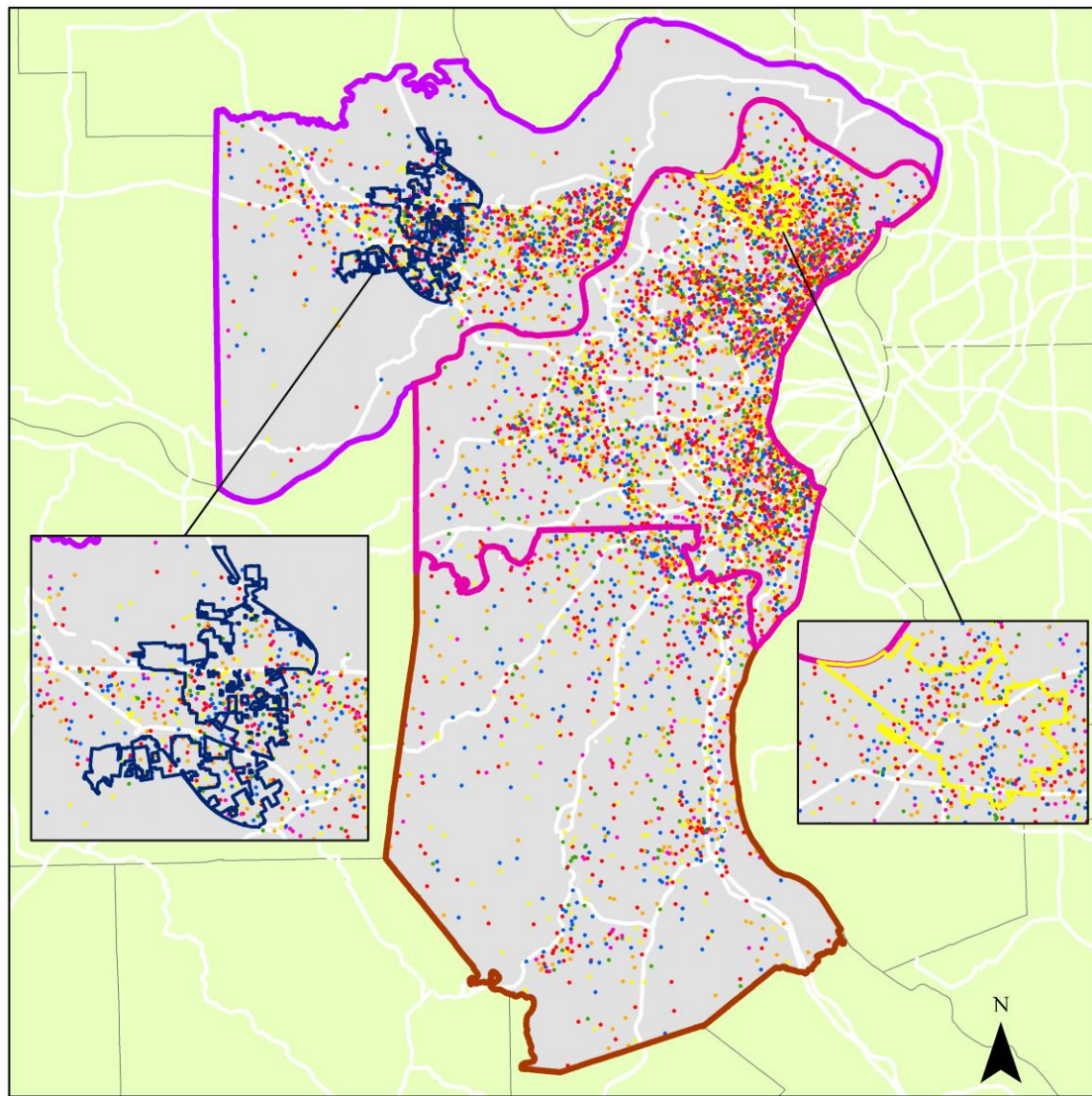
Like other jurisdictions, the most common disability type in O'Fallon is difficulty with ambulatory movement. People experiencing ambulatory difficulties comprise 3.7% of the city's total population. Population shares of people with disabilities that may require extensive assistance (independent living,

2.4% or self-care difficulties, 1.0%) are smaller compared to the region. Cognitive difficulty is the second-most-common disability type affecting 2.9% of residents. The population of people with hearing and vision difficulties make up 2.5% and 1.0% of the city's population, respectively.

The map in Figure 58 shows the spatial distribution of the population with disabilities in the study area. Residents with disabilities appear to be evenly distributed throughout all three counties without any discernible patterns or concentrations other than following general population density patterns.

FIGURE 58 – DISABILITY BY TYPE

Disability by Type



0 3 6 12 18 24 Miles

Source: American Community Survey 5-Year Estimates, 2014-2018

Disability by Type

1 Dot = 50 People

- Ambulatory Difficulty
- Cognitive Difficulty
- Independent Living Difficulty
- Hearing Difficulty
- Self-care Difficulty
- Vision Difficulty

- St Louis County
- St. Charles County
- Jefferson County
- City of Florissant
- City of O'Fallon

TABLE 20 – DISABILITY BY TYPE

Disability Type	St. Charles County		City of O’Fallon	
	#	%	#	%
Hearing difficulty	12,055	3.1%	2,798	4.2%
Vision difficulty	5,787	1.5%	1,885	2.8%
Cognitive difficulty	14,421	3.7%	4,598	6.9%
Ambulatory difficulty	18,352	4.7%	6,463	9.6%
Self-care difficulty	6,386	1.6%	2,091	3.1%
Independent living difficulty	12,654	3.2%	3,997	6.0%

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

Source: 2014-2018 5-Year American Community Survey, Tables B18102 to B18107

Disability Type	St. Louis County		City of Florissant	
	#	%	#	%
Hearing difficulty	29,640	3.0%	1,256	2.4%
Vision difficulty	18,551	1.9%	827	1.6%
Cognitive difficulty	44,407	4.4%	2,623	5.1%
Ambulatory difficulty	61,438	6.2%	3,369	6.5%
Self-care difficulty	23,962	2.4%	1,183	2.3%
Independent living difficulty	44,207	4.4%	2,310	4.5%

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

Source: 2014-2018 5-Year American Community Survey, Tables B18102 to B18107

Disability Type	Jefferson County		St. Louis MSA	
	#	%	#	%
Hearing difficulty	8,230	3.7%	7,005	4.8%
Vision difficulty	4,414	2.0%	5,247	3.6%
Cognitive difficulty	11,228	5.0%	10,373	7.1%
Ambulatory difficulty	14,057	6.3%	15,231	10.4%
Self-care difficulty	5,014	2.2%	4,942	3.4%
Independent living difficulty	9,837	4.4%	9,534	6.5%

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

Source: 2014-2018 5-Year American Community Survey, Tables B18102 to B18107

TABLE 21 – DISABILITY BY AGE GROUP

Age of People with Disabilities	St. Charles County		City of O'Fallon	
	#	%	#	%
Under age 18 with disabilities	1,912	4.0%	507	4.1%
Age 18-64 with disabilities	9,553	8.0%	1,514	5.8%
Age 65+ with disabilities	7,290	30.1%	1,484	36.9%

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

Source: 2014-2018 5-Year American Community Survey, Table B18101

Age of People with Disabilities	St. Louis County		City of Florissant	
	#	%	#	%
Under age 18 with disabilities	6,206	5.5%	463	7.3%
Age 18-64 with disabilities	26,107	9.1%	1,565	11.1%
Age 65+ with disabilities	20,977	30.2%	811	31.8%

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

Source: 2014-2018 5-Year American Community Survey, Table B18101

Age of People with Disabilities	Jefferson County		St. Louis MSA	
	#	%	#	%
Under age 18 with disabilities	1,823	6.8%	17,769	5.5%
Age 18-64 with disabilities	7,570	10.9%	87,799	10.5%
Age 65+ with disabilities	5,360	38.4%	61,405	33.4%

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

Source: 2014-2018 5-Year American Community Survey, Table B18101

ACCESSIBLE HOUSING SUPPLY AND AFFORDABILITY

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

A search for affordable elderly and special needs housing using HUD's Resource Locator tool was conducted to identify affordable rental properties throughout the region designed to serve people with disabilities. The search returned six results in Jefferson County that are designated for elderly and special

needs residents. House Springs Apartments, Pevely Square, Riverview Bend Apartments, Festus Gardens Apartments, Cedar Valley Apartments, and Desoto Apartments.

There are 8 multifamily apartments designated specifically for low-income, elderly, and special needs St. Charles County. Most of these apartments offer only one-bedroom units, however, Fox Hill Apartments and Hidden Valley estates offers a wider range of unit sizes.

In O'Fallon, there are two Section 202-funded multifamily properties primarily designed for seniors, but also available to tenants with disabilities who may not meet the age criteria. These properties, Grace Garden Apartments and Mill Pond Drive Senior Housing, together contain 101 affordable units which are a mixture of efficiency and one-bedroom formats.

St. Louis County has over 40 apartments that are designated to be affordable for elderly and special needs residents. Most of the apartments are located in densely populated areas in the eastern half of the county in close proximity to the city of St. Louis.

There are only five apartments designated for low-income, elderly, and special needs residents within the City of Florissant. They are all located on the periphery of the city rather than in geographically central locations. All of these apartments only offer one-bedroom units.

A similar point-in-time search on socialserve.com for affordable apartments with accessibility features currently for rent in jurisdictions in the Consortium returned a total of 15 results. There are four listings for Jefferson County with monthly rents ranging from \$650 to \$1,000. Only one listing in Jefferson County was specifically listed for elderly and people with disabilities. The search in St. Charles County only returned one listing with a monthly rent of \$785 for a 2-bedroom and 2-bathroom mobile home unit. Listings for the City of O'Fallon show three properties designated as seniors only with a 3 to 6-month waitlist. Monthly rent prices range from \$555 to \$681 for 2-bedroom units. Seven properties were listed in the City of Florissant with monthly rent ranging from \$700 to \$1,550 for units providing up to 3 bedrooms. The search in St. Louis County listed 48 total properties, however, when filtered for elderly and persons with disabilities, no units were listed.

The accessibility features offered varied significantly across listed units and were far from comprehensive. For example, some listings purport to have accessible bathrooms but are not equipped with grab bars. Most listings seemed to only offer incomplete, insufficient, or incorrect information about accessibility features of the units. None of the listings made apparent any accommodations for vision or hearing-related disabilities.

Based on a standard Supplemental Security Income (SSI) payment of \$783 per month (equating to an affordable rent of \$235 or less), it is highly likely that people with disabilities who are unable to work and rely on SSI as their sole source of income face substantial cost burdens and difficulty locating affordable housing. Publicly supported housing (discussed in the previous chapter), is often a key source of accessible and affordable housing for this population.

CHAPTER 9.

FAIR HOUSING ACTIVITIES

FAIR HOUSING COMPLAINTS

The HUD Office of Fair Housing and Equal Opportunity (FHEO) administers federal laws and establishes national policies that ensure that all Americans have equal access to the housing of their choice. An individual in Missouri who believes he or she has been the victim of an illegal housing practice may file a complaint with the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of when the discriminatory practice occurred. Typically, when a complaint is filed with FHEO, a case is opened and an investigation of the allegations of housing discrimination is initiated. During the investigation period, the agency will attempt through mediation to reach conciliation between the parties. If no conciliation agreement can be reached, the FHEO must prepare a final “Determination” report finding either that there is “reasonable cause” to believe that a discriminatory act has occurred or that there is no reasonable cause. If the agency finds “reasonable cause,” HUD must issue a “Charge of Discrimination.” If the investigator determines that there is no “reasonable cause,” the case is dismissed. If a charge is issued, a hearing/trial will be scheduled before an administrative law judge. The ALJ may award the aggrieved party injunctive relief, actual damages, and impose civil penalties; but unlike federal district court, the ALJ may not impose punitive damages. Administrative proceedings are generally more expedited than the federal court trial process. The advantages of seeking redress through the administrative complaint process are that the DFEH/FHEO takes on the duty, time, and cost of investigating the matter for the complainant and conciliation may result in a binding settlement. However, the complainant also gives up control of the investigation and ultimate findings.

Housing discrimination claims may be brought against local governments and zoning authorities and against private housing providers to protect the housing rights and interests of aggrieved individuals and families impacted by discrimination. Local civil rights advocacy groups, such as the Metropolitan St. Louis Equal Housing Opportunity Council (EHOC), and the State of Missouri, through the Missouri Commission on Human Rights (MCHR) may also receive and investigate complaints of housing discrimination on behalf of protected classes.

The remainder of this section presents data on and analysis of housing discrimination complaint filings received by HUD’s FHEO, The MCHR, and the Metropolitan St. Louis Equal Housing and Opportunity Council. In evaluating the data that follows, the number of complaint filings alone should not be interpreted as a measure of the extent of housing discrimination in a jurisdiction. Some communities may have large numbers of filings because of a healthy fair housing climate where residents are educated about their rights and know where to seek help and where strong advocates with a history of success in resolving fair housing issues are available to assist. A second caveat to consider is that a significant number of filed complaints are found not to have cause. Of the 253 housing discrimination complaints reported

by HUD (and further described below), 39% were found to have no cause. Therefore, while a complaint filing typically does suggest a perceived violation, recent HUD data indicates that nearly two in every five complaints does not meet the legal standard for charging a party with having committed housing discrimination.

Complaints Filed with HUD

Region VII of the FHEO receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Missouri and Iowa, Kansas, and Nebraska. 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 discrimination and hate violence.

For the purpose of this report, the Regional FHEO Office in Kansas City provided fair housing complaint data for each of the counties in the study area spanning the past five-year period. The following tables, one for each county, display the bases of complaints received by FHEO by year for 2016 through 2020 (note that the 2020 data is for a partial year; through only June 30). A single complaint can allege housing discrimination on multiple bases, so the numbers in these tables are not representative of the numbers of complaints received but only the number of times each basis was cited in the complaints filed in a given year. The full complaint data as supplied by the FHEO is found in the Appendix.

TABLE 22 – HOUSING DISCRIMINATION COMPLAINT BASES BY YEAR, ST. LOUIS COUNTY

Complaint Bases	2016	2017	2018	2019	2020†	Total
Race	19	11	11	7	9	57
National Origin	4	3	3	0	1	11
Religion	4	3	3	1	0	11
Sex	9	5	8	2	1	25
Disability	18	24	18	12	8	80
Familial Status	1	7	6	2	2	18
Retaliation	4	3	2	3	0	12
TOTAL	49	42	35	22	20	214

†Partial-year data reported through June 30, 2020

Source: HUD Region VII Office of Fair Housing and Equal Opportunity

Housing discrimination complaints originating in St. Louis County cite a disability as the basis of discrimination more often than any other basis. Disability is followed by race and then, with a substantially lower proportion, sex. In most years, complaints on the basis of disability are roughly twice as frequent as those alleging discrimination on the basis of race, however, 2016 and 2020 are exceptions to this trend. The bases of familial status, retaliation, national origin, and religion each appear less than 10% of the time in complaints filed during this period.

TABLE 7 – HOUSING DISCRIMINATION COMPLAINT BASES BY YEAR, ST. CHARLES COUNTY

Complaint Bases	2016	2017	2018	2019	2020†	Total
Race	8	4	3	1	0	16
National Origin	1	0	0	0	2	3
Religion	0	0	0	0	0	0
Sex	1	1	0	0	0	2
Disability	10	8	3	9	0	30
Familial Status	0	0	1	0	0	1
Retaliation	0	1	2	1	0	4
TOTAL	20	14	9	11	2	56

†Partial-year data reported through June 30, 2020

Source: HUD Region VII Office of Fair Housing and Equal Opportunity

Just over half of all the bases named in St. Charles County and Jefferson County-originating complaints was disability status over the 2016-2020 period. In St. Charles County, the second most common complaint basis was race, comprising nearly one in three bases cited. In Jefferson County, familial status follows disability status as the second most common basis of complaint followed by sex. All other bases were named at a frequency of less than 10%.

TABLE 24 – HOUSING DISCRIMINATION COMPLAINT BASES BY YEAR, JEFFERSON COUNTY

Complaint Bases	2016	2017	2018	2019	2020†	Total
Race	1	0	0	1	0	2
National Origin	0	0	0	0	0	0
Religion	0	0	0	0	0	0
Sex	1	0	2	1	0	4
Disability	6	1	5	5	0	17
Familial Status	3	0	1	1	0	5
Retaliation	0	0	2	0	0	2
TOTAL	11	1	10	8	0	30

†Partial-year data reported through June 30, 2020

Source: HUD Region VII Office of Fair Housing and Equal Opportunity

Complaints Filed With the Missouri Commission on Human Rights

The Missouri Commission on Human Rights (MCHR) also receives, investigates, and facilitates resolution of housing discrimination complaints (as well as complaints of discrimination in employment and places of public accommodations) based on race, color, religion, national origin, ancestry, sex, disability, age (in employment only), and familial status (in housing only). The MCHR is tasked with upholding and enforcing the Missouri Human Rights Act (MO. Rev. Stat. Chapter 213 et seq.).

For this analysis, housing discrimination complaint data was requested from the MCHR on September 30, 2020, for data reflecting the total number, the status, and the basis/bases of housing discrimination complaints received for the period July 1, 2015 through June 30, 2020. As of the date of this report, the MCHR had not provided any data in response.

Complaints Filed with Metropolitan St. Louis Equal Housing Opportunity Council (EHOC)

The Metropolitan St. Louis Equal Housing Opportunity Council (EHOC) was established in 1992 as a private, nonprofit fair housing advocacy and enforcement organization. EHOC provides fair housing education and outreach services, and also receives and investigates fair housing discrimination complaints for the Greater St. Louis Area. On behalf of the Consortium members, a request was made to EHOC for data reflecting the total number of housing discrimination complaints received, the basis/bases of all such complaints received, and the status of all such complaints received, for the period July 1, 2015 through June 30, 2020. The following information was provided by EHOC regarding complaints of housing discrimination and EHOC's full data is included in the Appendix.

TABLE 25 – HOUSING DISCRIMINATION COMPLAINTS: EHOC

	Jefferson County	St. Charles County	St. Louis County	Total
Total Filings				
Complaints Filed: July 2015 – June 2020	30	60	373	463
Disposition of Complaints				
Counseled and Closed, No Fair Housing Issue	12	25	211	248
Administratively Closed	12	19	83	114
Conciliated, Settled, or Consent Decree	5	13	53	71
Pending, Case Still Open	1	1	26	28
Basis of Complaints				
Race	2	13	91	106
National Origin	0	2	24	26
Religion	0	0	10	10
Sex	2	3	37	42
Disability	17	35	109	161
Familial Status	5	2	29	36
Sexual Orientation	2	1	3	6
Source of Income	4	7	14	25
Other	9	16	173	198

Source: Metropolitan St. Louis Equal Housing Opportunity Council

From July 1, 2015, through June 30, 2020, EHOc received 463 complaints for alleged housing discrimination occurring in Jefferson County, St. Charles County, or St. Louis County. A majority of the complaint allegations were closed without any conciliation or settlement. These cases reflect allegations that fail to substantiate an act of discrimination. EHOc counsels the complainant in these cases and may make referrals to other organizations for a various types of assistance or follow-up, but there is no formal action taken to further investigate the complaint. Nearly a quarter of complaints are administratively closed, typically because the complainant becomes unresponsive, fails to cooperate, or withdraws the complaint.

During the five-year period analyzed, approximately 15% of the housing discrimination complaints received by EHOc result in a formal action to resolve the discriminatory issue. In these cases, EHOc may negotiate a successful conciliation between the parties or may litigate the issue in court. These complaints are derived from substantiated incidents of housing discrimination.

Among the complaints received by EHOc, the data presented above suggests the category of “other” bases of discrimination is the most common. This category includes the basis of age and other bases not listed as well as complaints with no listed basis (which are often found to contain no fair housing issue). But of the other categories, complaints on the basis of disability (161 complaints; 35% of the total) are most prevalent. Race (106 complaints; 23% of the total) is also a significant basis of fair housing complaint, particularly in St. Louis County, where it falls just a few percentage points behind disability in prevalence. In Jefferson and St. Charles counties, race is a much smaller proportion of the total bases alleged.

FAIR HOUSING LAWSUITS AND LITIGATION

Within this section is a summary of the nature, extent, and disposition of significant housing discrimination lawsuits filed and/or adjudicated between 2015 and November 2020 involving or affecting parties and local governments within the St. Louis County Study Area, and which may impact fair housing choice within the Study Area. The cases chosen for discussion may be broken up into four main fair housing issues: (1) discriminatory lending practices, (2) discrimination based on sex, (3) discrimination based on familial status, (4) discrimination based on disability and reasonable accommodation requests, and (5) the intersection of nuisance ordinances with fair housing rights.

Discriminatory Lending Practices and Redlining

[UNITED STATES V. EAGLE BANK AND TRUST COMPANY OF MISSOURI, CIVIL ACTION NO. 4:15-CV-01492 \(E.D. MO.\)](#)

In September 2015, the Department of Justice and defendant bank filed a joint consent order with the federal district court to resolve allegations that Eagle Bank and Trust Company engaged in a pattern or practice of “redlining” (discriminating on the basis of race whereby a lending institution denies or avoids providing credit services because of the racial demographics of the neighborhood in which the consumer lives) predominately African-American neighborhoods in and around the city of St. Louis in violation of the Fair Housing Act and other federal laws. The DOJ’s investigation and eventual lawsuit originated from information gathered by the Metropolitan St. Louis Equal Housing & Opportunities Council. The Bank

denied it had violated federal fair housing and banking law but, to resolve the litigation, agreed to a program to expand its physical presence, community outreach, marketing, and investment in majority-African-American census tracts of the affected housing markets.

Specifically, the Bank committed to investing \$800,000 in a special financing program to increase the amount of credit the bank extends to majority African-American areas in the Missouri portion of the St. Louis metropolitan area, spend \$75,000 for consumer education and credit repair programs, and spend \$100,000 for outreach to potential customers and promotion of their products and services. Eagle Bank also agreed to open two additional branch locations to serve predominantly African American areas within the Missouri portion of the St. Louis metropolitan area, and to conduct fair lending training for its employees. The case was dismissed in October 2015, with the court retaining jurisdiction to enforce its terms.

Discrimination Based on Sex

[UNITED STATES V. WEBB, CIVIL ACTION NO. 4:16-CV-01400 \(E.D. MO.\) \(FILED AUG. 31, 2016; SETTLED AND DISMISSED APRIL 20, 2018\).](#)

In this lawsuit investigated and brought by the Department of Justice, the government alleged a long and pervasive history of sexual harassment and retaliation by the defendant housing provider against female tenants and prospective tenants in their rental properties in and around St. Louis, O’Fallon, and Florissant. From at least 1994 through at least 2014. The complaint detailed unlawful actions by the defendant such as nonconsensual touching; sexual comments; offering to grant tangible housing benefits in exchange for sex; and taking adverse housing actions, or threatening to take such actions, against female tenants or prospective tenants who objected to, refused, or would not continue to grant sexual favors. The conduct alleged constitutes a pattern or practice of resistance to the full enjoyment of rights granted by the FHA and denial to a group of persons of rights granted by the FHA, which denial raises an issue of general public importance.

The Defendants denied the allegations and any violations of the FHA. Under the terms of the settlement agreement, the defendant property managers are prohibited from entering any of Defendants’ rental properties and prohibited from directly or indirectly performing any property management responsibilities at any residential rental property; prohibited from purposefully or knowingly initiating contact or communications, either directly or indirectly, with any current or former tenant; and defendant property owners must sell or transfer all of their ownership interests in the rental properties. The Defendants also were required to pay \$600,000 to the aggrieved persons and pay a \$25,000 civil penalty to the U.S.

[WALSH V. FRIENDSHIP VILLAGE OF SOUTH COUNTY, CIVIL ACTION NO. 4:18-CV-1222, 352 F.SUPP.3D 920 \(E.D. MO. 2019\) \(FILED JULY 28, 2018\).](#)

Mary Walsh and Bev Nance, a married same-sex couple, sued Friendship Village—a continuing care senior community in St. Louis—after being denied housing because Friendship Village’s cohabitation policy defined marriage as a union between one man and one woman as purportedly “understood in the Bible.” Plaintiffs amended complaint alleged discrimination on the basis of sex in violation of the FHA “because

of her own sex (female) and because of the sex of her spouse (female), since if either Plaintiff had been a man married to a woman, they would not have been denied housing.” The district judge, however, dismissed the action in favor of defendants finding that the claims actually were based on sexual orientation rather than sex alone and, in the district court’s interpretation of Eighth Circuit jurisprudence, the Fair Housing Act does not explicitly protect against discrimination based on sexual orientation.

Plaintiffs appealed the district court’s decision to the Eighth Circuit Court of Appeals. The Eighth Circuit then put the appeal on hold pending the U.S. Supreme Court’s decision in Bostock v. Clayton County, No. 17-1618, 2020 WL 3146686 (U.S. June 15, 2020), an employment discrimination case considering whether an employer who allegedly fired a long-time employee simply for being homosexual or transgender violates Title VII of the Civil Rights Act. After the Supreme Court held in Bostock that discrimination based on sexual orientation necessarily includes discrimination based on sex, the Friendship Village defendants/appellees requested and were granted a motion for the Eighth Circuit to vacate the district court’s judgment and remand the case for further proceedings.

On remand, the district court’s mandated alternative dispute resolution (ADR) conference was held on September 4, 2020, and the parties reached a settlement. As of November 21, 2020, the terms of settlement had not yet been finalized or filed with the district court for approval and stipulation of dismissal of the case, but the pleadings are due by December 9, 2020.

Discrimination Based on Familial Status

[UNITED STATES V. RUPP, CIVIL ACTION NO. 4:19-CV-02644 \(E.D. MO.\) \(FILED SEPT. 26, 2019\).](#)

In this action, the DOJ represents a couple and their minor children following a complaint, investigation, and finding of reasonable cause by HUD that complainants were denied housing based on their familial status in violation of the FHA. Defendants own a residential four-plex apartment property in the city of St. Louis. At the time, the complainants and one minor child had been renting their two-bedroom apartment unit from defendants for over a year. Shortly after signing a lease extension agreement, the complainants gave birth to their second child. At all times relevant to the complaint, the tenants were in compliance with the space requirements/occupancy limits prescribed by the City of St. Louis Code of Ordinances. The complaint alleges that the defendants terminated the tenancy of the complainants because of the birth of their second child. The complaint also alleges that the defendants’ Application Form, Lease Agreement, and correspondence with the HUD complainants state an explicit “no children” policy. Defendant admitted during HUD’s investigation that he had been using a “no children” policy on lease applications and agreements for the past 45 years.

Defendants denied liability under the FHA and have argued that they were justified in terminating the tenancy because the Missouri circuit court had already issued an order for eviction for failure to pay rent. As of November 9, 2020, both parties had filed motions for summary judgment with the district court and the case was still pending adjudication.

METROPOLITAN ST. LOUIS EQUAL HOUSING AND OPPORTUNITY COUNCIL V. JEZEWAJ, CIVIL ACTION NO. 4:13-CV-481 (E.D. MO.) (FILED MARCH 14, 2013; SETTLED AND DISMISSED NOV. 2, 2016).

Plaintiff Metropolitan St. Louis Equal Housing & Opportunity Council (EHOC) is a fair housing advocacy and education nonprofit and HUD FHIP grantee. EHOC investigates, through paired testing and other means, housing providers and other entities covered by the Fair Housing Act and similar laws to ensure their compliance. In matched pair tests, two similarly-situated testers – one of whom is a member of a protected class and the other of whom is not – test the rental application process at the same property for evidence of discriminatory treatment. Between June 6, 2011, and September 20, 2011, EHOC conducted three matched pair tests of the subject property in the city of St. Louis owned, managed, and insured by Defendants. EHOC determined that the results of the June 6-8, July 7-12, and September 20, 2011, matched pair tests indicated that Defendants may be discriminating on the basis of familial status, as well as race and/or color. EHOC’s federal complaint averred that Defendants have frustrated the purpose and diverted the resources of EHOC through the discriminatory acts identified.

On Defendants’ motion for summary judgement, however, the district court found that Plaintiff had not provided sufficient evidence to demonstrate any damages “fairly traceable” to Defendants’ actions with respect to the first familial status test nor the racial discrimination test. On the other hand, the court ruled Plaintiff had established standing on the third matched pair test implicating familial status discrimination that may give rise to a claim against Defendants. That familial status discrimination test involved two female testers, one who purportedly was single and had a 4-year-old child, and the second who purported to be childfree and living with an adult boyfriend. The complaint alleged defendant property manager had refused to make one-bedroom units available for inspection by two-person households with children while indicating a willingness to make the same units available for inspection by two person households without children; informed testers who indicated that they had children that he would not rent to them because of his property insurance’s underwriting policy; and/or informed testers who indicated that they had children that each resident needed to have his or her own room because of his property insurance’s underwriting policy. The court’s order on motion for summary judgment concluded that litigation on that claim could proceed to determine whether and to what extent Defendants’ actions rise to the level of discrimination.

Several months later the parties reached a settlement on this remaining FHA claim, and the case was dismissed on November 2, 2016.

Discrimination Based on Disability or Request for a Reasonable Accommodation

UNITED STATES V. DUNNWOOD, CIVIL ACTION NO. 4:20-CV-00789 (E. D. MO.) (FILED JUNE 17, 2020; SETTLED AND DISMISSED JULY 16, 2020).

The DOJ filed this FHA lawsuit on behalf of a family residing in a 193-unit multifamily rental complex in Hazelwood, Missouri, owned and operated by defendants. The complaint alleged that defendants discriminated against a mom and her two minor children on the basis of disability by refusing to grant complainant’s request for a reasonable accommodation to transfer to a unit at the subject property with fewer steps which would have better accommodated her daughter’s mobility impairment.

The parties settled the lawsuit by consent order entered July 16, 2020, which required the defendants to pay \$44,000 in monetary damages to the complainant's family, and includes injunctive relief, training, monitoring, and a provision requiring defendants to vacate and shield from public disclosure a state court judgment they obtained against the complainant. Defendants were required to adopt and implement a specific written reasonable accommodation policy for receiving and handling requests for reasonable accommodations made by residents or prospective residents with disabilities at the subject property and at all other rental housing owned and/or managed by Dunnwood Acres Apartments, LLC.

[BLISSIT V. HOUSING AUTHORITY OF ST. LOUIS COUNTY, CIVIL ACTION NO. 4:16-CV-00864 \(E.D. MO.\) \(FILED JUNE 15, 2016; TERMINATED NOV. 3, 2016\).](#)

Plaintiff, a single mother with epilepsy, sued the Housing Authority of St. Louis County (HASLC) to try to prevent it from terminating her public housing lease and evicting her and her minor child from their rental unit after she lost her job and fell behind on her rent payments. Plaintiff alleged that HASLC failed to adjust her rent payment to reflect her lost income, wrongfully denied her a grievance hearing to challenge her lease termination, and failed to acknowledge a reasonable accommodation for her disability in violation of the FHA.

HASLC answered that the lease termination was lawful, that Plaintiff did not make monthly rental payments, failed to follow the requirements of her federally subsidized housing lease, and denied that it had violated Plaintiff's rights.

Before the merits of the complaint were adjudicated, the parties reached a settlement without admitting to liability and voluntarily dismissed the lawsuit on November 3, 2016.

Intersection of Local Nuisance Ordinances with Fair Housing Rights

[METROPOLITAN ST. LOUIS EQUAL HOUSING & OPPORTUNITY COUNCIL V. CITY OF MAPLEWOOD, CIVIL ACTION NO. 4:17-CV-886 \(E.D. MO. 2017\) \(FILED MARCH 13, 2017; MOTION FOR RECONSIDERATION AND RELIEF FROM JUDGMENT DENIED MAY 8, 2018\).](#)

In 2006, the city of Maplewood enacted a nuisance ordinance that gave the city authority to revoke a renter's occupancy permit to rent a dwelling or reside at another renter's dwelling where the person is deemed a "nuisance." The Metropolitan St. Louis Equal Housing & Opportunity Council (EHOC) filed a lawsuit under the FHA and Missouri Human Rights Act against the city claiming that the nuisance ordinance discriminates against and disproportionately impacts non-white residents, women, and people with disabilities. Specifically, EHOC averred that the City disproportionately enforces the ordinance against its small African-American population to perpetuate Maplewood's status as a "white" community; the City designated certain residents of a protected class to be nuisances simply because they had been the subject of multiple police calls, regardless of whether they did anything wrong; enforcement of the ordinance punishes victims of domestic violence, particularly African-American women; and the ordinance is enforced against individuals with disabilities, including those with mental illnesses, because of their disabilities.

In ruling on the City’s Motion to Dismiss for failure to state a claim, the district court found that Plaintiff failed to put forth sufficient facts or specific instances that could create an inference that Maplewood had a discriminatory intent or motive in providing favorable treatment to white and/or non-disabled residents had enforced its nuisance ordinance for the purpose of adversely affecting African American residents, women, and/or disabled residents, or any other improper criteria. The court also found that Plaintiff failed to sufficiently plead a causal connection between the alleged discriminatory policy, Maplewood's nuisance ordinance, and the alleged discriminatory disparate impact on African Americans, women, and disabled residents. The court thus granted defendant’s motion to dismiss and terminated the lawsuit on December 8, 2017.

[WATSON V. MAPLEWOOD, CIVIL ACTION NO. 4:17-CV-1268 \(E.D. MO.\) \(COMPLAINT FILED APRIL 7, 2017; SETTLEMENT AGREEMENT AND DISMISSAL SEPT. 28, 2018\).](#)

In another lawsuit challenging Maplewood’s 2006 nuisance ordinance filed shortly after the EHO’s lawsuit, the ACLU represented a former resident of Maplewood who was a victim of repeated domestic violence and on four occasions contacted the city police for protection and assistance at her rental home. The city’s nuisance ordinance allowed for the eviction of residents after three police calls for “peace disturbance or domestic violence” to a residence in under six months. As a result, Maplewood cited the victim for violation of the nuisance ordinance and ordered her to leave her home and banned her from living anywhere in Maplewood for six months. Plaintiff’s lawsuit alleged that the nuisance ordinance had a disproportionate impact on African-Americans, people with mental illness disabilities, and victims of domestic abuse.

The parties reached a settlement agreement requiring Maplewood to pay Plaintiff \$137,000 in damages, amend its municipal code, and re-train its nuisance hearing officers. Maplewood’s revised ordinance includes exceptions against penalty for domestic violence and crime victims and will not penalize residents based on calls for police or emergency services.

In 2019, Florissant similarly amended its public nuisance ordinance to provide that “no enforcement action or abatement will be ordered against an individual who was a victim in the whole or in part of the incidents that formed the basis of the nuisance enforcement action.” Under the amended enforcement provision, no occupancy permit revocation or other abatement measure can be predicated upon the fact that such individual called for police or emergency service.

PAST FAIR HOUSING GOALS AND RELATED ACTIVITIES

Each of the Consortium members (except for HASLC) has previously completed an AI or participated with partners in a regional AI, however, the parties to those previous documents have sifted since they were first created. Jefferson County last prepared an independent AI in 2011, prior to joining the Consortium. In 2013, St. Charles County prepared an AI that covered the County as well as several of its municipalities, including St. Peters. St. Louis County, together with the cities of Florissant and O’Fallon, developed a regional AI in 2014. As a public housing authority, HASLC is not required to conduct an Analysis of Impediments so has no prior set of fair housing goals.

These prior Ais each identified impediments to fair housing choice in the respective jurisdictions and recommended remedial actions to address them. The impediments from each jurisdiction’s prior AI are shown in the tables that follow, along with a statement of the progress made toward addressing them over the intervening period of time.

TABLE 8. ACTIONS TAKEN TO ADDRESS PREVIOUSLY-IDENTIFIED IMPEDIMENTS: JEFFERSON COUNTY

Impediment	Actions Taken Since Previous AI
Jefferson County	
1. Lack of Education and Awareness about Fair Housing	<ul style="list-style-type: none"> The Economic Development Corporation of Jefferson County dedicates a page solely to the HUD entitlement programs on its website in addition to links provided on the Jefferson County website. This allows for posting of public notices, public meetings regarding the CDBG program, applications and information on available programs, as well as fair housing information for residents).
2. Lack of Coordination among Local Governments and Agencies on Fair Housing	<ul style="list-style-type: none"> CDBG staff continually makes effort to identify existing organizations providing services to LMI residents and to participate in community groups such as the Housing Coalition, a focus group comprised of employees and volunteers from the various housing, service and counseling agencies throughout the County (Comtrea, HUD, Community Action, food pantries, Community partnership, etc.). Jefferson County entitlement program staff participated in regular meetings of the Jefferson County Housing Coalition, the Balance of State Continuum of Care, St. Louis HOME Consortium, County Building & Planning Departments and the newly added Jefferson Franklin Community Action meetings to ensure coordination and availability of services.
3. Lack of Measurable Fair Housing Goals	<ul style="list-style-type: none">
4. History of Racial Exclusion Continues to Impact Demographics of Jefferson County	<ul style="list-style-type: none">
5. Lack of Accessible Housing	<ul style="list-style-type: none"> The county continued to further fair housing through its CDBG funded programs which provide for suitable living conditions of existing structures and foster sustainability for its residents.
6. Advertising Media for Rental Housing Are Inadequate	<ul style="list-style-type: none">
7. Lending Disparities Exist Based on Race and Gender	<ul style="list-style-type: none"> The HOME funded Down Payment Assistance program continued to place first time homebuyers into affordable units while utilizing the services of HUD approved counseling agencies.
8. No Homeless Shelters Exist for Families with Children or Women who Are not Victims of Domestic Violence	<ul style="list-style-type: none">

Impediment	Actions Taken Since Previous AI
9. Homeseekers with Limited English Proficiency May Have Difficulty Accessing Housing	•
10. Racial Disparities in Homeownership Rates	• The HOME funded Down Payment Assistance program continued to place first time homebuyers into affordable units while utilizing the services of HUD approved counseling agencies.

TABLE 27. ACTIONS TAKEN TO ADDRESS PREVIOUSLY-IDENTIFIED IMPEDIMENTS: ST. CHARLES COUNTY

Impediment	Actions Taken Since Previous AI
St. Charles County	
1. Scarcity of Affordable Rental Units	• The County has shifted funding to an activity for the development of affordable rental properties. During FY 2018, the County provided funds to a sub recipient to assist in the purchase of four homes which were rehabbed and rented at an affordable rate to low income families.
2. Local Attitudes Resisting Fair Housing Opportunities	• The County Executive signs an annual Proclamation declaring April to be Fair Housing Month. The County also promotes and educates on Fair Housing on its Facebook and Twitter accounts during the month of April. St. Charles County also hosted two seminars for first time homebuyers.
3. Restrictive Zoning for Group Homes	<ul style="list-style-type: none"> • This impediment was addressed by St. Peters when it updated its group home ordinance. Other communities are reviewing or do not have restrictive ordinances. • The City of St. Charles passed an ordinance to relax its zoning law regarding the regulation of group homes. Other cities within the county have also used this ordinance as an example and have done the same.
4. Lack of Public Transportation Options	• St. Charles Urban County administers transportation programs for elderly, disabled and low-income persons. While the programs are limited, they have been successful in assisting many residents with access to transportation.

TABLE 28. ACTIONS TAKEN TO ADDRESS PREVIOUSLY-IDENTIFIED IMPEDIMENTS: ST. LOUIS COUNTY

Impediment	Actions Taken Since Previous AI
St. Louis County	
1. Affordable Housing Options Concentrated in Areas of Low Opportunity	<ul style="list-style-type: none"> •
2. NIMBY / Prejudiced Attitudes	<ul style="list-style-type: none"> • St. Louis County continues to provide EHOc with financial support to carry out fair housing activities such as rental and sales testing.
3. Unreasonably Restrictive Definitions of “Family” and Related Occupancy Permitting Requirements	<ul style="list-style-type: none"> •
4. Limited Housing Options for People with Disabilities	<ul style="list-style-type: none"> • During the underwriting process for all development projects, developers must submit their Affirmative Fair Housing Marketing Plan for approval. These plans describe the proposed marketing of the completed project, including the specific actions that will be taken to provide information and otherwise attract eligible persons in the housing market area to the available housing without regard to race, color, national origin, gender, religion, familial status, or disability.
5. Private Sector Lending Discrimination	<ul style="list-style-type: none"> • St. Louis County continues to provide EHOc with financial support to carry out fair housing activities such as rental and sales testing. • Consortium members and counseling agencies distribute and display fair housing flyers, brochures, and posters when advertising the Down Payment Assistance program.
6. Difficulties with Fair Housing Compliance from Small-Scale Landlords	<ul style="list-style-type: none"> • St. Louis County continues to provide EHOc with financial support to carry out fair housing activities such as rental and sales testing.

TABLE 29. ACTIONS TAKEN TO ADDRESS PREVIOUSLY-IDENTIFIED IMPEDIMENTS: FLORISSANT

Impediment	Actions Taken Since Previous AI
City of Florissant	
1. Affordable Housing Options Concentrated in Areas of Low Opportunity	•
2. NIMBY / Prejudiced Attitudes	•
3. Unreasonably Restrictive Definitions of “Family” and Related Occupancy Permitting Requirements	•
4. Limited Housing Options for People with Disabilities	•
5. Private Sector Lending Discrimination	<ul style="list-style-type: none"> • The City reports incidences of predatory lending practices to the Missouri Attorney General and the F.B.I.; incidences of unfair housing practices are reported to HUD and the Missouri Commission on Human Rights
6. Difficulties with Fair Housing Compliance from Small-Scale Landlords	<ul style="list-style-type: none"> • The City reports incidences of predatory lending practices to the Missouri Attorney General and the F.B.I.; incidences of unfair housing practices are reported to HUD and the Missouri Commission on Human Rights

TABLE 30. ACTIONS TAKEN TO ADDRESS PREVIOUSLY-IDENTIFIED IMPEDIMENTS: O’FALLON

Impediment	Actions Taken Since Previous AI
City of O’Fallon	
1. Imbalance Between Job Centers and Affordable Housing Options	<ul style="list-style-type: none"> • In recent years, six multi-family apartment structures have been completed in O’Fallon that provide affordable workforce and senior housing. These new developments offer a combined total of 760 apartment units, 274 of which are intended specifically for seniors. These properties offer an income-based rental process. • The City partners with the City of St. Charles, a local lending officer, a bank, and the EHOC to provide accurate and insightful information with the goal of bringing more residents into successful homeownership. • The City partners with a local realtor, insurance agent, lender independently, and sits with various Housing groups/teams to work towards more affordable housing options.

Impediment	Actions Taken Since Previous AI
2. NIMBY / Prejudiced Attitudes	<ul style="list-style-type: none"> • To combat negative stereotypes associated with affordable housing, the City of O’Fallon is working with the St. Charles County Housing Task Force to determine the amount of perceived discrimination towards various groups and develop strategies to further fair housing.
3. Unreasonably Restrictive Definitions of “Family” and Related Occupancy Permitting Requirements	<ul style="list-style-type: none"> •
4. Limited Housing Options for People with Disabilities	<ul style="list-style-type: none"> •
5. Need for Alternative Transportation Options	<ul style="list-style-type: none"> •

CHAPTER 10.

IDENTIFICATION OF IMPEDIMENTS

Described below are the fair housing impediments identified in this Analysis of Impediments, along with associated contributing factors and supporting datapoints. The next phase of developing this Analysis of Impediments will entail a series of community meetings to solicit public input on recommendations to address these impediments. The final AI will include a listing of recommended activities to address the impediments along with implementation timeframes and responsible parties.

IMPEDIMENT 1: LOW LABOR MARKET ENGAGEMENT AND LIMITED INCOMES RESTRICT HOUSING CHOICE AND ACCESS TO OPPORTUNITY AMONG PROTECTED CLASSES

APPLIES TO: ST. LOUIS COUNTY, ST. CHARLES COUNTY, JEFFERSON COUNTY, CITY OF FLORISSANT, CITY OF O'FALLON, HOUSING AUTHORITY OF ST. LOUIS COUNTY

Data on educational attainment, unemployment, incomes, and jobs proximity in the region highlight disparities in labor market engagement and access:

- Residents in central and west St. Louis County tend to have the highest levels of educational attainment, while educational attainment tends to be lowest in north St. Louis County and south Jefferson County. The share of residents with bachelor's degrees or higher is lowest among residents of Jefferson County who are Hispanic/ Latino, two or more races, or Black. In St. Louis County, Black residents are the least likely of all racial and ethnic groups to have a bachelor's degree or higher, coinciding with lower levels of educational attainment in areas of north St. Louis County.
- Census tracts in north St. Louis County have unemployment rates greater than 15%. Black residents in Jefferson and St. Louis counties, Native American residents of St. Louis and St. Charles counties, and residents of some other race alone in Jefferson County tend to experience the highest rates of unemployment.
- Median household incomes in the region tend to be lowest in north St. Louis County and highest central and west St. Louis County and parts of St. Charles County, including O'Fallon. Low median household incomes in many of the region's census tracts highlight the fact that a high proportion of households do not have sufficient incomes to afford basic needs.
- Jobs tend to be clustered in parts of central St. Louis County and St. Charles County, while fewer jobs exist in north St. Louis County, Jefferson County, and less densely populated areas of St. Charles County. Responses to the community survey also indicated disparities in access to jobs by area, with residents of outer north St. Louis County reporting the lowest levels of access. Residents and stakeholders who participated in this planning process noted that the lack of public

transportation in parts of the region such as St. Charles County is often a barrier for residents in accessing employment. High proportions of residents all three counties commute outside their county for employment, indicating that a lack of access to vehicles and low levels of public transportation access may be barriers for a high proportion of residents in accessing employment, which for many residents includes commutes across county lines.

Low labor market engagement drives down wages, thus restricting housing choice and access to opportunity. Combined, the region's lower labor market engagement among protected classes and moderate segregation levels contribute to racially and ethnically concentrated areas of poverty.

Place-based strategies allow for the targeting of resources and outreach efforts to areas with high proportions of residents whose housing choices may be limited by low earnings or unemployment. These strategies can be combined with other approaches focused on closing skills gaps and developing career pathways, increasing job creation and quality standards, and raising the wage floor. Further, access to affordable housing close to jobs and transportation services may be particularly important in supporting labor market engagement in the three-county region, as jobs proximity and transportation access are common barriers to accessing employment.

IMPEDIMENT 2: LACK OF ACCESS TO TRANSPORTATION SERVICES IN SOME AREAS OF THE REGION LIMITS HOUSING CHOICES AND ACCESS TO EMPLOYMENT, SERVICES, AND RESOURCES

APPLIES TO: ST. LOUIS COUNTY, ST. CHARLES COUNTY, JEFFERSON COUNTY, CITY OF FLORISSANT, CITY OF O'FALLON

Low levels of access to public transportation in parts of the region creates challenges for residents without access to vehicles in accessing employment, resources, and services. Reduced access impacts not only residents of these counties but also businesses--which residents and stakeholders noted often have trouble hiring and maintaining employees--and workers, who often commute across county lines to their places of employment. Indicators of disparate access to transportation options and related impacts include:

- Transportation costs tend to make up the greatest share of residents' incomes in the western portions of the three counties, areas with the lowest levels of access to public transit. Residents in parts of north St. Louis County also spend a high proportion of income on transportation costs. In these areas of the region, a combination of lower proximity to jobs and high proportions of residents' incomes spent on transportation may present barriers to obtaining and maintaining employment.
- While St. Louis County is served by the MetroLink system, residents and stakeholders noted that the system provides less service further west in the county. Public transit is not available in St. Charles County outside of limited options available in individual municipalities, such as the City of St. Charles. Jefferson County offers limited fixed-route and on-demand services, which serve

eastern and central Jefferson County. Residents and stakeholders living in St. Charles and Jefferson counties who responded to the community survey reported the lowest levels of access to reliable bus service (8.5% and 16.7% of county residents said they have access, respectively).

- Interview participants emphasized that residents of St. Charles County have historically opposed expansion of the MetroLink system in the county. Stakeholders further emphasized that the combination of a lack of affordable housing and lack of public transportation in St. Charles County is a primary barrier for residents in the region in accessing the variety of employment, job training, and educational opportunities that are available in St. Charles County. The lack of affordable transportation options in St. Charles County restricts employment and housing options for residents who cannot afford to live in the county near current or prospective employment opportunities.
- Residents in north St. Louis County have the lowest levels of vehicle access in the region. Residents and stakeholders emphasized that a lack of access to vehicles is often a barrier to employment for residents living in areas with low proximity to jobs and without access to public transportation. The low levels of access to vehicles in north St. Louis County combined with the lack of transportation opportunities to some areas with high concentrations of jobs, such as St. Charles County, suggests barriers to employment and housing choices among protected classes.
- Residents and stakeholders also emphasized that many areas of the region lack sidewalks, making accessing resources and services via walking more difficult and less safe, particularly for residents with disabilities. In this way, low levels of transit and vehicle access may pose a more significant barrier to accessing jobs and services for residents living in areas with low levels of walkability.

IMPEDIMENT 3: INSUFFICIENT HOUSING FOR PEOPLE WITH DISABILITIES

APPLIES TO: ST. LOUIS COUNTY, ST. CHARLES COUNTY, JEFFERSON COUNTY, CITY OF FLORISSANT, CITY OF O'FALLON, HOUSING AUTHORITY OF ST. LOUIS COUNTY

Disability rates among the Consortium's jurisdictions range from 8.4% in O'Fallon to over 17% in St. Louis County and those population shares represent nearly 200,000 residents of the study area who have one or more disabilities. Housing that is accessible and available for people with disabilities is in short supply, particularly in neighborhoods of opportunity that are served by transit and with other important amenities such as retail, healthcare services, and walkability. In the survey conducted as part of this analysis, 50% of respondents said "some more" or "a lot more" housing that is accessible to people with disabilities is needed in the region and 49% described the lack of housing options for this population as a barrier to fair housing, the survey's second highest-rated fair housing barrier. Searches for accessible rental housing using various internet search tools revealed relatively few properties with accessible units to serve this population and many of the existing accessible units have waiting lists. Compounding this lack of units are provisions of local zoning codes that have the effect of making the siting of new housing for this population more challenging.

Local governments have made an effort to increase housing choices for persons with disabilities by permitting congregate housing types called “group homes” under their jurisdictions. However, zoning ordinances in several of these jurisdictions should take additional steps to secure fair housing access for persons with disabilities. Disparate treatment occurs when group homes require conditional use permits for approval in single family or multifamily districts where unrelated individuals without disabilities are permitted to live together under the definition of “family”. Rather than specifying the types of allowable relationships (e.g. blood, marriage, adoption) more progressive zoning models define single family in terms of a “functional family” or “single housekeeping unit” sharing common space, meals, and household responsibilities, and/or leave maximum occupancy per dwelling as a matter of safety regulated by the building code rather than the zoning regulations. In instances where a conditional use permit is required, the process typically requires a public hearing, which might subject this protected housing type to public scrutiny and undue prejudice.

Furthermore, local governments should also be aware that persons who are in recovery from alcohol and substance abuse are considered “persons with disabilities” under the Fair Housing Act. Definitions of disability that intentionally exclude these individuals or prohibit the siting of group homes for persons in recovery, have the effect discriminating against a protected class and limiting their access to fair housing choice.

Finally, none of the five jurisdictions in the Consortium currently has a reasonable accommodation provision in its zoning ordinance. Such a provision would outline a simplified administrative process for the granting of a reasonable accommodation rather than the typical variance or special use permit procedures which subject the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities may impact the outcome. Although some local ordinances provide planning staff discretion in applying these standards to accessibility modifications, but without a codified process, this discretion has potential to be applied unevenly.

IMPEDIMENT 4: LIMITED ACCESS TO QUALITY SCHOOLS DISPROPORTIONATELY IMPACTS RESIDENTS OF COLOR

***APPLIES TO: ST. LOUIS COUNTY, ST. CHARLES COUNTY, JEFFERSON COUNTY, CITY OF FLORISSANT,
CITY OF O’FALLON***

Data on school district performance in the region indicates high levels of segregation by race and income, and disparities in access to proficient schools by race and income among school districts and counties. Residents of north St. Louis County, who are predominantly Black and low-income, have the lowest levels of access to proficient schools in the region. As housing choices—and therefore school choices-- are limited by income, the availability of affordable housing, transportation, and other factors, residents’ ability to access more proficient schools in other locations is often limited.

Disparities in school district performance exist by districts' geography and racial composition. The percentages of students scoring below the basic level on 3rd grade math is highest in the Riverview Gardens, Normandy Schools Collaborative, Ferguson-Florissant, Hazelwood, and Ritenour school districts, which are clustered in and around north St. Louis County and have high proportions of Black students. Districts with the lowest graduation rates tend to have relatively low proportions of white students, indicating that students of color-- and Black students in particular--are more likely to attend school in districts in the region that have lower graduation rates.

Responses to the community survey also indicate disparities in access to proficient schools by area. While 67.3% of all survey respondents reported having access to quality public schools, just 28.6% of residents in outer north St. Louis County said they have access (answered 'yes' when asked whether they have access to quality public schools, rather than 'somewhat' or 'no'). Residents of St. Charles County and south St. Louis County reported the highest levels of access to quality public schools (87.8% and 87.5%, respectively). White residents reported greater access to quality schools (70.4%) than African American or Black residents (63.5%).

These issues point to a need to develop policies and strategies to invest in schools and districts experiencing challenges and to develop housing and other strategies to increase integration by race and income, particularly in highly segregated districts.

IMPEDIMENT 5: LACK OF AFFORDABLE HOUSING SUPPLY PREVENTS MEMBERS OF PROTECTED CLASSES FROM LIVING IN AREAS OF OPPORTUNITY

APPLIES TO: ST. LOUIS COUNTY, ST. CHARLES COUNTY, JEFFERSON COUNTY, CITY OF FLORISSANT, CITY OF O'FALLON, HOUSING AUTHORITY OF ST. LOUIS COUNTY

Housing data for the three-county region indicates that renters, particularly in Florissant, O'Fallon and St. Charles County spend more than \$1,000 on rent at a disproportionately higher rate than renters in the MSA. Regional affordability data further indicates that at average worker wages of \$17.61 per hour, workers cannot spend more than \$905 per month on rent. Affordable housing supply is limited in areas with greater access to jobs and amenities. Anecdotal data from participant interviews indicates that a range of residents are being priced out of these areas of opportunity, such as St. Charles County and west St. Louis County. For example, participants indicated that young residents are unable to purchase starter homes; seniors looking to downsize are unable to find smaller housing units that meet their needs. Housing data confirms that non-family households, as well as large families, are most likely to spend more than 50% of their income on housing costs.

When affordable housing supply is limited through regulatory barriers such as limited land area zoned for triplex, quadraplex, or multi-family use, this exclusivity negatively impacts members of protected classes seeking housing choices. Affordable housing supply, which is also limited by the exclusion of subsidized housing types and programs from jurisdictions, has a similar effect of limiting housing choice.

IMPEDIMENT 6: ONGOING NEED FOR FAIR HOUSING OUTREACH, EDUCATION, AND ENFORCEMENT

APPLIES TO: ST. LOUIS COUNTY, ST. CHARLES COUNTY, JEFFERSON COUNTY, CITY OF FLORISSANT, CITY OF O'FALLON, HOUSING AUTHORITY OF ST. LOUIS COUNTY

The members of the Consortium share a broad need for ongoing outreach, education, and enforcement regarding fair housing, which is evident from public input, local litigation history, complaint filings, and the results of the fair housing survey. Meeting and interview participants named a variety of local organizations that they believed could provide fair housing assistance including EHOC, the Urban League, Arch City Defenders, Land of Lincoln, United Way, municipal governments, and others. Among these, EHOC was the most frequently mentioned and interview subjects tended to agree that the organization has a strong reputation in the region. While the previously named organizations and others do work to increase the community's knowledge of fair housing and work to enforce fair housing law, the community survey conducted as part of this AI indicated that only about half (50.2%) of survey respondents reported knowing their fair housing rights and 39.8% said they did not know where to file a complaint of housing discrimination.

The share of survey respondents who said they had experienced housing discrimination was 5.0% but more than 90% of the time, those instances of discrimination went unreported. The majority (62.5%) stated that they did not file a report because they "did not know what good it would do". This survey data suggests that for every formal housing discrimination complaint filed, as many as 9 other potentially discriminatory incidents go unreported. Complaint data from HUD and EHOC as well as an active history of recent housing discrimination litigation speaks to the dynamic fair housing enforcement climate in the region. Continued education, targeted both to members of the public who rent and own housing as well as the landlords, property managers, lenders, and real estate professionals who lease and sell housing will help to continue to close the gaps in knowledge. Support for the successful fair housing enforcement work (including paired testing, complaint investigation, and litigation) should also be advanced so that, as more residents become aware of their rights and are able to identify discrimination, there is assistance available to resolve the complaints.

IMPEDIMENT 7: CONTINUED NEED FOR NEIGHBORHOOD INVESTMENT AND EXPANDING ACCESS TO OPPORTUNITY IN NORTH ST. LOUIS COUNTY

APPLIES TO: ST. LOUIS COUNTY, CITY OF FLORISSANT, HOUSING AUTHORITY OF ST. LOUIS COUNTY

A lack of access to neighborhood services, facilities, and infrastructure in north St. Louis County presents additional barriers to fair housing in the region. About 44% of survey respondents rated 'neighborhoods that need revitalization and new investment' as a barrier to fair housing, making it the fifth most commonly identified barrier in the region. The following data points indicate a high level of need for

targeted investment in neighborhood resources and infrastructure in north St. Louis County, in particular, to address a lack of access for protected classes:

- About 32% of survey respondents indicated that grocery stores and other shopping are not equally available in their communities; however, the percentage was significantly higher for residents living in inner and outer St. Louis County, where 42.8% of residents said that grocery stores and other shopping are not equally available. Analysis of USDA food access data shows that in many census tracts in north St. Louis County, more than 40% of residents have low incomes and live more than ½ mile from the nearest supermarket. Further, in many north St. Louis County census tracts, between 20% and 30% of households do not have access to a vehicle, indicating that transportation is also a barrier to food access for a high proportion of residents.
- More than 40% of survey participants noted that property maintenance is not provided equally in the region, and residents in outer north St. Louis County were most likely to indicate that property maintenance is not equally available in their communities (57.1% of survey respondents living in outer north St. Louis County). Stakeholders who participated in this planning process related vacancy and property maintenance issues in north St. Louis County to high rates of foreclosure and declines in homeownership following the 2008 foreclosure crisis.
- The St. Louis Regional Health Commission (2018) notes that north St. Louis County has large numbers of uninsured users of safety net primary care, but that significant gaps in safety net primary care service exist in multiple zip codes. North County also has the largest numbers and highest rates of emergency care utilization by uninsured individuals in the St. Louis City/ County region, indicating a need for greater access to primary care and preventive healthcare services for uninsured residents.
- While mapping of park access in the region indicates that large areas of north St. Louis County fall within a 10-minute walk to a park, stakeholders emphasized that the quality and maintenance of parks often varies significantly, and that lower-income areas having less access to a variety of amenities. Environmental health data indicate that brownfields and toxic sites in the region are clustered in north St. Louis County, so that in addition to having lower levels of access to community resources, residents in high-poverty neighborhoods are also more likely have environmental health hazards nearby.

Together, these measures indicate that a lack of access to neighborhood services, facilities, infrastructure, and property maintenance restrict access to fair housing choice by limiting opportunity for residents of north St. Louis County. As public investment in neighborhood facilities, infrastructure, and services drives private investment, a lack of public investment poses barriers to residents' housing choice by furthering disparities in access to opportunity across the region.

IMPEDIMENT 8: NIMBYISM AND PREJUDICE REDUCES HOUSING CHOICE FOR PROTECTED CLASSES

APPLIES TO: ST. LOUIS COUNTY, ST. CHARLES COUNTY, JEFFERSON COUNTY, CITY OF FLORISSANT, CITY OF O'FALLON, HOUSING AUTHORITY OF ST. LOUIS COUNTY

While some other impediments discussed here relate to affordable housing siting decisions by developers or policymakers, this impediment addresses community attitudes that inhibit housing options for protected classes, including racial and ethnic minorities and immigrants. Public input indicated that attitudes and perceptions about multifamily housing and affordable housing impact housing development and housing choice. Stakeholders interviewed for this research noted that developing multifamily rental housing – affordable or market rate – in many areas is difficult due to pushback and Not In My Backyard (NIMBY) sentiments expressed by some residents. While new housing for seniors and people with disabilities was described as generally being more palatable to some existing residents, examples were offered of housing proposals for both of these populations being scrapped due to NIMBYism. The data from the community survey bears out this perspective, detecting a strong bias toward homeownership over rental housing. When asked about housing types needed in their communities, only 13.7% of respondents said their community needed “a lot more” apartments; 42.9% said “no more” apartments were needed. A near inverse response was received when asked about assistance for homebuyers: 13.3% said none was needed, while 28.9% said “a lot more” of this assistance was needed.

In addition to attitudes resisting development of certain *housing* types, many stakeholders also related that racism and prejudices work to oppose certain *groups of people*, based on their race, ethnicity, or other protected characteristics. Stakeholders cautioned that some areas that data may indicate are areas of opportunity are not areas that would be safe for people of color, especially Black families to move to because of racial profiling and microaggressions. Conversely, areas in north St. Louis County that have affordable housing prices and good proximity to transit and other amenities can be perceived as unsafe by white families who may opt instead to live further away in the suburbs where transportation costs are far greater. In general, stakeholders tended to perceive the region as sharply segregated and noted that racism is entrenched, playing an outsized role in the housing options that are available to residents.

TABLE 31 – FAIR HOUSING GOALS AND ACTIVITIES

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment #1: Low labor market engagement and limited incomes restrict housing choice and access to opportunity among protected classes		
<p>Need to increase access to workforce development and employment opportunities, particularly for residents of north St. Louis County and parts of Jefferson County</p>	<ul style="list-style-type: none"> • Continue to collaborate with key stakeholders with the goal of implementing workforce development strategies contained in the St. Louis City/County Comprehensive Economic Development Strategy (2017-2022) (St. Louis County, City of Florissant, Housing Authority of St. Louis County, Ongoing, 2021), including strategies that address to the following goals: <ul style="list-style-type: none"> ○ Develop and expand workforce development programs that focus on technical education, especially for residents living in disadvantaged communities. ○ Develop systems and partnerships that better link educational resources with employment opportunities. • Support resident and employer awareness of and participation in available job and skills training programs, including those available through Jefferson College, Rankin Technical College, Lewis and Clark Career Center, Connections to Success, North East Community Action Corporation, and other community partners (Ongoing, 2021). • Develop or expand paid job training programs (Ongoing, 2021). • Collaborate with residents to understand barriers to accessing existing job training programs, and develop strategies to address these barriers (Ongoing, 2021). • Continue to engage in local hiring for City/County contracts (Ongoing, 2021). • Continue efforts to integrate K-12 systems, higher education institutions, and major employers to ensure educational programs meet employer needs for high-demand jobs that pay living wages, and address any gaps in current programming (Ongoing, 2021). • Fund youth-focused programming, including education, mentoring, and job training (Ongoing, 2021). • Devote resources to expanding the supply of affordable housing options to support residents in accessing housing near employment opportunities. Examine zoning ordinances to ensure they support the development of a diversity of housing types and prices (St. Charles County, City of O’Fallon, St. Louis County, City of Florissant, Ongoing, 2021). • Devote resources to expanding transportation options to support residents in accessing available education and employment opportunities in areas that have jobs and training available but have limited access to transit (Ongoing, 2021). • Include neighborhood residents, business owners, industry representatives, and representatives from neighborhood groups in planning processes for workforce development programs (Ongoing, 2021). 	<p>St. Louis County City of Florissant St. Charles County City of O’Fallon Jefferson County Housing Authority of St. Louis County Workforce development stakeholders Educational Institutions Nonprofit Organizations</p>

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment #2: Lack of access to transportation services in some areas of the region limits housing choices and access to employment, services, and resources		
Need to expand transportation services within St. Charles County and connections to other areas of the region to increase access to employment, education and training, and other opportunities available in St. Charles County.	<ul style="list-style-type: none"> Collaborate with transportation providers in St. Charles County and St. Louis County to discuss unmet transportation needs, and expand upon existing connections to the MetroLink system, such as through the north Hanley station; explore opportunities to further expand routes to meet unmet transportation needs in St. Charles County (Ongoing, 2021). Partner with St. Charles Area Transit and other local and regional transportation stakeholders, service providers, and residents to understand transportation needs and barriers to accessing employment and other opportunities in St. Charles County; devote resources to addressing unmet transportation needs (Ongoing, 2021). Develop a community engagement strategy focused on transportation needs and opportunities in the county, including discussions of the benefits of public transportation and increased regional connectivity for St. Charles County (Ongoing, 2021). 	St. Charles County City of O’Fallon St. Louis County City of Florissant
Need to expand transportation services within Jefferson County and increase connections to other areas of the region.	<ul style="list-style-type: none"> Collaborate with OATS and other local stakeholders to discuss transportation needs and opportunities; seek additional funding to expand access to transportation in Jefferson County and increase connections to other areas of the region (Ongoing, 2021). Explore expanding programs that increase access to transportation opportunities and support residents in accessing employment, education, training, and services throughout the region. Opportunities may include providing bus passes to participants in job training, homeownership, and other programs, or funding nonprofit organizations, institutions, or workforce development programs that support residents in accessing transportation opportunities (Ongoing, 2021). 	Jefferson County
Need to increase access to employment, education, training, and other opportunities and resources, particularly for residents of north St. Louis County.	<ul style="list-style-type: none"> Explore expanding programs that increase access to transportation opportunities and support residents in accessing employment, education, training, and services throughout the region. Opportunities may include expanding the Via Metro pilot program or subsidizing other rideshare programs; providing bus passes to participants in job training, homeownership, and other programs; or funding nonprofit organizations, institutions, or workforce development programs that support residents in accessing transportation opportunities (Ongoing, 2021). 	St. Louis County City of Florissant
Need to ensure local and regional plans reflect the need for improved connectivity and transportation equity in the region.	<ul style="list-style-type: none"> City and County staff should review and provide comments on any proposed local, regional, or state transportation plans to indicate the need for improved connectivity and transportation equity in their communities and the region (Ongoing, 2021). 	St. Charles County City of O’Fallon St. Louis County City of Florissant Jefferson County

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment #3: Insufficient Housing for People with Disabilities		
Insufficient supply of accessible housing exists to serve the needs of people with disabilities in St. Louis County	<ul style="list-style-type: none"> • Consider opportunities to encourage or incentivize the construction of new accessible housing units for people with disabilities. (Ongoing, 2021) • Develop a database to track both families seeking accessible units as well as the number/location of accessible units within the county. (2022) • Utilize accessible housing database to advocate for additional accessible units in new LIHTC projects. (2022) • Create additional local subsidies for developers seeking to build both affordable and accessible units. (2022) • Identify ways to incentivize universal design, including reducing development fees or zoning requirements for projects with both affordable and accessible units. (2022) 	St. Louis County City of Florissant
Insufficient supply of accessible housing exists to serve the needs of people with disabilities in St. Charles County	<ul style="list-style-type: none"> • Consider opportunities to encourage or incentivize the construction of new accessible housing units for people with disabilities, particularly LIHTC projects. (Ongoing, 2021) • Address NIMBYism through consistent education and engagement on accessible housing need. (Ongoing, 2021) • Review studies on messaging (e.g. Framework Institute, “You Don’t Have To Live Here) to identify areas where messaging on housing can be improved. (Ongoing, 2021) • County/city staff should review the design and construction requirements of the Fair Housing Act and compare with local policies to identify areas for improvement. (Ongoing, 2021) 	St. Charles County O’Fallon
Insufficient supply of accessible housing exists to serve the needs of people with disabilities in Jefferson County	<ul style="list-style-type: none"> • Consider opportunities to encourage or incentivize the construction of new accessible housing units for people with disabilities. (Ongoing, 2021) • County staff should continue to partner with agencies such as Disability Resource Association, identifying areas where such agencies can provide input on the county’s design and construction requirements related to improving accessibility. (Ongoing, 2021) 	Jefferson County
Zoning code/land use provisions raise questions about allowable siting and occupancy for housing for people with disabilities	<ul style="list-style-type: none"> • Staff from each jurisdiction’s Planning Department should review the results of the zoning code review and the DOJ/HUD Joint Statement. Where opportunities exist to amend some aspects of the local zoning ordinances, staff will initiate the administrative process for such amendments. (2022) • Consider commissioning further research evaluating municipal zoning codes not reviewed as part of this AI to identify potential fair housing issues (St. Louis County, St. Charles County, and Jefferson County; 2023) 	St. Louis County City of Florissant City of O’Fallon St. Charles County Jefferson County

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment #4: Limited access to quality schools disproportionately impacts residents of color		
Low levels of access to proficient schools for residents of north St. Louis County	<ul style="list-style-type: none"> Partner with school districts, youth- and community development-focused organizations (e.g., Beyond Housing), community institutions, businesses, and residents to identify youth education, mentoring, recreation, and family support needs, particularly in north St. Louis County school districts (Ongoing, 2021). Provide CDBG or other funding for youth education, mentoring, recreation, and family support activities and early childhood programs and services to support school readiness and other aspects of child growth and development (Ongoing, 2021). 	St. Louis County City of Florissant
High housing costs limit access to high-performing school districts	<ul style="list-style-type: none"> Support development of workforce housing in areas with high-performing school districts to reduce affordability barriers to accessing these districts (St. Charles County, City of O’Fallon, Jefferson County, St. Louis County, Ongoing, 2021) Continue and expand individualized counseling through the Mobility Connection program to support residents with Housing Choice Vouchers in accessing high-performing school districts (Housing Authority of St. Louis County, Ongoing, 2021). 	St. Charles County City of O’Fallon Jefferson County St. Louis County City of Florissant Housing Authority of St. Louis County

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment #5: Lack of Affordable Housing Supply Prevents Members of Protected Classes From Living in Areas of Opportunity		
<p>Limited supply of affordable housing disproportionately impacts households of color in St. Charles County</p>	<ul style="list-style-type: none"> • Research, develop, and fund a local affordable housing trust fund to assist with the development of LIHTC and other developments serving low-to-moderate income families. (Q4, 2021) • Consider additional opportunities for mixed use developments that will incorporate both commercial and residential as well as a mix of income limits, e.g. 30% AMI, 60% AMI, 80% AMI, and market rate. (Ongoing, 2021) • Develop and deliver community education around the need for affordable housing and its cultural and economic value to the community. <ul style="list-style-type: none"> a. Develop an adaptable slide deck and presentation on the subject of the value of affordable housing. (2022) b. Establish a small “speakers bureau” of designated county staff or other community partners to deliver the presentation to local groups, both in person and virtually. (2022) c. Market the presentation and available speakers to community groups such as neighborhood/homeowners’ associations, Rotary and other similar clubs, and associations of Realtors, homebuilders, and lenders. (Ongoing, beginning 2023) 	<p>St. Charles County City of O’Fallon</p>
<p>Limited supply of affordable housing disproportionately impacts households of color in St. Louis County</p>	<ul style="list-style-type: none"> • Develop and deliver community education around the need for affordable housing and its cultural and economic value to the community. <ul style="list-style-type: none"> a. Develop an adaptable slide deck and presentation on the subject of the value of affordable housing. (2022) b. Establish a small “speakers bureau” of designated county staff or other community partners to deliver the presentation to local groups, both in person and virtually. (2022) c. Market the presentation and available speakers to community groups such as neighborhood/homeowners’ associations, Rotary and other similar clubs, and associations of Realtors, homebuilders, and lenders. (Ongoing, beginning 2023) • Promote and incentivize the siting of LIHTC developments in areas of opportunity. <ul style="list-style-type: none"> a. For developers proposing LIHTC projects in areas with access to key community resources/opportunity factors, work closely with the developers to increase the competitiveness of their applications through letters of support, provision of data and information, gap financing and other assistance. (2022) 	<p>St. Louis County City of Florissant</p>

<p>Limited supply of affordable housing disproportionately impacts households of color in Jefferson County</p>	<ul style="list-style-type: none"> • Identify opportunities to attract LIHTC developments by reviewing the Qualified Allocation Plans under the LIHTC program to identify local government policies or actions that may positively impact the competitiveness of developers' applications. (Ongoing, 2021) • Consider and adopt zoning code amendments that could increase possibilities for the development of affordable multifamily housing. (Ongoing, 2021) 	<p>Jefferson County</p>
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Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment #6: Ongoing need for fair housing outreach, education, and enforcement		
Residents need continued education regarding their fair housing rights, recognizing discrimination, and how and where to file a housing discrimination complaint.	<ul style="list-style-type: none"> • Fair housing education for tenants, homebuyers, and homeowners should be developed and delivered. <ul style="list-style-type: none"> ○ Review current contracts with providers of fair housing services for opportunities to clarify or reprioritize the scope of work and enhance accountability measures. (Annually, beginning 2022) ○ Review in-house fair housing programming and literature for opportunities to improve messaging and/or shift focus to topics indicated in this report. (Annually, beginning 2022) • As a condition of receiving CDBG public services funding, consider requiring subrecipients to partner with EHOC or another fair housing advocacy organization to host an annual educational event with their clients. (2022) 	St. Charles County City of O’Fallon Jefferson County St. Louis County City of Florissant Housing Authority of St. Louis County EHOC Other fair housing advocacy organizations
Housing industry professionals need continued education regarding their fair housing obligations and strategies for recognizing and dismantling implicit biases.	<ul style="list-style-type: none"> • Fair housing education for lenders, real estate agents, landlords, and property managers should be developed and delivered. <ul style="list-style-type: none"> ○ Review current contracts with providers of fair housing services for opportunities to clarify or reprioritize the scope of work and enhance accountability measures. (Annually, beginning 2022) ○ If needed, issue an RFP to local organizations for funding supporting education for lenders, landlords, and other housing industry professionals. (Annually, beginning 2022) • Consider requiring housing-related businesses and housing industry professionals found to be in violation of city/county codes, business licensing, or other local regulations to attend a fair housing training session as part of the requirements to cure the code or regulatory violation. (2023) 	St. Charles County City of O’Fallon Jefferson County St. Louis County City of Florissant Housing Authority of St. Louis County EHOC Other fair housing advocacy organizations
Fair housing enforcement measures require an ongoing funding commitment.	<ul style="list-style-type: none"> • Consider forming a jointly-funded regional fair housing council made up of the members of the HOME Consortium and other interested partners to coordinate planning and funding for a regional approach to fair housing enforcement. (2022) • Consider setting aside a portion of CDBG or other funding as an annual subgrant to support increased staffing for landlord/tenant litigation or mediation organizations. (2023) • Conduct region-wide fair housing testing specifically in the area of lending. <ul style="list-style-type: none"> ○ Issue an RFP to local organizations for funding supporting testing of the local lending market. (2023) 	St. Charles County City of O’Fallon Jefferson County St. Louis County City of Florissant Housing Authority of St. Louis County

<p>Fair housing advocates have limited visibility and recognition in rural areas.</p>	<ul style="list-style-type: none"> • Work with existing fair housing advocacy organizations in the region to plan an outreach campaign specifically to rural residents that increases local knowledge of EHOC and similar organizations, their respective missions, and the availability of their services to Jefferson County residents (2022). 	<p>Jefferson County EHOC Other fair housing advocacy organizations</p>
---	---	--

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment #7: Continued need for neighborhood investment and expanding access to opportunity in north St. Louis County		
Continued need for neighborhood reinvestment in north St. Louis County	<ul style="list-style-type: none"> Using CDBG or other funding, fund projects that develop, expand, or improve community centers and programming, healthcare facilities and services, and other public facilities, infrastructure, and services in low- and moderate-income census tracts in north St. Louis County (Ongoing, 2021). 	St. Louis County City of Florissant Nonprofit community partners
Lack of access to fresh food retailers in north St. Louis County	<ul style="list-style-type: none"> Using CDBG or other funding, fund projects that increase access to fresh food in low- and moderate-income census tracts with low levels of access, particularly in north St. Louis County (Ongoing, 2021). These may include gap financing to fresh food retailers, farmers markets, mobile food markets, financial support for resident in accessing fresh food, transportation programs, or other programs designed to support access to fresh food in north St. Louis County. 	St. Louis County City of Florissant Nonprofit community partners Fresh food retailers
High percentages of north St. Louis County residents do not have health insurance, and gaps in safety net primary care service exist in multiple zip codes.	<ul style="list-style-type: none"> Using CDBG or other funding, fund projects that increase access to healthcare in low- and moderate-income census tracts with low levels of access, particularly in north St. Louis County. These may include mobile clinics, community-based clinics in underserved areas, transportation assistance to support access to healthcare, community health workers, or sliding scale services for low-income uninsured residents, among other services and facilities (Ongoing, 2021). 	St. Louis County City of Florissant Healthcare service providers Nonprofit community partners
Need to further engage low- and moderate-income communities in planning decisions.	<ul style="list-style-type: none"> Expand community engagement efforts focused on community needs and priorities in low- and moderate-income census tracts, including working with residents and community groups to shape the jurisdictions' approach to community engagement. Implement targeted outreach to engage with residents to identify areas for investment (Ongoing, 2021). 	St. Louis County City of Florissant

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment #8: NIMBYism and prejudice reduces housing choice for protected classes		
NIMBYism threatens otherwise viable housing opportunities for protected classes	<ul style="list-style-type: none"> • Develop and deliver community education around the need for affordable housing and its cultural and economic value to the community. <ul style="list-style-type: none"> ○ Develop an adaptable slide deck and presentation on the subject of the value of affordable housing. (2022) ○ Establish a small “speakers bureau” of designated county staff or other community partners to deliver the presentation to local groups, both in person and virtually. (2022) ○ Market the presentation and available speakers to community groups such as neighborhood/homeowners’ associations, Rotary and other similar clubs, and associations of Realtors, homebuilders, and lenders. (Ongoing, beginning 2023) • Consider conducting a bus or van tour of successful affordable housing properties in the region for local leaders and other interested parties to build public support for additional affordable housing development. (2023) 	<p>St. Charles County City of O’Fallon Jefferson County St. Louis County City of Florissant Housing Authority of St. Louis County</p>
Stakeholder input indicates that prejudiced attitudes by some community members reduces housing choice	<ul style="list-style-type: none"> • Joining where possible with existing efforts by city or county government organizations (such as the St. Louis County Office of Diversity, Equity and Inclusion) and broad-based and trusted local convening institutions (e.g. Forward Through Ferguson, Jefferson College, or Washington University) create and offer a periodic diversity, equity, and inclusion training aimed at local leaders and other interested parties. (2024) • Explore and promote community events and programming such as cultural celebrations and food fairs that celebrate the region’s diversity and encourage interaction among diverse participants in neighborhoods throughout the region. (2022) 	<p>St. Charles County City of O’Fallon Jefferson County St. Louis County City of Florissant Housing Authority of St. Louis County</p>

APPENDIX I

PUBLIC PARTICIPATION RECORD

PUBLIC NOTICES, FLYERS, AND MEDIA

A variety of approaches were used to advertise the planning process and related participation opportunities to as broad an audience as possible, including the general public, as well as nonprofits, service providers, housing providers, and others working with low- and moderate-income households and special needs populations. Due to the COVID-19 pandemic, in-person engagement plans were curtailed, however, a number of alternate approaches were used and achieved a strong level of participation from stakeholders and members of the public. Twenty-seven (27) community stakeholders participated in interviews with the planning team. Participating stakeholders represented a range of viewpoints, including affordable housing, community development and planning, education, transportation, health services, homelessness services, senior services, family services, people with disabilities, and others.

Public notice of community engagement opportunities was given to residents through news announcements on the project website (fairhousingMO.com), social media, and notices in the St. Louis Post-Dispatch newspaper. Project flyers were emailed to more than 80 contacts representing a variety of viewpoints, including elected officials and staff, local government agencies, housing authority staff, housing developers, nonprofit organizations, homeless housing and service providers, mental health service providers, organizations serving people with disabilities, family and senior services, workforce development organizations, and others. Advertisements for the community survey targeted the general public, as well as nonprofits, service providers, housing providers, and others working with low- and moderate-income households and special needs populations.

PUBLIC MEETINGS

PLEASE JOIN US!

The St. Louis HOME Consortium is conducting a regional study of fair housing practices. As an active resident, we need to hear from you!

- **What actions should the partners take to expand housing options in the greater St. Louis region?**
- **What can be done to make communities in the region more open and inclusive?**



Join a Virtual Public Meeting

Jefferson County

Monday, March 15
1:00 PM
Zoom Meeting ID:
875 8650 4187

St. Charles County

Monday, March 15
5:00 PM
Zoom Meeting ID:
847 0242 4825

St. Louis County

Thursday, March 18
5:00 PM
Zoom Meeting ID:
871 6195 5257

Visit the website to register for a meeting
and to learn more about the project:
www.fairhousingMO.com

The St. Louis HOME Consortium is conducting an Analysis of Impediments to Fair Housing Choice (AI). The consortium includes St. Louis County, St. Charles County, Jefferson County, the cities of Florissant and O'Fallon, and the Housing Authority of St. Louis County. The study is required by the U.S. Department of Housing and Urban Development (HUD) so that the Consortium members can continue to receive federal housing and community development funds. For more information about the project, please contact Mosaic Community Planning at (470) 435-6020 or info@mosaiccommunityplanning.com



PUBLIC MEETING

PLEASE JOIN US!

Jefferson County is conducting a study of fair housing practices. As an active resident, we need to hear from you!

- **What actions should the County and its partners take to expand housing options?**
- **What can be done to make Jefferson County a more open and inclusive community?**



Join the Virtual Public Meeting

**Monday
March 15
1:00 PM**

**Zoom Meeting ID:
875 8650 4187**



**Visit the project website to learn more:
www.fairhousingMO.com**

The St. Louis HOME Consortium is conducting an Analysis of Impediments to Fair Housing Choice (AI). The consortium includes St. Louis County, St. Charles County, Jefferson County, the cities of Florissant and O'Fallon, and the Housing Authority of St. Louis County. The study is required by the U.S. Department of Housing and Urban Development (HUD) so that the Consortium members can continue to receive federal housing and community development funds. For more information about the project, please contact Mosaic Community Planning at (470) 435-6020 or info@mosaiccommunityplanning.com



PUBLIC MEETING

PLEASE JOIN US!

St. Charles County and the City of O'Fallon are conducting a study of fair housing practices. As an active resident, we need to hear from you!

- What actions should the County and its Cities take to expand housing options?
- What can be done to make St. Charles County a more open and inclusive community?



Join the Virtual Public Meeting

**Monday
March 15
5:00 PM**

**Zoom Meeting ID:
847 0242 4825**



**Visit the project website to learn more:
www.fairhousingMO.com**

The St. Louis HOME Consortium is conducting an Analysis of Impediments to Fair Housing Choice (AI). The consortium includes St. Louis County, St. Charles County, Jefferson County, the cities of Florissant and O'Fallon, and the Housing Authority of St. Louis County. The study is required by the U.S. Department of Housing and Urban Development (HUD) so that the Consortium members can continue to receive federal housing and community development funds. For more information about the project, please contact Mosaic Community Planning at (470) 435-6020 or info@mosaiccommunityplanning.com



PUBLIC MEETING

PLEASE JOIN US!

St. Louis County, Florissant, and the Housing Authority of St. Louis County are conducting a study of fair housing practices. As an active resident, we need to hear from you!

- What actions should the County and its partners take to expand housing options?
- What can be done to make St. Louis County a more open and inclusive community?



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FOR IMMEDIATE RELEASE

Contact: Jeremy Gray, Principal, Mosaic Community Planning
Phone: 470-435-6020
Email: jeremy@mosaiccommunityplanning.com

ST. LOUIS HOME CONSORTIUM FAIR HOUSING STUDY

Study Will Guide Local Investments in Housing and Community Development

The St. Louis HOME Consortium is conducting an Analysis of Impediments to Fair Housing Choice (AI). **The consortium includes St. Louis County, St. Charles County, Jefferson County, the cities of Florissant and O'Fallon, and the Housing Authority of St. Louis County.** The study identifies barriers to equal access to housing and neighborhood opportunities and proposes strategies to overcome those barriers. It is required by the U.S. Department of Housing and Urban Development (HUD) so that the Consortium members can continue to receive federal housing and community development funds.

The community's opinions and perceptions are an important part of this planning process, and everyone is invited to participate. Community input will provide essential information to local policymakers, city and county staff, housing providers, social service providers, lenders, and affordable housing advocates.

Residents can learn more about the project and take an online survey at www.fairhousingmo.com/take-the-survey. To be notified when drafts of the study are available, please subscribe to our mailing list at www.fairhousingmo.com/contact-us.

For more information, please contact Mosaic Community Planning at (470) 435-6020 or info@mosaiccommunityplanning.com.

###

Mosaic Community Planning, LLC – At the Intersection of People and Places

195 Arizona Avenue NE, Suite 123, Atlanta, GA 30307 | 470.435.6020 |
www.mosaiccommunityplanning.com

https://www.stltoday.com/pr/news/regional-fair-housing-study/article_74287d1a-1a1f-11eb-9892-5cb9017b8d1b.html

CONTRIBUTED

Regional Fair Housing Study

guest1518
Oct 29, 2020

Subscribe for \$5 for 5 months

ST. LOUIS HOME CONSORTIUM FAIR HOUSING STUDY

Contact: Jeremy Gray, Principal, Mosaic Community Planning

Phone: 470-435-6020

Email: jeremy@mosaiccommunityplanning.com

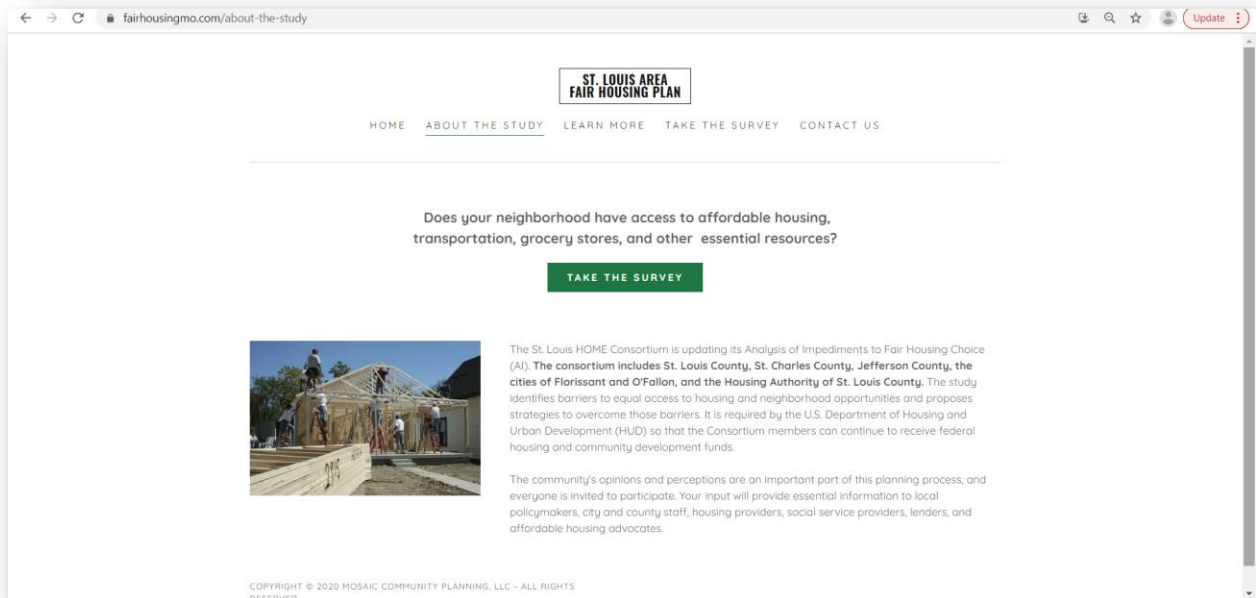
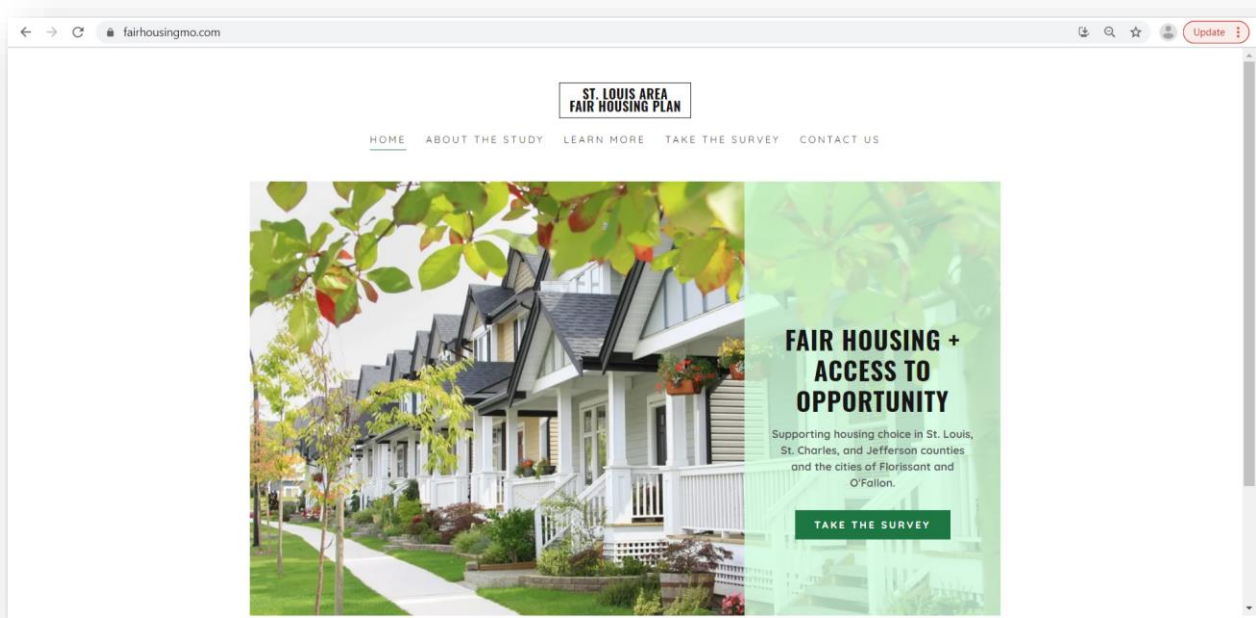
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For more information, please contact Mosaic Community Planning at (470) 435-6020 or info@mosaiccommunityplanning.com.

PROJECT WEBSITE IMAGES (FAIRHOUSINGMO.COM)



**ST. LOUIS AREA
FAIR HOUSING PLAN**

HOME ABOUT THE STUDY LEARN MORE TAKE THE SURVEY CONTACT US

Local Resources



Read more about the St. Louis HOME Consortium and its programs on the [St. Louis County website](#).

National Resources



Check out [HUD's website](#) to learn more about the fair housing planning process.

**ST. LOUIS AREA
FAIR HOUSING PLAN**

HOME ABOUT THE STUDY LEARN MORE TAKE THE SURVEY CONTACT US

We'd love to hear your input. Take the survey here.

SURVEY

**ST. LOUIS AREA
FAIR HOUSING PLAN**

Name

Email*

Message

SEND

Have something to share?

- What types of housing are available in your community?
- Does your neighborhood have access to good schools, jobs, transportation, healthcare, and grocery stores?
- What barriers limit the range of housing option available to you?
- Do you know what to do if you feel you have experienced housing discrimination?

Please use this contact form to share your thoughts on these questions or any other topics related to fair housing in the St. Louis area.

This site is protected by reCAPTCHA and the Google Privacy Policy and Terms of Service apply.

SUBSCRIBE

Content Revisions to Adapt Site for Public Comment Period

**ST. LOUIS AREA
FAIR HOUSING PLAN**

[HOME](#) [ABOUT THE STUDY](#) [LEARN MORE](#) [JOIN A MEETING](#) [CONTACT US](#)

Review the Report Summaries

An executive summary of the draft Analysis of Impediments report is available for each of the jurisdictions in the HOME Consortium. For an overview of the research and findings, click below to download the executive summaries.

To share your input on recommendations that should be included in the final report to help guide the partners toward addressing the fair housing barriers, please [join a meeting](#).

Florissant Executive Summary (pdf)	Download
Jefferson County Executive Summary (pdf)	Download
O'Fallon Executive Summary (pdf)	Download
St. Charles County Executive Summary (pdf)	Download
St. Louis County Executive Summary (pdf)	Download

**ST. LOUIS AREA
FAIR HOUSING PLAN**

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Join a Virtual Public Meeting!

Three virtual public meetings will be held to share research and findings and to hear from residents their ideas for solutions and strategies that can address the identified fair housing barriers. Please register for a meeting below.

<p>Jefferson County Meeting</p> <p>Monday, March 15 1:00 - 2:00 p.m.</p> <p>REGISTER</p>	<p>St. Charles County Meeting</p> <p>Monday, March 15 5:00 - 6:00 p.m.</p> <p>REGISTER</p>	<p>St. Louis County Meeting</p> <p>Thursday, March 18 5:00 - 6:00 p.m.</p> <p>REGISTER</p>
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PUBLIC MEETING SLIDES, ATTENDEES, AND COMMENTS



1

THE ST. LOUIS HOME CONSORTIUM

- City of Florissant
- City of O'Fallon
- Jefferson County
- St. Charles County
- St. Louis County
- The Housing Authority of St. Louis County (HASLC)

St. Louis County
St. Charles County
Jefferson County
City of Florissant
City of O'Fallon

2

“Taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics”

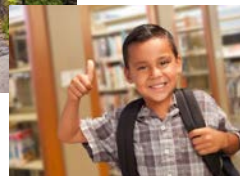
-HUD AFFH Final Rule

AFFIRMATIVELY FURTHERING FAIR HOUSING

3

WHAT IS AN ANALYSIS OF IMPEDIMENTS?


- Analysis of the regional fair housing landscape
- Four specific fair housing issues:
 - Integration and segregation
 - Areas of poverty
 - Access to opportunity
 - Housing need
- Fair housing priorities and goals



4

**ST. LOUIS AREA
FAIR HOUSING PLAN**

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**FAIR HOUSING +
ACCESS TO
OPPORTUNITY**

Supporting housing choice in St. Louis, St. Charles, and Jefferson counties and the cities of Florissant and O'Fallon.

JOIN A MEETING

Review the Report Summaries

An executive summary of the draft Analyses of Impediments report is available for each of the jurisdictions in the HOME Consortium. For an overview of the research and findings, click below to download the executive summaries.

To share your input on recommendations that should be included in the final report to help guide the partners toward addressing the fair housing barriers, please [join a meeting](#).

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O'Fallon Executive Summary (pdf)	Download
St. Charles County Executive Summary (pdf)	Download
St. Louis County Executive Summary (pdf)	Download

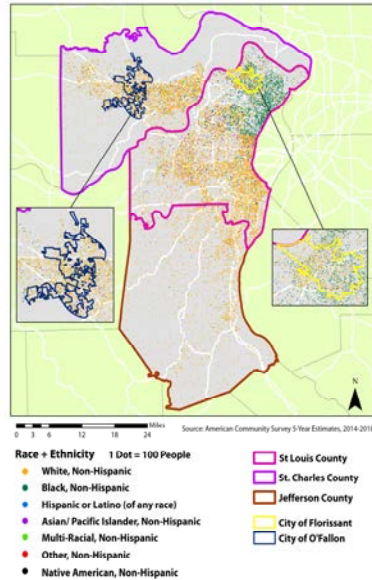
5

RACIAL AND ETHNIC SEGREGATION

Race/Ethnicity	1990	2000	2010
St. Louis County			
Black/White	69.3	70.6	71.3
Hispanic/White	14.3	20.2	28.5
St. Charles County			
Black/White	22.1	17.4	21.0
Hispanic/White	10.2	15.3	19.9
Jefferson County			
Black/White	61.8	46.1	27.8
Hispanic/White	11.6	9.9	14.5
City of Florissant			
Black/White	20.6	23.7	31.4
Hispanic/White	8.1	10.0	11.4
City of O'Fallon			
Black/White	32.8	10.9	9.1
Hispanic/White	9.0	8.8	10.6
St. Louis Region			
Black/White	77.2	73.3	70.6
Hispanic/White	23.4	27.7	30.5

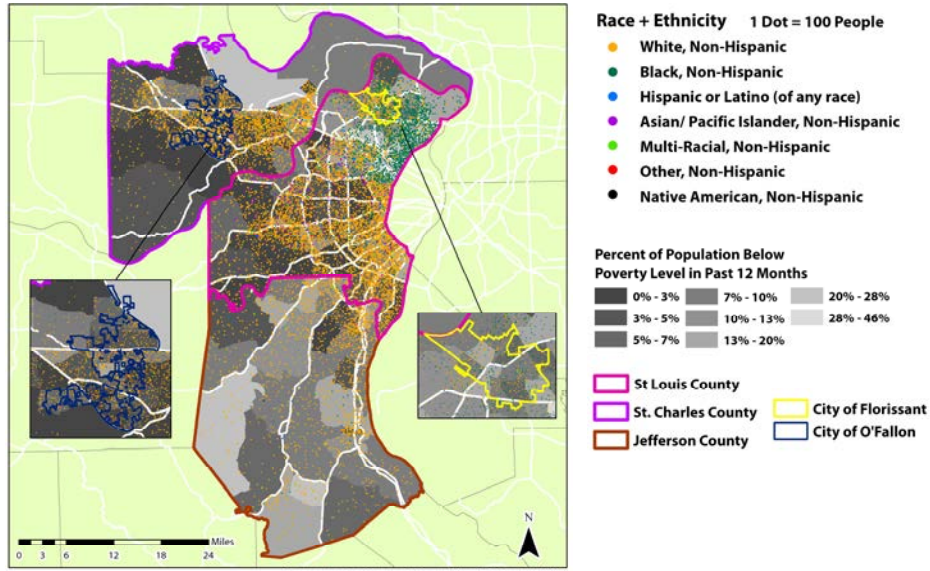
Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

Race/Ethnicity, St. Louis HOME Consortium, 2014-2018



6

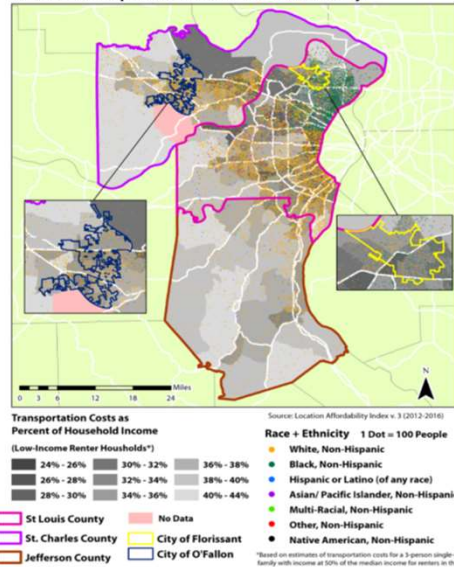
AREAS OF CONCENTRATED POVERTY



7

ACCESS TO OPPORTUNITY

Low-Cost Transportation Access + Race/ Ethnicity



- Labor Market Engagement
- Jobs Proximity
- Education
- Access to Affordable Transportation
- Walkability
- Access to Parks
- Environmental Hazards
- Food Access
- Healthcare Access

8

HOUSING NEEDS

DEMOGRAPHICS OF HOUSEHOLDS WITH DISPROPORTIONATE HOUSING NEEDS

Disproportionate Housing Needs	Jefferson County		
	# with problems	# of households	% with problems
White, Non-Hispanic	19,500	80,625	24.2%
Black, Non-Hispanic	203	518	39.2%
Hispanic	295	1,145	25.8%
Asian or Pacific Islander, Non-Hispanic	85	369	23.0%
Native American, Non-Hispanic	64	229	27.9%
Other, Non-Hispanic	225	855	26.3%
Total	20,372	83,741	24.3%

9

IMPEDIMENT #1

Low labor market engagement and limited incomes restrict housing choice and access to opportunity among protected classes

10

IMPEDIMENT #2

Lack of access to transportation services in some areas of the region limits housing choices and access to employment, services, and resources

11

IMPEDIMENT #3

Insufficient housing for people with disabilities

12

IMPEDIMENT #4

Limited access to quality schools disproportionately impacts residents of color

13

IMPEDIMENT #5

Lack of affordable housing supply prevents members of protected classes from living in areas of opportunity

14

IMPEDIMENT #6

Ongoing need for fair housing outreach, education, and enforcement

15

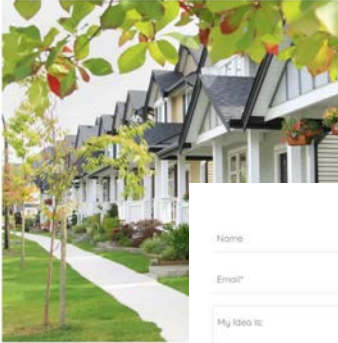
IMPEDIMENT #7

NIMBYism and prejudice reduce housing choice for protected classes

16

ST. LOUIS AREA
FAIR HOUSING PLAN

HOME ABOUT THE STUDY LEARN MORE JOIN A MEETING CONTACT US



**FAIR HOUSING +
ACCESS TO
OPPORTUNITY**

Supporting housing choice in St. Louis,
St. Charles, and Jefferson counties

Name:

Email:

My idea is:

SEND

What are your ideas?

We are seeking public input on recommendations that should be proposed to address the fair housing barriers identified by the study. (Click [here](#) to preview the research and the draft fair housing impediments.)

- What actions should the project partners take to expand housing options?
- What can be done to make the St. Louis region a more open and inclusive community?

Please use this submission form to share your ideas!

This site is protected by reCAPTCHA and the Google Privacy Policy and Terms of Service apply.

17



Presentation of the Regional
**Analysis of Impediments
to Fair Housing Choice**

18

JEFFERSON COUNTY AI MEETING ATTENDEES

Meeting ID	Topic	Start Time	End Time	Duration (Minutes)	Participants
87586504187	Jefferson County AI Public Meeting	3/15/2021 13:58	3/15/2021 15:02	64	3

Name (Original Name)	User Email	Join Time	Leave Time	Duration (Minutes)	Guest
Jeremy Gray		3/15/2021 13:58	3/15/2021 15:02	64	No
David Bookless - City of Arnold (David Bookless)		3/15/2021 14:00	3/15/2021 15:02	62	Yes
Rosie Buchanan		3/15/2021 14:00	3/15/2021 15:02	62	Yes

ST. CHARLES COUNTY AI MEETING ATTENDEES

Meeting ID	Topic	Start Time	End Time	User Email	Duration (Minutes)	Participants
84702424825	St. Charles County AI Public Meeting	3/15/2021 17:55	3/15/2021 19:02		67	25

Name (Original Name)	User Email	Total Duration (Min)	Guest
Jeremy Gray		68	No
Lenore Toser-Aldaz		68	Yes
Kathleen Thompson		69	Yes
tom		34	Yes
stephanie puszkar		32	Yes
Alexis Jaegers		68	Yes
Jim Ruedin		68	Yes
Jessica Fisch		67	Yes
Bruce Prinster		67	Yes
Todd Barnes - Community Council (Todd Barnes)		64	Yes
Brittany Morgan - Sts. Joachim & Ann Care		63	Yes
Tom Wilkison		64	Yes
Babs Gellman (she (Babs Gellman))		64	Yes
Glenn Burleigh		64	Yes
Pinar Turker		63	Yes
Patrick McKeehan		63	Yes
Michelle Woods		63	Yes
Bonita Dillard		61	Yes
636-634-XXXX		27	Yes
Grace Kyung		59	Yes
Cathleen Lenihan		59	Yes
denise mitchell		17	Yes
Sanjeet		2	Yes

ST. LOUIS COUNTY AI MEETING ATTENDEES

Meeting ID	Topic	Start Time	End Time	User Email	Duration (Minutes)	Participants
87161955257	St. Louis County AI Public Meeting	3/18/2021 17:58	3/18/2021 19:01		64	12

Name (Original Name)	User Email	Total Duration (Minutes)	Guest
Jeremy Gray		64	No
Mitch Marku		64	Yes
Carol O'Mara		64	Yes
K51		5	Yes
Amy Ellis		66	Yes
Kim Mitchell		63	Yes
Andrea Jackson-Jennings		63	Yes
Codi Holt		62	Yes
Shannon Koenig		61	Yes
Evan Maxwell (Rebecca Zoll)		24	Yes

Public Comments Received via Webform

3/7/2021

Name

david

Email

[REDACTED]

Message

The biggest barrier for us is that to move into a low crime neighborhood we have to buy very expensive housing. Housing prices are the only way we have to keep the riff-raff out. Pushing for low cost housing without a strong police presence just invites crime. If you want to remove those barriers, deal with the crime so neighborhoods feel safer with lower cost options.

Device

desktop

Language

en-US

Submitted from

Contact us

APPENDIX II

STAKEHOLDER INTERVIEW RESULTS

The planning team engaged with stakeholders representing a variety of perspectives through in-depth individual interviews. Interviews typically lasted 45 minutes to one hour and included discussions about barriers to fair housing, discrimination, access to opportunity, and fair housing resources. Twenty-seven (27) community stakeholders participated in interviews with the planning team. Participating stakeholders represented a range of viewpoints, including affordable housing, community development and planning, education, transportation, health services, homelessness services, senior services, family services, people with disabilities, and others. While summarized within the AI report, the full results of these stakeholder interviews is contained in this appendix.

1. What types of housing needs are greatest in the region? Are there areas where the need is greater than others?

Residents and stakeholders discussed a wide range of housing needs in the HOME Consortium area, with emphasis on the following themes:

Need to Increase Housing Affordability and Supply

- Rental housing for extremely low-income renters is a need. Some of the programs we have, like LIHTC, don't put housing in that affordable range.
- In St. Charles County, the Housing Team did a one-pager on statistics a year ago. There is a lack of affordable housing and 23,000 households who are cost burdened. When we talk about homeownership, we talk about homes that are \$180,000 or less. On the market recently, there have been about 60 homes in that range all throughout the county. They go like hotcakes. There aren't many homes available at all at a price point less than \$200,000. We have the good and the bad of being in an affluent community, with a fair amount of people who struggle financially. Builders are able to build expensive homes and sell them, so it's more attractive to them to do that. Mixed income communities typically don't have housing available for less than \$180,000 or \$200,000.
- The St. Charles County Housing Team did a study and found that 6 in 10 households earning \$55,000 or less are cost burdened. The team looked at population growth and housing solutions and found that the county needed 7,700 affordable housing units by 2030 for the workforce. There is a need for additional production.
- We have a huge problem in St. Charles County from a housing perspective. Working people are spending an inordinate amount of money on rent.
- Affordable housing is a major challenge. In many instances, issues around some of the challenges- poverty, education, job readiness- in many instances aren't tackled in a comprehensive way, and you shift challenges from one place to another. Many

communities have been disinvested in for decades, and systematic racism is well documented.

- Multifamily development is easier to get done than tiny homes. There is a proliferation of apartment buildings. I-64 has not developed as quickly as I-70, but I-64 is now being developed and we see enclaves of retail shops and apartments combined, which focus on the younger population who don't want to drive a lot. These new apartment complexes are fairly expensive- around \$1,500 per month rent.
- In St. Charles County, there is a need for more affordable single-family homes for families with children.
- In north St. Louis County, there are pockets of poverty where there are needs for affordable rental and homeownership housing. There are parts of St. Charles and Jefferson as well, but not at the scale as in St. Louis County because St. Louis County is larger.
- In St. Louis County, the inner ring suburbs bordering the city of St. Louis are housing- and economically challenged. These areas suffer from disinvestment, and there has been flight of middle- and upper-income people into areas further out, including St. Charles County and beyond. There is a need to create quality affordable housing for existing residents and build new homes to attract families into those areas, both owner-occupied and rental. Some areas suffer from not having the right balance and/or quality of homes to offer at affordable prices.
- There seems to be plenty of construction going on in St. Charles County, but it's more high end.
- The two main areas with a need for affordable housing are north St. Louis County, which is primarily Black, with high vacancies and a lack of safe housing, and also in the south area near Lemay.

Need for Specific Housing Types

- There is a need to have a sufficient supply of decent, safe, affordable homes, environmentally safe and code compliant. Having those in quantities that create a critical mass so that families feel comfortable making an investment in the area.
- There is a need for all of the housing types - more senior housing, housing for people with disabilities, multifamily housing, and single-family housing in areas where it fits.
- There is a need for affordable, quality senior housing.
- There is a need for decent rental housing and duplexes or denser multifamily. There is a need to create the right product mix.

Need for Housing Accessible for People with Disabilities and Seniors

- One need is transit oriented development. Thinking about housing for people with disabilities, there is a need to prioritize housing near transit.
- Looking at affordable housing for seniors is a need. A lot of seniors in north St. Louis County like the area but can't afford to stay in a place where it's not safe for them (accessible). A lot

of the areas out here have ordinance where your housing must be minimum of 1.5 stories, which is challenging for seniors.

- Habitat for Humanity has moved toward universal design, but developers have not. There are many people with disabilities who can afford to buy a home, but the developers don't do universal design. We need proactive strategies to promote universal design, affordable housing, if we want to see it happen. The incentives aren't there to do universal design (tax abatement, public recognition, fee waiver). Placing people with disabilities into housing is difficult.
- Senior housing isn't an issue. The tax credit properties that have been developed are all senior housing. Any state dollars that do get invested in rental development strongly favors seniors.

Housing and Transportation

- A client without a vehicle was saying she can't find affordable housing where she can walk to places. Options in Jefferson County are very limited. Affordable apartments are not walkable. The most affordable apartments are even less walkable.
- We always say that people's transportation insecurities are the tip of the iceberg of other insecurities. You can't separate transportation, housing, and health. Where there is affordable housing in walkable areas, they are very disinvested areas where people may not want to live.

Jobs-Housing Balance

- There's a lack of affordable housing, an imbalance between jobs and housing. Where there's jobs that pay less, there isn't necessarily housing that's commensurate with that. People have to commute, and they don't necessarily have transportation. A lot of people would say that there's not affordable housing in the region, but I would say that there's not decent housing, and it's not located in the right place. There are lots of jobs in St. Charles County. The county has a hard time getting workers in a specific lower pay range, lower wages. For St. Charles County, there needs to be more workforce housing that would be a better match between housing and jobs.
- About 50% of new housing development in St. Charles County is upscale luxury multifamily, and about 30-40% is senior housing of various types (market rate or luxury). It makes it pricier for folks who don't have a good job to try to live here, at least for new construction. The only time housing came up with a company was when Amazon was considering the area. 62% of the workforce was an exported commodity to another part of the region. St. Charles County is exporting higher-skilled workers and bringing in lower-skilled workers. The county is trying to bring more higher-skilled jobs. The county is trying to drive the export of workers into other counties down to 50% - 50%.
- In St. Charles County, affordable housing is a real issue. We have large companies that have moved into St. Charles County that have built large warehouses, but the folks who work there have to commute into the county because they can't afford housing in the county.

- Recently there has been someone who bought a tract of land not far from the UPS warehouse and is wanting to build less expensive homes to provide housing for the folks who work there. St. Charles County housing team has tried to get real estate folks focusing on that sort of thing to help promote affordable housing.
- A lot of low-income health workers live in north St. Louis County have commutes of 1-hour or more in each direction to work.

Need for Home Rehabilitation and Repair

- The St. Charles County Housing Team talked about repair programs and repairing homes. 11,000 homes will be 70 and older by 2030. There is a need to preserve the naturally occurring affordable housing. Mobile home communities are where many low-income folks find affordable housing, yet the homes are aging, and most aren't repairable.

Foreclosure and Vacancy

- Part of the problem is a transfer of wealth from low-income families to banks who purchase homes on foreclosure and rent them. People can no longer build equity in the properties. Banks do not have enough incentive to maintain the properties in the same way an owner would. There has been a decrease in homeownership in the North County stemming from the foreclosure crisis. The inner ring suburbs of St. Louis County, in particular the northeastern suburbs closest to the city, tend to have lower incomes and a higher percentage of minority population. They have seen the greatest amount of foreclosure and vacancy.
- Incomes in St. Louis County aren't growing in the way we would hope so that owner occupants could invest in their properties. Because of the foreclosure crisis and white flight/ real estate practices that drive people out into the suburbs, home equity is lower in these areas. There is less of an incentive for other owners to purchase in the neighborhoods. The property taxes are then lower and so the services and schools are of lower quality. There is a lot of exit pressure. Because of foreclosures and falling prices, there is an incentive to get out early.
- In north St. Louis County, there are a lot of single-family homes that have been bought up by big companies by the hundreds. There is a need for homeownership.

Segregation, Concentration of Poverty, and Location of Affordable Housing

- There is a tendency to target certain districts as locations for affordable housing. Generally, it's the path of least resistance with affordable housing, and people in some districts don't have the energy to fight.
- We have growing issues of poverty. Those are the same census tracts/ municipalities in which affordable housing is there, but it is becoming concentrated in terms of poverty, leading to poor conditions in those communities.

- There is a need to create affordable housing in areas that don't traditionally have affordable housing available and to diversify communities where affordable housing has been in existence and there is concentrated poverty.

Homeownership

- Homeownership opportunities are a need. There is an appraisal gap along the lines of race and ethnicity. It is difficult to become a homeowner if you're black and in a black neighborhood.
- Many times people who are renting are oblivious to what NECAC has to offer about the homeownership program. That is something that needs to be highlighted- getting people's credit in order, having a longer-term job, etc. The pursuit of people who could own a home is a huge need. People find themselves in rental situations and the longer they do that, unless they're saving money to purchase a home, they are trapped with higher rents, in a vicious cycle of not building equity. The community suffers as well. That needs to be front and center in all of our municipalities. It's an education process, a support process. The cost of owning a home is much less than renting in St. Charles County. There is a need to support homeownership as opposed to having wealthy individuals come in and buy homes to rent and be slumlords. There needs to be some legal protection against that.
- Rents are \$1,200- \$1,500 per month in St. Charles County. When you take that against a mortgage payment, owning a home may be more affordable.
- The neighborhoods want to encourage homeownership. The traditional way is through single family detached, but you see an evolution into attached/ villa style that could be more cost effective for the public sector to support.
- The biggest issue in north St. Louis County is the appraisal gap. Because of this, it is hard to get a mortgage.

Employment

- African Americans experience disparate outcomes. Unemployment for African Americans who have a college degree is higher than for white residents who don't have a college degree. Systemic racism is a problem. There is a need to provide skillsets that allow people to become their own employers and create businesses in their own communities that don't require outside communities to come in and do affordable housing. There is a need to coordinate resources like CDBG in a more complementary way for collective impact.

Zoning

- There is not enough affordable rental housing in St. Charles County. There is not enough by right property that is zoned for multifamily. To build multifamily, people have to go through a special approval process, go through a public approval process for housing, whether it's affordable or not. There is a perception that people don't want multifamily housing.

- Among all of these municipalities, exclusionary zoning is a problem. West St. Louis County has very large lot sizes. Because of the history of racism, these areas are overwhelmingly white. There is concentrated wealth and concentrated poverty.
- Some of the zoning around lot sizes and square footage of houses (e.g., requiring a two-car garage) make it challenging to build houses with smaller footprints. Targeted policies around set-asides for affordable housing are a need. It seems like senior housing can get done and nothing else can get done.
- In St. Charles County, many government folks want to eliminate mobile home parks. Expanding the tiny home concept in the county would require changes to the building codes. There is a company in St. Charles County that ships tiny homes all over the U.S. because in Missouri the codes will not allow such a small home to be lived in. There needs to be a change in code to allow for tiny home parks. They can be made attractive and functional.
- Large parts of the suburbs have exclusionary zoning with minimum square footages that make it impossible to build affordable housing. They only allow single-family homes at a minimum of 2,500 square feet. There is no way to get an affordable home to pencil out.

Housing Choice Vouchers

- St Charles County offers Section 8 vouchers. The county has a public housing authority, but it is used solely for Section 8 vouchers. The county doesn't have enough landlords interested in using that program. There is a need for more apartment buildings and landlords interested in taking Section 8.
- In St. Charles County, in the past 3 to 4 years, it's gotten to where people with vouchers can't find housing. It usually affected families with children. There is not a lot of quality affordable single-family homes with a yard for kids. That has almost all but gone away. People can't find single family dwellings because they are priced above what the subsidy amounts are so that people can't qualify. Over 70% of people with vouchers from the St. Charles Housing Authority live in apartments. There is quite a bit of senior and disability apartments in St. Charles County, some nice complexes. The apartments have also started to price themselves where they can't take a voucher. People with vouchers can port anywhere, so many people will use the vouchers in Lincoln and Warren County. In the past couple years, they price the big complexes too high, and people with vouchers have had to move out.
- Metro counties run background and credit checks, charging the clients \$25 - \$100 to run an application. For low-income people who are applying to multiple places, it is difficult.
- There is not enough available Section 8 subsidy.
- The market is so tight that landlords can pick whoever they want to rent. There is no way to make them rent to a low-income person, even if we can put together the finance packages.
- There should be income protections, which allow people with vouchers to rent. The City of Webster Groves passed a source of income protection.

Evictions and Resources

- Courts are doing virtual evictions. We are seeing a number of people being displaced due to rental problems, problems with landlords due to illegal lockouts, and foreclosures. They don't have the resources to fight for their housing, and their housing is substandard.
- Where are CARES Act being sent to prevent evictions? 85% of evictions that have been filed are in north St. Louis county.
- Right now there is a shortage of resources and the resources we have are not set up well. CARES act funding that has been allocated has to be spent by the end of December this year. Unemployment rates are rising. We see a shortage of resources like shelters, which would normally be open. A lack of funding is the main issue. Arch City Defenders, EHOC, and Land of Lincoln are working hard to fill the needs gap, but they need to be compensated.
- People will be faced with back rent. What kinds of systems can we create to support them once these temporary fixes are removed?
- There is a need for mediation between tenants and landlords.

Homelessness

- Affordable housing has grown from a concern to a major impediment to folks experiencing homelessness. We have a strong process for identifying folks who are experiencing homelessness and getting short term subsidies. Homelessness migrates where the jobs go, and the support systems don't follow. Low-income workers have moved to the suburbs and the exurbs. People move to better paying jobs and struggle with affording things, and they lack support they would have in the city. Trying to rehouse folks with an adequate income to sustain them back in the community is extremely challenging. We say we want communities with resources, better schools, and economic opportunities to take their fair share, but the resources don't follow. Our CDBG and HOME funding are low, making it difficult to attract developers. We do have some NIMBYism, but that's not as much the barrier as the funding issue.
- We have a huge percentage of extended stay hotels in the area that are home to families, and they get trapped in not being able to save money and correct their credit record. If you surveyed the extended stay hotels, you would find an extremely high percentage of people who have lived there for months and years. They need to be pursued to recognize that the community supports them, and to get them into housing. They may have to go to St. Ann because housing is expensive in St. Charles County. Lower income folks often have to live further out.

Opposition to Affordable Housing

- NIMBYism is a barrier to more affordable housing- people oppose affordable housing development. People have opposed a senior housing area as well. There was a contentious public hearing when a senior living area was proposed in St. Charles County. It was vehemently opposed. The government is influenced by citizens who are opposed to affordable housing.

- People don't want lower-income people in their neighborhoods.

Fragmentation

- We have so many jurisdictions. We have 88 municipal governments in St. Louis County. Nuisance ordinances are different in different places, for example. It's been by design. There is also nonprofit fragmentation. I don't know if there are any civic voices making headway on this issue. There is decentralized leadership when it comes to non-profits.
- Municipalities have different mayors, and everyone has their own fiefdom. The county is not empowered enough to tell the municipalities what to do. The Housing Authority of St. Louis County works with all of those mayors and city staff. It is difficult to enact sensible fair housing rules and to get buy-in from all of the municipalities involved. The higher end places do not care and do not have to care.
- The municipalities resist things that may shift more power into the city of St. Louis. They are not able to do things that are beneficial for the whole area because of the resistance of small municipalities.

Other Barriers to Affordable Housing Development

- Land is very expensive, about \$40,000 for a lot in St. Charles County. Those lots are becoming few and far between. Nonprofit developers are also looking for larger lots but are in competition with for-profit builders.
- Nonprofit developers haven't received an affordable housing set aside with for-profit builders. Our municipalities should take a look at affordable housing set asides.
- Policies make it difficult for affordable housing types to be built in certain areas.
- The cities have knowledge about the issue, but there is a need to educate the public on the need for workforce housing.
- There needs to be strong proactive strategies to try to mitigate the lack of affordable housing, including incentives for developers and set-aside policies that encourage affordable housing.
- The county executive really focuses on property values and promotes St. Charles County as a good place to live because the property values are good. By focusing on that, it's not promoting less expensive homes.
- In St. Charles County, land for development is becoming more scarce. St. Peters is part of St. Charles County- they have no land that can be developed, so it becomes more difficult for developers to come in and develop something.
- Costs continue to rise, and incomes are not- that is a huge issue. The gap to fill is growing every year between what a family can afford, and the public sector has to step up. There are not enough dollars being allocated to affordable housing based on the demand.
- The inner ring suburbs are stuck a bit more because of the lack of capacity in the system to support affordable housing. The units would be selling like hotcakes if we could put more projects together. We never have issues selling them or leasing them.

- Our municipalities are open to affordable housing options but are not proactive in planning it.
- The Dismantling the Divide report raised public awareness, but there hasn't been much action.

Property Taxes

- A lot of communities are funded by taxes. A lot of black and brown communities are taxed at a higher rate and bring in less money.

Other

- There is a need to reallocate CDBG allocation to correlate with housing need.
- St. Louis County's Affordable Housing Trust Fund task force report provides recommendations and has data and detail for housing need, type of housing, demographics, and types of housing.

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

Residents and stakeholders noted multiple areas of opportunity in the HOME Consortium counties, including:

- St. Charles County attracts a lot of families. The houses might be less expensive and newer than in west St. Louis County. The attractiveness of price. Everything is new- roads, stores, hospital. The county normally gets a lot of families more than singles or young professionals. A lot of our larger cities are some of the safest in the US. Crime rates are lower in St. Charles County.
- St. Charles County has about 300,000 residents, and really all of the municipalities are good places to live. Some county subdivisions and mobile home communities are run down, but they're all in good school districts and good areas. Wentzville is the fastest growing community with many subdivisions.
- St. Louis County and St. Charles County have incredible park systems. The library system in St. Charles County is tremendously supportive and invested in the community.
- The inner ring suburbs, such as Richmond Heights and Maplewood, are very popular. The school district used to be majority Black, and the number of students of color continued to decrease as wealthy white families are buying up housing. There is a need to increase the affordable housing stock.
- Central suburbs like Clayton, Ladue, Richmond Height, and Creve Coeur are seen as very affluent and nice communities. The schools in Kirkwood and Webster Groves have a very good reputation. South St. Louis County has lower income areas, but is they are not concentrated like in North St. Louis County.
- Many of the older inner-ring suburbs have rising real estate prices as young professionals are purchasing more affordable housing. In lots of neighborhoods in the inner-ring- Maple wood, Richmond Heights, Clayton, University city- the real estate is getting more expensive.
- Within St. Louis County, the more affluent areas are Clayton, the seat of the county government, Kirkwood, and Lindbergh. In all of those areas the home values are high, and it's a challenge to find affordable housing. Along I-64, property values tend to increase toward the west.
- Webster Groves is a pretty diverse neighborhood, a historic Black neighborhood that they are trying to honor and not gentrify. They have interracial groups, including the Alliance for Racial Dignity. Webster Groves is a good model of a place that has good access to schools, low poverty, and low violence, but is not so homogenously white. Webster Groves implemented a source of income protections with strong teeth, and they are talking about establishing a community land trust.

- As you move from St. Louis City, most of the migration is of Black residents to north St. Louis County (District 1). This is the first area they land that they can afford and there aren't covenants to keep people out. As people move west, they take the resources with them. The inner ring suburbs are left with fewer businesses and a reduced tax base.
- People prefer the Arnold (northern) area of Jefferson County because the public transportation is better and proximity to healthcare providers in St. Louis. There are more retail opportunities in the northern part of the county.
- Typically more suburban areas are better funded. In areas in the city and north St. Louis County, the effects of redlining are strongly apparent.
- People who say they want diversity may want to live in Tower Grove south/east, Fox Park, or Benton Park. There are parts of the city people may avoid because of racial stereotypes.
- Florissant and the areas further west are areas of opportunity. People are moving there, perhaps for the schools or the opportunities for newer housing stock in those areas. Attracting businesses and families is a challenge for the inner ring suburbs.
- The municipalities in the I-70 corridor- the cities of St. Charles, St. Peters, O'Fallon, Wentzville are out of the flood zone and have the institutions and jobs, but don't have public transportation.
- Employers in St. Charles County offer training. There is an aluminum-casting facility in Wentzville that starts people at \$15 per hour and will move them to \$20 per hour, so the jobs are here. The community college system has a welding program where you can get federal dollars and come out having a certification as a welder. They make very good money in St. Charles County. The community college system is tremendously effective in making sure people are job ready. There are so many employers in St. Charles County that can't get employees because people have difficulty affording housing in the county, and there is a lack of public transportation.
- In Missouri, school funding is based on property taxes, meaning that if you live in a neighborhood in which property values are higher, your school district gets more money. Poorer neighborhoods generate more poorly funded schools. Conversely, wealthier communities have better funded schools. We don't have parity in funding for schools. People have moved to St. Louis County and St. Charles County for the school districts. In the last 10 years, two of the St. Louis County school districts were unaccredited. There are other school districts that are now struggling with shifts in populations. Areas of opportunity are those communities that are safer, with quality schools, and with quality access to public transportation.
- Residents want to live in the Parkway, Rockway, Clayton, Ladue, Kirkwood, Lindbergh, Wentzville, and Francis Howell school districts. The quality of the school district is tied to the value of people's homes and the perceived quality of the neighborhood. Pattonville school district is in a low-income area, but are constantly knocking it out of the park. St. Charles County has very highly rated schools.
- Things are changing over time in terms of housing desirability and demand. A home built in the 1970s may have one bathroom, but today many homebuyers won't look at a home with one bathroom. A place like City of St. Peters has miles of homes built in the 1970s and 1980s. As people's preferences change, those homes may become more affordable.

Residents and stakeholders noted multiple barriers to moving to areas of opportunity, including:

Municipal Policies

- Some municipalities have traditionally been more exclusive with higher minimum lot sizes. Many of the municipalities were built on a very exclusive vision of who fits in these municipalities and what neighborhoods should look like. The larger the minimum lot size, the more expensive the home. Whether or not these municipalities are zoning for multifamily at all is an open question. Kirkwood and similar affluent municipalities deliberately design policies to exclude low-income people. Kirkwood went through a racial healing process maybe 10 years ago. There is still a tendency to zone for large expensive houses. Multifamily provides a smaller contribution to the school district.
- There are still some zoning requirements, such as minimum lot sizes, that make projects economically unfeasible with available subsidies.
- Affordable housing is difficult to do much because people can build what they want on their property. They can build the most expensive house to make the most money. There is a need for incentives for landowners to build more affordable housing- even tiny houses- while still making a reasonable profit.
- There has been poor land use policy in the inner-ring suburbs. University city has depleted existing housing for big box stores.
- Source of income protection requirements don't exist in most place (only in Webster Groves, Clayton). Webster Groves' policy has teeth: you can lose your occupancy permit for violating it.

Housing Costs

- The price of housing is a barrier in St. Charles County. The average for rental housing is about \$1,000. It would be difficult to find an apartment under \$1,000. Ownership is high, and there are lots of houses, but it's not cheap to live here. It has been a long time since there have been apartments with affordability requirements in the county.
- In St. Louis County west and in St. Charles County, you have gated communities that have certain requirements, certain amounts of money that you need to purchase these homes.
- The lack of affordable housing makes it challenging for people to take advantage of the employment and educational opportunities in St. Charles County. There is a need for more federal dollars to support rents that people can afford.
- Affordable homes aren't being financed into developers' projects. St. Peter's has run out of land and started to encourage apartment development, but affordable units are not being advertised in any of these luxury developments. There are lots of warehouse jobs, but those salaries aren't going to be affording luxury apartment prices. Who is the housing for? The jobs are good, but if people can't live near them, we aren't doing all we can to improve quality of life.
- St. Charles County residents coming out of college have to live with their parents or live in one of the other counties and commute in to work because of the lack of affordable housing.
- A home that sells for \$250,000 in north St. Louis County might sell for \$600,000 in Kirkwood. Ferguson is now associated with racial tension and violence even though it has similar homes to some of these other areas with more expensive homes. The name value of a place like Kirkwood is important- when you're selling your home in Kirkwood you know you'll get a premium compared to Ferguson.
- Most of the developments in St. Charles County- there is not a diversity of income ranges in those neighborhoods. The housing costs dictate that. The county does have a great number of very nice

suburban communities. Most of the communities are very affluent. It is less expensive than in St. Louis County.

Housing Quality

- Low-income people don't have as many options as upper-income people. The spectrum of the condition of properties affordable to low-income residents is less desirable. If you're in a position to buy a market rate home, you have a lot of options, but if you're in the market for an affordable home, you have to dig deeper to find that home and be comfortable with the environmental factors that might deter you from purchasing the home. There are more constraints for low-income working-class families, particularly for single parents. It's a lot more challenging to find decent, sanitary housing in a safe neighborhood. That doesn't mean we don't have some product in the market, but people may live in substandard housing because they don't have a lot of options. There may be mold, lead paint, or lack of energy efficiency.

Land Prices

- The availability of land and price of land may also affect the availability of multifamily affordable housing.

Foreclosure and Decline in Homeownership

- What are the impacts of the housing downturn, which disproportionately impacted the African American community and North County? There have been significant declines in homeownership. Homes have been purchased in previously owner-occupied areas. People had the ability to buy homes at very low price- single family houses at \$20,000. Now what used to be an owner-occupied area is primarily Section 8. Section 8 has value, but the question becomes is the concentration of section 8 good for everyone involved. It has decreased property values in some areas.

Schools

- Finding an area with quality schools is a challenge. If you look at the property value map, it would probably suggest that the Lindbergh and Clayton school districts have a higher tax base, and it is harder to buy or rent in those areas. West and South St. Louis County have good school districts. The Ferguson-Florissant and University City school districts are starting to decline.
- Children have to go to a school that's in their neighborhood. Many people use a different address to get their kids into a different school.
- All of the desegregation legal requirements expired about 10 years ago. There had been required for children from the cities to be able to go on buses to other schools. Once the requirement ended, schools had the liberty to decide if they still wanted to comply and to what degree. What was once a robust opportunity for inner city kids to go out to more successful schools, got reduced. Either it was stopped or reduced to a token effort. Fewer kids were involved.
- Regarding schools, it's not legal to discriminate, but people want to feel welcome wherever they go. There is a level of discomfort if you didn't grow up in an area. This happened with the desegregation program, too. They separated the black and white children within the schools.

Transportation and Distance to Work

- Lack of access to public transportation can inhibit people who need it to get to work.
- Transportation is a barrier. If you don't have your own source of reliable transportation, you won't be able to get to work or get your kids to school or activities. I was hoping that some of the transportation issues would fade due to rideshares, but now that's kind of slowed down.
- People would like to live close to work but most healthcare workers are confined to a few zip codes. So people are taking long bus trips to get back and forth to work.
- Many of these areas have no sidewalks, making them less accessible for people with disabilities.
- St. Charles County doesn't have public transportation. Everyone has to rely on their own vehicle.
- St. Louis County has a MetroLink light rail, but it's not fully connected to all of the areas. It's not a complete system.
- MetroLink has a boundary and only goes a certain distance into the county, but better-paying jobs may be further out. There was a battle for extending MetroLink. People didn't want it to be extended because they didn't want people with lower incomes coming into their neighborhoods.
- St. Louis County is such a large geography. Busing is available most places, but in terms of mass transit is not available everywhere. There is an opportunity to expand on that and direct resources to transit oriented development to create diversity in income and density. Many of these distant suburbs have a challenge in maintaining their infrastructure. There needs to be a density of resources that makes a place sustainable and diverse.
- The fallout of lack of public transportation in St. Charles County is the new development in Lincoln and Warren counties, which is 30 minutes to St. Charles county and up to an hour commuting into the city of St. Louis. The sprawl further spreads out the region.
- Jefferson county has a public transit system, which serves the east part of the county- the more urbanized area. It doesn't connect to metro transit, the largest transit operator in the state, which serves St. Louis.
- I worked in an afterschool program in North St. Louis County and took a student to McDonalds to a job interview. There were 15 to 20 people in the lobby waiting to interview. In St. Charles County, every fast-food place is looking to hire. It illustrates how our mobility gaps and affordability gaps play out. Business are clamoring for workers in St. Charles County, but there is no transit to get out there. There was an article profiling commuters traveling 60 or 90 minutes by bus one way for an \$11 per hour job at a Steak-n-Shake.

Opposition to Affordable Housing

- There are few progressive parts of the region that want diversity of housing stock and of incomes, but no place is wildly supportive of affordable housing. If an area is defined as an area of opportunity, there would definitely be a lot of pushback to affordable housing. You have to go through zoning to do LIHTC project, and you would need to get a letter of support from the local municipality. There are places that that's not going to happen.
- There is a lot of anti-renter sentiment. So even if you don't have a Housing Choice Voucher, renting is a challenge too. People don't want affordable apartments. They are fine with lofts.

Racial Identity

- The Housing Authority of St. Louis County defines areas of opportunity as areas with less than 10% poverty. What we need to think of, especially with black families moving to those areas, if there is no transit or there is overt racism, that it is not an area of opportunity. Maplewood, Clayton, South City are areas that have good schools but are not so overwhelmingly white, but if you are a low-income renter and person of color, these might not be a good place to live. A 'better' opportunity may not be a safer opportunity for your identity. People bused to Jefferson County have to deal with racial microaggressions.
- People of color may feel socially isolated living in a white neighborhood because of microaggressions and subtle racism. Black people typically don't want to be the first one in a neighborhood.
- It is challenging for people to move to an unfamiliar place without monetary, family, and friend support because of racism. The county, city, and state are very polarized. The police department engages in racial profiling, and people feel their children are unsafe. There are some housing authorities with nice units in other counties, but no one wants to move there.

Discrimination by Landlords

- A lot of landlords run background checks on criminal history and evictions, which will make people with criminal histories ineligible.
- Income and rental history are barriers. So much of the rental housing across the board is in the hands of private landlords who own a few units or private corporations. There is a need for more incentives to get landlords to take chances on people, but it's more difficult to do with these landlords who own a few units and don't have to do it or national corporations who have set policies that they don't waive.
- Landlords can turn down housing choice vouchers. There is no source of income protection.
- Race definitely impacts people's housing choices. There is still discrimination in housing in St. Louis County.
- There are organizations that fight discrimination. EHOOC does some testing on it, but it's still a problem that requires monitoring.
- The challenge comes with small landlords at the municipal level. People don't have to register their rental units, so the city doesn't know where they are. You do hear case by case discrimination by race and family size.

Steering

- Realtors may steer people away from areas.
- There are still landlords more likely to rent or sell to white people instead of Black people. It's hard to say how widespread.
- A not so great statistic is that we're one of the most segregated cities in the country. I don't believe that's by accident. Some of that is people's familiarity, wanting to be close to things they're familiar with. Some is steering by realtors.

Racism

- St. Louis has been very impacted and shaped by systemic racism. There are so many affordable homes in St. Louis County in the Florissant-Hazelwood area, but a lot of people don't want to move to St. Louis County. They would rather move elsewhere than live closer to the city's core. The sprawl diminishes the impact affordable housing can have. Depending on the color of your skin, a good area to buy affordable housing may be very different. It takes generations to undo.

Lack of Housing Accessible to People with Disabilities

- There is a need for housing accessible for people with disabilities and to require universal design in new development.

Credit and Debt

- There are traditional challenges of lending and credit. It is challenging for people to have enough income and to have the credit scores to purchase in areas of opportunity.
- Credit is definitely an impediment. It is difficult to overcome poor credit. There is a need for outreach to the population of St. Charles County who may not be aware of what it takes to be ready to buy a house.
- College debt makes it difficult for people to afford to buy a house.

Access to Capital

- There are challenges in ability to access capital and loans that make it difficult for folks to move to different areas.

Education

- Education/post-secondary education is a barrier. You need knowledge in coding. Many Indian families that move to the south side of the Francis Howell School district because they are programmers for Mastercard or Citi.

Housing Supply and Preferences

- People also want new housing. There are less expensive homes in older more established areas.
- We have diverse stock available, but how long it lasts on market would be an issue.

Taxes and Insurance

- It's more expensive to own a home in north St. Louis County and City because the per-value property tax and insurance is greater than in the rest of the county. The property tax is greater because the overall taxable wealth is less to get the same amount of funding.
- Insurance companies rate the risk of loss as much higher in lower-income communities.
- There are always some additional costs associated with being in municipalities with better amenities and services, such as taxes.

Other

- The amenities that are available vary across communities.
- Some of the programs, including Habitat, require that you live or work in the area to receive assistance.

3. Are you aware of any housing discrimination?

Residents and stakeholders discussed their experiences with housing discrimination in the region, including the following themes:

- St. Louis is known for discrimination in housing, including steering to different neighborhoods based on race. There is a well-documented history of racial discrimination in housing.
- All of the protected classes still face discrimination and need enforcement under the Fair Housing Act. Other classes, such as transgender people, need to also be protected. Municipalities could expand their fair housing ordinance to cover additional protected classes, including sexual orientation, gender identity, and source of income.
- I don't have any personal knowledge, but I wouldn't be surprised if people would choose to rent to people who were from the area already, rather than those outside the area. We still have racially discriminatory views in our community.
- We have had instances where a senior living place was cited for being inaccessible for people with disabilities.
- There is some redlining by financial institutions that still goes on that won't give any credence to communities of color.
- It's not rampant, but it still exists. There is racial discrimination and steering by agents.
- Assuming it occurs, but we rarely receive reports, emails, or calls about housing discrimination. The biggest factor is a refusal to allow multifamily housing or workforce housing. If there are communities that won't allow homes under \$400,000 in their communities, that may be a form of discrimination.
- There is documented evidence of housing choice vouchers being turned away.
- Another way to discriminate is through nuisance ordinances. There were federal lawsuits against Maplewood regarding nuisance calls.
- Another ongoing issue has been illegal lockouts, where a landlord forces a tenant to leave while an eviction is in process. In some leases, unless there is immediate violence there is no legal reason for the landlord to evict without due process. Housing is a health priority. The county CARES money has gone primarily to renters. The national moratorium info needs to be out there so people know about it.
- In the Francis Howell School District, families in Park Ashwood Apartments, get put on a month-to-month lease after one year. Then if they complain about the mold or other issues, they get evicted for noise. We try to connect families with Eastern Legal Alliance because it is causing hardship for the families. I can't say it's discrimination but there seems to be a pattern.
- Familial status is a big type of housing discrimination. For single parents, finding an apartment in St. Louis is hard.
- There have been some disability cases and some design and construction cases.

- Religion is seldom a cause of discrimination. In South County someone said they weren't going to sell their home to a Muslim. Some areas have discrimination against Muslims.
- In the last 2 years, there have been a lot of familial status and sexual harassment cases.
- Sometimes apartment managers do not give people enough notice to leave, e.g. a week. The standard is one month.
- We see it. It's veiled sometimes. We had a go-round with a landlord who wouldn't sign the VAWA form because if there was any domestic violence the renter (a woman) would be put out.
- Sometimes the pushback on affordable housing has a racial undertone.

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

Stakeholders described segregation in the region, emphasizing the following themes:

Segregation by Race/ Ethnicity

- People are segregated in St. Louis. It is one of the most segregated communities in the country.
- The region is extremely segregated along the lines of race and socioeconomic status.
- There is segregation and longitudinal systemic racism. It still exists and is alive and well.
- The people in greatest need of affordable housing are people of color. It's been intentional that they will live in the county or north city.
- In the City of St. Louis, we have the Delmar divide. Delmar is a street in the city of St. Louis that was the redlining designation. North of Delmar tend to be very disinvested and poor, mostly African American. On the other side there are million-dollar mansions. It has a real impact on life expectancy. There was a report put out, Dismantling the Divide, which looked at life expectancy based on zip codes in St. Louis. The task force looked at challenges, concentrations of poverty, health disparities, and allocation of resources.
- Jefferson and St. Charles county have a growing African American and Latino population, but it's still relatively small. White people will move throughout the region to live around other white people.
- St. Charles County has been predominantly white. There is a small population of Black and Latino folks. There is a regional reputation that white people live in St. Charles County, and everyone else lives further east in St. Louis County or St. Louis City.
- It is getting less segregated. The St. Charles County I grew up in was way less diverse than it is now. There has been an influx of immigrants that are breaking the Black-white binary. That is another way the region is becoming less segregated, as the composition of the region changes.
- There is definitely present-day segregation- the Delmar divide is very real. As the region sprawls out, people make reference to an Olive divide (Olive St.) in St. Louis County.
- What affordable housing that does exist in St. Charles County is pretty spread out. St. Louis County has very clear racial division. The North is more minority rental housing. The South is either white rental or homeownership. There are very clear lines. Jefferson County is more rural. Same with Florissant. In O'Fallon there is a mix of housing and ethnic groups- it's pretty integrated.
- If you look in St. Louis County, only a handful of schools have significant diversity.

- There is more integration at the lower income levels than upper income. There are pockets of integration in the city in low-income areas, but less in the county.
- You have to be intentional to live in a diverse community. University City – if you look at the numbers it sounds diverse, but people of color live north of Olive Blvd and whites live south.
- We have Bosnian and Somalian populations. There is an immigrant services provider network.

Segregation by Income

- In St. Charles County, there are pockets that are more higher and lower income by census tract. I don't see it as an externally imposed barrier. I think it's as diverse as it could be in St. Charles County. You don't see any one community disproportionately favored.

Segregation by Political Views

- There is a political divide in the region- St. Charles County has been republican, and St. Louis County/City has been democratic. Jefferson County has been fairly republican.

Stakeholders noted several causes of segregation, including:

Municipal Policies and Fragmentation

- St. Louis County has 88 different municipalities and different forms of government. The land use decision making is so decentralized in St. Louis County because the municipalities all have their own decision-making in terms of land use. That has caused a degree of segregation. Municipalities can put in their own policies to prevent development of certain types of housing.
- There is a history of racism, restrictive covenants, and exclusionary zoning. Now these take on different forms- we limit zoning to large lots, so if you can't afford a large home, you can't live here.
- Cities can keep people out by controlling the type of housing and the cost of housing. They keep it that way for a reason.
- In St. Louis County, historically there was a lot of redlining, called the Delmar divide- a major street in St. Louis County. When you drive past that, you see more vacant housing and buildings. It goes back to redlining. There has been a lot of attention to overcoming that, but the remnants are still there.
- Redlining leads to white flight and steering, and its impacts lives to this day.
- There are still municipalities in St. Charles County saying that you cannot put housing for people with developmental disabilities in a single-family home or apartment supported by a provider agency. Neighborhoods ban together to prevent that from happening.

Funding for Education

- There is segregation based on education funding. We rely on property taxes to fund schools, so people self-segregate in wealthy enclaves and don't feel selfish because they're doing it for their kids.

Subdivision Development

- The main reason is that our communities are pieced together by sameness. The way communities are developed is here is your \$300,000- \$400,000 subdivision. The way we build, we build similar price-point housing in subdivisions. I love the picture of a community with rental, starter homes, different price points, because that's where you get the diversity of people living together. My neighbors may be different races and ethnicities, but we're all the same income range.

Real Estate Valuation

- When you buy a house in north St. Louis County, you won't get as much for it. Comparison of houses in north and south county shows that south county houses might be worth twice as much. This entrenches segregation. We have a racist real estate valuation system. In some parts of town you can't get a mortgage. It creates an incentive for people to move and creates a rational reason for white flight. This creates a compounding self-fulfilling prophecy. The value of the house is based on proximity to whiteness.

NIMBYism

- There is NIMBYism- people block the development of new housing.

Jobs-Housing Balance and Transportation

- In north St. Louis County, where people with low incomes live, they may not have opportunities to move to where they work. North St. Louis County has become a lot poorer. If you live there, your job may be somewhere else. Some employees may live 1.5 hours away by bus. If they missed the bus, they may get home at 1 in the morning. In that case, the City of Chesterfield doesn't have housing for people who work in Chesterfield. They have a lot of high paying office jobs but they have a lot of retail as well, which pays more modest incomes. So that gets back to the imbalance between jobs and housing.
- Several years ago when we started with our light rail system, MetroLink, there was an effort to expand that into St. Charles County. It was met with much resistance. I don't see any significant motion to expand light rail into St. Charles County.
- St. Charles County has a lot of workers commuting to St. Louis County for work. About $\frac{2}{3}$ of workers commute elsewhere to work. Presumably a lot of them could afford to live in St. Louis County but are living here. Workers in St. Charles County are commuting in from Warren, Lincoln counties. They are working at a little above minimum wage.
- Part of what fueled growth out toward St. Charles County was the GM plant in 1980. That started bringing jobs to St. Charles County.

Busing

- The busing plans of the 1980s/90s also fueled some of the folks who moved out this way. That is long gone, now the region has different political cultures that are ingrained.

White Flight

- There was white flight during the 1950s-70s and a shift of white people from north St. Louis County to St. Charles County in the 1980s and 1990s. There has been significant growth into St. Charles and Jefferson County, by and large by white people.

- You could be the first African American in a neighborhood and experience immediate flight in 2020. We still have a ways to go.

Personal Preferences

- Some segregation may be by choice. Indian families on the south side share of St. Charles County culture. They may even ask to buy a house that isn't for sale. Some people choose to live together. Many Hispanic families live in our Town West mobile home park.
- There is not segregation in any racial sense. I know some of the older residents have started to move further out to get away from development.
- I think it's just old traditions – the smaller towns in Jefferson County, that's always been the place where people lived. It's been hard to get integration in those areas.

Solutions

- There is a need to create educational opportunities and improve economic conditions for people.
- The big thing in St. Charles County is for communities to be very conscious of what kinds of incentives they can give developers to have more affordable and accessible housing.

Other

- The percentage of low and moderate income is a lot lower in St. Charles County. It's all integrated. There are not really any lower-income areas. One exception is homes in flood zones- it lends itself to lower home values. For example, the Mississippi River flood zone- not a lot of people live there anymore because of the flooding. Because there is less demand, housing is more affordable there.
- If you didn't go to high school here, you are always an alien. In the black intelligentsia, the interest is in keeping it a small group. They want to be in control of how the black experience is expressed in the area. They don't let a lot of other people in.

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

Stakeholders identified a variety of resources for fair housing services, including:

Metropolitan St. Louis Equal Housing and Opportunity Council (EHOC)

- EHOC started with HUD support and have been the champions of addressing fair housing violations in the marketplace for the metro area.
- EHOC offers tenant education, landlord education, fair housing advocacy, and testing for discrimination. They have done some programs to try to make it clearer what discrimination looks like and to expose it so people know when it happens.
- They coordinate well and work with other agencies. EHOC is pretty well known. Most folks in the housing world know who they are.

- EHOc does a phenomenal job here, as long as folks are aware of them and what is actually illegal.

Other Nonprofit Organizations

- Legal Services of Eastern Missouri facilitates cases against landlords or government.
- North East Community Action Corporation and Beyond Housing do financial counseling, foreclosure counseling, and homeowner education.
- The Community Council of St. Charles County tries to be a one-stop shop for social services and was designated as the coordinated entry.
- Habitat St. Charles does financial education and homebuyer readiness. The organization helps prepare anyone in the community to be financially ready to buy a home.
- Better Family Life (in the city) provides workshops for housing ownership and utility assistance.
- Other organizations that provide fair housing services include The Urban League, Arch City Defenders, Land of Lincoln, United Way and the 211 system. Missouri Protection and Advocacy, and Catholic Legal Assistance Ministry.

Local Government

- Municipal governments are proactive in offering fair housing seminars. They present at CoC meetings to a broad community and at a variety of public gatherings.
- St. Charles County runs educational sessions and invites people to learn about financial literacy, how to get loans and acquire housing, and fair housing. When people have complaints, the County pairs them with EHOc.
- Stakeholders noted that St. Louis County may offer services through Housing or Human Services, and the Housing Authority of St. Charles may offer services.

HUD

- Stakeholders also noted that they refer residents to the local HUD office for filing fair housing complaints, and that HUD offers seminars.

State Services

- Stakeholders also noted that the state of Missouri may offer fair housing services.

6. Are public resources (e.g. parks, schools, roads, police & fire services, etc.) available evenly throughout the region? Do some areas get more/less than their share?

Stakeholders noted disparities in access to and funding of public resources by municipality size and racial composition, as well as disparities in HUD funding across the region:

Differences in Spending on Public Resources by Municipality Size

- There is definitely a big difference. It's easy to quantify how much municipalities are spending on recreation. An analysis of how all 90 municipalities were spending their funds on 10 different areas found that, in substantial part, police departments and public works are where the large majority of funds are spent, especially in lower income smaller municipalities. About 50% of funds are spent on police. As municipalities get larger and wealthier, they expanded to more services,

with a higher percentage of funds devoted to parks and recreation, community development, and quality of life services. Those services are much more common in larger, more affluent municipalities. In the north part of St. Louis County, a lot of the inner ring suburbs are small and low-income, so they spend money on police and courts and not much else.

- It's based on the tax base of the municipality. If you live in a small municipality, it may not have the same resources as a city like Florissant.

Disparities in Access to Public Resources by Race

- In St. Charles County and Jefferson County the majority of the population is white, and there are more grocery stores, parks, and schools.

Disparities in HUD Funding

- I think the HUD funding and the way taxes work, funding is going to trendy areas, such as the Grove, a predominantly Black area bordering south city and north city, which was taken over by the queer community.

Stakeholders emphasized disparities in access to a range of public resources across the region:

Disparities in School Quality and Resources

- Schools are well-distributed, but the quality of schools varies greatly throughout the region. The City of St. Louis has one of the lowest-rated school districts in Missouri. At the same time, there are some school districts in the region that are very highly rated.
- As you move into north city and north St. Louis County, you see our beautiful brick schools crumbling. They are vacant.
- The schools in north St. Louis County have the most challenges with test scores, equipment.
- The loss of accreditation of the Normandy school district and the busing of those students into St. Charles County schools is one of the most extreme examples of how structural racism is baked into society. Students with the most trauma get the least resources, including outside of school-tutors, private lessons, etc. Our system produces unequal results. It maps onto poverty, which strongly maps onto race.
- Two school districts, both in North St. Louis County- Normandy and Riverview Gardens, lost accreditation. Families did not want kids from Normandy coming into St. Charles County schools. That was more 10 years ago than now.
- There are not any schools in St. Charles that are strongly better than others. All three school districts in St. Charles County are good. That makes St. Charles County more attractive.
- West St. Louis County has some very good schools. West County is very affluent. When you get into the city, historically east St. Louis has been very violent and desolated.
- Virtual learning is a challenge. We don't have the stay-at-home parents, parents who work from home. Many of our parents are essential workers. There is no one home to make sure the children get on the computer when they are supposed to.

Food Access

- Food access has been an emerging need for youth in north St. Louis County. Many of the challenges go back to the way our capitalistic system is arranged. There have been rapid closures in grocery stores in north St. Louis County. There is a large grocer names Schnucks and they purchased another grocer called Shop-n-Save. They closed a number of Shop-n-Save locations or Schnucks locations when they consolidated. Large parts of North County do not have a grocery store for many miles. What already wasn't great turned into a food desert overnight. There are some nonprofits working in that area. I see that as a valuable activity, but it doesn't solve the problem of sustainable and scaled access to food throughout those communities. There is a need for more than small supermarkets that focus on processed foods. Communities need to have options that include nutritious foods.
- There are still a handful of places in those three counties that have limited access to grocery stores- parts of north St. Louis County it is difficult to find grocery stores in close proximity.
- There are still big food deserts. I see that issue a little differently- the problem is a little more upstream- why fast food is so cheap, and agricultural subsidies.
- Every time a grocery store closes in the area north of the divide, it's more than likely the only one. Talking to volunteers via phone banking, we didn't realize that we would have to travel so far to get groceries. A lot of north city and north St. Louis County are food deserts or have one grocery store. In the city or rest of the county, you find a Schnucks in every neighborhood, or a Target, or a Home Depot or Lowe's.
- Food access isn't terrible in St. Charles County. I grew up in the City of St. Charles, and for years, there was no grocery store on the north side of town. There are definitely not food deserts, but the grocery stores are more placed in heavily populated areas.
- In St. Charles County, it's pretty evenly dispersed. The north end of O'Fallon is a little bit of a food desert. We could use a grocery store.
- Right now, because of COVID, the food desert is exacerbated. We have several organizations who are giving food away. It's very difficult. The Urban League and people like that have gotten money from the CARES Act to distribute food to areas where it's needed.

Parks

- We have quite a few parks. They are some of the greatest thing St. Louis has. They are accessible, free, and fairly well present, even in impoverished areas. The maintenance, if they are county-owned, has been pretty decent. They are one of the shining parts of St. Louis. In the absence of a community center or neighborhood house where they might have amenities, people do have access to parks.
- One of our assets is the natural areas. We have abundance of greenspace. There is an organization doing greenways around the region. Great Rivers Greenway is the public parks and recreation agency for St. Charles and St. Louis counties, tasked with building a 300-mile network of parks and greenways.

- The North County area has fewer recreational resources. There are some nice parks in north St. Louis County, but the upkeep is not the same as in other areas. We have county parks, and I would assume they are evenly distributed, but not all are created equal. Some have top rate equipment, but the quality may not be on the same level. The pandemic is contributing more to that.
- I think if you were to look at the inner ring areas, the recreational amenities, there is a distinction in quality. There may be a pocket park in the low-income areas, but the upper income areas have many more amenities- ball fields, fishing, trails, more than a small park with some grass and a little playground equipment.
- There are beautiful parks in all of our cities in St. Charles County. People have pretty good access to parks. In St. Charles County, voters approved a tax that goes specifically to parks. In the past 15 years, the county has developed a good parks program, focused on larger parks. There are municipal parks as well. We have a lot of very accessible parks in St. Charles County.
- We have a new park in St. Charles County called Veteran's park. We were told there were people who live close to it who couldn't access it easily and there wasn't a sidewalk to connect the park to the community. We can build something, but really making it accessible to everyone- I think we have holes in the process.

Sidewalks and Bike Trails

- There could be more sidewalks, particularly along some of the more major roads in St. Charles County. The walkability and bikeability in target areas could be looked at. That's definitely an area of improvement, especially since public transportation is limited.
- I don't know that there has been a comprehensive study to evaluate sidewalks, etc. With all the different municipalities and different codes, I am highly doubtful that there is real parity around sidewalks. It's such a large geography. Many parts of the community, particularly in the city, they have tried bike lanes and narrowing streets.
- There are places we could do better with sidewalks and crosswalks – the Francis Howell School District will not provide transportation for students within 1.5 miles because by law the district does not have to transport them. They looked at this to see who would have to walk. It would be okay in some areas, but in others children would have to cross a highway or cross streets without a crossing guard, etc. So those kids are probably getting driven to school.

Healthcare

- Urgent care facilities have popped up in south city. You won't see those in North City and North County.

Fire Services

- In St. Charles County, there are quite a few fire districts. There are probably longer response times in rural areas.

Policing

- Michael Brown and the ensuing protests shined a light on the inequities in policing. In places where there is more affordable housing, the police tend to be not as well regarded and not as resourced in training. There are many police departments but no standard in service.
- In north St. Louis County, patrol is lacking. There are huge differences in the police services and whether residents feel safe.

Broadband

- In general, St. Charles County has good access to broadband. People with physical disabilities and the poorest residents often do not have access to broadband. Due to their income, they might not have a computer, tablet, or smartphone.

Community Engagement

- More resources could be deployed in engaging communities, ways to dialogue with communities about the needs they may have. The pandemic tells us we have to think and doing things differently. It would be good to understand how we use our landscapes from people who may not traditionally participate. Make sure we are casting the widest net possible for community feedback.

Lack of Political Will

- There are great discrepancies. There are gaps in resources like early education, food access, and amenities like parks. There is no public will to do more, and there is no leadership advocating for significant change in resources.

APPENDIX III

COMMUNITY SURVEY

A 36-question community survey was made available to the general public, including people living and/or working in the HOME Consortium area and other stakeholders. The survey was available from August through December 2020 via the project website and online link. The planning team also sent 401 surveys by mail to residents of the St. Louis County Housing Authority and provided 50 hard copy surveys to the Sts. Joachim and Ann Care Service to support participation from low-income residents in the region.

A total of 301 survey responses had been received by the time the AI was drafted, however, an additional 24 hard copy responses were returned in the mail after the report was drafted. Where survey data is analyzed and reported in the Analysis of Impediments, it is based on the 301 responses at the time the draft was prepared. This appendix reports data for all 325 responses, including those received too late to be included in the analysis.

St. Louis Area HOME Consortium Survey

St. Louis County, together with St. Charles and Jefferson Counties, the Cities of O'Fallon and Florissant, and Housing Authority of St. Louis County are working on a study to expand fair access to housing and neighborhood opportunity. This study, called an Analysis of Impediments to Fair Housing (AI), is required by the U.S. Department of Housing and Urban Development (HUD) so that the region can continue to receive federal money for housing and community development. The study will look at whether everyone in the three-county region has similar choices for housing regardless of their race, ethnicity, national origin, sex, religion, whether they have children, or whether they have a disability. It will also outline a plan to address any fair housing issues in the region.

An important part of this study is hearing from members of the public on issues of fair housing and housing choice. This survey is one way we'll gather input.

Your answers are confidential. We'll only report this information in combination with other survey responses and in summary format to protect your privacy. Please do not write your name or other personal information anywhere on the survey. You may stop the survey at any time without losing any benefits that you otherwise receive. If you have questions, contact Mosaic Community Planning at info@mosaiccommunityplanning.com or 470-435-6020.

Estimated time to complete: 7-10 minutes

General Information

1. Please select the area where are you live.

- | | | |
|---|---|---|
| <input type="checkbox"/> Outer North St. Louis County | <input type="checkbox"/> West St. Louis County | <input type="checkbox"/> St. Charles County |
| <input type="checkbox"/> Inner North St. Louis County | <input type="checkbox"/> Central St. Louis County | <input type="checkbox"/> Outside of the three-county region |
| <input type="checkbox"/> South St. Louis County | <input type="checkbox"/> Jefferson County | |

If you selected "Outside of the three-county region," please specify:

2. What city or town do you live in? (If you live in an unincorporated area, please leave blank)

3. Which is your age group?

- | | | |
|-----------------------------------|--------------------------------|--------------------------------|
| <input type="checkbox"/> Under 18 | <input type="checkbox"/> 35-44 | <input type="checkbox"/> 62-74 |
| <input type="checkbox"/> 18-24 | <input type="checkbox"/> 45-54 | <input type="checkbox"/> 75+ |
| <input type="checkbox"/> 25-34 | <input type="checkbox"/> 55-61 | |

4. What is your total household income?

- | | | |
|---|---|---|
| <input type="checkbox"/> Less than \$10,000 | <input type="checkbox"/> \$25,000 to \$34,999 | <input type="checkbox"/> \$75,000 to \$99,999 |
| <input type="checkbox"/> \$10,000 to \$14,999 | <input type="checkbox"/> \$35,000 to \$49,999 | <input type="checkbox"/> \$100,000 and above |
| <input type="checkbox"/> \$15,000 to \$24,999 | <input type="checkbox"/> \$50,000 to \$74,999 | |

5. What is your race/ethnicity?

- | | | |
|--|--|---|
| <input type="checkbox"/> White | <input type="checkbox"/> Latino or Hispanic | <input type="checkbox"/> Native American or Alaska Native |
| <input type="checkbox"/> African American or Black | <input type="checkbox"/> Asian or Pacific Islander | <input type="checkbox"/> Multiple races |
| <input type="checkbox"/> Other (please list) | | |

6. Does anyone in your home regularly speak a language other than English?

No

Yes, please list the language:

7. Does anyone in your home have a disability?

No

Yes

8. What is your current housing status?

I own a home

I live in a hotel/motel

I live with a relative

I rent a home

I am homeless

Other (please list):

9. Do you currently live in public housing or receive Section 8 rental assistance?

No

Yes

About Your Neighborhood

10. How satisfied are you with the neighborhood where you live?

Very satisfied

Not very satisfied

Somewhat satisfied

Not at all satisfied

11. What do you like best about your neighborhood?

12. What improvements would you like to see?

13. Is there another area in St. Louis, St. Charles, and Jefferson Counties where you would like to move?

No

Yes, please list where and why you would choose that area

14. In your neighborhood, do you have access to the following community resources?

	<i>Yes</i>	<i>Somewhat</i>	<i>No</i>	<i>I don't know</i>
Quality public schools	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reliable bus service	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Areas with jobs you could get	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Places to shop and bank	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Housing that you can afford	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Housing that is in good condition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks and trails	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Clean environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

15. How long is your daily commute to work (one-way)?

- Less than 15 minutes 30 minutes to 1 hour
 15 to 30 minutes More than 1 hour

16. If you wish to live closer to your workplace, are any of the following barriers preventing you from doing so? (Check all that apply.)

- Cost of housing
 - Few housing options that meet my family size
 - Few housing accessible to people with disabilities
 - Few transportations option
 - Distance from family/support network
 - Quality of the public schools
 - Condition of housing
 - Poor rental/credit history
 - Landlords will not accept my voucher
 - Other (please specify)
-

About St. Louis, St. Charles and Jefferson Counties

17. Thinking about about the community where you live, please check whether you think more is needed for each of the housing types below.

	<i>No more is needed</i>	<i>Some more is needed</i>	<i>A lot more is needed</i>	<i>I don't know</i>
Housing that is accessible to people with disabilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Housing for seniors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Housing that people with lower incomes can afford	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Housing that accepts Section 8 vouchers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Apartments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
First time homebuyer assistance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please share any other comments about local housing needs

18. Thinking about the community where you live, please check whether you think each of the following are *equally provided* in all areas.

	<i>Equally provided</i>	<i>Not equally provided</i>	<i>I don't know</i>
Schools	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bus service	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Roads and sidewalks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Grocery stores and other shopping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Banking and lending	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks and trails	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Property maintenance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Garbage collection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police and fire protection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

19. Thinking about the community where you live, please check whether you think each of the following are *equally maintained* in all areas.

	<i>Equally maintained</i>	<i>Not equally maintained</i>	<i>I don't know</i>
Schools	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bus service	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Roads and sidewalks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Grocery stores and other shopping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Banking and lending	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks and trails	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Property maintenance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Garbage collection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fire and police protection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Fair Housing Rights

20. Do you understand your fair housing rights?

- Yes No Somewhat

21. Do you know where to file a housing discrimination complaint?

- Yes No Somewhat

22. Since living in this area, have you experienced housing discrimination?

The following actions are examples of housing discrimination if they are based on race, ethnicity, national origin, sex, religion, whether you have children, or whether you have a disability: refusing to rent or sell housing, refusing to discuss the rental or sale of housing, saying that housing is not available for rent or sale when it is, having different rental or sale terms, or providing different housing or housing services

- Yes No

23. Who discriminated against you? (Check all that apply).

- Landlord or property manager Mortgage lender
 Real estate agent City or county staff person
 Other (please list):

24. On what basis do you believe you were discriminated against? (Check all that apply)

- Race Religion Familial status (single parent with children, family with children, expecting a child)
 Ethnicity Sex
 National Origin Disability

25. Did you file a report of that discrimination?

- yes No

26. If you answered NO, why didn't you file? (Check all that apply)

- I didn't know what good it would do I was afraid of retaliation
 I didn't know where to file The process wasn't in my language
 I didn't have time to file The process wasn't accessible to me because of a disability
 Other, please list:

Barriers to Fair Housing

27. Do you think housing discrimination is an issue in the St. Louis region?

- Yes, housing discrimination is an issue No, housing discrimination is not an issue
 Housing discrimination may be an issue I don't know if housing discrimination is an issue

28. Do you think any of the following are barriers to fair housing in the St. Louis region? (Check all that apply)

- Admission and occupancy policies in public housing
- Community opposition to affordable housing
- Discrimination by landlords or rental agents
- Discrimination by mortgage lenders
- Discrimination or steering by real estate agents
- Displacement of residents due to rising housing costs
- Government regulations, ordinances, or policies
- Lack of housing options for people with disabilities
- Landlords refusing to accept vouchers
- Limited access to banking and financial services
- Limited access to jobs
- Limited access to good schools
- Limited access to community resources for people with disabilities
- Neighborhoods that need revitalization and new investment
- Not enough affordable rental housing for individuals
- Not enough affordable rental housing for large families
- Not enough affordable rental housing for small families
- Not enough Section 8 / Housing Choice Vouchers to meet needs
- Other (please list):

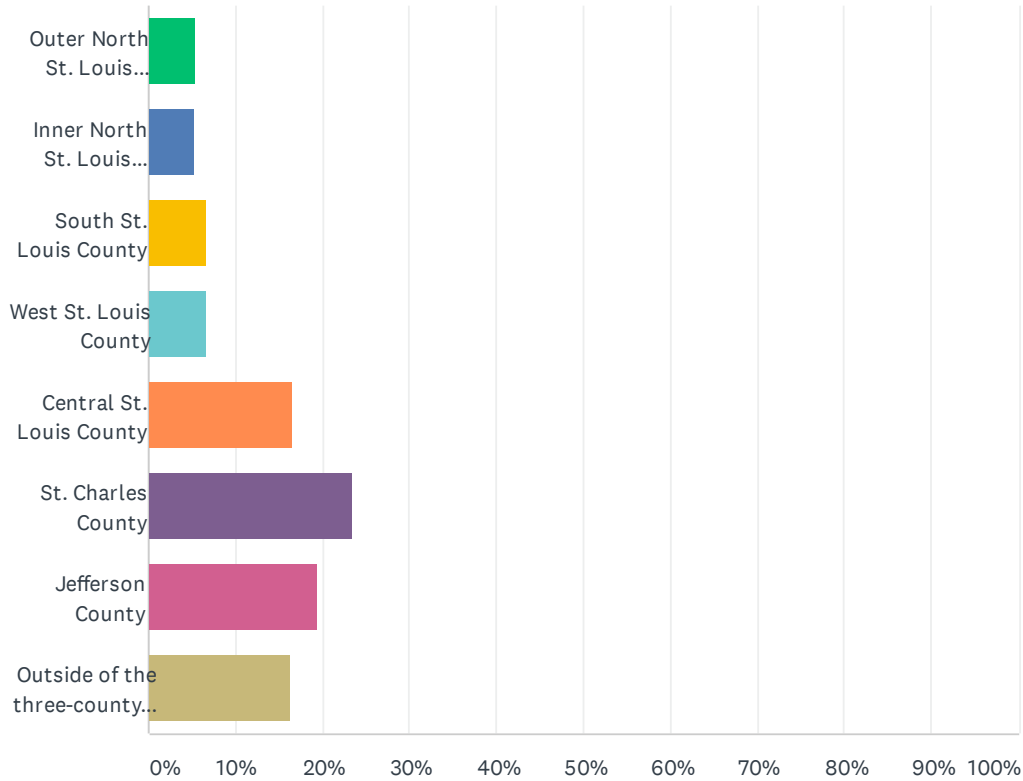
29. Please use the box below to provide any additional information about housing choice and fair housing in the St. Louis Region.

If you believe you have experienced housing discrimination and would like help, contact HUD's Housing Discrimination Hotline at **1-800-669-9777**.

Thank you for participating!

Q1 Please select the area where you live.

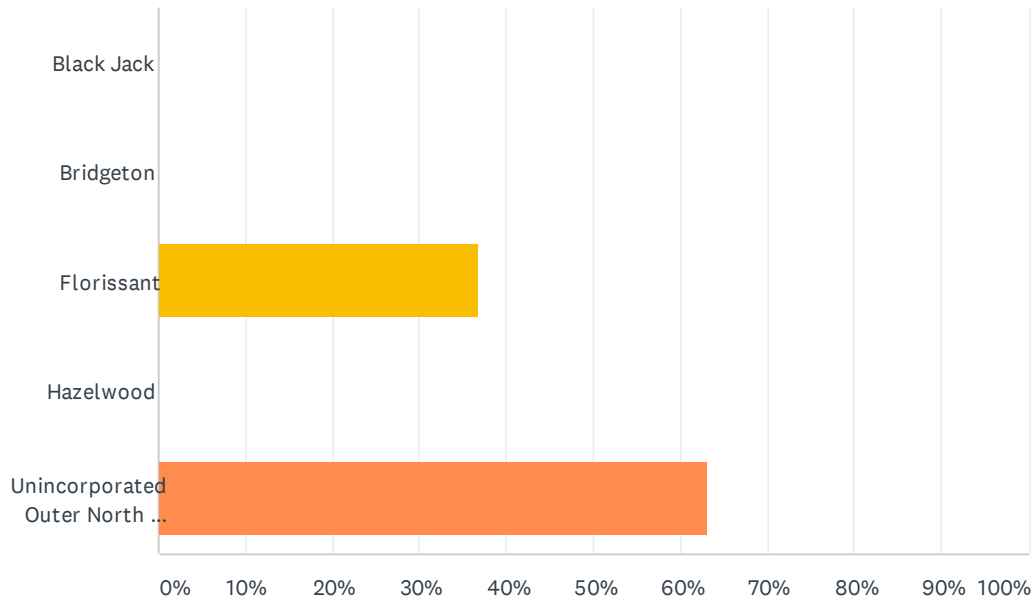
Answered: 325 Skipped: 0



ANSWER CHOICES	RESPONSES	
Outer North St. Louis County	5.54%	18
Inner North St. Louis County	5.23%	17
South St. Louis County	6.77%	22
West St. Louis County	6.77%	22
Central St. Louis County	16.62%	54
St. Charles County	23.38%	76
Jefferson County	19.38%	63
Outside of the three-county region	16.31%	53
TOTAL		325

Q2 Please select your jurisdiction in Outer North St. Louis County.

Answered: 19 Skipped: 306



ANSWER CHOICES	RESPONSES	
Black Jack	0.00%	0
Bridgeton	0.00%	0
Florissant	36.84%	7
Hazelwood	0.00%	0
Unincorporated Outer North St. Louis County	63.16%	12
TOTAL		19

Q3 Please select your jurisdiction in Inner North St. Louis County.

Answered: 19 Skipped: 306

St. Louis Area HOME Consortium Survey

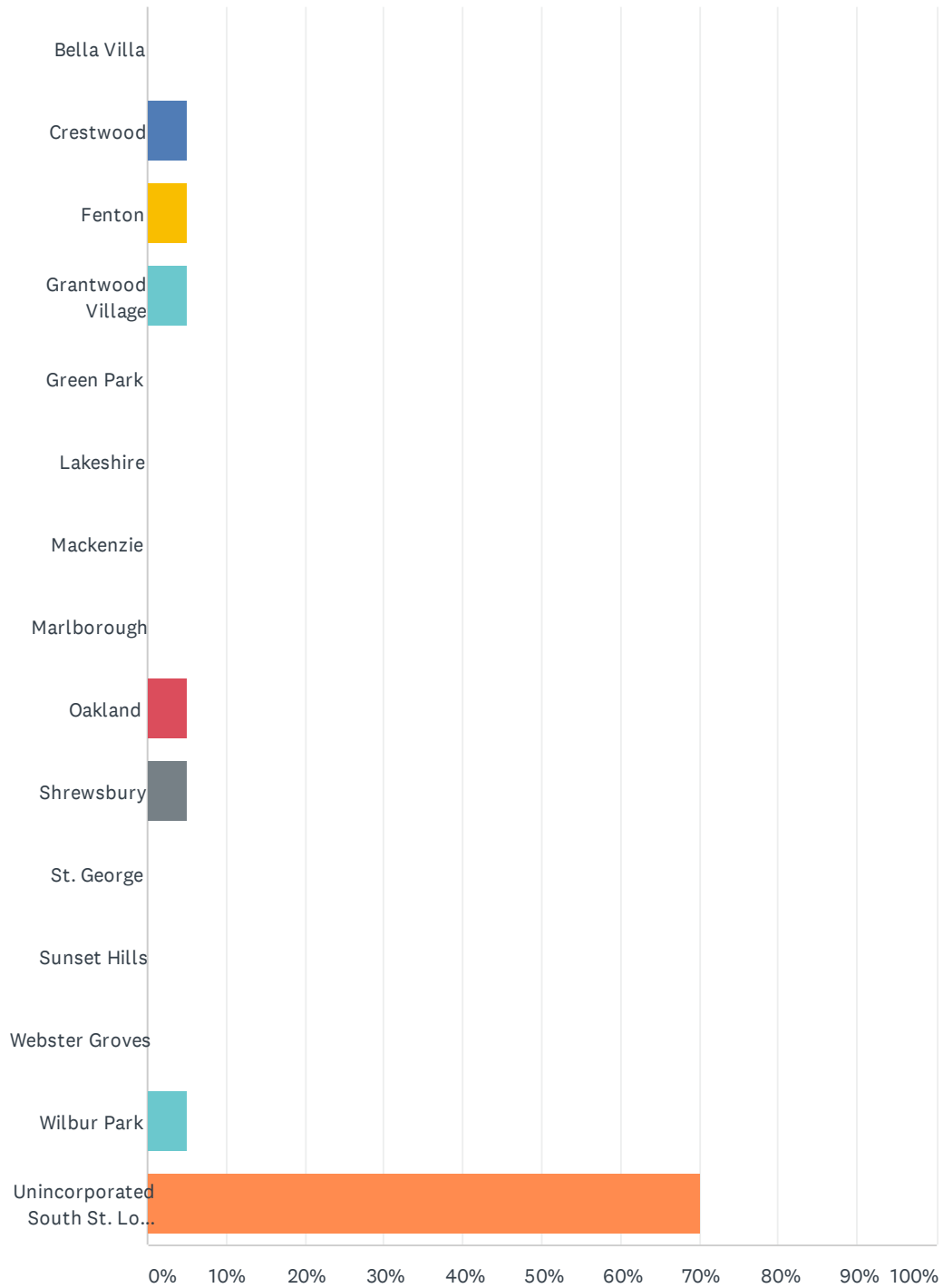


St. Louis Area HOME Consortium Survey

ANSWER CHOICES	RESPONSES	
Bellefontaine Neighbors	5.26%	1
Berkeley	0.00%	0
Bridgeton	0.00%	0
Calverton Park	0.00%	0
Cool Valley	0.00%	0
Country Club Hills	0.00%	0
Dellwood	0.00%	0
Ferguson	10.53%	2
Flordell Hills	0.00%	0
Florissant	0.00%	0
Hazelwood	0.00%	0
Jennings	0.00%	0
Kinloch	0.00%	0
Moline Acres	5.26%	1
Norwood Court	0.00%	0
Pasadena Park	5.26%	1
Riverview	0.00%	0
Unincorporated Inner North St. Louis County	73.68%	14
TOTAL		19

Q4 Please select your jurisdiction in South St. Louis County.

Answered: 20 Skipped: 305

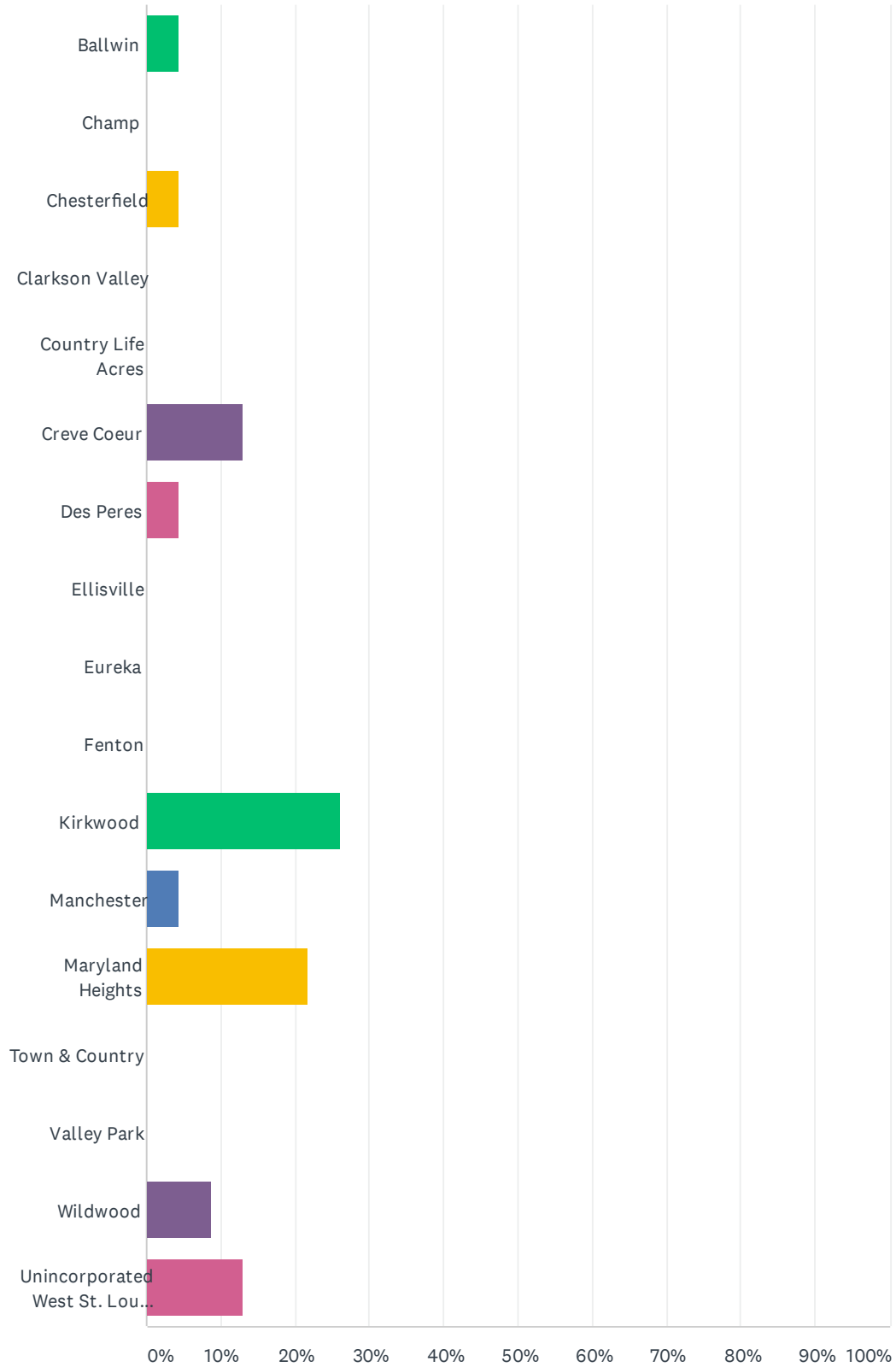


St. Louis Area HOME Consortium Survey

ANSWER CHOICES	RESPONSES	
Bella Villa	0.00%	0
Crestwood	5.00%	1
Fenton	5.00%	1
Grantwood Village	5.00%	1
Green Park	0.00%	0
Lakeshire	0.00%	0
Mackenzie	0.00%	0
Marlborough	0.00%	0
Oakland	5.00%	1
Shrewsbury	5.00%	1
St. George	0.00%	0
Sunset Hills	0.00%	0
Webster Groves	0.00%	0
Wilbur Park	5.00%	1
Unincorporated South St. Louis County	70.00%	14
TOTAL		20

Q5 Please select your jurisdiction in West St. Louis County.

Answered: 23 Skipped: 302

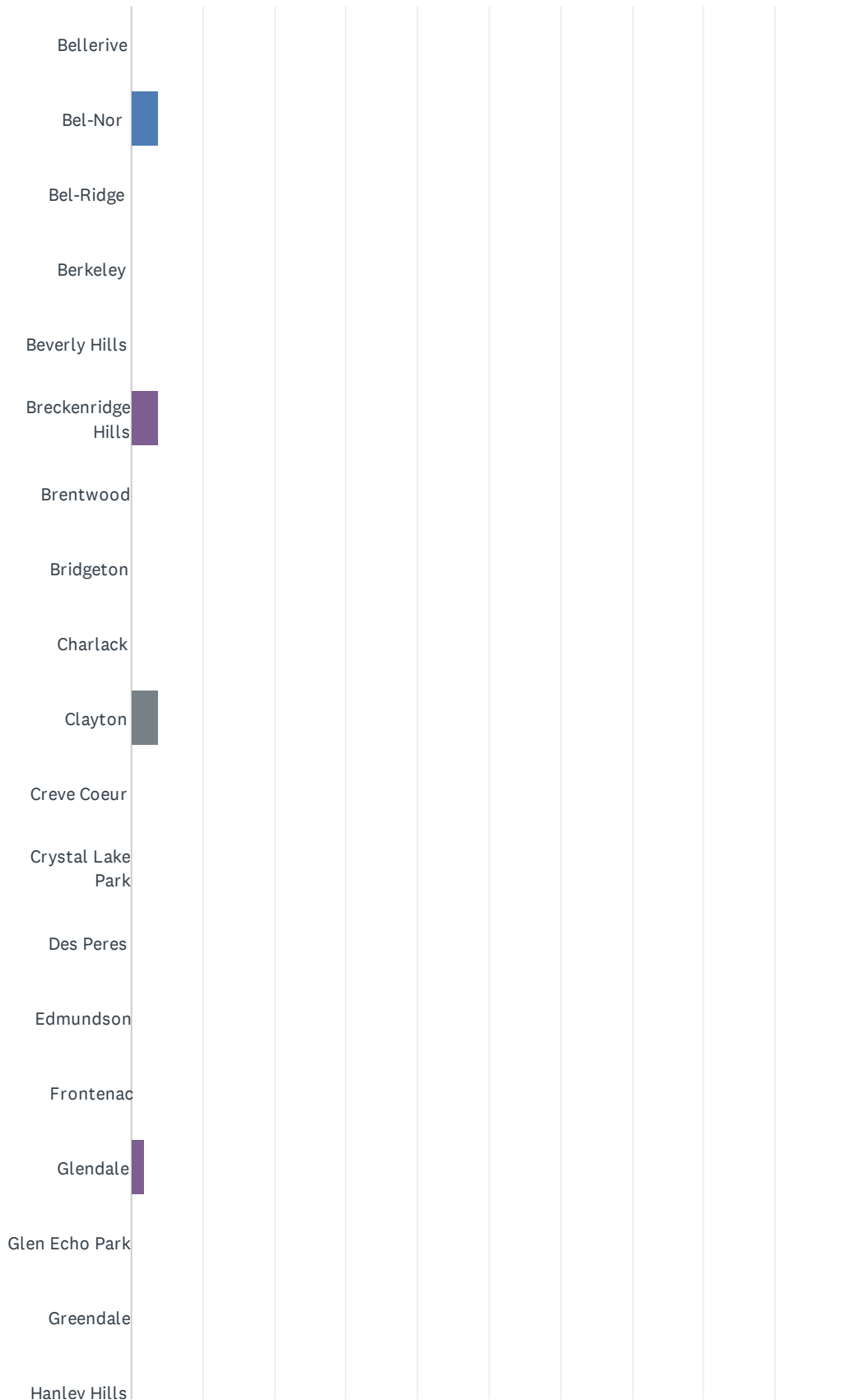


St. Louis Area HOME Consortium Survey

ANSWER CHOICES	RESPONSES	
Ballwin	4.35%	1
Champ	0.00%	0
Chesterfield	4.35%	1
Clarkson Valley	0.00%	0
Country Life Acres	0.00%	0
Creve Coeur	13.04%	3
Des Peres	4.35%	1
Ellisville	0.00%	0
Eureka	0.00%	0
Fenton	0.00%	0
Kirkwood	26.09%	6
Manchester	4.35%	1
Maryland Heights	21.74%	5
Town & Country	0.00%	0
Valley Park	0.00%	0
Wildwood	8.70%	2
Unincorporated West St. Louis County	13.04%	3
TOTAL		23

Q6 Please select your jurisdiction in Central St. Louis County.

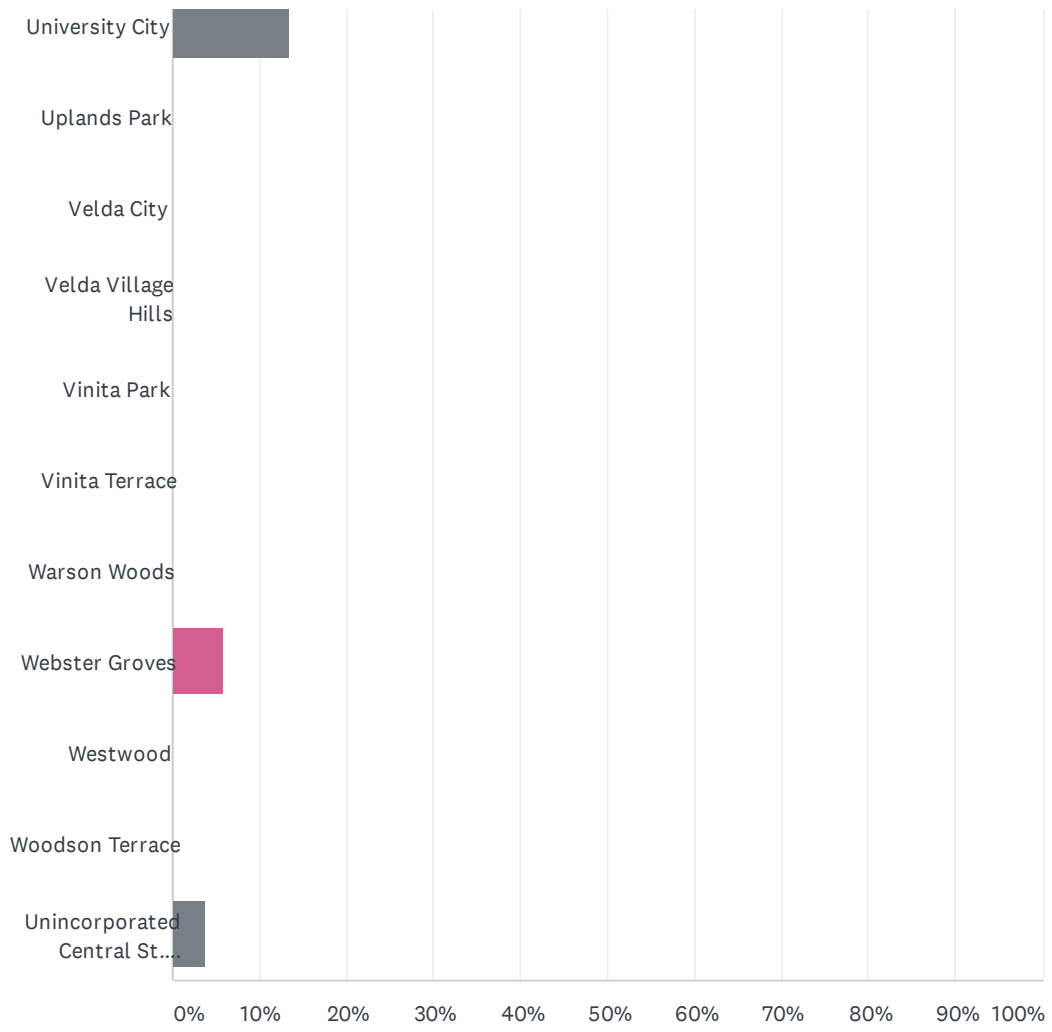
Answered: 52 Skipped: 273



St. Louis Area HOME Consortium Survey



St. Louis Area HOME Consortium Survey



St. Louis Area HOME Consortium Survey

ANSWER CHOICES	RESPONSES	
Bellerive	0.00%	0
Bel-Nor	3.85%	2
Bel-Ridge	0.00%	0
Berkeley	0.00%	0
Beverly Hills	0.00%	0
Breckenridge Hills	3.85%	2
Brentwood	0.00%	0
Bridgeton	0.00%	0
Charlack	0.00%	0
Clayton	3.85%	2
Creve Coeur	0.00%	0
Crystal Lake Park	0.00%	0
Des Peres	0.00%	0
Edmundson	0.00%	0
Frontenac	0.00%	0
Glendale	1.92%	1
Glen Echo Park	0.00%	0
Greendale	0.00%	0
Hanley Hills	0.00%	0
Hillsdale	1.92%	1
Huntleigh	0.00%	0
Kirkwood	3.85%	2
Ladue	1.92%	1
Maplewood	1.92%	1
Maryland Heights	21.15%	11
Normandy	0.00%	0
Northwoods	0.00%	0
Oakland	0.00%	0
Olivette	5.77%	3
Overland	3.85%	2
Pagedale	17.31%	9
Pasadena Hills	0.00%	0

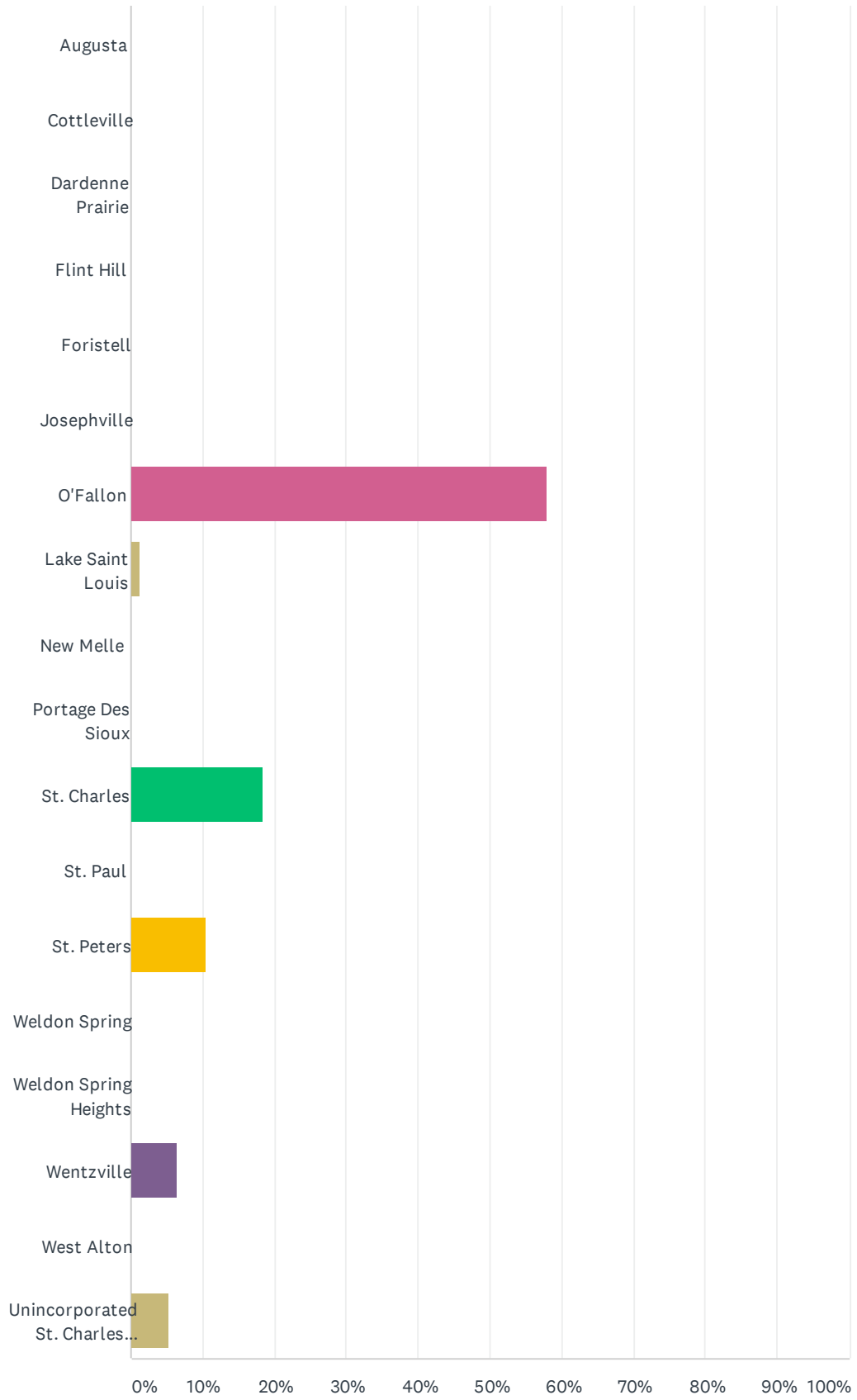
St. Louis Area HOME Consortium Survey

Pasadena Park	0.00%	0
Pine Lawn	0.00%	0
Richmond Heights	5.77%	3
Rock Hill	0.00%	0
St. Ann	0.00%	0
St. John	0.00%	0
Town & Country	0.00%	0
University City	13.46%	7
Uplands Park	0.00%	0
Velda City	0.00%	0
Velda Village Hills	0.00%	0
Vinita Park	0.00%	0
Vinita Terrace	0.00%	0
Warson Woods	0.00%	0
Webster Groves	5.77%	3
Westwood	0.00%	0
Woodson Terrace	0.00%	0
Unincorporated Central St. Louis County	3.85%	2
TOTAL		52

Q7 Please select your jurisdiction in St. Charles County.

Answered: 76 Skipped: 249

St. Louis Area HOME Consortium Survey

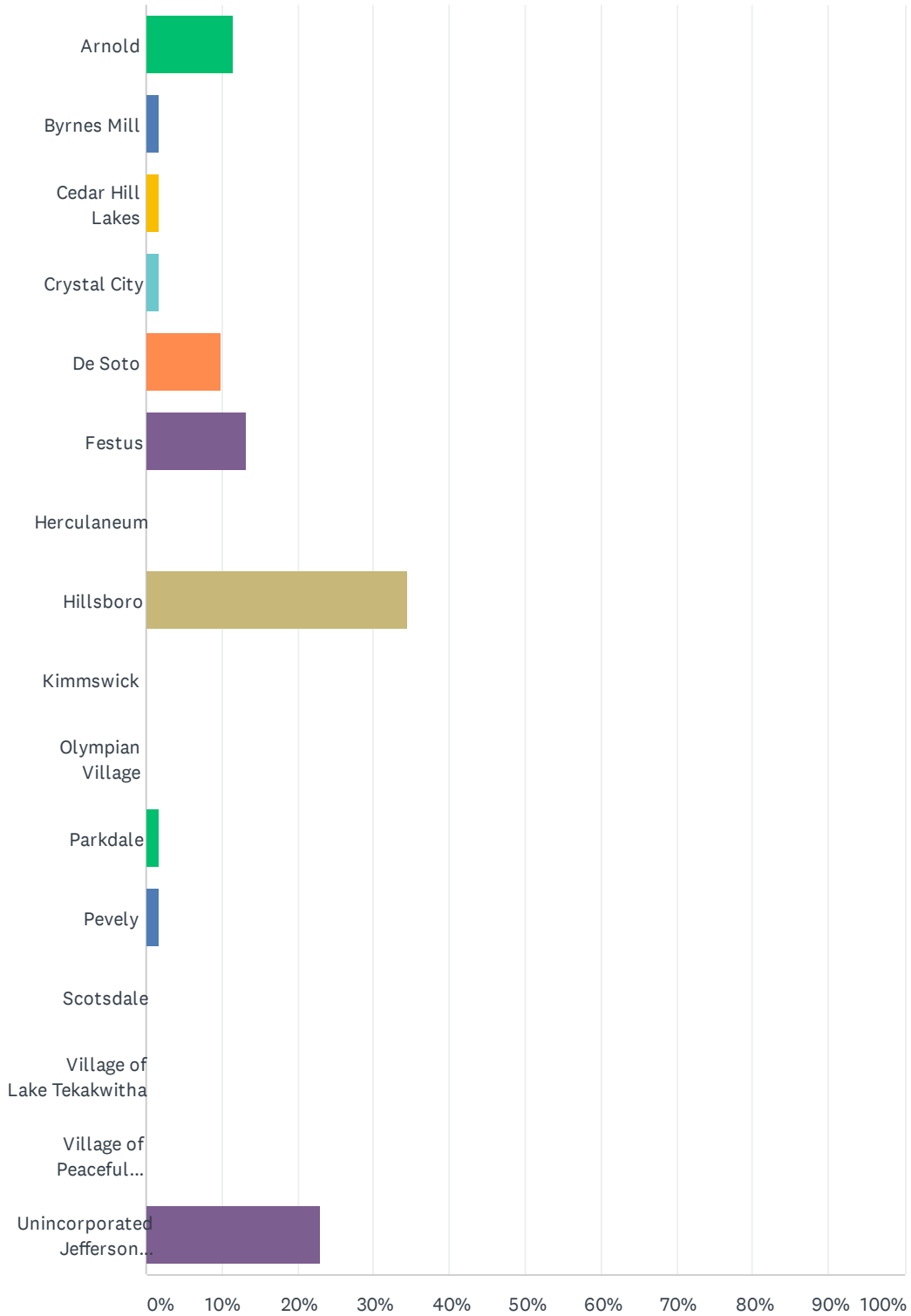


St. Louis Area HOME Consortium Survey

ANSWER CHOICES	RESPONSES	
Augusta	0.00%	0
Cottleville	0.00%	0
Dardenne Prairie	0.00%	0
Flint Hill	0.00%	0
Foristell	0.00%	0
Josephville	0.00%	0
O'Fallon	57.89%	44
Lake Saint Louis	1.32%	1
New Melle	0.00%	0
Portage Des Sioux	0.00%	0
St. Charles	18.42%	14
St. Paul	0.00%	0
St. Peters	10.53%	8
Weldon Spring	0.00%	0
Weldon Spring Heights	0.00%	0
Wentzville	6.58%	5
West Alton	0.00%	0
Unincorporated St. Charles County	5.26%	4
TOTAL		76

Q8 Please select your jurisdiction in Jefferson County.

Answered: 61 Skipped: 264

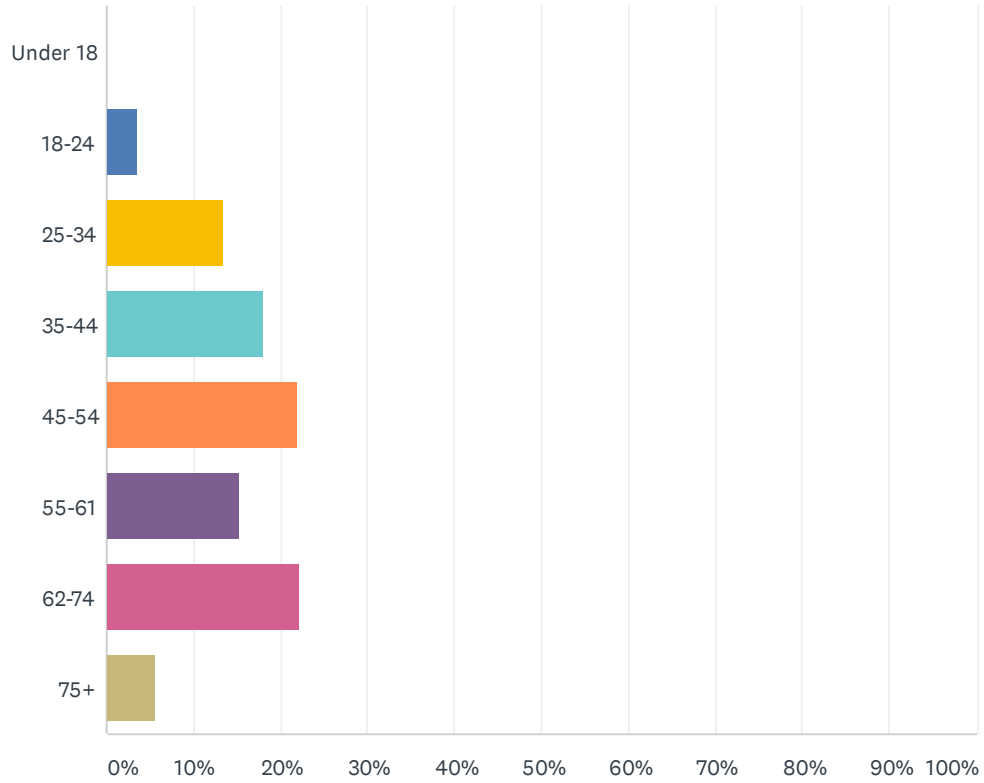


St. Louis Area HOME Consortium Survey

ANSWER CHOICES	RESPONSES	
Arnold	11.48%	7
Byrnes Mill	1.64%	1
Cedar Hill Lakes	1.64%	1
Crystal City	1.64%	1
De Soto	9.84%	6
Festus	13.11%	8
Herculaneum	0.00%	0
Hillsboro	34.43%	21
Kimmswick	0.00%	0
Olympian Village	0.00%	0
Parkdale	1.64%	1
Pevely	1.64%	1
Scotsdale	0.00%	0
Village of Lake Tekakwitha	0.00%	0
Village of Peaceful Village	0.00%	0
Unincorporated Jefferson County	22.95%	14
TOTAL		61

Q9 Which is your age group?

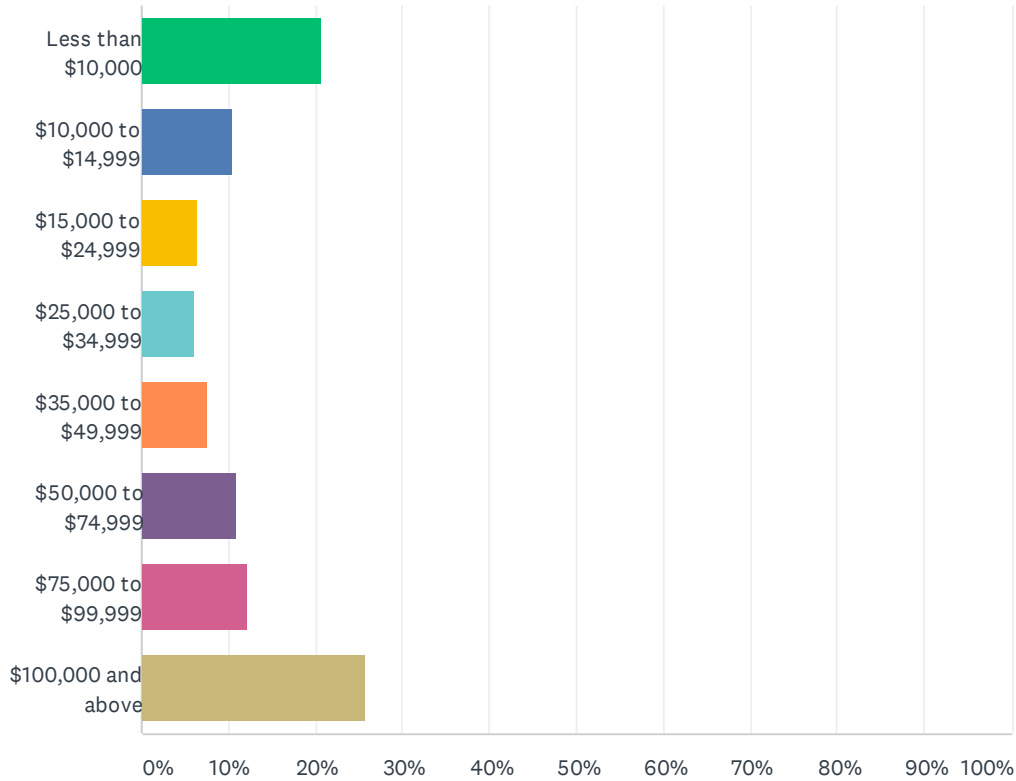
Answered: 301 Skipped: 24



ANSWER CHOICES	RESPONSES	
Under 18	0.00%	0
18-24	3.65%	11
25-34	13.29%	40
35-44	17.94%	54
45-54	21.93%	66
55-61	15.28%	46
62-74	22.26%	67
75+	5.65%	17
TOTAL		301

Q10 What is your total household income?

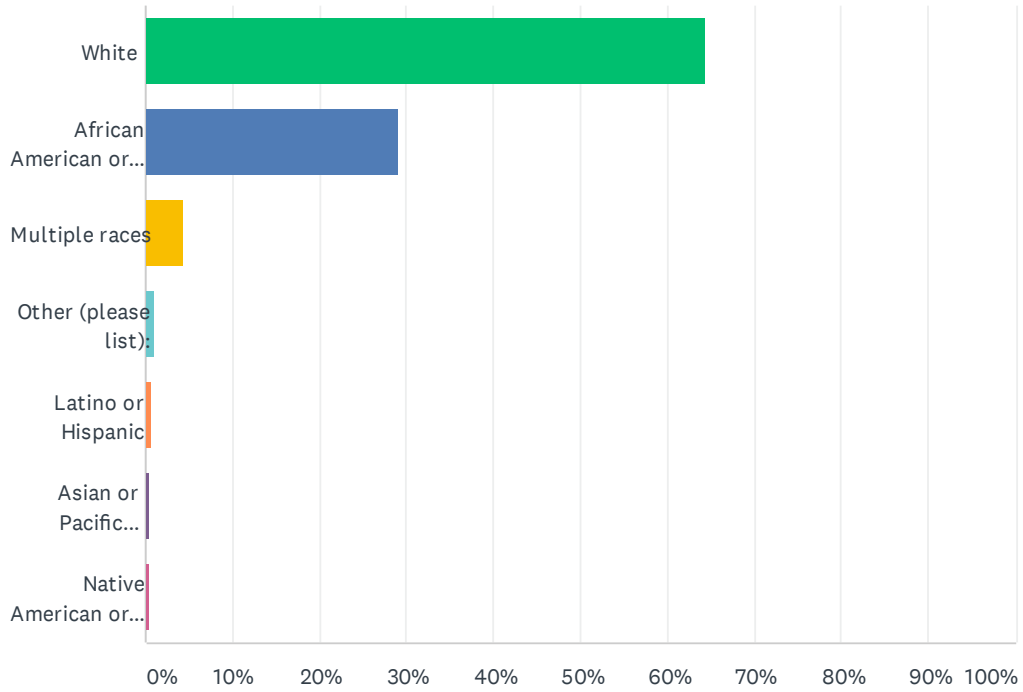
Answered: 295 Skipped: 30



ANSWER CHOICES	RESPONSES	
Less than \$10,000	20.68%	61
\$10,000 to \$14,999	10.51%	31
\$15,000 to \$24,999	6.44%	19
\$25,000 to \$34,999	6.10%	18
\$35,000 to \$49,999	7.46%	22
\$50,000 to \$74,999	10.85%	32
\$75,000 to \$99,999	12.20%	36
\$100,000 and above	25.76%	76
TOTAL		295

Q11 What is your race/ethnicity?

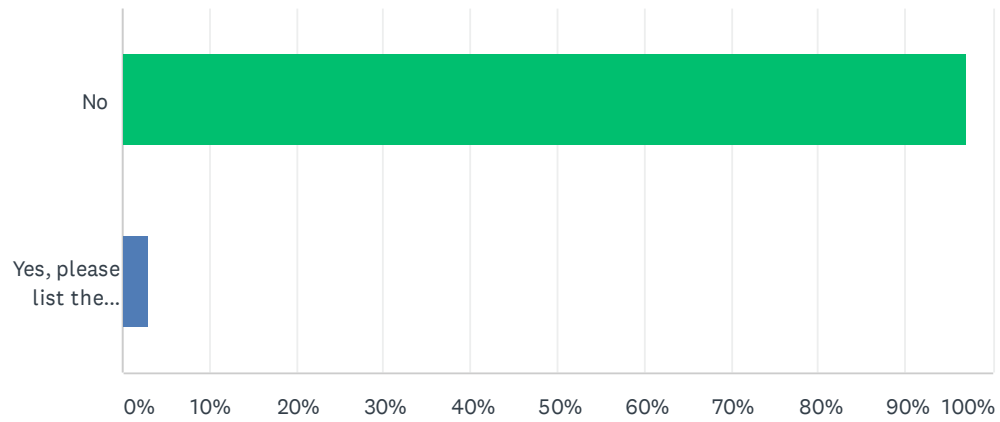
Answered: 300 Skipped: 25



ANSWER CHOICES	RESPONSES	
White	64.33%	193
African American or Black	29.00%	87
Multiple races	4.33%	13
Other (please list):	1.00%	3
Latino or Hispanic	0.67%	2
Asian or Pacific Islander	0.33%	1
Native American or Alaska Native	0.33%	1
TOTAL		300

Q12 Does anyone in your home regularly speak a language other than English?

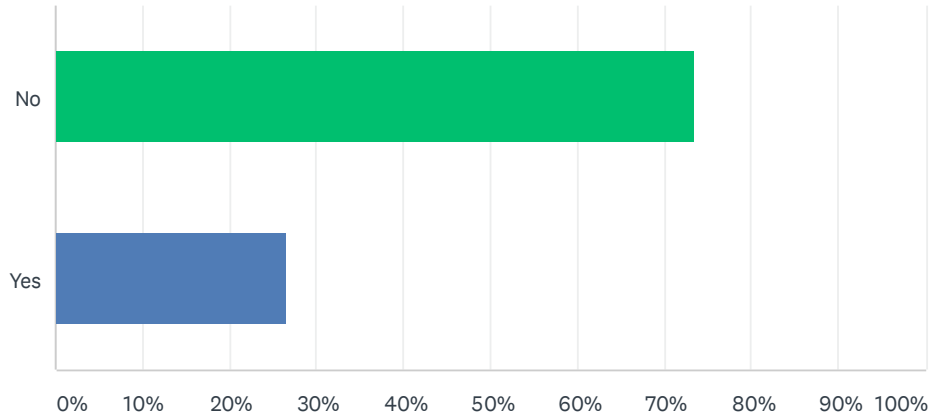
Answered: 298 Skipped: 27



ANSWER CHOICES	RESPONSES	
No	96.98%	289
Yes, please list the language:	3.02%	9
TOTAL		298

Q13 Does anyone in your home have a disability?

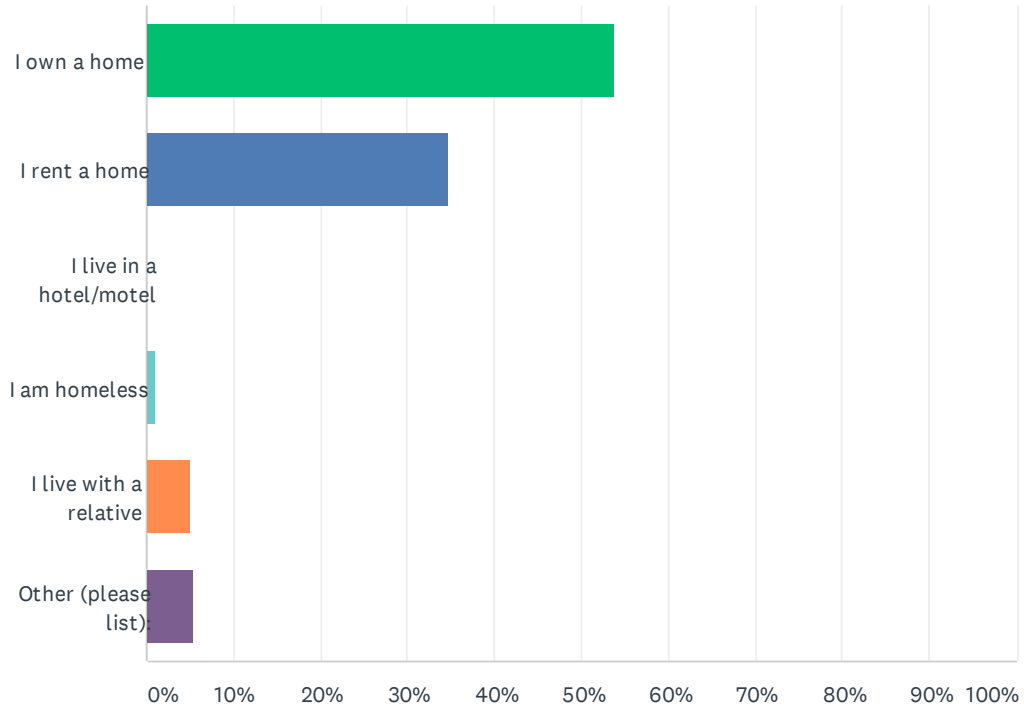
Answered: 297 Skipped: 28



ANSWER CHOICES	RESPONSES	
No	73.40%	218
Yes	26.60%	79
TOTAL		297

Q14 What is your current housing status?

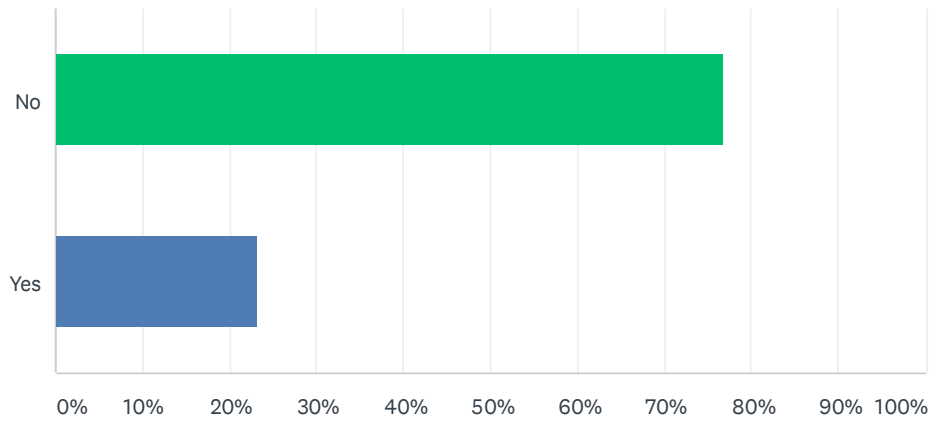
Answered: 296 Skipped: 29



ANSWER CHOICES	RESPONSES	
I own a home	53.72%	159
I rent a home	34.80%	103
I live in a hotel/motel	0.00%	0
I am homeless	1.01%	3
I live with a relative	5.07%	15
Other (please list):	5.41%	16
TOTAL		296

Q15 Do you currently live in public housing or receive Section 8 rental assistance?

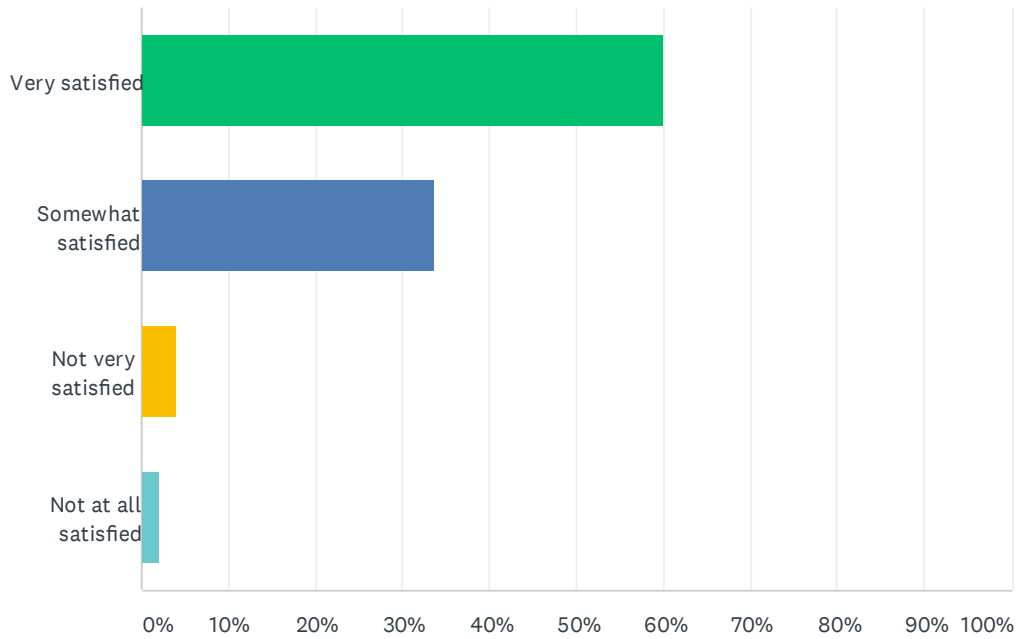
Answered: 297 Skipped: 28



ANSWER CHOICES	RESPONSES	
No	76.77%	228
Yes	23.23%	69
TOTAL		297

Q16 How satisfied are you with the neighborhood where you live?

Answered: 276 Skipped: 49



ANSWER CHOICES	RESPONSES	
Very satisfied	60.14%	166
Somewhat satisfied	33.70%	93
Not very satisfied	3.99%	11
Not at all satisfied	2.17%	6
TOTAL		276

Q17 What do you like best about your neighborhood?

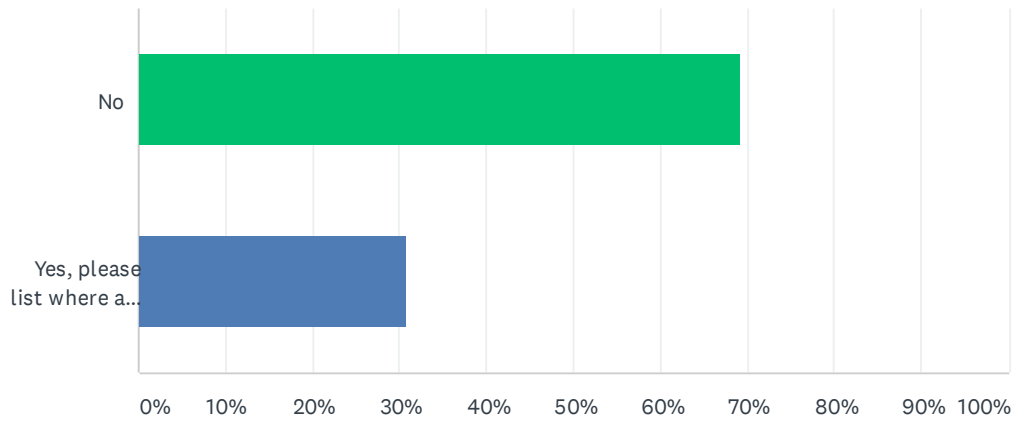
Answered: 251 Skipped: 74

Q18 What improvements would you like to see?

Answered: 233 Skipped: 92

Q19 Is there another area in St. Louis, St. Charles and Jefferson Counties where you would like to move?

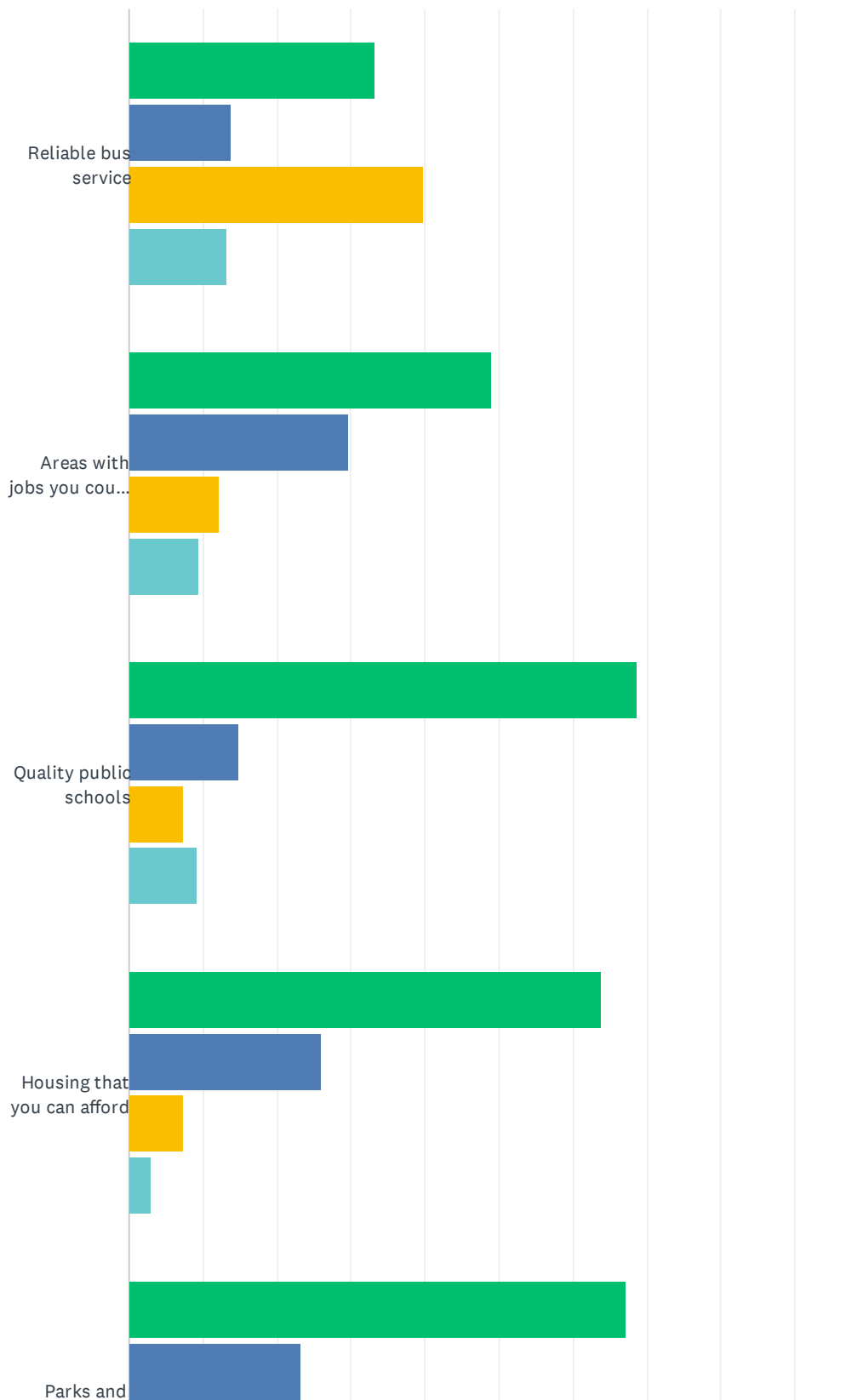
Answered: 270 Skipped: 55



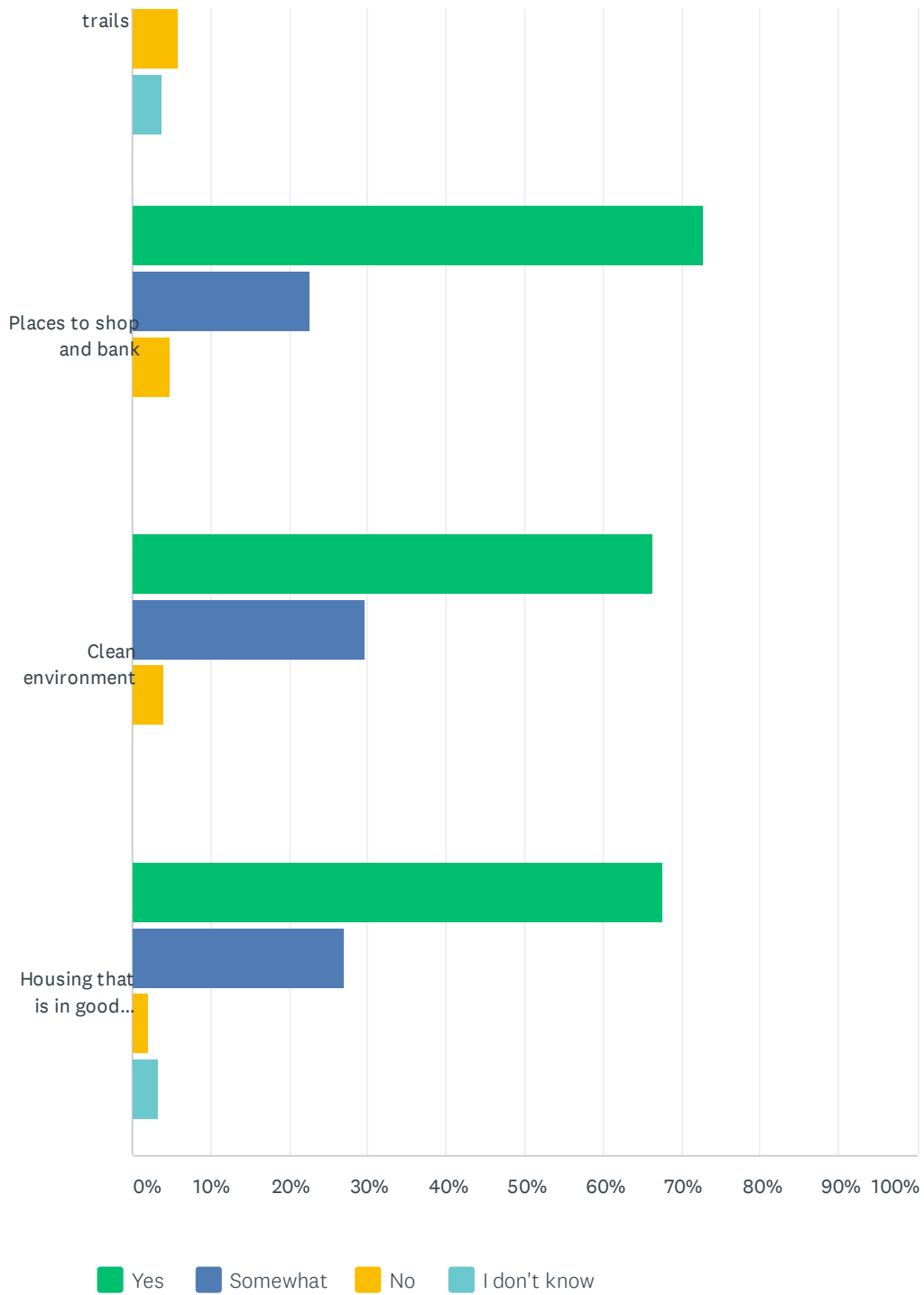
ANSWER CHOICES	RESPONSES	
No	69.26%	187
Yes, please list where and why you would choose that area:	30.74%	83
TOTAL		270

Q20 In your neighborhood, do you have access to the following community resources?

Answered: 277 Skipped: 48



St. Louis Area HOME Consortium Survey

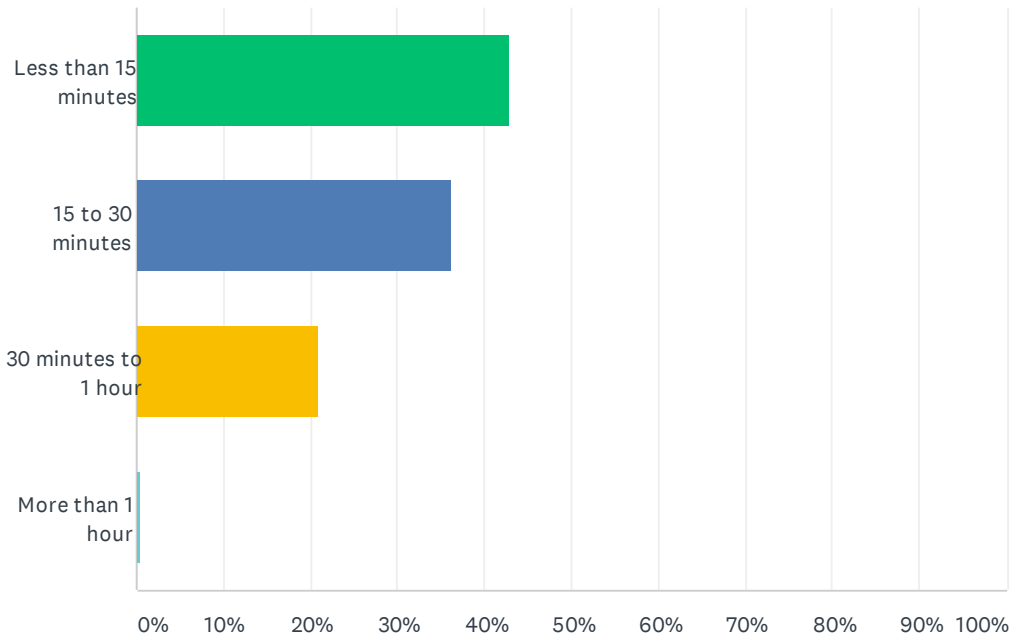


St. Louis Area HOME Consortium Survey

	YES	SOMEWHAT	NO	I DON'T KNOW	TOTAL	WEIGHTED AVERAGE
Reliable bus service	33.33% 89	13.86% 37	39.70% 106	13.11% 35	267	1.93
Areas with jobs you could get	48.87% 130	29.70% 79	12.03% 32	9.40% 25	266	2.41
Quality public schools	68.63% 186	14.76% 40	7.38% 20	9.23% 25	271	2.67
Housing that you can afford	63.87% 175	25.91% 71	7.30% 20	2.92% 8	274	2.58
Parks and trails	67.16% 182	23.25% 63	5.90% 16	3.69% 10	271	2.64
Places to shop and bank	72.73% 200	22.55% 62	4.73% 13	0.00% 0	275	2.68
Clean environment	66.30% 181	29.67% 81	4.03% 11	0.00% 0	273	2.62
Housing that is in good condition	67.52% 185	27.01% 74	2.19% 6	3.28% 9	274	2.68

Q21 How long is your daily commute to work (one-way)?

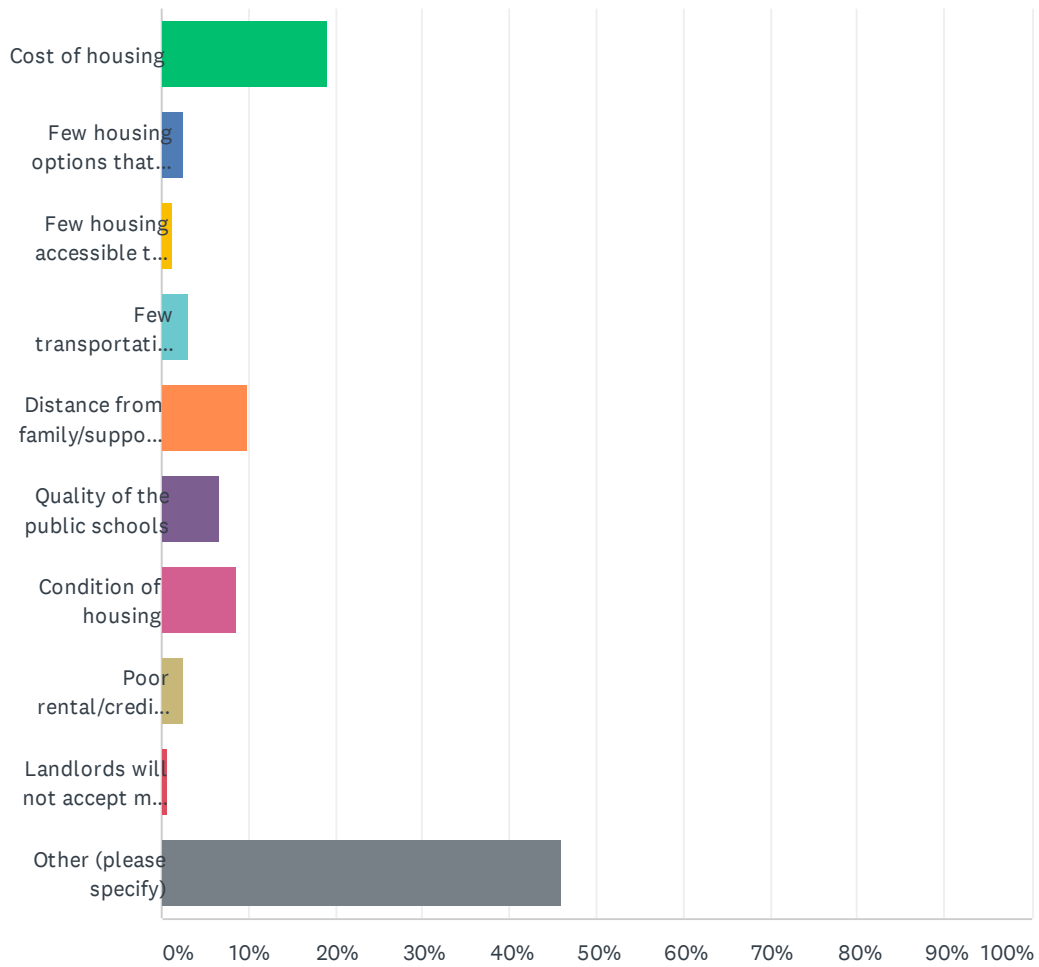
Answered: 205 Skipped: 120



ANSWER CHOICES	RESPONSES	
Less than 15 minutes	42.93%	88
15 to 30 minutes	36.10%	74
30 minutes to 1 hour	20.98%	43
More than 1 hour	0.49%	1
Total Respondents: 205		

Q22 If you wish to live closer to your workplace, are any of the following barriers preventing you from doing so? (Check all that apply.)

Answered: 163 Skipped: 162

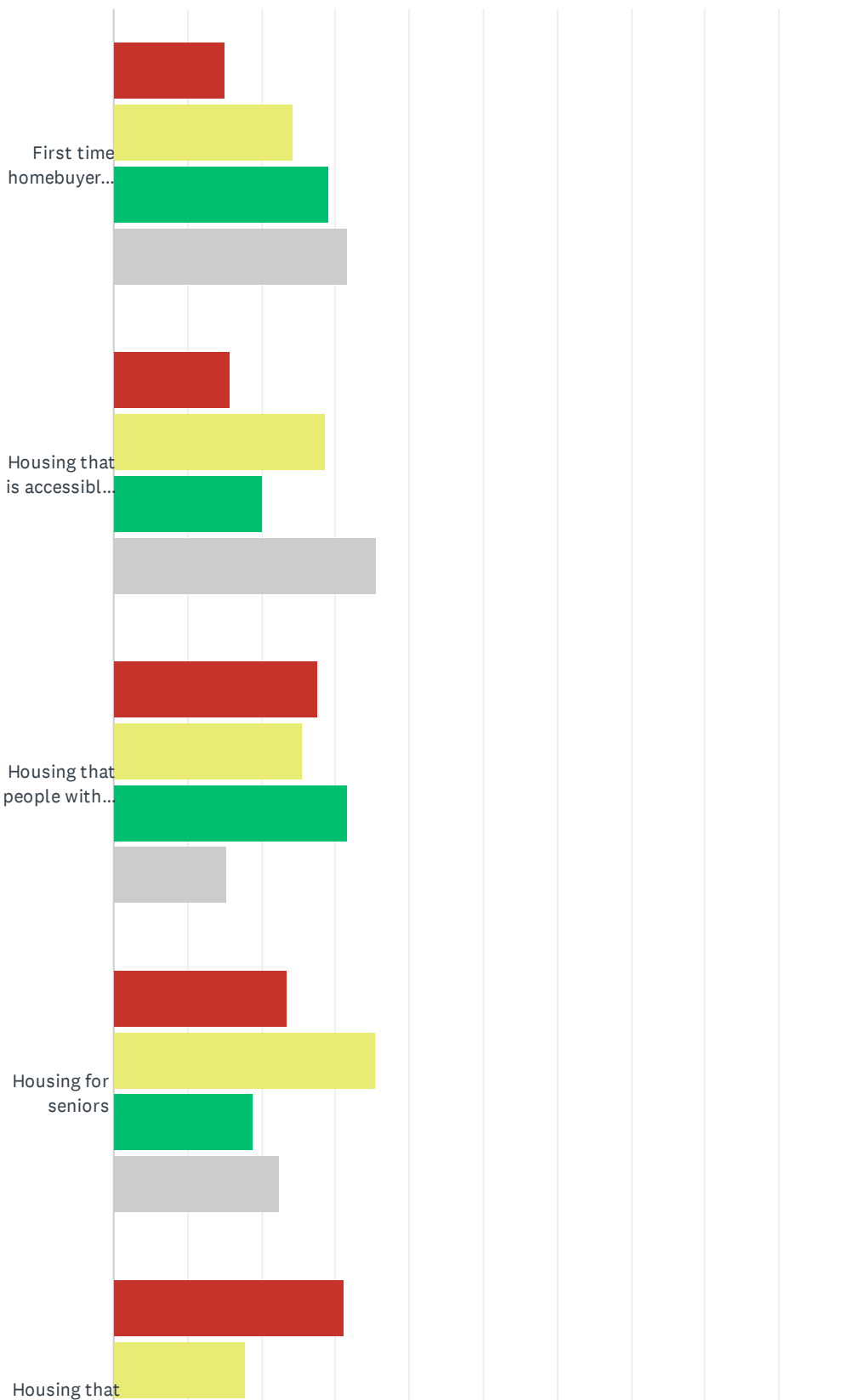


St. Louis Area HOME Consortium Survey

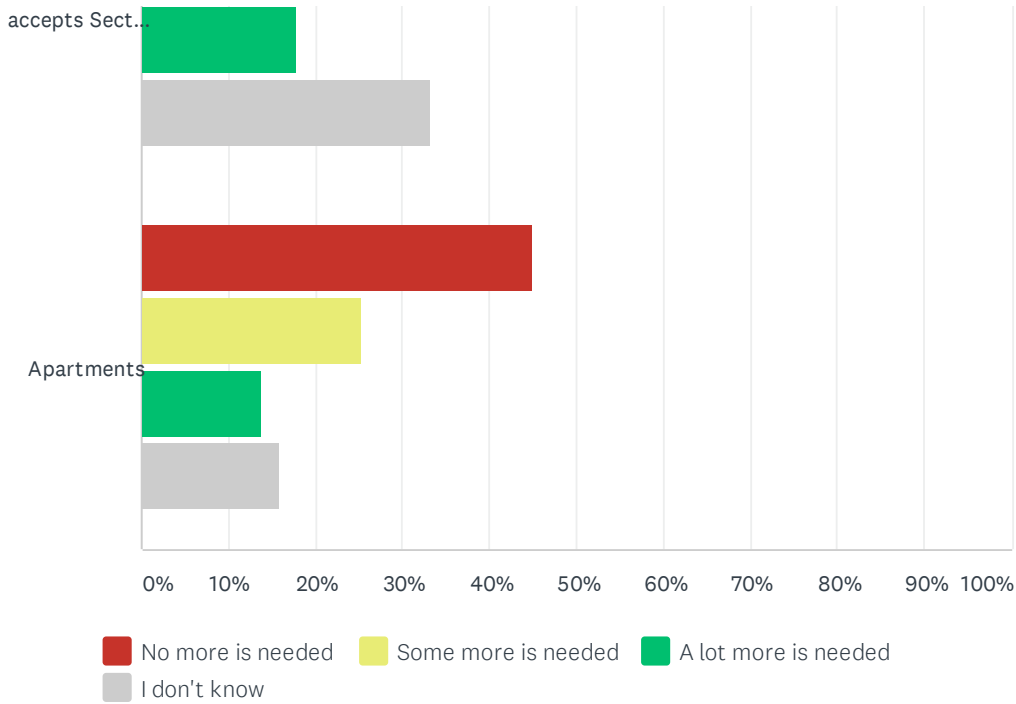
ANSWER CHOICES	RESPONSES	
Cost of housing	19.02%	31
Few housing options that meet my family size	2.45%	4
Few housing accessible to people with disabilities	1.23%	2
Few transportation options	3.07%	5
Distance from family/support network	9.82%	16
Quality of the public schools	6.75%	11
Condition of housing	8.59%	14
Poor rental/credit history	2.45%	4
Landlords will not accept my voucher	0.61%	1
Other (please specify)	46.01%	75
TOTAL		163

Q23 Thinking about about the community where you live, please check whether you think more is needed for each of the housing types below.

Answered: 257 Skipped: 68



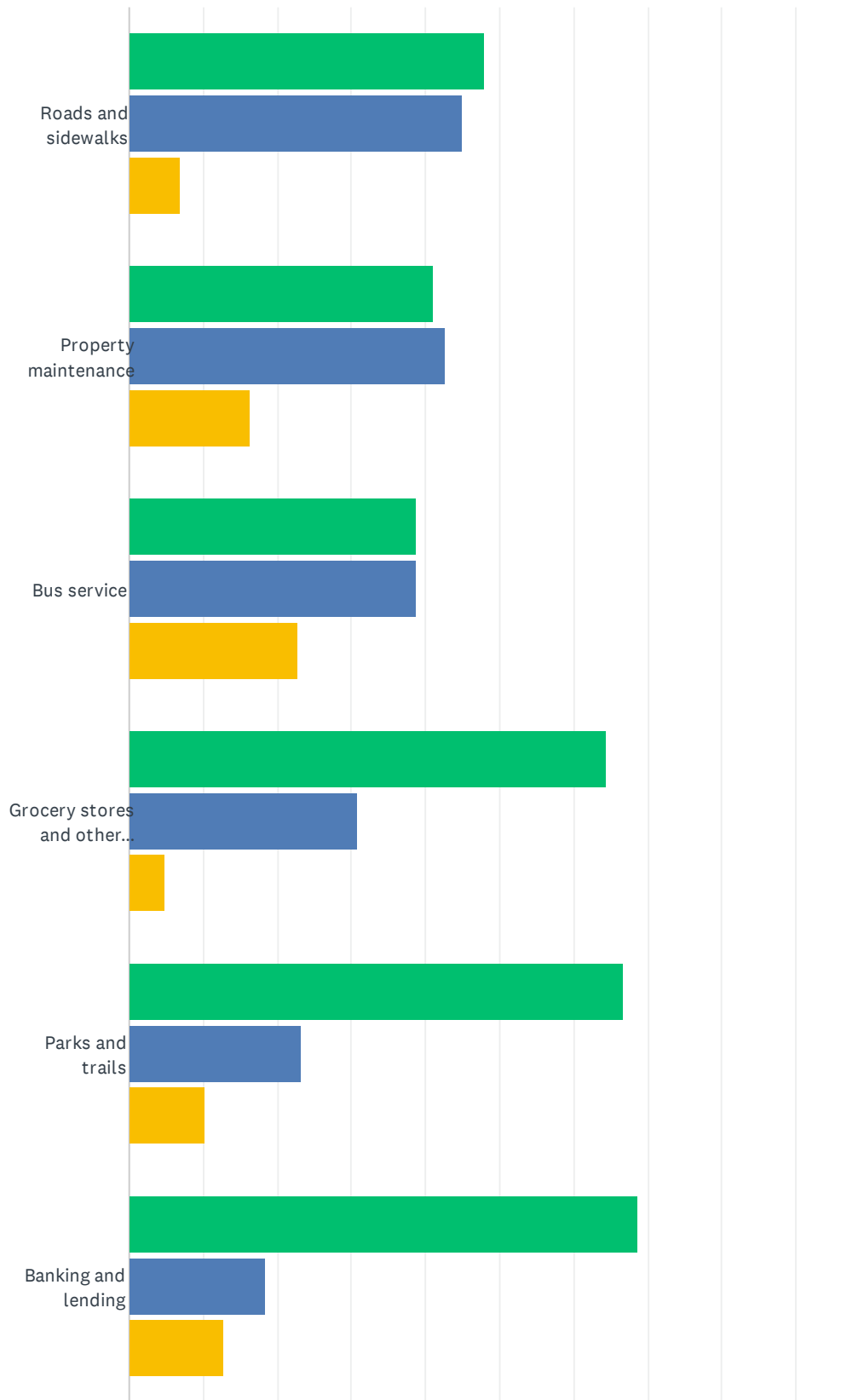
St. Louis Area HOME Consortium Survey



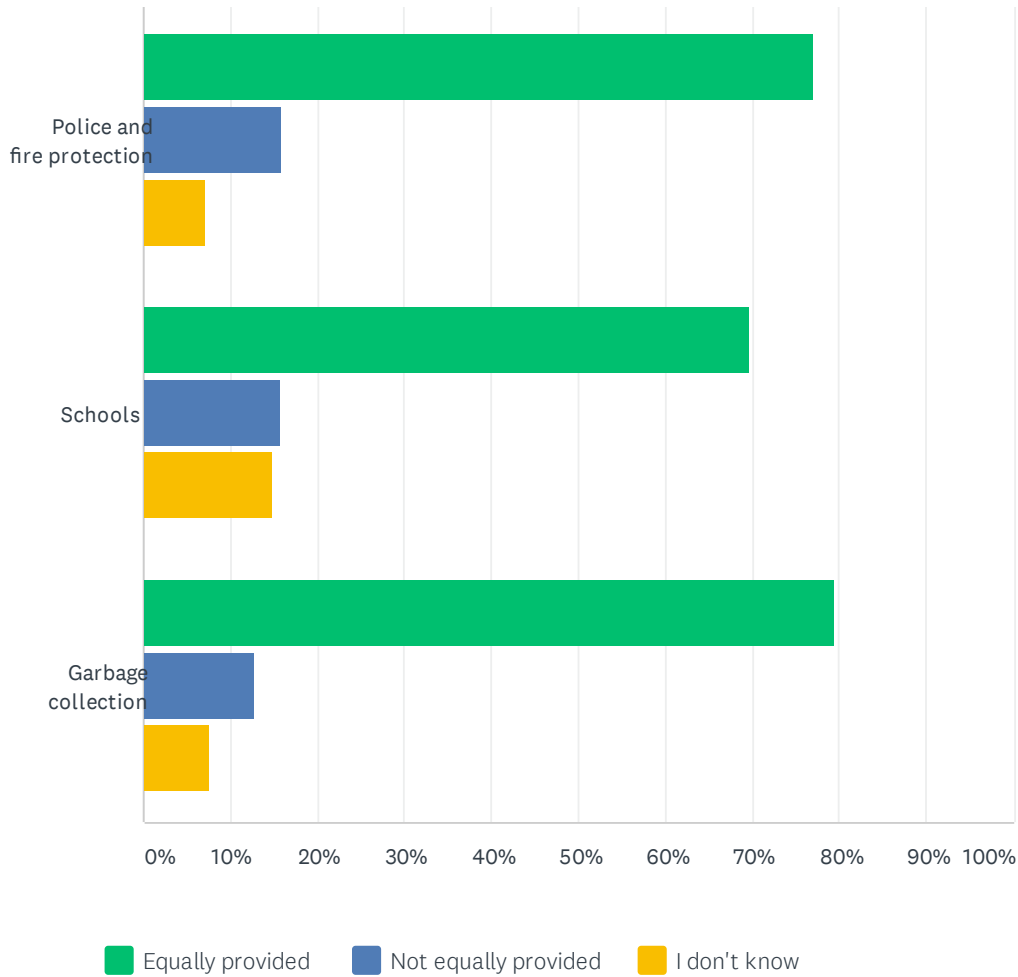
	NO MORE IS NEEDED	SOME MORE IS NEEDED	A LOT MORE IS NEEDED	I DON'T KNOW	TOTAL	WEIGHTED AVERAGE
First time homebuyer assistance	15.00% 36	24.17% 58	29.17% 70	31.67% 76	240	2.21
Housing that is accessible to people with disabilities	15.73% 39	28.63% 71	20.16% 50	35.48% 88	248	2.07
Housing that people with lower incomes can afford	27.56% 70	25.59% 65	31.50% 80	15.35% 39	254	2.05
Housing for seniors	23.51% 59	35.46% 89	18.73% 47	22.31% 56	251	1.94
Housing that accepts Section 8 vouchers	31.28% 76	17.70% 43	17.70% 43	33.33% 81	243	1.80
Apartments	45.00% 108	25.42% 61	13.75% 33	15.83% 38	240	1.63

Q24 Thinking about the community where you live, please check whether you think each of the following are equally provided in all areas.

Answered: 257 Skipped: 68



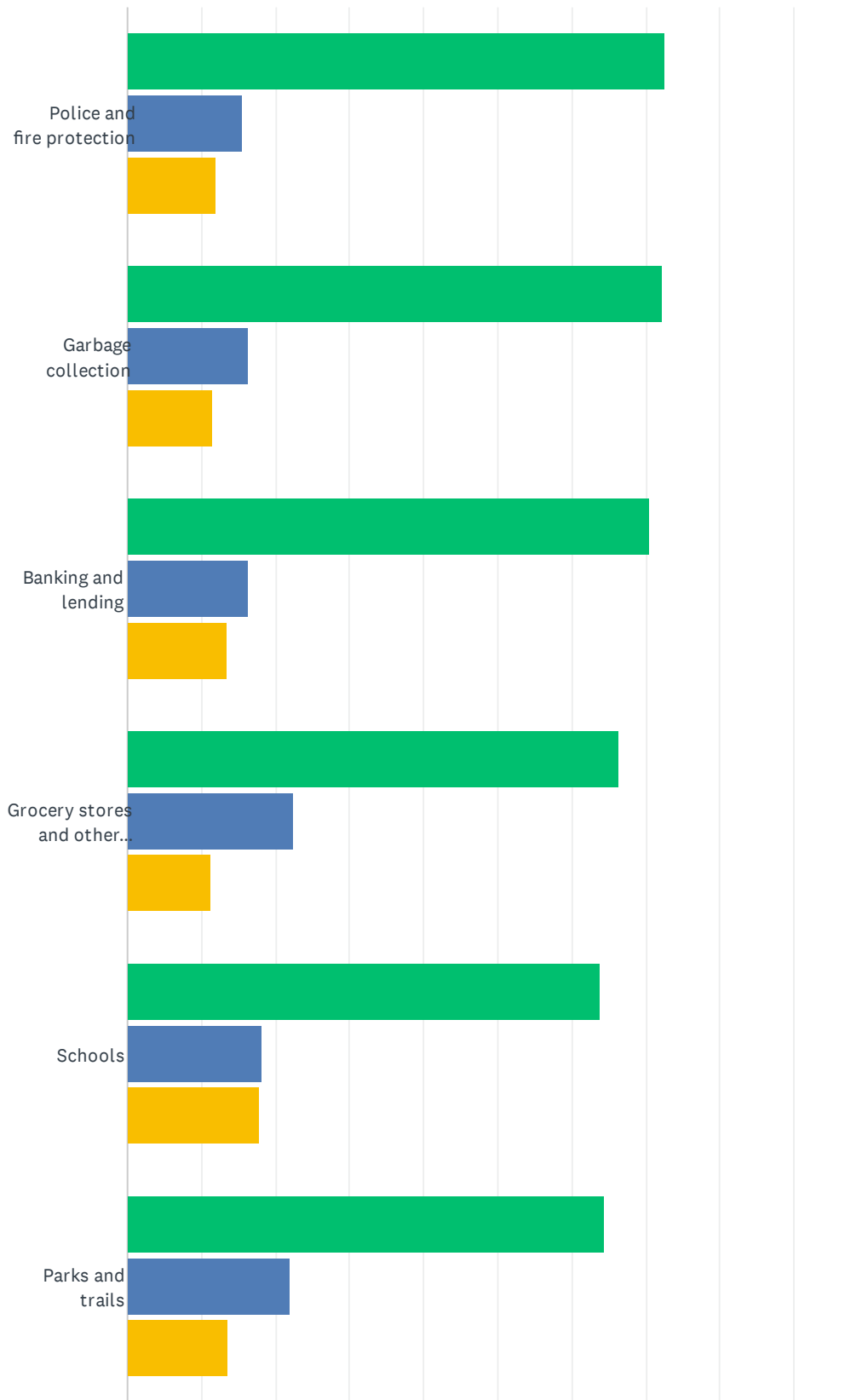
St. Louis Area HOME Consortium Survey



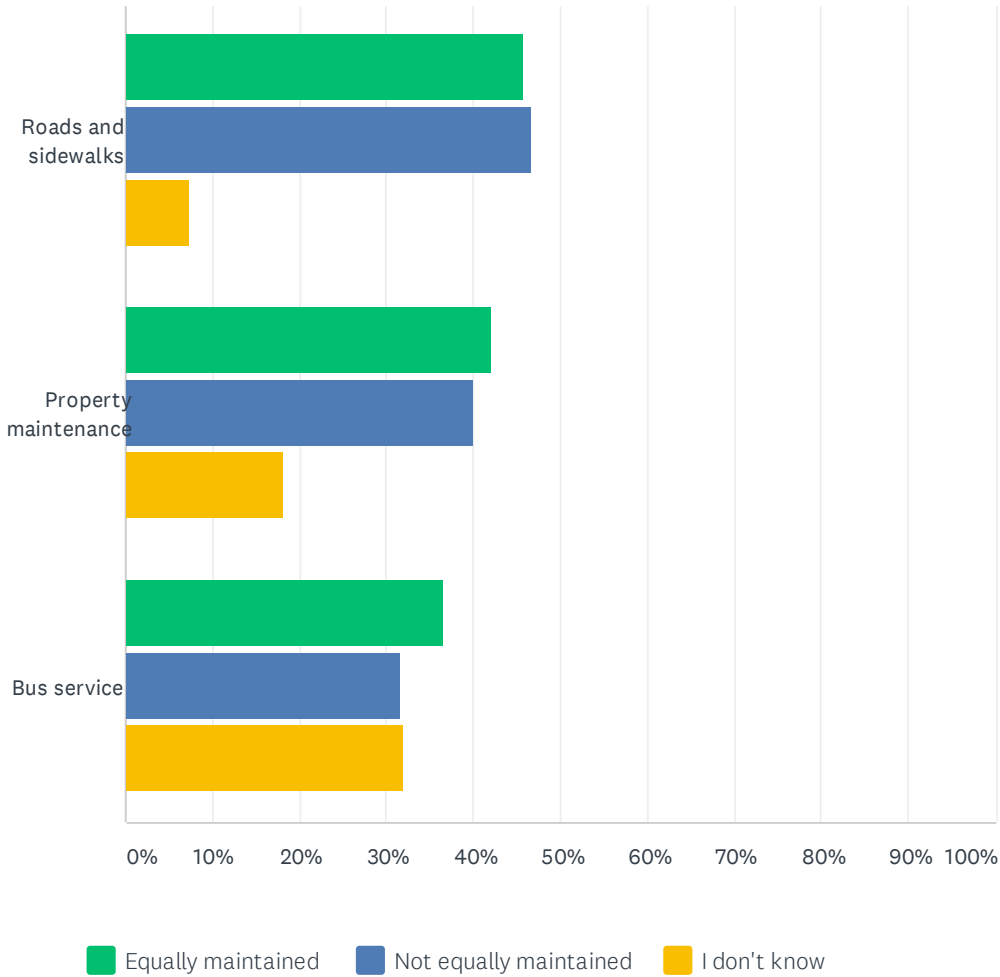
	EQUALLY PROVIDED	NOT EQUALLY PROVIDED	I DON'T KNOW	TOTAL	WEIGHTED AVERAGE
Roads and sidewalks	47.95% 117	45.08% 110	6.97% 17	244	1.52
Property maintenance	40.98% 100	42.62% 104	16.39% 40	244	1.49
Bus service	38.62% 95	38.62% 95	22.76% 56	246	1.50
Grocery stores and other shopping	64.43% 163	30.83% 78	4.74% 12	253	1.68
Parks and trails	66.67% 164	23.17% 57	10.16% 25	246	1.74
Banking and lending	68.67% 171	18.47% 46	12.85% 32	249	1.79
Police and fire protection	76.89% 193	15.94% 40	7.17% 18	251	1.83
Schools	69.60% 174	15.60% 39	14.80% 37	250	1.82
Garbage collection	79.52% 198	12.85% 32	7.63% 19	249	1.86

Q25 Thinking about the community where you live, please check whether you think each of the following are equally maintained in all areas.

Answered: 252 Skipped: 73



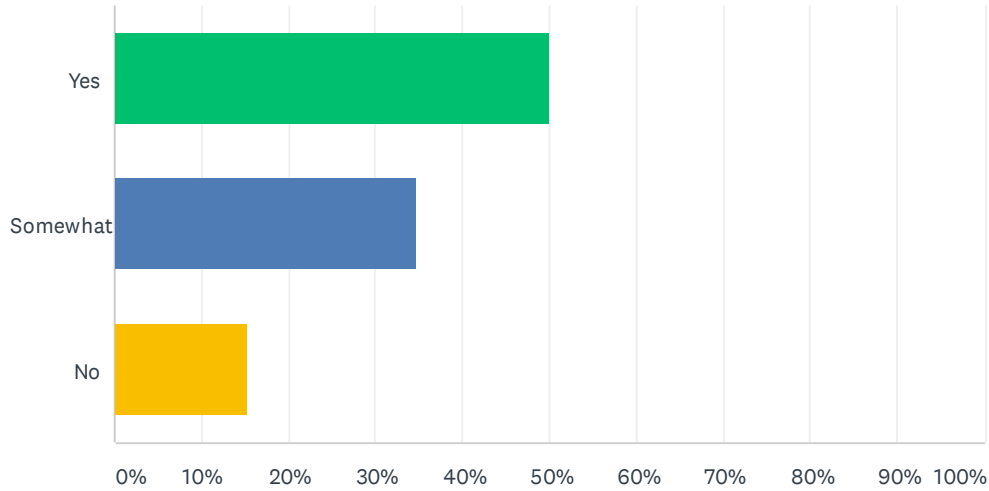
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	EQUALLY MAINTAINED	NOT EQUALLY MAINTAINED	I DON'T KNOW	TOTAL	WEIGHTED AVERAGE
Police and fire protection	72.65% 178	15.51% 38	11.84% 29	245	1.82
Garbage collection	72.13% 176	16.39% 40	11.48% 28	244	1.81
Banking and lending	70.42% 169	16.25% 39	13.33% 32	240	1.81
Grocery stores and other shopping	66.39% 160	22.41% 54	11.20% 27	241	1.75
Schools	63.82% 157	18.29% 45	17.89% 44	246	1.78
Parks and trails	64.46% 156	21.90% 53	13.64% 33	242	1.75
Roads and sidewalks	45.90% 112	46.72% 114	7.38% 18	244	1.50
Property maintenance	41.98% 102	39.92% 97	18.11% 44	243	1.51
Bus service	36.51% 88	31.54% 76	31.95% 77	241	1.54

Q26 Do you understand your fair housing rights?

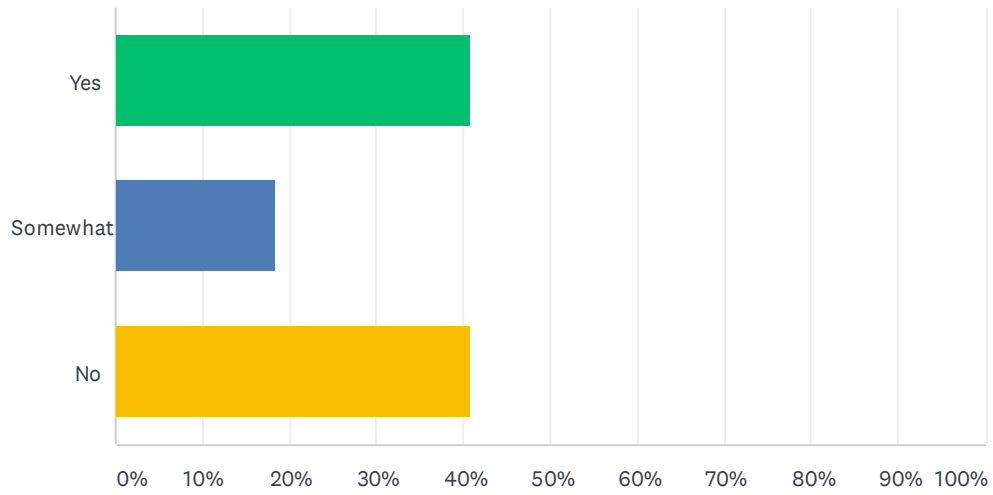
Answered: 262 Skipped: 63



ANSWER CHOICES	RESPONSES	
Yes	50.00%	131
Somewhat	34.73%	91
No	15.27%	40
TOTAL		262

Q27 Do you know where to file a housing discrimination complaint?

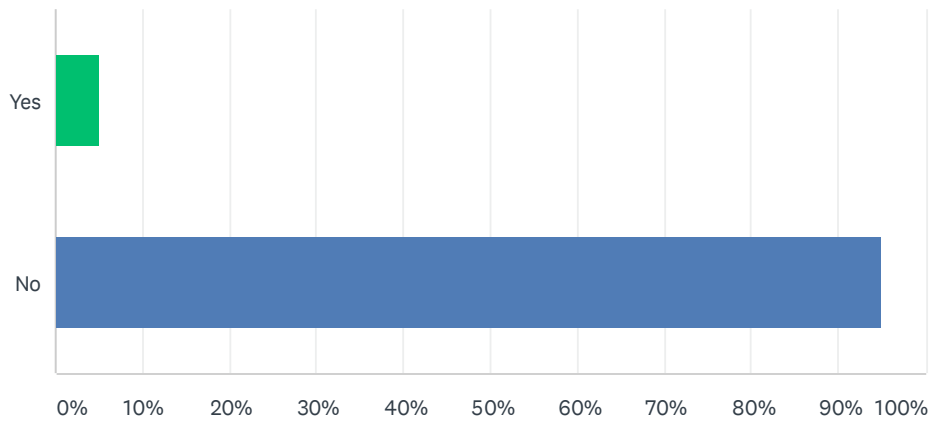
Answered: 262 Skipped: 63



ANSWER CHOICES	RESPONSES	
Yes	40.84%	107
Somewhat	18.32%	48
No	40.84%	107
TOTAL		262

Q28 Since living in this area, have you experienced housing discrimination?The following actions are examples of housing discrimination if they are based on race, ethnicity, national origin, sex, religion, whether you have children, or whether you have a disability: refusing to rent or sell housing, refusing to discuss the rental or sale of housing, saying that housing is not available for rent or sale when it is, having different rental or sale terms, or providing different housing or housing services.

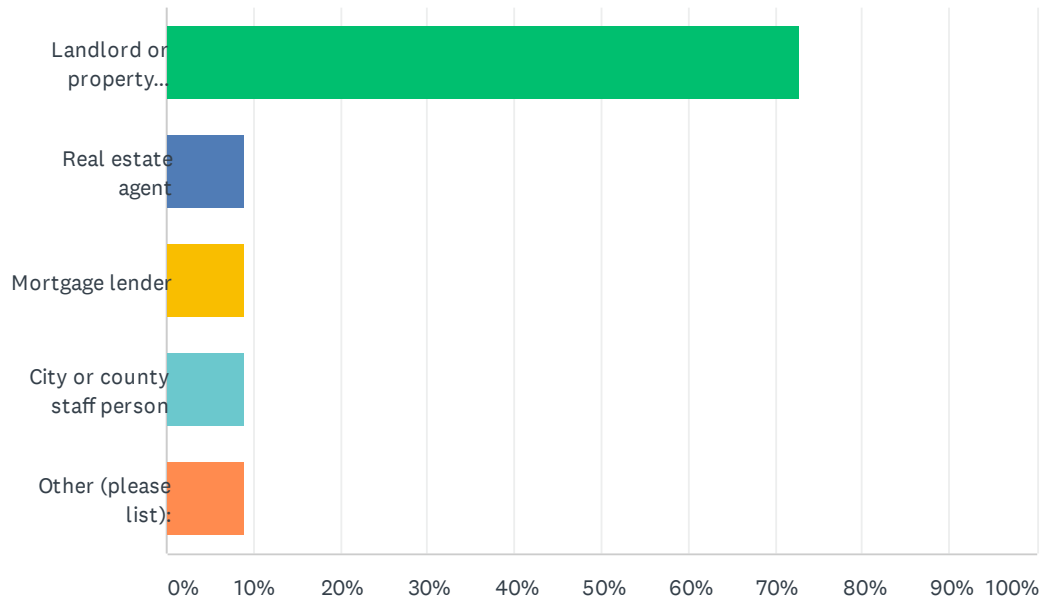
Answered: 258 Skipped: 67



ANSWER CHOICES	RESPONSES	
Yes	5.04%	13
No	94.96%	245
TOTAL		258

Q29 Who discriminated against you? (Check all that apply)

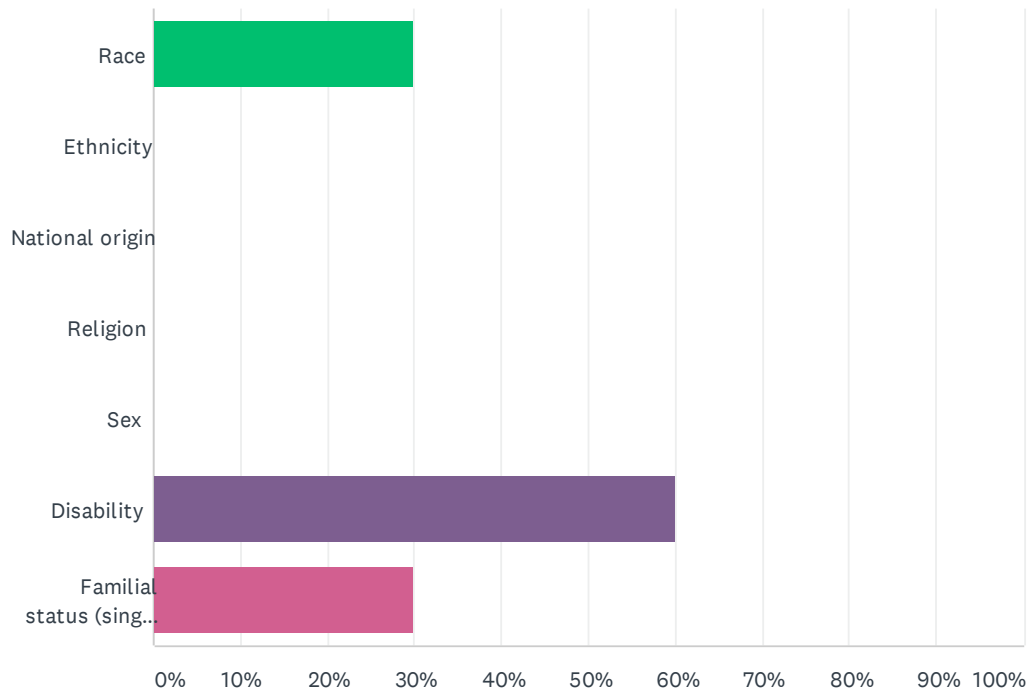
Answered: 11 Skipped: 314



ANSWER CHOICES	RESPONSES	
Landlord or property manager	72.73%	8
Real estate agent	9.09%	1
Mortgage lender	9.09%	1
City or county staff person	9.09%	1
Other (please list):	9.09%	1
Total Respondents: 11		

Q30 On what basis do you believe you were discriminated against? (Check all that apply)

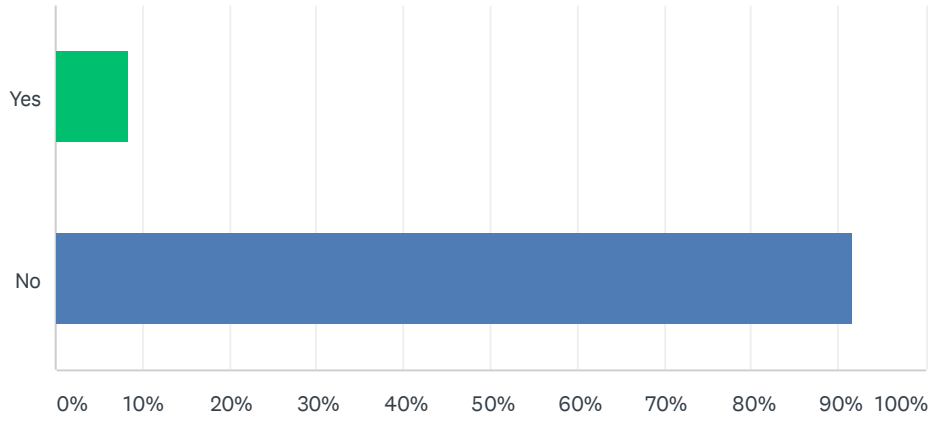
Answered: 10 Skipped: 315



ANSWER CHOICES	RESPONSES	
Race	30.00%	3
Ethnicity	0.00%	0
National origin	0.00%	0
Religion	0.00%	0
Sex	0.00%	0
Disability	60.00%	6
Familial status (single parent with children, family with children, expecting a child)	30.00%	3
Total Respondents: 10		

Q31 Did you file a report of that discrimination?

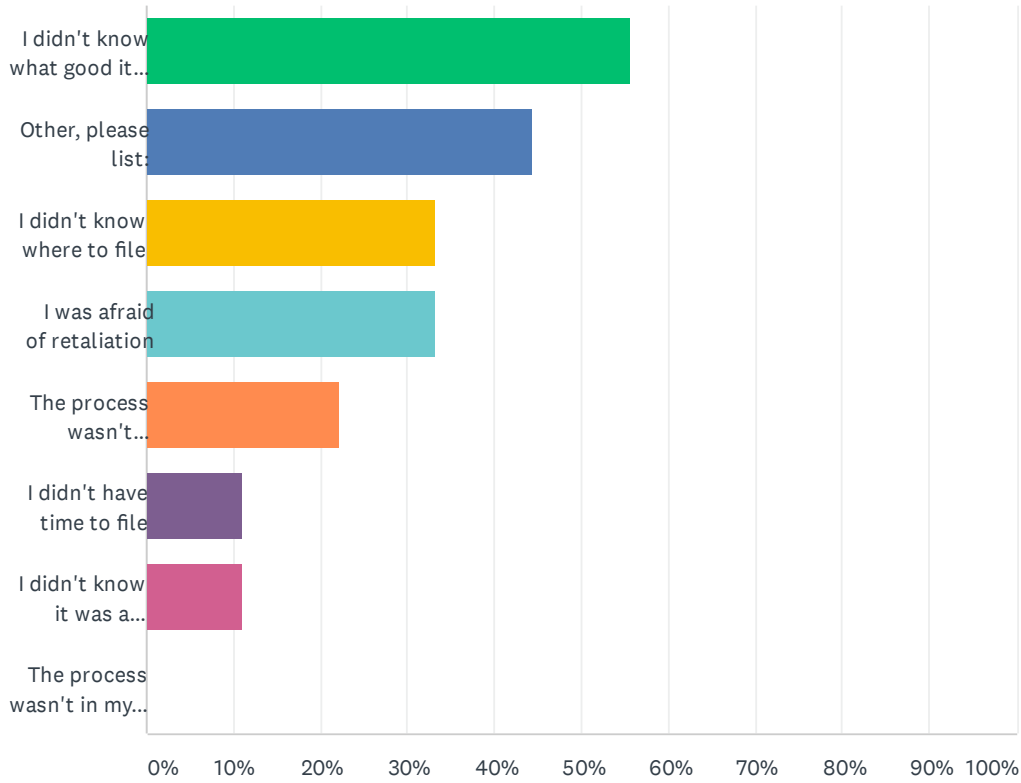
Answered: 12 Skipped: 313



ANSWER CHOICES	RESPONSES	
Yes	8.33%	1
No	91.67%	11
TOTAL		12

Q32 If you answered NO, why didn't you file? (Check all that apply)

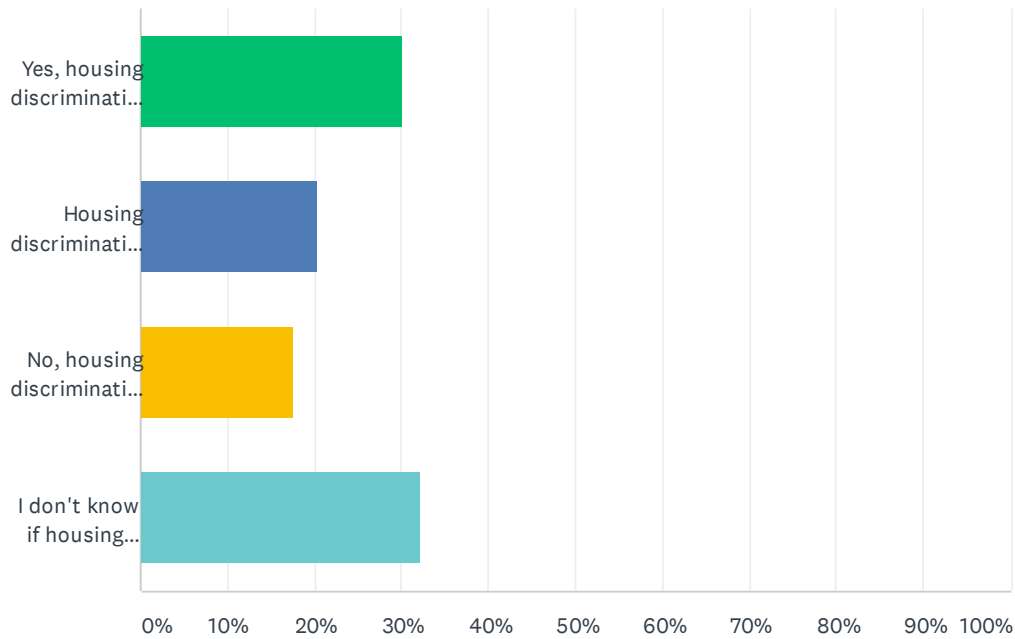
Answered: 9 Skipped: 316



ANSWER CHOICES	RESPONSES	
I didn't know what good it would do	55.56%	5
Other, please list:	44.44%	4
I didn't know where to file	33.33%	3
I was afraid of retaliation	33.33%	3
The process wasn't accessible to me because of a disability	22.22%	2
I didn't have time to file	11.11%	1
I didn't know it was a violation of the law	11.11%	1
The process wasn't in my language	0.00%	0
Total Respondents: 9		

Q33 Do you think housing discrimination is an issue in the St. Louis region?

Answered: 246 Skipped: 79

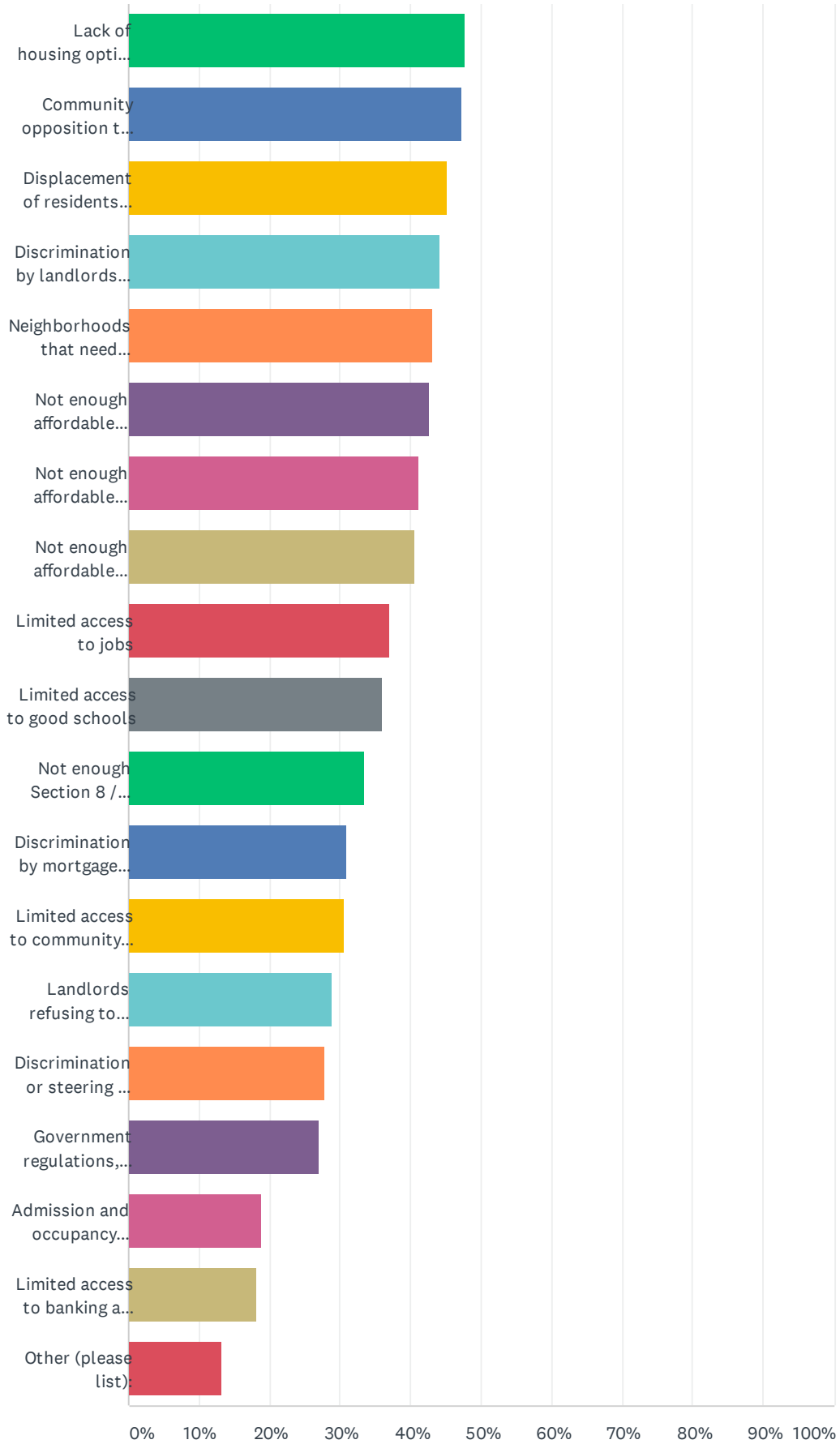


ANSWER CHOICES	RESPONSES	
Yes, housing discrimination is an issue	30.08%	74
Housing discrimination may be an issue	20.33%	50
No, housing discrimination is not an issue	17.48%	43
I don't know if housing discrimination is an issue	32.11%	79
TOTAL		246

Q34 Do you think any of the following are barriers to fair housing in the St. Louis region? (Check all that apply)

Answered: 197 Skipped: 128

St. Louis Area HOME Consortium Survey



St. Louis Area HOME Consortium Survey

ANSWER CHOICES	RESPONSES	
Lack of housing options for people with disabilities	47.72%	94
Community opposition to affordable housing	47.21%	93
Displacement of residents due to rising housing costs	45.18%	89
Discrimination by landlords or rental agents	44.16%	87
Neighborhoods that need revitalization and new investment	43.15%	85
Not enough affordable rental housing for individuals	42.64%	84
Not enough affordable rental housing for small families	41.12%	81
Not enough affordable rental housing for large families	40.61%	80
Limited access to jobs	37.06%	73
Limited access to good schools	36.04%	71
Not enough Section 8 / Housing Choice Vouchers to meet needs	33.50%	66
Discrimination by mortgage lenders	30.96%	61
Limited access to community resources for people with disabilities	30.46%	60
Landlords refusing to accept vouchers	28.93%	57
Discrimination or steering by real estate agents	27.92%	55
Government regulations, ordinances, or policies	26.90%	53
Admission and occupancy policies in public housing	18.78%	37
Limited access to banking and financial services	18.27%	36
Other (please list):	13.20%	26
Total Respondents: 197		

Q35 Please use the box below to provide any additional information about housing choice and fair housing in the St. Louis Region.

Answered: 50 Skipped: 275

APPENDIX IV

HOUSING DISCRIMINATION

COMPLAINT DATA

**RAW HOUSING DISCRIMINATION COMPLAINT DATA AS SUPPLIED BY
HUD AND EHO**

Status of Cases Filed in St. Louis County, MO between July 1, 2015 - June 30, 2020

Case Number - HUD	Open/Closed	Closure Reason	Issues
07-15-0490-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-15-0514-8	Closed	Complaint withdrawn by complainant after resolution	Failure to make reasonable accommodation
07-15-0539-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
07-15-0576-8	Closed	Complaint withdrawn by complainant after resolution	Discriminatory terms, conditions, privileges, or services and facilities
07-16-0002-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-16-0054-8	Closed	Complainant failed to cooperate	Discriminatory refusal to negotiate for rental
07-16-0055-8	Closed	Conciliation/settlement successful	Discriminatory terms, conditions, privileges, or services and facilities
07-16-0080-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-16-0081-8	Closed	Complaint withdrawn by complainant after resolution	Discriminatory financing (includes real estate transactions)
07-16-0082-8	Closed	No cause determination	Discriminatory refusal to rent
07-16-0083-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-16-0094-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-16-0100-8	Closed	Closed because trial has begun	Discriminatory refusal to rent; Discriminatory advertisement - rental
07-16-0107-8	Closed	Complaint withdrawn by complainant after resolution	Failure to make reasonable accommodation
07-16-4085-8	Closed	No cause determination	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities
07-16-4091-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-16-4094-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental
07-16-4100-8	Closed	Complainant failed to cooperate	Discrimination in terms/conditions/privileges relating to rental
07-16-4103-8	Closed	No cause determination	Discriminatory refusal to rent
07-16-4132-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-16-4147-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-16-4164-8	Closed	No cause determination	Discriminatory refusal to negotiate for sale; Discriminatory advertising, statements and notices
07-16-4180-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-16-4197-8	Closed	No cause determination	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental
07-16-4204-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
07-16-4218-8	Closed	Unable to locate complainant	Discrimination in terms/conditions/privileges relating to rental
07-16-4244-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental
07-16-4249-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-16-4272-8	Closed	No cause determination	Discriminatory advertising, statements and notices
07-16-4288-8	Closed	Conciliation/settlement successful	Discriminatory terms, conditions, privileges, or services and facilities
07-16-4291-8	Open		Discrimination in terms/conditions/privileges relating to rental
07-16-4294-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-16-4295-8	Closed	No cause determination	Discriminatory acts under Section 818 (coercion, Etc.)
07-16-4328-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-16-4330-8	Closed	Dismissed for lack of jurisdiction	Discrimination in terms/conditions/privileges relating to rental
07-16-4350-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-16-4351-8	Closed	No cause determination	Discrimination in the making of loans
07-16-4357-8	Closed	No cause determination	Discriminatory acts under Section 818 (coercion, Etc.)
07-16-4373-8	Closed	Complaint withdrawn by complainant without resolution	Discriminatory acts under Section 818 (coercion, Etc.)
07-16-4377-8	Closed	Complaint withdrawn by complainant after resolution	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
07-16-4397-8	Closed	Conciliation/settlement successful	Discriminatory refusal to rent and negotiate for rental; False denial or representation of availability - rental
07-16-4407-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental
07-16-4418-8	Closed	Complaint withdrawn by complainant after resolution	Discrimination in terms/conditions/privileges relating to rental
07-16-4419-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to sale; Discriminatory acts under Section 818 (coercion, Etc.)
07-16-4455-8	Closed	Complainant failed to cooperate	Discrimination in terms/conditions/privileges relating to rental
07-16-4478-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation
07-16-4605-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-16-4611-8	Closed	Complainant failed to cooperate	Discrimination in terms/conditions/privileges relating to rental
07-16-4649-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental

07-16-4656-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-16-4807-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental
07-17-4845-8	Closed	Complaint withdrawn by complainant after resolution	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities
07-17-4885-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-17-4906-8	Closed	Complaint withdrawn by complainant after resolution	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
07-17-4928-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-17-4947-8	Closed	Conciliation/settlement successful	Discriminatory terms, conditions, privileges, or services and facilities
07-17-4954-8	Closed	No cause determination	Discriminatory refusal to rent
07-17-4967-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-17-5025-8	Closed	Conciliation/settlement successful	Discriminatory terms, conditions, privileges, or services and facilities
07-17-5030-8	Closed	Complaint withdrawn by complainant without resolution	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental
07-17-5048-8	Closed	Conciliation/settlement successful	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices
07-17-5186-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation
07-17-5385-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-17-5588-8	Closed	Conciliation/settlement successful	Discriminatory refusal to negotiate for rental; Failure to make reasonable accommodation
07-17-6006-8	Closed	Complaint withdrawn by complainant after resolution	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
07-17-6086-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Using ordinances to discriminate in zoning and land use
07-17-6087-8	Closed	Complaint withdrawn by complainant without resolution	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable
07-17-6185-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-17-6606-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
07-17-6607-8	Closed	Complaint withdrawn by complainant after resolution	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
07-17-6627-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-17-6632-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation
07-17-6748-8	Closed	No cause determination	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental
07-17-6767-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-17-7006-8	Open		Other discriminatory acts; Discriminatory acts under Section 901 (criminal)
07-17-7007-8	Open		Other discriminatory acts; Discriminatory acts under Section 901 (criminal)
07-17-7010-8	Closed	Complaint withdrawn by complainant after resolution	Discriminatory terms, conditions, privileges, or services and facilities; Failure to provide an accessible building entrance
07-17-7025-8	Open		Other discriminatory acts; Discriminatory acts under Section 901 (criminal)
07-17-7085-8	Closed	Complaint withdrawn by complainant without resolution	Discrimination in terms/conditions/privileges relating to rental
07-17-7225-8	Closed	Complainant failed to cooperate	Discrimination in terms/conditions/privileges relating to rental
07-17-7228-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
07-17-7229-8	Closed	No cause determination	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities
07-17-7230-8	Closed	Complaint withdrawn by complainant after resolution	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation
07-17-7305-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-17-7306-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-17-7310-8	Open		Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable
07-17-7365-8	Closed	Complaint withdrawn by complainant after resolution	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable
07-17-7427-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to sale
07-17-7429-8	Closed	Complaint withdrawn by complainant after resolution	Discrimination in terms/conditions/privileges relating to rental
07-17-7433-8	Closed	Complaint withdrawn by complainant after resolution	Failure to make reasonable accommodation
07-17-7587-8	Closed	No cause determination	Discrimination in the making of loans
07-17-7588-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to sale; Failure to permit reasonable modification
07-18-0116-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation

07-18-0215-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
07-18-0257-8	Closed	Complainant failed to cooperate	Discriminatory refusal to rent; False denial or representation of availability - rental; Otherwise deny or make housing unavailable
07-18-7647-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-18-7666-8	Closed	Conciliation/settlement successful	Discriminatory refusal to rent; Otherwise deny or make housing unavailable
07-18-7667-8	Closed	Conciliation/settlement successful	Discriminatory refusal to rent; Otherwise deny or make housing unavailable
07-18-7705-8	Closed	No cause determination	Failure to make reasonable accommodation
07-18-7805-8	Closed	Conciliation/settlement successful	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
07-18-7826-8	Closed	Complaint withdrawn by complainant after resolution	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)
07-18-7837-8	Closed	Conciliation/settlement successful	Discriminatory terms, conditions, privileges, or services and facilities; Non-compliance with design and construction requirements (handicap); Failure to provide an accessible building entrance; Failure to provide accessible and usable public and common user areas; Failure to provide usable doors; Failure to provide an accessible route into and thru the covered unit; Failure to provide usable kitchens and bathrooms; Other non-compliance with design and construction requirements
07-18-7926-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-18-7928-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
07-18-7965-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification
07-18-7985-8	Closed	No cause determination	Failure to make reasonable accommodation
07-18-7986-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-18-8067-8	Closed	Complaint withdrawn by complainant after resolution	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation
07-18-8205-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-18-8552-8	Closed	Complaint withdrawn by complainant after resolution	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable
07-18-8588-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
07-18-8627-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-18-8767-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation
07-18-8850-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)
07-18-8867-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
07-18-8967-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
07-18-8968-8	Closed	No cause determination	Discriminatory refusal to rent; Otherwise deny or make housing unavailable
07-18-8969-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-18-9069-8	Closed	Complaint withdrawn by complainant without resolution	Discrimination in terms/conditions/privileges relating to rental
07-18-9073-8	Closed	Conciliation/settlement successful	Discriminatory refusal to rent; Otherwise deny or make housing unavailable
07-18-9130-8	Closed	Conciliation/settlement successful	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
07-18-9212-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)
07-18-9251-8	Open		Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)
07-18-9252-8	Open		Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)
07-18-9253-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)
07-18-9296-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
07-18-9374-8	Closed	No cause determination	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable
07-18-9472-8	Closed	Complainant failed to cooperate	Discrimination in terms/conditions/privileges relating to rental
07-18-9552-8	Closed	Dismissed for lack of jurisdiction	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in services and facilities relating to sale

07-18-9591-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification; Failure to make reasonable accommodation
07-18-9757-8	Closed	Complaint withdrawn by complainant after resolution	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
07-18-9997-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
07-19-0395-8	Closed	Complaint withdrawn by complainant without resolution	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
07-19-0499-8	Closed	Complaint withdrawn by complainant after resolution	Discriminatory refusal to rent; False denial or representation of availability - rental; Otherwise deny or make housing unavailable
07-19-0567-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable
07-19-0568-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-19-0602-8	Closed	Complaint withdrawn by complainant after resolution	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental
07-19-0607-8	Closed	Complainant failed to cooperate	Discrimination in terms/conditions/privileges relating to rental
07-19-0782-8	Closed	No cause determination	Discriminatory refusal to rent; Otherwise deny or make housing unavailable
07-19-0839-8	Closed	Dismissed for lack of jurisdiction	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable
07-19-0996-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation
07-19-1076-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to sale; Discriminatory acts under Section 818 (coercion, Etc.)
07-19-1077-8	Closed	Dismissed for lack of jurisdiction	Discrimination in terms/conditions/privileges relating to sale; Discriminatory acts under Section 818 (coercion, Etc.)
07-19-1280-8	Closed	No cause determination	Discriminatory refusal to rent; Otherwise deny or make housing unavailable
07-19-1299-8	Open		Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to permit reasonable modification; Failure to make reasonable accommodation
07-19-1409-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification; Failure to make reasonable accommodation
07-19-1577-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable
07-19-1757-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
07-19-1758-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
07-19-1860-8	Closed	Conciliation/settlement successful	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation
07-19-2260-8	Closed	Complaint withdrawn by complainant without resolution	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable
07-19-2380-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
07-19-2523-8	Closed	Complaint withdrawn by complainant after resolution	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable
07-19-2535-8	Closed	Complaint withdrawn by complainant after resolution	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable
07-19-2628-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-19-2668-8	Closed	Conciliation/settlement successful	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
07-19-2706-8	Closed	No cause determination	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Otherwise deny or make housing unavailable
07-19-2908-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable
07-19-2910-8	Closed	Complainant failed to cooperate	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
07-20-3265-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-20-3327-8	Closed	Complaint withdrawn by complainant after resolution	Discrimination in terms/conditions/privileges relating to rental
07-20-3328-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-20-3567-8	Closed	Complaint withdrawn by complainant without resolution	Discriminatory advertising, statements and notices; Discrimination in terms and conditions of membership; Discriminatory terms, conditions, privileges, or services and facilities
07-20-3666-8	Closed	Conciliation/settlement successful	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable

07-20-3750-8	Open		Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)
07-20-4127-8	Open		Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental
07-20-4128-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-20-4207-8	Closed	Conciliation/settlement successful	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Otherwise deny or make housing unavailable
07-20-4208-8	Open		Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
07-20-4266-8	Closed	Conciliation/settlement successful	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)
07-20-4329-8	Closed	Dismissed for lack of jurisdiction	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
07-20-4506-8	Open		Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
07-20-4566-8	Closed	Conciliation/settlement successful	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable
07-20-4567-8	Open		Discriminatory refusal to rent; False denial or representation of availability; Otherwise deny or make housing unavailable
07-20-4689-8	Closed	Complaint withdrawn by complainant after resolution	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
07-20-4727-8	Open		Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
07-20-4768-8	Closed	Complaint withdrawn by complainant without resolution	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable
07-20-4788-8	Open		Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
07-20-4911-8	Closed	Complaint withdrawn by complainant without resolution	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)
07-20-4946-8	Closed	Conciliation/settlement successful	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable
07-20-4966-8	Open		Discrimination in terms/conditions/privileges relating to rental
07-20-4990-8	Closed	Complaint withdrawn by complainant without resolution	Discriminatory refusal to rent

Status of Cases Filed in St. Charles County, MO between July 1, 2015 - June 30, 2020

Case Number - HUD	Open/Closed	Closure Reason	Issues
07-16-0123-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-16-4093-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental
07-16-4109-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-16-4155-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
07-16-4229-8	Closed	Complaint withdrawn by complainant after resolution	Discriminatory terms, conditions, privileges, or services and facilities
07-16-4403-8	Closed	Complaint withdrawn by complainant after resolution	Discrimination in terms/conditions/privileges relating to rental
07-16-4568-8	Closed	Complaint withdrawn by complainant after resolution	Discriminatory terms, conditions, privileges, or services and facilities
07-16-4746-8	Closed	Conciliation/settlement successful	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
07-16-4786-8	Closed	Complaint withdrawn by complainant without resolution	Discriminatory terms, conditions, privileges, or services and facilities
07-16-4825-8	Closed	Dismissed for lack of jurisdiction	Discriminatory acts under Section 818 (coercion, Etc.)
07-16-4826-8	Closed	Dismissed for lack of jurisdiction	Discriminatory acts under Section 818 (coercion, Etc.)
07-16-4827-8	Closed	Dismissed for lack of jurisdiction	Discriminatory terms, conditions, privileges, or services and facilities
07-16-4828-8	Closed	Dismissed for lack of jurisdiction	Discriminatory acts under Section 818 (coercion, Etc.)
07-17-5006-8	Closed	Complaint withdrawn by complainant after resolution	Discrimination in terms/conditions/privileges relating to rental
07-17-5007-8	Closed	Conciliation/settlement successful	Discriminatory refusal to negotiate for rental; Discrimination in terms/conditions/privileges relating to rental
07-17-5047-8	Closed	Conciliation/settlement successful	Discriminatory refusal to negotiate for rental; Discrimination in terms/conditions/privileges relating to rental
07-17-5185-8	Closed	Conciliation/settlement successful	Discriminatory refusal to negotiate for rental; Discrimination in terms/conditions/privileges relating to rental
07-17-5188-8	Closed	Complaint withdrawn by complainant without resolution	Failure to permit reasonable modification; Failure to make reasonable accommodation
07-17-5299-8	Closed	Conciliation/settlement successful	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental
07-17-5300-8	Closed	Closed because trial has begun	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
07-17-6010-8	Closed	Complaint withdrawn by complainant after resolution	Discrimination in the making of loans
07-17-6247-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-17-6346-8	Closed	Complaint withdrawn by complainant after resolution	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
07-17-6630-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
07-17-6825-8	Closed	No cause determination	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable
07-17-7466-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-18-7835-8	Closed	Conciliation/settlement successful	Discriminatory terms, conditions, privileges, or services and facilities; Non-compliance with design and construction requirements (handicap); Failure to provide usable kitchens and bathrooms; Other non-compliance with design and construction requirements
07-18-7836-8	Closed	Conciliation/settlement successful	Discriminatory terms, conditions, privileges, or services and facilities; Non-compliance with design and construction requirements (handicap); Failure to provide an accessible building entrance; Failure to provide accessible and usable public and common user areas; Failure to provide usable doors; Failure to provide accessible light switches, electric outlets, etc.; Other non-compliance with design and construction requirements
07-18-7846-8	Closed	Conciliation/settlement successful	Discriminatory terms, conditions, privileges, or services and facilities; Non-compliance with design and construction requirements (handicap); Other non-compliance with design and construction requirements
07-18-8068-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
07-18-8386-8	Closed	Dismissed for lack of jurisdiction	Discriminatory acts under Section 818 (coercion, Etc.)
07-18-8486-8	Closed	No cause determination	False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental; Steering; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)
07-18-8533-8	Closed	No cause determination	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable
07-18-8539-8	Closed	Conciliation/settlement successful	Discriminatory refusal to rent

07-18-8909-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
07-19-0377-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
07-19-0455-8	Closed	Complainant failed to cooperate	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
07-19-1408-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
07-19-1638-8	Closed	Conciliation/settlement successful	Discriminatory terms, conditions, privileges, or services and facilities; Non-compliance with design and construction requirements (handicap); Other non-compliance with design and construction requirements
07-19-1702-8	Closed	Conciliation/settlement successful	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Steering; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
07-19-1880-8	Closed	Dismissed for lack of jurisdiction	Discrimination in terms/conditions/privileges relating to rental; Non-compliance with design and construction requirements (handicap); Failure to provide an accessible building entrance; Failure to provide usable doors; Failure to provide an accessible route into and thru the covered unit; Failure to provide reinforced walls for grab bars; Other non-compliance with design and construction requirements; Failure to permit reasonable modification
07-19-1900-8	Open		Discriminatory terms, conditions, privileges, or services and facilities; Non-compliance with design and construction requirements (handicap); Failure to provide an accessible building entrance; Failure to provide accessible and usable public and common user areas; Failure to provide usable doors; Failure to provide reinforced walls for grab bars; Failure to provide usable kitchens and bathrooms; Other non-compliance with design and construction requirements
07-19-1950-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
07-19-2202-8	07/30/19	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)
07-19-2842-8	07/31/19	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-19-2914-8	08/01/19	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-19-2915-8	08/02/19	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
07-20-4606-8	08/03/19	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
07-20-4826-8	Open		False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental

Status of Cases Filed in Jefferson County, MO between July 1, 2015 - June 30, 2020

Case Number - HUD	Open/Closed	Closure Reason	Issues
07-16-4095-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
07-16-4150-8	Closed	Complaint withdrawn by complainant after resolution	Discrimination in terms/conditions/privileges relating to rental
07-16-4160-8	Closed	Complainant failed to cooperate	Discrimination in terms/conditions/privileges relating to rental
07-16-4487-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental
07-16-4503-8	Closed	No cause determination	Discriminatory terms, conditions, privileges, or services and facilities
07-16-4652-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental
07-17-5008-8	Closed	Conciliation/settlement successful	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental
07-17-5190-8	Closed	Conciliation/settlement successful	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
07-18-7830-8	Closed	No cause determination	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
07-18-8349-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation
07-18-8350-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation
07-18-8392-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
07-18-8568-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable
07-18-9391-8	Closed	Complaint withdrawn by complainant without resolution	Discriminatory advertising, statements and notices; Failure to make reasonable accommodation
07-18-9835-8	Closed	No cause determination	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
07-19-0838-8	Closed	Complainant failed to cooperate	Discrimination in terms/conditions/privileges relating to rental
07-19-2501-8	Closed	Complaint withdrawn by complainant after resolution	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)
07-19-2629-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable
07-20-3013-8	Closed	No cause determination	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
07-20-3026-8	Closed	Conciliation/settlement successful	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
07-20-3029-8	Closed	Complaint withdrawn by complainant after resolution	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
07-20-3097-8	Closed	Conciliation/settlement successful	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable

EHOC Discrimination Inquiries/Complaints: July 1, 2015 through June 30, 2020

Intake Date	Case Type	Client Type	Protected Basis	Discrimination Allegations	Zip	County	Filed With	Date Filed	Resolution	Resolution Date	Fair Housing Outcome(s)	Resolution Value - amount	Resolution Value - currency
2014-03-19	Discrimination	Renter	Race; Color	Screening - Refusal to rent, sell, or negotiate	n/a	St. Charles County	MO - Other Court	2016-08-22	Litigated by organization attorney - decision, settlement or consent decree	2020-02-11	Monetary award (FH); Determination of Cause by FHAP/HUD/CREA; Tested by FHIP with discrimination finding	\$4,000	
2014-03-19	Discrimination	Organization	Race	Screening - Refusal to rent, sell, or negotiate	n/a	St. Charles County	MO - Other Court	2016-08-22	Litigated by organization attorney - decision, settlement or consent decree	2020-02-11	Monetary award (FH); Determination of Cause by FHAP/HUD/CREA; Tested by FHIP with discrimination finding	\$500	
2015-07-01	Discrimination	Renter	Sex	Sexual Harassment (quid pro quo or hostile environment); Intimidation, threats, harassment	63129	St. Louis County			Counseled and closed - No fair housing issue	2015-07-01			
2015-07-02	Other	Renter	Disability	Reasonable accommodation/modification issue	63130	St. Louis County			Fair Housing organization administratively closed	2015-07-02	Housing maintained; Reasonable accommodation made		
2015-07-06	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63301	St. Charles County			Fair Housing organization administratively closed	2015-07-06			
2015-07-07	Discrimination	Renter	Religion; Age	Intimidation, threats, harassment ; Reasonable accommodation/modification issue	63141	St. Louis County	Closed		Counseled and closed - No fair housing issue	2015-07-07			
2015-07-07	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63051	Jefferson County			Counseled and closed - No fair housing issue	2015-07-17			
2015-07-14	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63143	St. Louis County			Counseled and closed - No fair housing issue	2015-07-14			
2015-07-29	Discrimination	Renter	Race; Sex; Disability	Differential Treatment, other	63136	St. Louis County	Closed		Conciliated/settled by organization attorney without filing	2015-07-29	Housing maintained		
2015-08-04	Discrimination	Renter			63017	St. Louis County			Counseled and closed - No fair housing issue	2015-08-04			
2015-08-05	Discrimination	Renter	Disability; Source of Income	Reasonable accommodation/modification issue	63070	Jefferson County			Counseled and closed - No fair housing issue	2015-08-05			
2015-08-05	Discrimination	Renter		Screening - Refusal to rent, sell, or negotiate; Differential Treatment, other	63052	Jefferson County			Counseled and closed - No fair housing issue	2015-08-12			
2015-08-10	Discrimination	Renter	Disability		63123	St. Louis County	Closed		Fair Housing organization administratively closed	2015-08-10			
2015-08-26	Discrimination	Renter	Other; Race	Refusal to transmit offer to rent or purchase	63136	St. Louis County			Counseled and closed - No fair housing issue	2015-08-26			
2015-08-26	Discrimination	Renter	Sexual Orientation	Differential Treatment, other	63130	St. Louis County			Counseled and closed - No fair housing issue	2015-08-26			
2015-09-01	Discrimination	Buyer	Disability	Reasonable accommodation/modification issue	63146	St. Louis County			Conciliated/settled by organization attorney without filing	2015-09-04	Reasonable accommodation made; Monetary award (FH); Housing maintained		
2015-09-01	Discrimination	Buyer	Race; National Origin	Differential Treatment, other; Intimidation, threats, harassment	63146	St. Louis County	Closed		Fair Housing organization administratively closed	2015-09-03			
2015-09-02	Discrimination	Renter	Disability	Differential prices, terms and conditions; Intimidation, threats, harassment ; Reasonable accommodation/modification issue	63026	St. Louis County			Conciliated/settled by organization attorney without filing	2016-08-03	LLT- No judgment against client; Extended time to move out; Reasonable accommodation made		
2015-09-15	Discrimination	Renter	Disability	Reasonable accommodation/modification issue; Retaliation	63301	St. Charles County	Closed		Counseled and closed - No fair housing issue	2015-09-15			
2015-09-22	Discrimination	Renter Landlord/Other	Disability	Differential prices, terms and conditions	63138	St. Louis County	Closed		Fair Housing organization administratively closed	2015-09-22			
2015-09-25	Other Landlord/Tenant - General;	Homeowner		None	63033	St. Louis County			Counseled and closed - No fair housing issue	2015-09-25			
2015-10-01	Discrimination	Renter		None	63136	St. Louis County			Conciliated/settled by organization attorney without filing	2016-08-01	Extended time to move out		
2015-10-01	Discrimination	Renter	Disability	None	63026	St. Louis County			Counseled and closed - No fair housing issue	2015-10-01			
2015-10-01	Other	Renter		None	63033	St. Louis County			Counseled and closed - No fair housing issue	2015-10-01			
2015-10-12	Discrimination	Renter	Disability	Dispute on related transactions (financing, insurance, etc.); Differential prices, terms and conditions; Other	63119	St. Louis County			Counseled and closed - No fair housing issue	2015-10-12			
2015-10-14	Discrimination	Renter		None	63134	St. Louis County			Counseled and closed - No fair housing issue	2015-10-14	Closed without resolution by FHIP		
2015-10-27	Discrimination	Renter		None	63129	St. Louis County			Counseled and closed - No fair housing issue	2015-10-27			
2015-11-10	Discrimination	Renter	Disability Race; Disability; Sexual Orientation	Intimidation, threats, harassment	63028	Jefferson County			Counseled and closed - No fair housing issue	2015-11-10			
2015-11-12	Discrimination	Other		Intimidation, threats, harassment	63367	St. Charles County	HUD		Fair Housing organization administratively closed	2015-11-24			

2016-01-20	Other	Landlord/Other Homeowner	National Origin	Differential Treatment, other	63044	St. Louis County			Counseled and closed - No fair housing issue	2016-06-07	
2016-01-29	Mortgage	Other		None	63133	St. Louis County			Counseled and closed - No fair housing issue	2016-01-29	
2016-02-01	Mortgage	Buyer Landlord/Other Homeowner		None	63134	St. Louis County			Counseled and closed - No fair housing issue	2016-02-01	
2016-02-01	Discrimination	Homeowner		Other	63114	St. Louis County			Counseled and closed - No fair housing issue	2016-02-01	
2016-02-12	Discrimination	Renter		Reasonable accommodation/modification issue	63123	St. Louis County			Conciliated/settled by organization attorney without filing	2016-02-12	Monetary award (FH); LLT- No judgment against client
2016-02-12	Discrimination	Renter	Disability	Screening - Refusal to rent, sell, or negotiate; Reasonable accommodation/modification issue	63028	Jefferson County	HUD	2017-10-30	FHAP/HUD/DOJ/CREA administratively closed	2018-04-26	Determination of No Cause by FHAP/HUD/CREA
2016-02-19	Other	Renter		None	63136	St. Louis County			Litigated by organization attorney - decision, settlement or consent decree	2016-12-13	Housing maintained; LLT- No judgment against client
2016-03-09	Discrimination	Renter	National Origin	Differential prices, terms and conditions; Intimidation, threats, harassment	63301	St. Charles			Counseled and closed - No fair housing issue	2016-03-09	
2016-03-11	Discrimination	Renter	Disability	Intimidation, threats, harassment ; Reasonable accommodation/modification issue	63028	Jefferson County			Counseled and closed - No fair housing issue	2016-03-11	
2016-03-14	Landlord Tenant	Renter		None	63136	St. Louis County	DOJ	2018-04-17	Pending with organization attorney	2017-12-28	Referred to DOJ
2016-03-16	Discrimination	Renter	Source of Income Disability; Source of Income	Reasonable accommodation/modification issue	63033	St. Louis County			Counseled and closed - No fair housing issue	2016-03-16	
2016-03-16	Discrimination	Renter		Differential prices, terms and conditions; Reasonable accommodation/modification issue	63049	Jefferson County			Fair Housing organization administratively closed	2016-03-16	
2016-03-25	Discrimination	Renter	Familial Status	Screening - Refusal to rent, sell, or negotiate; Statement of intent, policy, practice of discrimination	63005	St. Louis County			Counseled and closed - No fair housing issue	2016-03-25	
2016-04-01	Discrimination	Renter		None	63074	St. Louis County			Conciliated/settled by organization attorney without filing	2016-06-20	Housing maintained; Monetary award (FH)
2016-04-11	Discrimination	Renter		None	63136	St. Louis County			Conciliated/settled by organization attorney without filing	2016-04-11	
2016-04-21	Discrimination	Renter	Race	None	63121	St. Louis County	Closed		Counseled and closed - No fair housing issue	2016-04-21	
2016-05-02	Discrimination	Renter		None	63011	St. Louis County			Conciliated/settled by organization attorney without filing	2016-08-01	Extended time to move out
2016-05-02	Discrimination	Renter	Disability; Familial Status	Refusal to transmit offer to rent or purchase	63301	St. Charles			Counseled and closed - No fair housing issue	2016-05-02	
2016-05-09	Discrimination	Renter	Familial Status	Refusal to transmit offer to rent or purchase	63010	Jefferson County			Fair Housing organization administratively closed	2016-05-10	
2016-05-12	Other	Buyer		Reasonable accommodation/modification issue	63044	St. Louis County	Closed		Fair Housing organization administratively closed	2016-05-12	
2016-05-27	Discrimination	Renter	Race; National Origin; Color	Differential Treatment, other; Differential prices, terms and conditions	63132	St. Louis County			Conciliated/settled by organization attorney without filing	2016-05-27	Other (FH)
2016-06-07	Discrimination	Renter	Disability	Screening - Refusal to rent, sell, or negotiate; Reasonable accommodation/modification issue; Other	63119	St. Louis County			Conciliated/settled by organization attorney without filing	2016-08-03	Reasonable accommodation made; LLT- No judgment against client; Housing maintained
2016-06-07	Discrimination	Renter	Familial Status	Screening - Refusal to rent, sell, or negotiate	63121	St. Louis County			Counseled and closed - No fair housing issue	2016-09-14	
2016-06-09	Discrimination	Renter	Disability	Other; Reasonable accommodation/modification issue	63136	St. Louis County	Closed		Conciliated/settled by organization attorney without filing	2016-06-10	Reasonable accommodation made
2016-06-09	Discrimination	Renter	National Origin	Intimidation, threats, harassment ; Retaliation; Statement of intent, policy, practice of discrimination	63146	St. Louis County			Counseled and closed - No fair housing issue	2016-06-10	
2016-06-09	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63138	St. Louis County			Organization attorney directly assisted with RA/RM	2017-12-02	Reasonable accommodation made; Housing unit obtained
2016-06-10	Discrimination	Renter	Source of Income	Screening - Refusal to rent, sell, or negotiate	63301	St. Charles			Counseled and closed - No fair housing issue	2016-06-10	
2016-06-13	Discrimination	Renter	Religion	Differential Treatment, other	63123	St. Louis County	Closed		Fair Housing organization administratively closed	2016-06-13	Other (FH)
2016-06-14	Discrimination	Renter	Race; Disability	Intimidation, threats, harassment	63136	St. Louis County			Counseled and closed - No fair housing issue	2016-06-14	
2016-06-14	Discrimination	Renter	Disability	Differential Treatment, other; Statement of intent, policy, practice of discrimination; Reasonable accommodation/modification issue	63137	St. Louis County			Counseled and closed - No fair housing issue	2016-06-15	Reasonable accommodation made
2016-06-14	Discrimination	Renter	Race	Differential prices, terms and conditions; Intimidation, threats, harassment	63136	St. Louis County	DOJ	2019-04-25	Fair Housing organization administratively closed	2019-04-26	LLT- No judgment against client; Referred to DOJ
2016-06-16	Discrimination	Renter	Race	Differential Treatment, other	63136	St. Louis County			Counseled and closed - No fair housing issue	2018-04-10	
2016-06-16	Discrimination	Renter	Race	Discriminatory Advertising/Notices	63136	St. Louis County		2018-06-20	Pending with organization attorney	2016-06-16	
2016-06-23	Discrimination	Renter		None	63123	St. Louis County			Counseled and closed - No fair housing issue	2016-06-23	

2016-06-30	Insurance	Landlord/Other Homeowner	Race; Disability	Differential Treatment, other; Differential prices, terms and conditions; Dispute on related transactions (financing, insurance, etc.)	63034	St. Louis County			Fair Housing organization administratively closed	2016-07-01	
2016-07-07	Discrimination	Homeowner	Disability	Reasonable accommodation/modification issue	63043	St. Louis County			Fair Housing organization administratively closed	2016-07-16	
2016-07-08	Discrimination	Renter	Race	Differential Treatment, other; Other	63130	St. Louis County			Fair Housing organization administratively closed	2016-07-08	
2016-07-29	Mortgage	Seller		Dispute on related transactions (financing, insurance, etc.)	63136	St. Louis County			Counseled and closed - No fair housing issue	2016-07-29	
2016-07-29	Discrimination	Renter		Reasonable accommodation/modification issue	63028	Jefferson County			Organization attorney directly assisted with RA/RM	2016-11-10	Reasonable accommodation made; Housing unit obtained
2016-07-31	Discrimination	Renter	Race; Disability	None	63136	St. Louis County	Closed		Counseled and closed - No fair housing issue	2016-07-31	
2016-08-02	Discrimination	Renter	National Origin; Sex	None	63127	St. Louis County			Counseled and closed - No fair housing issue	2016-08-02	
2016-08-02	Discrimination	Renter	Race	Differential Treatment, other; Differential prices, terms and conditions; Intimidation, threats, harassment	63136	St. Louis County			Counseled and closed - No fair housing issue	2016-08-02	
2016-08-05	Other	Renter		None	63026	St. Louis County			Counseled and closed - No fair housing issue	2016-08-05	
2016-08-10	Discrimination	Renter	Disability	Retaliation	63033	St. Louis County	FED - E.D.Mo.	2016-06-30	Litigated by organization attorney - decision, settlement or consent decree	2017-09-22	Monetary award (FH) 21500 USD
2016-08-15	Discrimination	Renter	Disability	Intimidation, threats, harassment ; Sexual Harassment (quid pro quo or hostile environment)	63026	St. Louis County			Counseled and closed - No fair housing issue	2016-08-18	
2016-08-16	Discrimination	Renter	Race; Color; Sex	Differential Treatment, other	63136	St. Louis County			Fair Housing organization administratively closed	2018-04-13	
2016-08-17	Discrimination	Renter	Race; Age	None	63136	St. Louis County			Counseled and closed - No fair housing issue	2016-08-19	
2016-08-23	Discrimination	Renter	Disability	Differential Treatment, other	63368	St. Charles			Counseled and closed - No fair housing issue	2016-08-23	
2016-08-29	Mortgage	Landlord/Other Homeowner		None	63121	St. Louis County			Counseled and closed - No fair housing issue	2016-09-02	Closed without resolution by FHIP
2016-09-02	Discrimination	Renter	Race; Disability	Differential prices, terms and conditions	63123	St. Louis County			Counseled and closed - No fair housing issue	2016-09-07	Extended time to move out; LLT- No judgment against client;
2016-09-14	Discrimination	Renter	Race	Differential prices, terms and conditions; Intimidation, threats, harassment ; Statement of intent, policy, practice of discrimination; Refusal to transmit offer to rent or purchase	63042	St. Louis County	HUD	2017-04-10	FHAP/HUD/DOJ/CREA administratively closed	2019-05-20	Determination of No Cause by FHAP/HUD/CREA
2016-09-16	Discrimination	Renter	Sexual Orientation; Disability	Retaliation; Dispute on related transactions (financing, insurance, etc.)	63070	Jefferson			Fair Housing organization administratively closed	2017-06-15	
2016-09-26	Discrimination	Renter	Race; Disability	Retaliation	63385	St. Charles			Fair Housing organization administratively closed	2016-09-26	Fair housing training
2016-09-28	Discrimination	Landlord/Other Homeowner		Other	63105	St. Louis County			Conciliated/settled by private attorney after referral	2016-12-23	Housing maintained
2016-10-06	Discrimination	Other		None	63044	St. Louis County			Counseled and closed - No fair housing issue	2016-10-06	
2016-10-06	Discrimination	Renter		None	63136	St. Louis County			Counseled and closed - No fair housing issue	2016-10-06	
2016-10-14	Discrimination	Renter	Race	Differential prices, terms and conditions; Other	63136	St. Louis County			Fair Housing organization administratively closed	2016-10-14	Closed without resolution by FHIP
2016-10-17	Discrimination	Renter	Disability	Screening - Refusal to rent, sell, or negotiate	63033	St. Louis County			Fair Housing organization administratively closed	2016-10-17	Closed without resolution by FHIP
2016-10-17	Discrimination	Renter	Religion	Differential Treatment, other	63122	St. Louis County			Counseled and closed - No fair housing issue	2016-10-17	Closed without resolution by FHIP
2016-10-25	Discrimination	Renter	National Origin	None	63017	St. Louis County			Counseled and closed - No fair housing issue	2016-10-28	
2016-10-26	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63114	St. Louis County			Organization attorney directly assisted with RA/RM	2016-12-06	Reasonable accommodation made
2016-10-27	Discrimination	Renter		None	63137	St. Louis County			Counseled and closed - No fair housing issue	2016-10-27	
2016-10-27	Other	Landlord/Other Homeowner		None	63121	St. Louis County			Counseled and closed - No fair housing issue	2016-10-27	Other (FH)
2016-10-30	Discrimination	Renter	Race; Disability	None	63136	St. Louis County	Closed		Conciliated/settled by organization attorney without filing	2017-03-07	LLT- No judgment against client
2016-11-01	Discrimination	Renter	Race; Familial Status; Sex	Differential Treatment, other; Sexual Harassment (quid pro quo or hostile environment); Differential prices, terms and conditions	63136	St. Louis County			Fair Housing organization administratively closed	2019-05-15	
2016-11-04	Discrimination	Renter	Race	Differential prices, terms and conditions; Other	63136	St. Louis County			Fair Housing organization administratively closed	2019-05-15	

2016-11-10	Discrimination	Renter	Disability	Other	63301	St. Charles			Fair Housing organization administratively closed	2016-11-10	
2016-11-16	Discrimination	Renter		Other	63114	St. Louis County			Fair Housing organization administratively closed	2017-02-03	
2016-11-16	Discrimination	Renter		None	63137	St. Louis County			Counseled and closed - No fair housing issue	2016-11-16	
2016-11-17	Discrimination	Renter	Familial Status	Reasonable accommodation/modification issue	63052	Jefferson			Counseled and closed - No fair housing issue	2016-11-17	
2016-12-01	Other	Renter	Other	Other	63136	St. Louis County			Counseled and closed - No fair housing issue	2016-12-01	
2016-12-02	Discrimination	Renter		None	63121	St. Louis County			Counseled and closed - No fair housing issue	2016-12-09	Housing maintained
2016-12-19	Discrimination	Renter	National Origin; Race; Disability	Differential Treatment, other; Differential prices, terms and conditions; Reasonable accommodation/modification issue	63044	St. Louis County			Litigated by organization attorney - decision, settlement or consent decree	2018-01-11	Housing maintained; LLT- No judgment against client; Monetary award (FH)
2016-12-30	Discrimination	Renter	Disability	Differential Treatment, other	63132	St. Louis County			Fair Housing organization administratively closed	2016-12-30	
2017-01-06	Discrimination	Renter Landlord/Other		None	63138	St. Louis County			Fair Housing organization administratively closed	2017-01-06	Determination of No Cause by FHAP/HUD/CREA
2017-01-10	Other	Homeowner		None	63136	St. Louis County			Litigation by organization attorney - decision, settlement or consent decree	2017-03-20	Housing maintained
2017-01-24	Discrimination	Renter Landlord/Other	Disability; Source of Income	Differential prices, terms and conditions; Differential Treatment, other	63385	St. Charles			Conciliated/settled by organization attorney without filing	2017-02-02	Reasonable accommodation made; Housing maintained
2017-01-26	Discrimination	Homeowner	Race; National Origin; Religion	Intimidation, threats, harassment ; Other	63125	St. Louis County	HUD	2017-06-27	Pending with organization attorney	2017-01-26	Administratively filed with FHAP/HUD/CREA; Referred to DOJ
2017-01-27	Discrimination	Buyer	Religion	Other	63125	St. Louis County	HUD	2017-06-27	Pending with organization attorney	2017-02-23	
2017-01-27	Discrimination	Renter	Disability	Differential prices, terms and conditions	63143	St. Louis County			Counseled and closed - No fair housing issue	2017-01-27	
2017-01-30	Discrimination	Renter	Familial Status	Differential Treatment, other; Screening - Refusal to rent, sell, or negotiate	63052	Jefferson	Closed		Fair Housing organization administratively closed	2017-01-30	
2017-02-02	Mortgage	Buyer		None	63135	St. Louis County			Counseled and closed - No fair housing issue	2017-02-17	
2017-02-06	Discrimination	Renter	Race	None	63143	St. Louis County			Counseled and closed - No fair housing issue	2017-02-06	
2017-02-17	Discrimination	Renter	Race	Intimidation, threats, harassment	63366	St. Charles			Counseled and closed - No fair housing issue	2017-06-15	
2017-02-28	Discrimination	Renter	Disability	Retaliation; Reasonable accommodation/modification issue	63376	St. Charles	Closed		Fair Housing organization administratively closed	2017-04-18	
2017-03-01	Mortgage	Buyer		None	63031	St. Louis County			Counseled and closed - No fair housing issue	2017-03-01	
2017-03-02	Discrimination	Renter	Race	Screening - Refusal to rent, sell, or negotiate	63130	St. Louis County			Counseled and closed - No fair housing issue	2017-03-03	
2017-03-02	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63301	St. Charles			Fair Housing organization administratively closed	2017-04-11	
2017-03-07	Discrimination	Renter		Retaliation	63122	St. Louis County			Counseled and closed - No fair housing issue	2017-03-07	
2017-03-17	Other	Renter		None	63143	St. Louis County			Counseled and closed - No fair housing issue	2017-03-29	
2017-03-17	Discrimination	Renter		Intimidation, threats, harassment	63146	St. Louis County			Counseled and closed - No fair housing issue	2017-03-17	
2017-03-22	Sales	Renter		None	63133	St. Louis County			Counseled and closed - No fair housing issue	2017-03-22	
2017-03-22	Discrimination	Renter Landlord/Other	Race	Screening - Refusal to rent, sell, or negotiate	63304	St. Charles			Fair Housing organization administratively closed	2017-03-22	Closed without resolution by FHIP
2017-03-28	Other	Homeowner	Race	Other	63143	St. Louis County			Counseled and closed - No fair housing issue	2017-05-10	
2017-03-29	Discrimination	Renter		Statement of intent, policy, practice of discrimination	63114	St. Louis County			Fair Housing organization administratively closed	2018-04-10	
2017-03-30	Other	Renter		None	63129	St. Louis County			Counseled and closed - No fair housing issue	2017-03-30	
2017-03-30	Discrimination	Renter		Differential Treatment, other	63143	St. Louis County			Fair Housing organization administratively closed	2017-03-30	
2017-04-14	Discrimination	Other	Race	Differential Treatment, other	63034	St. Louis County			Fair Housing organization administratively closed	2017-04-14	
2017-04-17	Discrimination	Renter	Race; Familial Status; Disability	None	63136	St. Louis County	Closed		Fair Housing organization administratively closed	2017-04-17	

2017-04-25	Mortgage	Landlord/Other Homeowner	Race	Dispute on related transactions (financing, insurance, etc.); Differential Treatment, other	63134	St. Louis County	Closed		Counseled and closed - No fair housing issue	2017-04-27	
2017-05-02	Discrimination	Homeowner		None	63138	St. Louis County			Conciliated/settled by organization attorney without filing	2017-07-21	Extended time to move out; LLT- No judgment against client
2017-05-09	Discrimination	Renter	Race	None	63137	St. Louis County	Closed		Counseled and closed - No fair housing issue	2017-05-09	Other (FH)
2017-05-19	Discrimination	Renter	Disability	Dispute on related transactions (financing, insurance, etc.)	63138	St. Louis County			Counseled and closed - No fair housing issue	2017-05-22	
2017-05-22	Other	Renter		None	63125	St. Louis County			Counseled and closed - No fair housing issue	2017-06-05	
2017-05-25	Discrimination	Renter	Disability	Differential Treatment, other; Intimidation, threats, harassment ; Reasonable accommodation/modification issue	63130	St. Louis County			Fair Housing organization administratively closed	2017-05-25	
2017-05-25	Discrimination	Renter	Race; Color; Sex; Familial Status;	None	63130	St. Louis County			Counseled and closed - No fair housing issue	2017-06-14	
2017-05-25	Discrimination	Renter	Race; Color; Sex; Familial Status	None	63031	St. Louis County			Counseled and closed - No fair housing issue	2017-05-25	
2017-05-30	Other	Other	Other	Other	63031	St. Louis County			Fair Housing organization administratively closed	2017-06-20	
2017-05-31	Discrimination	Renter		Intimidation, threats, harassment ; Other	63126	St. Louis County			Fair Housing organization administratively closed	2017-05-31	
2017-05-31	Discrimination	Renter	Disability	Reasonable accommodation/modification issue; Retaliation	63074	St. Louis County			Organization attorney directly assisted with RA/RM	2017-05-31	
2017-05-31	Discrimination	Renter	Race; Sex	Differential Treatment, other; Intimidation, threats, harassment ; Retaliation	63031	St. Louis County			Fair Housing organization administratively closed	2018-10-05	
2017-05-31	Discrimination	Renter	Race; Sex	None	63123	St. Louis County			Counseled and closed - No fair housing issue	2017-05-31	
2017-06-01	Discrimination	Renter	Sex	Sexual Harassment (quid pro quo or hostile environment)	63017	St. Louis County			Fair Housing organization administratively closed	2017-06-01	
2017-06-01	Mortgage	Landlord/Other Homeowner	Race; Color; Sex; Disability; Familial Status	Differential Treatment, other; Screening - Refusal to rent, sell, or negotiate	63130	St. Louis County			Fair Housing organization administratively closed	2017-06-01	Closed without resolution by FHIP
2017-06-05	Discrimination	Renter		Public Accommodation Discrimination	63136	St. Louis County			Counseled and closed - No fair housing issue	2017-06-05	
2017-06-07	Discrimination	Renter		None	63088	St. Louis County			Counseled and closed - No fair housing issue	2017-06-12	
2017-06-08	Discrimination	Landlord/Tenant - General;							Litigated by organization attorney - decision, settlement or consent decree	2018-10-31	Housing unit obtained; Extended time to move out; LLT- No judgment against client; Other (FH)
2017-06-09	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63020	Jefferson					
2017-06-09	Discrimination	Landlord/Other Homeowner	Disability	Reasonable accommodation/modification issue	63146	St. Louis County			Organization attorney directly assisted with RA/RM	2017-06-14	Reasonable accommodation made
2017-06-15	Discrimination	Renter	Religion; National Origin; Race; Color; Familial Status	Differential Treatment, other; Intimidation, threats, harassment ; Screening - Refusal to rent, sell, or negotiate	63021	St. Louis County	HUD	2018-05-24	Pending with organization attorney	2017-06-15	Determination of Cause by FHAP/HUD/CREA
2017-06-20	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63130	St. Louis County			Counseled and closed - No fair housing issue	2017-06-21	
2017-06-20	Discrimination	Renter	Race; Age	None	63137	St. Louis County			Counseled and closed - No fair housing issue	2017-06-20	
2017-06-21	Mortgage	Other	Disability	Other	63026	St. Louis County			Counseled and closed - No fair housing issue	2017-06-22	
2017-06-30	Discrimination	Landlord/Other Homeowner	Other	Other	63121	St. Louis County			Fair Housing organization administratively closed	2017-07-26	
2017-07-05	Discrimination	Renter	Disability	Reasonable accommodation/modification issue; Retaliation	63127	St. Louis County			Fair Housing organization administratively closed	2017-09-28	
2017-07-05	Other	Renter	Race	Other	63042	St. Louis County			Counseled and closed - No fair housing issue	2017-08-30	
2017-07-06	Discrimination	Renter	Disability	Reasonable accommodation/modification issue; Differential Treatment, other	63044	St. Louis County			Counseled and closed - No fair housing issue	2017-07-06	
2017-07-07	Discrimination	Renter		None	63125	St. Louis County			Counseled and closed - No fair housing issue	2017-07-11	
2017-07-10	Discrimination	Renter		None	63125	St. Louis County			Counseled and closed - No fair housing issue	2017-07-10	
2017-07-12	Discrimination	Renter	National Origin	Differential Treatment, other	63074	St. Louis County			Conciliated/settled by organization attorney without filing	2017-10-17	LLT- No judgment against client
2017-07-12	Other	Renter		Other	63137	St. Louis County			Fair Housing organization administratively closed	2017-10-09	

2017-07-13	Discrimination	Renter	Disability	Differential Treatment, other; Retaliation; Reasonable accommodation/modification issue	63028	Jefferson	HUD	2018-01-09	FHAP/HUD/DOJ/CREA administratively closed	2019-08-22	Determination of No Cause by FHAP/HUD/CREA; Tested by FHIP with discrimination finding	
2017-07-13	Other	Renter		None	63123	St. Louis County			Litigated by organization attorney - decision, settlement or consent decree	2018-06-21	Reasonable accommodation made; LLT- No judgment against client	6500 USD
2017-07-19	Other	Renter		None	63033	St. Louis County			Counseled and closed - No fair housing issue	2017-07-19		
2017-07-20	Discrimination	Renter		None	63119	St. Louis County			Counseled and closed - No fair housing issue	2017-07-20		
2017-07-21	Discrimination	Renter	Age	Refusal to transmit offer to rent or purchase	63130	St. Louis County			Counseled and closed - No fair housing issue	2017-07-21	Determination of No Cause by FHAP/HUD/CREA	
2017-07-25	Other	Renter		None	63136	St. Louis County			Counseled and closed - No fair housing issue	2017-07-25		
2017-07-26	Discrimination	Renter	Disability; National Origin	Differential Treatment, other; Screening - Refusal to rent, sell, or negotiate	63129	St. Louis County			Counseled and closed - No fair housing issue	2017-07-26		
2017-08-07	Discrimination	Renter	Disability; Familial Status	Screening - Refusal to rent, sell, or negotiate; Reasonable accommodation/modification issue; Retaliation; Differential prices, terms and conditions	63121	St. Louis County			Conciliated/settled by organization attorney without filing	2018-07-24	Monetary award (FH)	6095 USD
2017-08-09	Discrimination	Renter		Differential Treatment, other	63138	St. Louis County			Counseled and closed - No fair housing issue	2017-08-11		
2017-08-15	Discrimination	Renter	National Origin	Differential Treatment, other; Differential prices, terms and conditions	63044	St. Louis County			Fair Housing organization administratively closed	2018-04-06		
2017-08-16	Discrimination Landlord/Tenant - General;	Renter	Other	Screening - Refusal to rent, sell, or negotiate	63134	St. Louis County			Fair Housing organization administratively closed	2017-08-16		
2017-08-30	Discrimination Landlord/Tenant - General;	Renter	Race	None	63133	St. Louis County			Counseled and closed - No fair housing issue	2017-08-30	Determination of No Cause by FHAP/HUD/CREA	
2017-08-30	Discrimination	Renter	Race; Age; Disability	Differential Treatment, other; Reasonable accommodation/modification issue	63033	St. Louis County			Organization attorney directly assisted with RA/RM	2017-11-08	Reasonable accommodation made	
2017-09-05	Discrimination	Renter	Disability	Screening - Refusal to rent, sell, or negotiate; Differential prices, terms and conditions	63074	St. Louis County			Fair Housing organization administratively closed	2017-09-05		
2017-09-05	Other Landlord/Tenant - General;	Other		Other	63385	St. Charles			Counseled and closed - No fair housing issue	2017-09-05	Other (FH)	
2017-09-08	Discrimination	Renter	Race; Disability; Source of Income	Intimidation, threats, harassment ; Reasonable accommodation/modification issue; Dispute on related transactions (financing, insurance, etc.)	63088	St. Louis County			Conciliated/settled by organization attorney without filing	2017-11-16	Reasonable accommodation made; Housing maintained	
2017-09-13	Other	Renter		Differential Treatment, other	63136	St. Louis County			Counseled and closed - No fair housing issue	2017-09-13		
2017-09-13	Discrimination	Organization Landlord/Other	Disability	Design and Constuction	n/a	St. Charles County	HUD	2017-10-27	Conciliated/settled by organization attorney	2018-04-01	Monetary award. Training. Retrofits.	4000
2017-09-14	Other	Homeowner		None	63138	St. Louis County			Counseled and closed - No fair housing issue	2017-09-14	Other (FH)	
2017-09-15	Discrimination	Renter		Statement of intent, policy, practice of discrimination; Reasonable accommodation/modification issue	63137	St. Louis County			Counseled and closed - No fair housing issue	2017-09-15		
2017-09-20	Discrimination	Renter	Disability	Differential Treatment, other; Intimidation, threats, harassment ; Retaliation; Reasonable accommodation/modification issue	63069	Jefferson County			Fair Housing organization administratively closed	2017-09-20	Other (FH)	
2017-09-22	Discrimination	Renter	Race; Sex; Disability	Other	63136	St. Louis County			Counseled and closed - No fair housing issue	2017-09-22		
2017-09-26	Discrimination	Renter	Race; Source of Income; Disability	Refusal to transmit offer to rent or purchase	63105	St. Louis County			Counseled and closed - No fair housing issue	2017-11-08		
2017-09-27	Discrimination	Renter	Source of Income	Differential prices, terms and conditions; Intimidation, threats, harassment ; Retaliation	63366	St. Charles County			Counseled and closed - No fair housing issue	2017-09-27		
2017-09-28	Discrimination	Renter	Disability	Screening - Refusal to rent, sell, or negotiate	63143	St. Louis County			Counseled and closed - No fair housing issue	2017-09-28		
2017-09-29	Discrimination	Renter	Race; Sex; Age	Other; None	63136	St. Louis County			Counseled and closed - No fair housing issue	2017-10-02		
2017-10-01	Discrimination	Organization	Family Status	Refusal to Rent, Steering	n/a	St. Louis County	HUD	2017-10-15	Conciliated/settled by organization attorney	2018-12-10	Monetary award. Training. Change in Policies.	20000
2017-10-02	Discrimination	Renter	Age	Screening - Refusal to rent, sell, or negotiate	63138	St. Louis County			Counseled and closed - No fair housing issue	2017-10-02		
2017-10-03	Discrimination	Renter		None	63136	St. Louis County			Counseled and closed - No fair housing issue	2017-10-03		
2017-10-03	Discrimination	Organization	Disability	Design and Constuction	n/a	St. Charles County	HUD	2017-10-26	Conciliated/settled by organization attorney	2018-08-01	Monetary award. Training. Retrofits.	4500
2017-10-03	Discrimination	Organization	Disability	Design and Constuction	n/a	St. Charles County	HUD	2017-10-26	Conciliated/settled by organization attorney	2019-02-19	Monetary award. Training. Retrofits.	10235
2017-10-04	Discrimination	Renter	Race; Familial Status	Screening - Refusal to rent, sell, or negotiate	63303	St. Charles	HUD	2018-01-19	FHAP/HUD/DOJ/CREA administratively closed	2018-07-09	Determination of No Cause by FHAP/HUD/CREA	

2017-10-09	Discrimination	Renter		None	63137	St. Louis County			Counseled and closed - No fair housing issue	2017-10-09		
2017-10-10	Discrimination	Renter	Race	Differential prices, terms and conditions; Differential Treatment, other	63124	St. Louis County			Counseled and closed - No fair housing issue	2017-12-13		
2017-10-12	Discrimination	Renter		None	63137	St. Louis County			Counseled and closed - No fair housing issue	2017-10-12		
2017-10-13	Discrimination	Renter	Color; Race; Disability	None; Differential Treatment, other	63136	St. Louis County			Counseled and closed - No fair housing issue	2017-10-13		
2017-10-13	Discrimination	Renter	Race; Familial Status	Intimidation, threats, harassment ; Other	63021	St. Louis County	HUD	2018-05-24	FHAP/HUD/DOJ/CREA administratively closed	2018-05-22	Determination of No Cause by FHAP/HUD/CREA; Administratively filed with FHAP/HUD/CREA; Tested by FHIP without discrimination finding	
2017-10-13	Discrimination	Renter	Familial Status	Screening - Refusal to rent, sell, or negotiate; Differential prices, terms and conditions	63121	St. Louis County	HUD	2018-05-03	Conciliated/settled by organization attorney without filing	2019-01-14	Monetary award (FH)	5500 USD
2017-10-16	Discrimination	Renter Landlord/Other	Race	None	63130	St. Louis County			Counseled and closed - No fair housing issue	2017-10-16		
2017-10-23	Discrimination	Homeowner	Disability	Differential prices, terms and conditions; Reasonable accommodation/modification issue	63146	St. Louis County			Fair Housing organization administratively closed	2017-11-13		
2017-10-23	Discrimination	Renter	Race	None	63138	St. Louis County			Counseled and closed - No fair housing issue	2017-10-23		
2017-10-26	Discrimination	Renter		None	63136	St. Louis County			Counseled and closed - No fair housing issue	2017-10-26		
2017-10-27	Discrimination	Renter		None	63143	St. Louis County			Counseled and closed - No fair housing issue	2017-10-27		
2017-10-30	Discrimination	Renter		None	63074	St. Louis County			Counseled and closed - No fair housing issue	2017-10-30		
2017-11-01	Discrimination	Renter		None	63121	St. Louis County			Counseled and closed - No fair housing issue	2017-11-01		
2017-11-01	Mortgage	Buyer	Race	Differential prices, terms and conditions; Differential Treatment, other; Intimidation, threats, harassment ; Dispute on related transactions (financing, insurance, etc.)	63138	St. Louis County			Counseled and closed - No fair housing issue	2017-12-01	Determination of No Cause by FHAP/HUD/CREA; Other (FH)	
2017-11-02	Discrimination	Renter	Source of Income	Other	63123	St. Louis County			Counseled and closed - No fair housing issue	2017-11-02		
2017-11-11	Discrimination	Organization	Disability	Design and Constuction	n/a	St. Louis County	HUD	2017-10-27	Conciliated/settled by organization attorney	2018-05-01	Monetary award. Training, Retrofits.	4000
2017-11-15	Discrimination	Renter		None	63105	St. Louis County			Counseled and closed - No fair housing issue	2017-11-15		
2017-11-16	Discrimination	Other	Disability	Public Accommodation Discrimination	63131	St. Louis County	Closed		Fair Housing organization administratively closed	2017-12-29	Other (FH)	
2017-11-16	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63366	St. Charles			Counseled and closed - No fair housing issue	2018-05-03		
2017-11-20	Discrimination	Renter		Screening - Refusal to rent, sell, or negotiate; Differential Treatment, other	63385	St. Charles			Counseled and closed - No fair housing issue	2017-11-20		
2017-11-21	Discrimination	Renter		Reasonable accommodation/modification issue	63021	St. Louis County			Counseled and closed - No fair housing issue	2017-11-21		
2017-11-21	Discrimination	Renter		Retaliation	63136	St. Louis County			Counseled and closed - No fair housing issue	2018-03-08		
2017-11-30	Discrimination	Renter	Race; Disability	Reasonable accommodation/modification issue	63138	St. Louis County			Counseled and closed - No fair housing issue	2017-11-30		
2017-11-30	Discrimination	Renter	Race; Color; Familial Status; Disability; Source of Income	None	63121	St. Louis County			Counseled and closed - No fair housing issue	2017-11-30		
2017-12-01	Discrimination	Renter		None	63376	St. Charles			Counseled and closed - No fair housing issue	2017-12-01		
2017-12-04	Discrimination	Renter		None	63031	St. Louis County			Counseled and closed - No fair housing issue	2017-12-04		
2017-12-05	Discrimination	Renter		None	63031	St. Louis County	Closed		Counseled and closed - No fair housing issue	2017-12-05		
2017-12-12	Discrimination	Renter		Screening - Refusal to rent, sell, or negotiate	63105	St. Louis County			Fair Housing organization administratively closed	2018-02-27		
2017-12-14	Discrimination	Renter		None; Reasonable accommodation/modification issue	63301	St. Charles			Counseled and closed - No fair housing issue	2017-12-14		
2017-12-15	Discrimination	Renter		None	63033	St. Louis County			Counseled and closed - No fair housing issue	2018-01-03		
2017-12-18	Discrimination	Renter	Disability; Race	Reasonable accommodation/modification issue	63130	St. Louis County			Organization attorney directly assisted with RA/RM	2017-12-29	Reasonable accommodation made	
2017-12-18	Discrimination	Renter		None	63130	St. Louis County			Counseled and closed - No fair housing issue	2017-12-18		

2018-02-26	Discrimination	Renter	None	63368	St. Charles			Counseled and closed - No fair housing issue	2018-02-28
2018-02-28	Discrimination	Renter	Disability	63146	St. Louis County			Counseled and closed - No fair housing issue	2018-02-28
2018-02-28	Discrimination	Renter	Age; Source of Income	63141	St. Louis County			Counseled and closed - No fair housing issue	2018-03-06
2018-03-01	Discrimination	Renter	Familial Status	63136	St. Louis County	DOJ	2019-04-25	Pending with organization attorney	2019-04-26
2018-03-06	Discrimination	Renter	None	63366	St. Charles			Counseled and closed - No fair housing issue	2018-03-06
2018-03-06	Other	Other	None	63137	St. Louis County			Counseled and closed - No fair housing issue	2018-03-15
2018-03-07	Discrimination	Renter	None	63119	St. Louis County			Counseled and closed - No fair housing issue	2018-03-07
2018-03-07	Discrimination	Renter	Age; Sex	63125	St. Louis County			Fair Housing organization administratively closed	2018-04-06
2018-03-08	Discrimination	Renter	None	63138	St. Louis County			Counseled and closed - No fair housing issue	2018-03-08
2018-03-08	Discrimination	Renter	None	63137	St. Louis County			Counseled and closed - No fair housing issue	2018-03-08
2018-03-08	Discrimination	Renter	None	63130	St. Louis County			Counseled and closed - No fair housing issue	2018-03-08
2018-03-14	Discrimination	Renter	None	63134	St. Louis County			Fair Housing organization administratively closed	2018-03-14
2018-03-14	Discrimination	Renter	Race	63136	St. Louis County			Fair Housing organization administratively closed	2018-04-17
2018-03-15	Discrimination	Renter	None	63136	St. Louis County			Counseled and closed - No fair housing issue	2018-03-15
2018-03-21	Discrimination	Renter	None	63011	St. Louis County			Counseled and closed - No fair housing issue	2018-05-29
2018-03-21	Discrimination	Renter	Reasonable accommodation/modification issue; Intimidation, threats, harassment	63125	St. Louis County			Counseled and closed - No fair housing issue	2018-03-21
2018-03-21	Discrimination Landlord/Tenant - General;	Renter	None	63136	St. Louis County			Counseled and closed - No fair housing issue	2018-03-21
2018-03-21	Discrimination	Renter	Age	63136	St. Louis County			Organization attorney directly assisted with RA/RM	2018-06-20
2018-03-26	Discrimination	Renter	Differential prices, terms and conditions	63021	St. Louis County			Fair Housing organization administratively closed	2018-08-07
2018-03-26	Discrimination	Renter	Differential prices, terms and conditions	63043	St. Louis County			Fair Housing organization administratively closed	2018-05-30
2018-03-27	Discrimination	Renter	None	63042	St. Louis County			Counseled and closed - No fair housing issue	2018-03-27
2018-03-27	Discrimination	Renter	None	63136	St. Louis County			Counseled and closed - No fair housing issue	2018-03-27
2018-04-10	Discrimination	Renter	Race	63136	St. Louis County	DOJ	2019-04-25	Pending with organization attorney	2019-07-01
2018-04-12	Discrimination	Renter	Familial Status; Sex	63128	St. Louis County			Differential Treatment, other; Screening - Refusal to rent, sell, or negotiate	2019-07-26
2018-05-03	Discrimination	Renter	Disability	63136	St. Louis County			Pending with organization attorney	2019-07-26
2018-05-07	Discrimination	Renter	Other	63146	St. Louis County			Conciliated/settled by organization attorney without filing	2018-11-20
2018-05-15	Discrimination	Renter	Race; Sex; Familial Status; Other	63136	St. Louis County	DOJ	2019-04-25	Fair Housing organization administratively closed	2018-05-29
2018-05-16	Discrimination Landlord/Tenant - General;	Renter	Reasonable accommodation/modification issue	63133	St. Louis County				2019-07-26
2018-05-16	Discrimination	Renter	Disability	63137	St. Louis County			Pending with organization attorney	2019-04-26
2018-05-16	Discrimination	Renter	Race	63074	St. Louis County			Counseled and closed - No fair housing issue	2019-04-26
2018-05-17	Discrimination	Renter	Source of Income	63122	St. Louis County	Closed		Counseled and closed - No fair housing issue	2019-04-26
2018-05-21	Discrimination	Renter	None	63134	St. Louis County			Counseled and closed - No fair housing issue	2019-04-26
2018-05-21	Discrimination	Renter	None	63134	St. Louis County			Counseled and closed - No fair housing issue	2018-05-17
2018-05-29	Discrimination	Renter	Race	63136	St. Louis County	DOJ	2019-04-25	Counseled and closed - No fair housing issue	2018-05-21
2018-06-06	Mortgage	Buyer	Race; Disability	63031	St. Louis County			Pending with organization attorney	2019-08-30
			Dispute on related transactions (financing, insurance, etc.)					Counseled and closed - No fair housing issue	2018-06-06

LLT- No judgment against client; Extended time to move out; Referred to DOJ

600 USD

2018-06-15	Discrimination	Renter	Disability	Differential Treatment, other; Reasonable accommodation/modification issue	63043	St. Louis County			Fair Housing organization administratively closed	2018-09-11
2018-06-22	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63376	St. Charles			Fair Housing organization administratively closed	2018-10-18
2018-06-25	Discrimination	Renter	Disability	Differential Treatment, other	63031	St. Louis County			Counseled and closed - No fair housing issue	2018-06-25
2018-07-05	Discrimination	Renter Landlord/Other	Religion; National Origin	Differential prices, terms and conditions	63017	St. Louis County			Counseled and closed - No fair housing issue	2018-07-27
2018-07-10	Discrimination	Homeowner	Familial Status	Statement of intent, policy, practice of discrimination	63026	St. Louis County			Counseled and closed - No fair housing issue	2018-07-10
2018-07-11	Discrimination	Renter		Intimidation, threats, harassment ; Retaliation	63028	Jefferson			Fair Housing organization administratively closed	2018-09-02
2018-07-11	Discrimination	Renter		None	63137	St. Louis County			Counseled and closed - No fair housing issue	2018-07-11
2018-07-11	Discrimination	Renter	Familial Status; Sex	Sexual Harassment (quid pro quo or hostile environment); Retaliation	63136	St. Louis County	DOJ	2019-04-25	Pending with organization attorney	2019-04-26 Referred to DOJ
2018-07-15	Discrimination	Renter	National Origin; Race	Differential prices, terms and conditions	63368	St. Charles			Fair Housing organization administratively closed	2018-08-14
2018-07-16	Discrimination	Renter	Race; Sex	Differential Treatment, other	63136	St. Louis County			Pending with organization attorney	2019-04-25 Referred to DOJ
2018-07-18	Discrimination	Renter Landlord/Other	Disability	Reasonable accommodation/modification issue	63119	St. Louis County			Counseled and closed - No fair housing issue	2018-07-18
2018-07-18	Other	Homeowner		None	63367	St. Charles			Fair Housing organization administratively closed	2018-07-18 Other (FH)
2018-07-19	Other	Other		None	63130	St. Louis County			Counseled and closed - No fair housing issue	2018-07-19
2018-07-20	Mortgage	Buyer		None	63125	St. Louis County			Counseled and closed - No fair housing issue	2018-07-20
2018-07-25	Discrimination	Renter	Disability; Source of Income	Reasonable accommodation/modification issue	63366	St. Charles			Counseled and closed - No fair housing issue	2018-07-25
2018-07-26	Discrimination	Renter	Disability	Differential Treatment, other; Reasonable accommodation/modification issue	63119	St. Louis County	HUD	2018-09-10	Conciliated/settled by organization attorney without filing	2018-11-19 Reasonable accommodation made; Housing maintained; LLT- No judgment against client; Fair housing training
2018-07-31	Discrimination	Renter		None	63135	St. Louis County			Counseled and closed - No fair housing issue	2018-07-31
2018-08-01	Discrimination	Renter		Other	63123	St. Louis County			Counseled and closed - No fair housing issue	2018-08-03
2018-08-02	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63017	St. Louis County	HUD		Organization attorney directly assisted with RA/RM	2019-05-10 Reasonable accommodation made; Administratively filed with FHAP/HUD/CREA
2018-08-07	Discrimination	Renter	Race; Disability; Familial Status	Intimidation, threats, harassment ; Differential Treatment, other; Reasonable accommodation/modification issue	63136	St. Louis County	DOJ	2019-04-25	Pending with organization attorney	2019-04-26 Referred to DOJ
2018-08-15	Discrimination	Renter	Race; Sex	Differential Treatment, other; Sexual Harassment (quid pro quo or hostile environment); Public Accommodation Discrimination	63021	St. Louis County			Counseled and closed - No fair housing issue	2018-08-15
2018-08-17	Discrimination	Renter		None	63136	St. Louis County			Fair Housing organization administratively closed	2019-05-15
2018-08-22	Discrimination	Renter	Sexual Orientation	Screening - Refusal to rent, sell, or negotiate; Statement of intent, policy, practice of discrimination	63143	St. Louis County			Fair Housing organization administratively closed	2019-02-27
2018-08-23	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63123	St. Louis County			Counseled and closed - No fair housing issue	2018-08-23
2018-08-29	Discrimination	Renter	Familial Status	Screening - Refusal to rent, sell, or negotiate	63021	St. Louis County			Counseled and closed - No fair housing issue	2018-08-29
2018-09-06	Discrimination	Renter		None	63137	St. Louis County			Counseled and closed - No fair housing issue	2018-09-06
2018-09-06	Discrimination	Renter Landlord/Tenant - General;	Disability	Reasonable accommodation/modification issue	63122	St. Louis County			Counseled and closed - No fair housing issue	2018-09-06
2018-09-10	Discrimination	Renter	Age; Disability	None; Reasonable accommodation/modification issue	63031	St. Louis County			Counseled and closed - No fair housing issue	2018-09-10 Reasonable accommodation made
2018-09-11	Discrimination	Renter	Disability	Differential Treatment, other; Intimidation, threats, harassment ; Reasonable accommodation/modification issue	63123	St. Louis County			Counseled and closed - No fair housing issue	2018-09-11
2018-09-18	Discrimination	Renter	Race; Sex; Disability	Statement of intent, policy, practice of discrimination	63136	St. Louis County	HUD	2019-02-05	Pending with organization attorney	2019-02-05
2018-09-28	Discrimination	Renter	Disability	Differential Treatment, other; Other	63125	St. Louis County			Counseled and closed - No fair housing issue	2018-09-28

2018-10-01	Discrimination	Renter		None	63137	St. Louis County		Counseled and closed - No fair housing issue	2018-10-04	
2018-10-01	Discrimination	Renter		None	63136	St. Louis County		Counseled and closed - No fair housing issue	2018-10-01	
2018-10-02	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63138	St. Louis County		Fair Housing organization administratively closed	2019-01-09	
2018-10-11	Discrimination	Renter		Other	63031	St. Louis County		Counseled and closed - No fair housing issue	2018-10-15	
2018-10-18	Other	Renter		Differential Treatment, other	63135	St. Louis County		Counseled and closed - No fair housing issue	2018-10-18	
2018-10-22	Discrimination	Renter	Race; Sex	Sexual Harassment (quid pro quo or hostile environment)	63114	St. Louis County		Counseled and closed - No fair housing issue	2018-12-03	
2018-10-26	Discrimination	Renter	Race; Disability	Screening - Refusal to rent, sell, or negotiate	63143	St. Louis County		Fair Housing organization administratively closed	2018-10-26	Other (FH)
2018-10-26	Discrimination	Renter		None	63123	St. Louis County		Counseled and closed - No fair housing issue	2018-10-26	
2018-10-26	Discrimination	Other	Disability	Differential Treatment, other; Other	63042	St. Louis County		Counseled and closed - No fair housing issue	2018-10-26	
2018-11-01	Discrimination	Renter	National Origin; Other	Screening - Refusal to rent, sell, or negotiate	63114	St. Louis County		Fair Housing organization administratively closed	2019-04-08	
2018-11-01	Discrimination	Renter		None	63028	Jefferson County		Counseled and closed - No fair housing issue	2018-11-01	Extended time to move out
2018-11-08	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63121	St. Louis County		Counseled and closed - No fair housing issue	2018-12-04	
2018-11-08	Discrimination	Renter		None	63301	St. Charles County		Counseled and closed - No fair housing issue	2018-12-04	
2018-11-12	Discrimination	Renter	Race; Disability; Source of Income	Screening - Refusal to rent, sell, or negotiate	63119	St. Louis County		Fair Housing organization administratively closed	2019-02-27	
2018-11-19	Discrimination	Renter		None	63121	St. Louis County		Counseled and closed - No fair housing issue	2018-11-19	
2018-12-01	Discrimination	Renter	Disability	Design and Constuction	n/a	St. Charles County		Conciliated/settled by organization attorney	2019-01-01	Housing maintained, retrofits, RM, fee waived.
2018-12-04	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63368	St. Charles County		Organization attorney directly assisted with RA/RM	2019-10-24	Reasonable modification permitted; Reasonable accommodation made; Monetary award (FH)
2018-12-04	Discrimination	Renter	Disability	Statement of intent, policy, practice of discrimination	63376	St. Charles County		Fair Housing organization administratively closed	2019-03-28	350 USD
2018-12-06	Discrimination	Renter		Differential Treatment, other	63128	St. Louis County		Fair Housing organization administratively closed	2018-12-06	
2018-12-17	Discrimination	Renter Landlord/Other	Disability	Reasonable accommodation/modification issue	63141	St. Louis County	Closed	Conciliated/settled by organization attorney without filing	2019-01-02	Reasonable accommodation made
2019-01-04	Mortgage	Homeowner	Disability	None	63301	St. Charles County	Closed	Counseled and closed - No fair housing issue	2019-01-04	
2019-01-07	Discrimination	Renter		Differential Treatment, other	63134	St. Louis County		Fair Housing organization administratively closed	2019-01-07	
2019-01-17	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63123	St. Louis County		Fair Housing organization administratively closed	2019-06-17	
2019-01-22	Discrimination	Renter	Sex	Sexual Harassment (quid pro quo or hostile environment)	63124	St. Louis County		Counseled and closed - No fair housing issue	2019-02-19	Other (FH)
2019-01-22	Discrimination	Renter	Familial Status	Intimidation, threats, harassment	63133	St. Louis County		Counseled and closed - No fair housing issue	2019-01-22	
2019-01-23	Discrimination	Renter	Familial Status	Intimidation, threats, harassment	63033	St. Louis County		Counseled and closed - No fair housing issue	2019-03-18	
2019-01-23	Other	Renter		None	63125	St. Louis County		Counseled and closed - No fair housing issue	2019-02-19	Other (FH)
2019-01-23	Other	Renter		None	63042	St. Louis County		Counseled and closed - No fair housing issue	2019-01-23	
2019-01-25	Other	Renter		None	63376	St. Charles County		Counseled and closed - No fair housing issue	2019-01-28	
2019-01-28	Discrimination Landlord/Tenant - General;	Renter	Age; Disability	Reasonable accommodation/modification issue	63074	St. Louis County		Organization attorney directly assisted with RA/RM	2019-08-02	Reasonable accommodation made
2019-01-28	Discrimination	Renter	Race	None	63134	St. Louis County	Closed	Conciliated/settled by organization attorney without filing	2019-01-31	Housing maintained; Other (FH)
2019-01-30	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63138	St. Louis County		Fair Housing organization administratively closed	2019-02-08	
2019-02-19	Discrimination	Renter	Disability	Reasonable accommodation/modification issue;	63074	St. Louis County		Counseled and closed - No fair housing issue	2019-02-19	
2019-02-19	Discrimination	Renter	Race; Color; National Origin	Differential Treatment, other; Intimidation, threats, harassment ; Retaliation	63105	St. Louis County		Counseled and closed - No fair housing issue	2019-02-28	

2019-02-22	Discrimination	Landlord/Other Homeowner	None	63025	St. Louis County			Counseled and closed - No fair housing issue	2019-02-22		
2019-02-25	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63123	St. Louis County		Counseled and closed - No fair housing issue	2019-02-25	Reasonable accommodation made Extended time to move out; Monetary award (FH); Administratively filed with	
2019-02-25	Discrimination	Renter	Disability	Statement of intent, policy, practice of discrimination	63301	St. Charles County	HUD	2019-03-26 Conciliated/settled by HUD after organization attorney filing	2019-06-10	FHAP/HUD/CREA	1000 USD
2019-02-27	Other	Other	None	63121	St. Louis County			Counseled and closed - No fair housing issue	2019-02-27		
2019-03-05	Discrimination	Renter	Disability	Retaliation; Differential Treatment, other	63125	St. Louis County		Counseled and closed - No fair housing issue	2019-03-05		
2019-03-09	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63376	St. Charles County	HUD	2019-04-22 FHAP/HUD/DOJ/CREA administratively closed	2019-12-03	Reasonable accommodation made; Reasonable modification permitted	
2019-03-09	Discrimination	Organization	Disability-Design and Construction	Design and Construction Violations	n/a	St. Charles County	HUD	2019-04-22 Conciliated/settled by organization attorney			
2019-03-18	Discrimination Landlord/Tenant - General;	Renter	None	63136	St. Louis County			Counseled and closed - No fair housing issue	2019-09-16		
2019-03-21	Discrimination	Renter	None	63137	St. Louis County			Counseled and closed - No fair housing issue	2019-03-21	Reasonable accommodation made	
2019-03-25	Discrimination	Renter	Race; Sex	Differential prices, terms and conditions; Screening - Refusal to rent, sell, or negotiate; Differential Treatment, other; Intimidation, threats, harassment	63136	St. Louis County		Fair Housing organization administratively closed	2019-05-15		
2019-03-27	Discrimination Landlord/Tenant - General;	Renter	Age	Differential Treatment, other; Retaliation	63129	St. Louis County		Counseled and closed - No fair housing issue	2019-04-04		
2019-03-28	Discrimination	Homeowner	National Origin; Race; Familial Status	None	63121	St. Louis County		Conciliated/settled by organization attorney without filing	2019-07-23	Other (FH)	175 USD
2019-04-08	Discrimination	Renter	Disability	Other; Reasonable accommodation/modification issue	63301	St. Charles County		Organization attorney directly assisted with RA/RM	2019-04-08		
2019-04-10	Discrimination	Organization	Disability	None; Intimidation, threats, harassment ; Sexual Harassment (quid pro quo or hostile environment)	n/a	St. Charles County	HUD		6000		
2019-04-11	Discrimination	Renter			63136	St. Louis County		Counseled and closed - No fair housing issue	2019-09-30		
2019-04-11	Discrimination	Renter		Intimidation, threats, harassment	63136	St. Louis County		Counseled and closed - No fair housing issue	2019-04-11		
2019-04-18	Discrimination	Renter	National Origin	Differential Treatment, other; Retaliation; Dispute on related transactions (financing, insurance, etc.)	63146	St. Louis County		Fair Housing organization administratively closed	2019-04-18		
2019-04-18	Discrimination	Renter		Differential Treatment, other	63301	St. Charles County		Fair Housing organization administratively closed	2019-04-22		
2019-04-22	Discrimination	Organization	Disability	Design and Construction	n/a	St. Charles County	HUD				
2019-05-03	Mortgage	Buyer	Disability	None	63028	Jefferson County	Closed	Counseled and closed - No fair housing issue	2019-05-03		
2019-05-14	Discrimination	Renter	Race; Sex	Differential Treatment, other	63136	St. Louis County	DOJ	Pending with organization attorney	2019-06-24		
2019-05-21	Discrimination	Community Agency	Religion	Public Accommodation Discrimination	63044	St. Louis County		Fair Housing organization administratively closed	2019-05-21	Other (FH)	
2019-06-03	Discrimination	Landlord/Other Homeowner	Disability	Screening - Refusal to rent, sell, or negotiate; Intimidation, threats, harassment ; Differential prices, terms and conditions	63134	St. Louis County		Conciliated/settled by organization attorney without filing	2019-07-17	Other (FH)	
2019-06-05	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63031	St. Louis County		Fair Housing organization administratively closed	2019-06-05		
2019-06-05	Other	Other	Status	Other; Retaliation	63031	St. Louis County		Counseled and closed - No fair housing issue	2019-07-30		
2019-06-05	Discrimination	Renter	Source of Income; Age	Other	63070	Jefferson County		Counseled and closed - No fair housing issue	2019-07-18		
2019-06-06	Discrimination	Renter	Sex	Differential Treatment, other; Differential prices, terms and conditions	63051	Jefferson County	HUD	2019-07-30 Conciliated/settled by FHAP after organization attorney filing	2019-08-22	Administratively filed with FHAP/HUD/CREA	
2019-06-06	Discrimination	Renter	Disability	Sexual Harassment (quid pro quo or hostile environment); Reasonable accommodation/modification issue	63366	St. Charles County		Fair Housing organization administratively closed	2020-04-06		
2019-06-07	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63114	St. Louis County		Organization attorney directly assisted with RA/RM	2019-06-10	Referred to DOJ; Reasonable accommodation made	
2019-06-13	Other	Other		Retaliation	63134	St. Louis County		Fair Housing organization administratively closed	2019-07-25		
2019-06-18	Discrimination	Renter	Disability	Intimidation, threats, harassment	63114	St. Louis County		Fair Housing organization administratively closed	2019-10-02		
2019-06-19	Discrimination	Renter	Sex; Other	Retaliation; Differential Treatment, other	63136	St. Louis County		Conciliated/settled by organization attorney without filing	2019-06-24	Other (FH)	

2019-06-19	Discrimination Landlord/Tenant - General;	Renter	None		63031	St. Louis County		Counseled and closed - No fair housing issue	2019-06-26	
2019-06-19	Discrimination	Renter	Disability; Religion	Differential Treatment, other	63146	St. Louis County	Closed	Counseled and closed - No fair housing issue Organization attorney directly assisted with RA/RM	2019-06-19	Other (FH)
2019-06-24	Discrimination	Renter		Reasonable accommodation/modification issue Intimidation, threats, harassment ; Differential prices, terms and conditions; Differential Treatment, other	63368	St. Charles St. Louis County	DOJ	2019-11-14 Pending with organization attorney Counseled and closed - No fair housing issue	2019-08-07	Reasonable accommodation made 1700 USD
2019-06-25	Discrimination	Renter	Familial Status		63128	St. Louis County	DOJ	2019-11-14 Pending with organization attorney Counseled and closed - No fair housing issue	2019-11-14	Referred to DOJ
2019-06-26	Discrimination	Renter	Other	Public Accommodation Discrimination Sexual Harassment (quid pro quo or hostile environment); Retaliation	63017	St. Louis County	DOJ	2019-04-25 Pending with organization attorney Fair Housing organization administratively closed Counseled and closed - No fair housing issue	2019-06-26	
2019-07-01	Discrimination	Renter	Race; Sex		63136	St. Louis County	DOJ	2019-04-25 Pending with organization attorney Fair Housing organization administratively closed Counseled and closed - No fair housing issue	2019-07-01	Referred to DOJ
2019-07-02	Other	Renter		None	63136	St. Louis County		2019-04-25 Pending with organization attorney Fair Housing organization administratively closed Counseled and closed - No fair housing issue	2019-07-25	
2019-07-08	Discrimination	Renter		None	63133	St. Louis County		2019-04-25 Pending with organization attorney Fair Housing organization administratively closed Counseled and closed - No fair housing issue	2019-07-08	
2019-07-10	Discrimination	Renter		None	63301	St. Charles		2019-04-25 Pending with organization attorney Fair Housing organization administratively closed Counseled and closed - No fair housing issue	2019-07-10	
2019-07-15	Discrimination	Renter	Disability	Reasonable accommodation/modification issue; Differential Treatment, other	63366	St. Charles St. Louis County		2019-04-25 Pending with organization attorney Fair Housing organization administratively closed Counseled and closed - No fair housing issue	2019-07-15	
2019-07-16	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63134	St. Louis County		2019-04-25 Pending with organization attorney Fair Housing organization administratively closed Counseled and closed - No fair housing issue	2019-09-16	
2019-07-16	Discrimination	Renter	Race; Sex; Disability	Refusal to transmit offer to rent or purchase Intimidation, threats, harassment ; Retaliation; Reasonable accommodation/modification issue	63123	St. Louis County		2019-04-25 Pending with organization attorney Fair Housing organization administratively closed Counseled and closed - No fair housing issue	2019-09-16	
2019-07-26	Discrimination	Renter	Disability	Reasonable accommodation/modification issue; Differential prices, terms and conditions	63367	St. Charles		2019-04-25 Pending with organization attorney Fair Housing organization administratively closed Counseled and closed - No fair housing issue	2019-07-26	
2019-07-31	Discrimination	Renter	Race; Disability	Differential prices, terms and conditions Intimidation, threats, harassment ; Statement of intent, policy, practice of discrimination; Differential Treatment, other	63020	Jefferson	HUD	2019-10-10 Conciliated/settled by HUD after organization attorney filing	2019-12-17	Other (FH)
2019-08-13	Discrimination	Renter	Race; Familial Status; Disability		63123	St. Louis County		2019-10-10 Conciliated/settled by HUD after organization attorney filing Fair Housing organization administratively closed Organization attorney directly assisted with RA/RM	2019-11-26	
2019-08-20	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63132	St. Louis County		2019-10-10 Conciliated/settled by HUD after organization attorney filing Fair Housing organization administratively closed Organization attorney directly assisted with RA/RM	2019-08-27	Reasonable accommodation made 872 USD
2019-08-20	Discrimination	Renter	Disability	Reasonable accommodation/modification issue Differential prices, terms and conditions; Statement of intent, policy, practice of discrimination	63119	St. Louis County	Closed	2019-10-10 Conciliated/settled by HUD after organization attorney filing Fair Housing organization administratively closed Organization attorney directly assisted with RA/RM	2019-08-20	
2019-09-03	Discrimination	Renter	Race Race; Sex; Disability; Color; Sexual Orientation		63033	St. Louis County	HUD	2020-01-06 Pending with organization attorney Counseled and closed - No fair housing issue	2019-09-24	
2019-09-04	Other	Renter		None	63143	St. Louis County		2020-01-06 Pending with organization attorney Counseled and closed - No fair housing issue Fair Housing organization administratively closed	2019-09-05	
2019-09-04	Discrimination	Renter		Reasonable accommodation/modification issue	63129	St. Louis County		2020-01-06 Pending with organization attorney Counseled and closed - No fair housing issue Fair Housing organization administratively closed	2020-01-29	
2019-09-10	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63143	St. Louis County		2020-01-06 Pending with organization attorney Counseled and closed - No fair housing issue Fair Housing organization administratively closed	2019-10-16	
2019-09-13	Other	Renter		None	63136	St. Louis County		2020-01-06 Pending with organization attorney Counseled and closed - No fair housing issue Fair Housing organization administratively closed	2019-09-13	
2019-09-16	Discrimination	Renter	Race; Familial Status Race; Color; Sex; Source of Income	Statement of intent, policy, practice of discrimination; Intimidation, threats, harassment	63019	Jefferson St. Louis County		2020-01-06 Pending with organization attorney Counseled and closed - No fair housing issue Organization attorney directly assisted with RA/RM	2020-03-17	
2019-09-18	Discrimination	Renter	Disability; Source of Income; Sex; Age	Differential Treatment, other Differential Treatment, other; Public Accommodation Discrimination	63034 63043	St. Louis County		2020-01-06 Pending with organization attorney Counseled and closed - No fair housing issue Organization attorney directly assisted with RA/RM	2019-11-05	
2019-09-18	Discrimination	Renter	Race; Color	Steering	63033	St. Louis County		2020-01-06 Pending with organization attorney Counseled and closed - No fair housing issue Fair Housing organization administratively closed	2019-10-17	Reasonable accommodation made
2019-09-18	Discrimination	Renter	Race; Color	Steering	63033	St. Louis County		2020-01-06 Pending with organization attorney Counseled and closed - No fair housing issue Fair Housing organization administratively closed	2019-09-18	
2019-09-19	Discrimination	Renter	National Origin Sex; Disability; Source of Income	Differential prices, terms and conditions	63074	St. Louis County		2020-01-06 Pending with organization attorney Counseled and closed - No fair housing issue Fair Housing organization administratively closed	2019-09-19	
2019-09-25	Other	Other Landlord/Oth er		None	63376	St. Charles		2020-01-06 Pending with organization attorney Counseled and closed - No fair housing issue Fair Housing organization administratively closed	2019-09-25	
2019-09-25	Discrimination	Homeowner Landlord/Oth er	Disability	Reasonable accommodation/modification issue	63141	St. Louis County		2020-01-06 Pending with organization attorney Counseled and closed - No fair housing issue Fair Housing organization administratively closed	2019-10-17	
2019-09-27	Other	Homeowner	Disability	None	63133	St. Louis County	Closed	2020-01-06 Pending with organization attorney Counseled and closed - No fair housing issue Fair Housing organization administratively closed	2019-09-30	
2019-10-04	Discrimination	Renter	Sex; Familial Status; Disability; Source of Income	Refusal to transmit offer to rent or purchase; Other	63028	Jefferson		2020-01-06 Pending with organization attorney Counseled and closed - No fair housing issue Fair Housing organization administratively closed Conciliated/settled by HUD after organization attorney filing	2019-11-26	
2019-10-09	Discrimination	Buyer		Reasonable accommodation/modification issue Differential Treatment, other; Differential prices, terms and conditions	63028	Jefferson St. Louis County	HUD	2019-10-15 Pending with organization attorney Conciliated/settled by HUD after organization attorney filing	2020-05-29	Reasonable accommodation made Administratively filed with
2019-10-21	Discrimination	Renter	National Origin		63129	St. Louis County	MCHR	2020-03-20 Pending with organization attorney Conciliated/settled by HUD after organization attorney filing	2020-03-20	FHAP/HUD/CREA

2019-10-23	Other	Renter	Race; Color	None	63136	St. Louis County			Counseled and closed - No fair housing issue	2019-10-23
2019-10-25	Discrimination	Renter		Screening - Refusal to rent, sell, or negotiate	63105	St. Louis County			Fair Housing organization administratively closed	Tested by FHIP without 2019-10-25 discrimination finding
2019-11-01	Discrimination	Renter	Race; Color; Sex; Source of Income; Disability	None	63136	St. Louis County			Counseled and closed - No fair housing issue	2019-11-01
2019-11-01	Discrimination	Renter		Reasonable accommodation/modification issue	63026	St. Louis County			Fair Housing organization administratively closed	2020-02-12
2019-11-04	Discrimination	Renter	Race; Color; Sex; Disability; Age; Source of Income	None	63121	St. Louis County			Counseled and closed - No fair housing issue	2019-11-04
2019-11-04	Discrimination	Renter		Reasonable accommodation/modification issue	63088	St. Louis County			Fair Housing organization administratively closed	2019-11-04
2019-11-13	Discrimination	Renter	Race; Color; Source of Income	Differential Treatment, other; Differential prices, terms and conditions	63121	St. Louis County			Counseled and closed - No fair housing issue	2019-11-13
2019-11-22	Discrimination	Renter		Reasonable accommodation/modification issue	63136	St. Louis County			Counseled and closed - No fair housing issue	2020-03-04
2019-11-22	Other	Renter		None	63137	St. Louis County			Counseled and closed - No fair housing issue	2019-11-22
2019-11-26	Discrimination	Renter		Intimidation, threats, harassment	63146	St. Louis County			Fair Housing organization administratively closed	2019-12-18 DOJ Administratively Closed
2019-11-27	Discrimination	Renter	Familial Status	Intimidation, threats, harassment ; Differential Treatment, other; Differential prices, terms and conditions	63128	St. Louis County			Pending with organization attorney	2019-11-27 Referred to DOJ
2019-12-03	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63119	St. Louis County			Conciliated/settled by organization attorney without filing	2020-03-26
2019-12-04	Discrimination	Renter	Sex	Sexual Harassment (quid pro quo or hostile environment)	63033	St. Louis County			Counseled and closed - No fair housing issue	2019-12-04
2019-12-18	Discrimination	Renter		Differential Treatment, other; Differential prices, terms and conditions; Intimidation, threats, harassment	63088	St. Louis County			Fair Housing organization administratively closed	2020-05-28
2020-01-08	Discrimination	Organization	Disability	Refusal to grant RA for person with disability needing a service animal	n/a	St. Louis County	HUD	2020-02-02	Conciliated/settled by organization attorney	
2020-01-16	Discrimination	Renter	Disability	Differential Treatment, other; Reasonable accommodation/modification issue	63136	St. Louis County			Pending with organization attorney	2020-01-16
2020-01-22	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63303	St. Charles County			Pending with organization attorney	2020-01-22
2020-01-28	Discrimination	Renter	Other	Screening - Refusal to rent, sell, or negotiate	63146	St. Louis County			Fair Housing organization administratively closed	2020-04-20
2020-02-18	Other	Renter		None	63136	St. Louis County			Counseled and closed - No fair housing issue	2020-02-17
2020-02-21	Discrimination	Renter	Disability	None	63026	St. Louis County			Counseled and closed - No fair housing issue	2020-02-21
2020-02-26	Discrimination	Renter	Race; National Origin	Screening - Refusal to rent, sell, or negotiate; Refusal to transmit offer to rent or purchase	63043	St. Louis County			Pending with organization attorney	2020-02-26
2020-03-02	Mortgage	Buyer		Dispute on related transactions (financing, insurance, etc.)	63136	St. Louis County			Counseled and closed - No fair housing issue	2020-03-24
2020-03-04	Other	Renter	Race	Other	63304	St. Charles County			Conciliated/settled by other	2020-03-04
2020-03-30	Discrimination	Renter		Reasonable accommodation/modification issue	63136	St. Louis County			Pending with organization attorney	2020-03-30
2020-04-24	Discrimination Landlord/Tenant - General;	Renter	Race	Screening - Refusal to rent, sell, or negotiate	63129	St. Louis County			Fair Housing organization administratively closed	Tested by FHIP without 2020-04-27 discrimination finding
2020-05-06	Discrimination	Renter	Disability	Reasonable accommodation/modification issue	63121	St. Louis County			Organization attorney directly assisted with RA/RM	2020-05-15 Reasonable accommodation made
2020-05-19	Discrimination	Renter		None	63021	St. Louis County			Pending with organization attorney	2020-05-19
2020-05-29	Discrimination	Renter	Other; Disability	Intimidation, threats, harassment ; Retaliation	63028	Jefferson County			Fair Housing organization administratively closed	2020-07-01
2020-06-02	Discrimination	Renter		Other	63031	St. Louis County			Counseled and closed - No fair housing issue	2020-06-02
2020-06-03	Other Landlord/Tenant - General;	Other		None	63132	St. Louis County			Counseled and closed - No fair housing issue	2020-06-04
2020-06-03	Discrimination	Renter		None	63143	St. Louis County			Organization attorney directly assisted with RA/RM	2020-08-07 Reasonable accommodation made
2020-06-03	Discrimination	Renter Landlord/Other	National Origin	Other	63105	St. Louis County			Fair Housing organization administratively closed	2020-06-22
2020-06-04	Discrimination	Homeowner	Age; Race	Differential prices, terms and conditions	63367	St. Charles County			Counseled and closed - No fair housing issue	2020-06-04
2020-06-04	Discrimination	Other	Disability	Other	63088	St. Louis County			Counseled and closed - No fair housing issue	2020-06-04

2020-06-05	Discrimination	Renter		Differential Treatment, other; Other	63366	St. Charles St. Louis County		Counseled and closed - No fair housing issue	2020-06-17
2020-06-08	Discrimination	Renter	Disability	Reasonable accommodation/modification issue; Other	63136	St. Louis County	MHDC	Fair Housing organization administratively	2020-06-08
2020-06-10	Discrimination	Renter	Disability	Differential Treatment, other	63052	Jefferson St. Louis County		2020-08-11 closed	2020-06-10
2020-06-12	Discrimination	Renter	Race	Screening - Refusal to rent, sell, or negotiate; Differential prices, terms and conditions	63134	St. Louis County		Pending with organization attorney	2020-06-12
2020-06-15	Discrimination	Renter	Disability	Intimidation, threats, harassment	63376	St. Charles St. Louis County		Counseled and closed - No fair housing issue	2020-06-18
2020-06-18	Discrimination	Renter	Sex; Race	Sexual Harassment (quid pro quo or hostile environment)	63121	St. Louis County		Pending with organization attorney	2020-06-18
2020-06-23	Discrimination	Renter	Religion	Differential Treatment, other; Intimidation, threats, harassment ; Statement of intent, policy, practice of discrimination	63146	St. Louis County		Conciliated/settled by other	2020-06-23
2020-06-25	Discrimination	Renter	Race; Other	Differential prices, terms and conditions	63130	St. Louis County		Counseled and closed - No fair housing issue	2020-07-20
2020-06-29	Discrimination	Renter	Source of Income; Other; Race	Differential Treatment, other; Differential prices, terms and conditions	63303	St. Charles		Counseled and closed - No fair housing issue	2020-06-29
2020-06-29	Discrimination	Renter	Disability	Intimidation, threats, harassment	63303	St. Charles St. Louis County		Counseled and closed - No fair housing issue	2020-06-29
2020-06-30	Discrimination	Renter	Race; National Origin; Disability	Differential Treatment, other	63124	St. Louis County	HUD	2020-08-03 Pending with organization attorney	2020-06-30
									Administratively filed with FHAP/HUD/CREA