



# **2009 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR ROCKFORD, ILLINOIS**

**FINAL REPORT**

**NOVEMBER 4, 2009**

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# **HAS YOUR RIGHT TO FAIR HOUSING BEEN VIOLATED?**

If you feel you have experienced discrimination in the housing industry, please contact:

The Illinois Department of Human Rights  
Fair Housing Division  
100 West Randolph Street, Suite 10-100  
Chicago, IL 60601  
(312) 814-6219 or (800) 662-3942

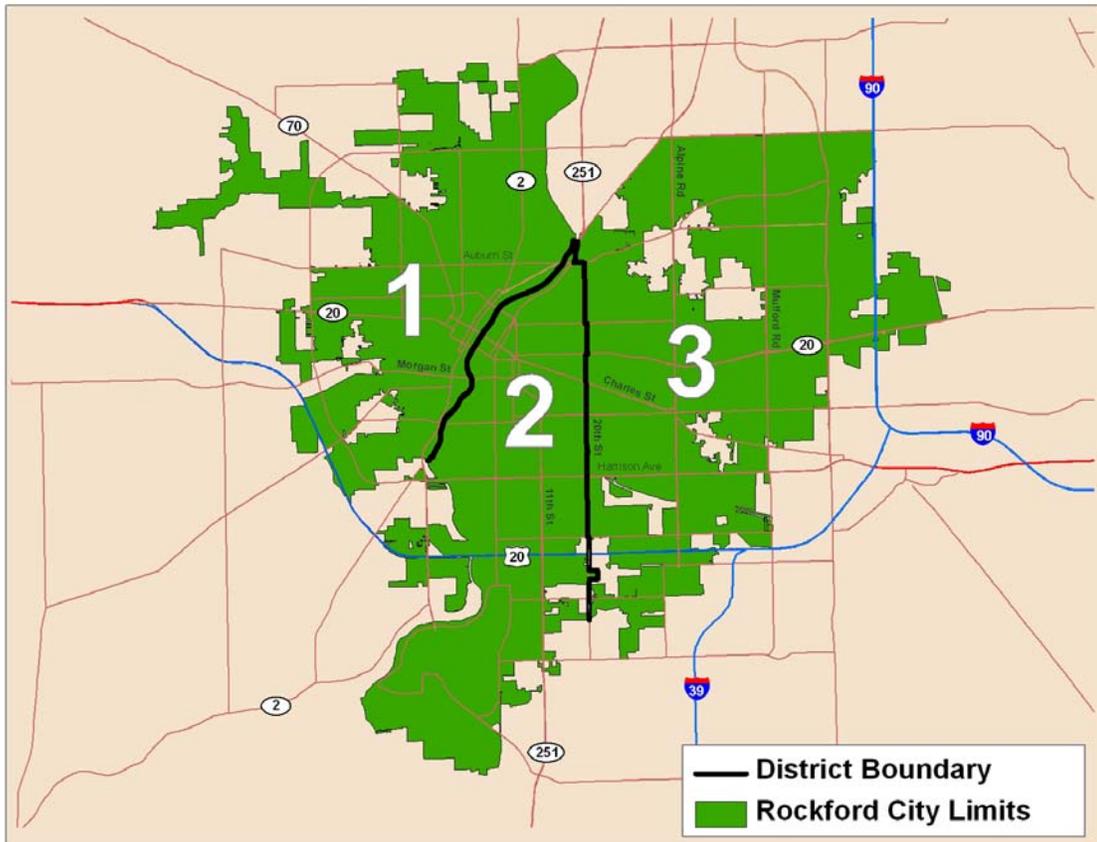
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**Map 1**  
**City of Rockford, Illinois**



# **EXECUTIVE SUMMARY**

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## **BACKGROUND**

As an entitlement jurisdiction, the city of Rockford is required to submit to the U.S. Department of Housing and Urban Development (HUD) certification that it is affirmatively furthering fair housing. This certification has three elements and requires that the City:

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

An Analysis of Impediments to fair housing choice (AI) is a document that presents research on barriers in obtaining housing that people face within a certain geographic area. HUD defines impediments to fair housing choice in terms of their applicability to local, state and federal law. In Rockford, barriers would include:

- Any actions, omissions or decisions taken because of race, color, religion, sex, disability or handicap, familial status, national origin, ancestry, age, marital status, military status, sexual orientation, or unfavorable military discharge (protected classes) which restrict housing choices or the availability of housing choice.
- Any actions, omissions or decisions which have the effect of restricting housing choices or the availability of housing choice on the protected classes previously listed.

The AI process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system and housing transactions which affect people who are protected under fair housing law. AI sources include census data, home mortgage industry data, federal and state fair housing complaint data, surveys of housing industry experts and stakeholders, township assessor data, and public housing information.

An AI also includes an active and involved public input and review process via direct contact with stakeholders, focus group sessions with housing experts, public forums to collect input from citizens, distribution of draft reports for citizen review and formal presentations of findings.

## **OVERVIEW OF FINDINGS**

### **Socio-Economic Context**

Rockford experienced an increase in population from 2000 to 2007 of about 4.3 percent, growing from 150,115 to 156,596 persons. The population was roughly balanced between those age 34 or younger (50.8 percent) and those age 35 or older (49.2 percent).

The racial composition of the city was 72.8 percent white and 17.3 percent black, followed by other race with 4.8 percent, two or more races with 2.4 percent, and Asian with 2.2 percent. Both American Indian and Native Hawaiian/Pacific Islander populations comprised less than 1.0 percent of the population. However, the distribution of racial and ethnic minorities within the city was not balanced, with extremely high concentrations of such populations in census block groups located primarily in District 1 and partially in District 2.

Between 2005 and 2008, the labor force in Winnebago County, defined as people either working or looking for work, rose quite modestly from just under 140,000 people to nearly 153,000 people, an increase of roughly 8.5 percent. The unemployment rate in Winnebago County at the end of 2008 was 12.0 percent, nearly twice that of national figures. Additionally, average earnings per job and per capita income were at least \$7,000 less than national averages; this disparity has been expanding in recent years. In Rockford, the poverty rate in 2000 was 14.0 percent, with 20,351 people considered to be in poverty. Poverty in Rockford was highly concentrated in selected block groups, primarily in District 1.

The 2000 census reported a total of 63,607 housing units in Rockford, 93.1 percent of which were occupied. Of these occupied housing units, 61.3 percent were owned and 38.7 were rented. The total number of housing units in Winnebago County expanded from 114,404 units in 2000 to 124,921 units in 2007, an increase of more than 10,517 units or 9.2 percent over this time period. Nearly 3,000 of these units were located within the city of Rockford. Almost 20.0 percent of vacant housing in Rockford was qualified as “other vacant” units or housing that has been abandoned or boarded up and deemed unsuitable for occupation. The large rise in housing stock combined with modest population growth may have contributed to increased blighting influences of the vacant housing stock. The Rockford Township Assessor data indicate that much of the lower-quality housing in Rockford is located in Districts 1 and 2.

## **Lending Practices**

According to HMDA data, about 51,900 loan applications were sought specifically for home purchases. Excluding loan applications that were withdrawn, incomplete or approved by the lender but not accepted by the applicant, there were 25,110 loan originations and 4,094 loan denials, for an average nine-year loan denial rate of 14.0 percent. Denial rates were not evenly distributed throughout the city. Many census tracts on the central west side of Districts 1 and 2 had average denial rates above 31.0 percent, and one census tract in this area experienced a rate above 61.0 percent. In general, blacks and Hispanics tended to have significantly higher denial rates than whites over the nine-year period, even within similar household income groupings. From 2004 to 2007, 3,392 or 28.0 percent of all originated loans were high-interest rate loans. Roughly twice as many loans originated to black households were predatory as compared to whites.

## **Fair Housing Agencies and Programs**

Many organizations play a role in fair housing in Rockford, including the U.S. Department of Housing and Urban Development, the Illinois Department of Human Rights and the Rockford Fair Housing Board. These organizations handle fair housing complaints within the region and settle related fair housing disputes.

## **Evaluation of the Fair Housing Profile**

Information gathered from articles regarding housing discrimination in the region showed that discrimination has occurred in the forms of failure to make reasonable accommodations and advertising discrimination, while a regional study showed that problems with steering and racial segregation are common in the real estate industry.

Additionally, lawsuits filed with the Department of Justice from the region also revealed problems of steering, as well as possible discrimination in a nearby housing authority.

Fair housing complaint data from HUD from 2001 to 2008 was gathered and analyzed. HUD complaint data was most often related to discrimination against renters, including failure to make reasonable accommodations and questionable rental conditions. Most complaints submitted to HUD were either dismissed or withdrawn by the complainant.

Complaint data from the Illinois Department of Human Rights showed that between 2003 and 2008 nearly 20 complaints were filed. Of these complaints, most were related to discrimination in terms or conditions of renting or selling property.

Findings from the 2008 Fair Housing Survey revealed that most persons surveyed were aware of fair housing laws and their purpose; however fewer persons felt that the laws were easy to understand. Most persons surveyed were unaware of fair housing testing or planning conducted by the city, and a significant number of respondents indicated that barriers or other issues affect fair housing in the city. Most persons surveyed were unable to correctly identify protected classes or to which organizations persons with fair housing concerns should be referred. Survey respondents also provided input on factors contributing to residential segregation, which included housing program guidelines, tax credit criteria, locations of public housing, and limited areas where Section 8 vouchers are accepted.

## **IDENTIFIED IMPEDIMENTS TO FAIR HOUSING CHOICE**

The 2009 Analysis of Impediments for the city of Rockford uncovered several issues that can be considered barriers to affirmatively furthering fair housing and, consequently, impediments to fair housing choice. These issues are as follows:

1. Several areas of the city of Rockford have extremely high concentrations of selected racial and ethnic minorities. These areas also tend to have lower-quality and older housing units. High concentrations of assisted housing units, public housing and Section 8 voucher use exist in the same areas of the city. This situation has resulted in racial and ethnic minority segregation.
2. Potential history of steering is a concern.
3. Very few housing complaints tend to lead to several concerns:
  - a. Insufficient fair housing system capacity for enforcement,
  - b. Lack of effective referral system,
  - c. Lack of understanding of the fair housing system,
  - d. Lack of concern by residents on the east side of Rockford,
  - e. Questionable effectiveness of the Rockford Fair Housing Board fair housing complaint process.
4. HMDA data indicate that minorities are denied home loans much more often than whites, even after correcting for income.
5. Concentration of high annual percentage rate loans tends to occur more frequently in areas with high concentrations of racial and ethnic minorities. Hence, the geographic distribution of sales is a concern and it seems that subprime and potentially predatory lending has been occurring in marketplace and has been targeted to areas with higher concentrations of poverty and ethnic and racial minorities.

## **SUGGESTED ACTIONS TO CONSIDER**

In response to these listed impediments, the city of Rockford should consider taking the following actions:

1. Work with Realtors to issue a policy statement that discourages steering and exclusionary location policies and encourages inclusive housing location patterns and activities.
2. In order to prevent or remedy concentrations of assisted housing, public housing and Section 8 voucher use, incentives or disincentives can be offered to encourage better integration. This approach could include working more closely with the Rockford Housing Authority to dissipate its public housing stock throughout the city.
3. Enhance the capacity of Rockford's fair housing system.
  - a. Increase the effectiveness of the Rockford Fair Housing Board by:
    - i. Posting the annual report to the Mayor on the City's Web site,
    - ii. Tracking the number of complaints that have come to the Board over the year and the referrals to the Illinois Department of Human Rights,
    - iii. Making the online information more user-friendly, such as:
      - Making a link directly to the City's Fair Housing Ordinance,
      - Being sure that the voice mail box is available and not full,

- Posting the mailing address of the Board and indicating a contact person,
  - Explaining the process of filing a complaint more simply.
- iv. Listing other resources where a person might also go for support, such as Prairie Legal Services, Inc. or the Illinois Department of Human Rights.
- b. Engage an existing Fair Housing Initiative Program (FHIP) grant recipient, or entity receiving funds from HUD for various fair housing activities, to conduct outreach and education activities in Rockford.
    - i. This effort would include outreach and education to the general population.
    - ii. This effort could include fair housing trainings for city staff, management and public safety offices.
    - iii. This effort could include a focus area, such as the eastern side of the city, thereby encouraging greater understanding and knowledge of the current fair housing situation in Rockford.
4. Enhance the education of prospective homebuyers and report the attributes of loans with predatory characteristics, such as high annual percentage rate terms, balloon payments, teaser introductory rates and constrained refinancing terms.



## ***SECTION I. INTRODUCTION***

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### **BACKGROUND**

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

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

State or local government may enact a fair housing law that extends protection to other groups. For example, the Illinois Human Rights Act incorporates the national protections of race, color, religion, national origin, sex, disability and familial status and extends additional protections for ancestry, age, marital status, military status, sexual orientation and unfavorable military discharge for citizens of Illinois.

### **WHY ASSESS FAIR HOUSING?**

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD) housing and community development programs. These provisions flow from Section 808(e) (5) of the Federal Fair Housing Act, which requires that the Secretary of HUD administer HUD's housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single preparation: the Consolidated Plan for Housing and Community Development. This document incorporates the plans for original consolidated programs, which include Community Development Block Grants (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA), as well as encouraging additional program components that have been enacted.

As a part of the consolidated planning process, states and entitlement jurisdictions, such as the city of Rockford, are required to submit to HUD certification that they are affirmatively furthering fair housing. This certification has three parts and requires that entitlements:

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

HUD interprets these three certifying elements to entail:

- Analyzing and working to eliminate housing discrimination in the jurisdiction;
- Promoting fair housing choice for all people;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.<sup>1</sup>

## **PURPOSE**

Thus, the purpose of this AI is to document impediments to fair housing choice that affect those who are protected by fair housing laws and to suggest actions that the city can consider in working toward overcoming or mitigating the identified impediments.

## **RESEARCH METHODOLOGY**

The AI offers a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system and housing transactions affecting people who are protected under fair housing law. The following four types of research activities were utilized in creating this AI:

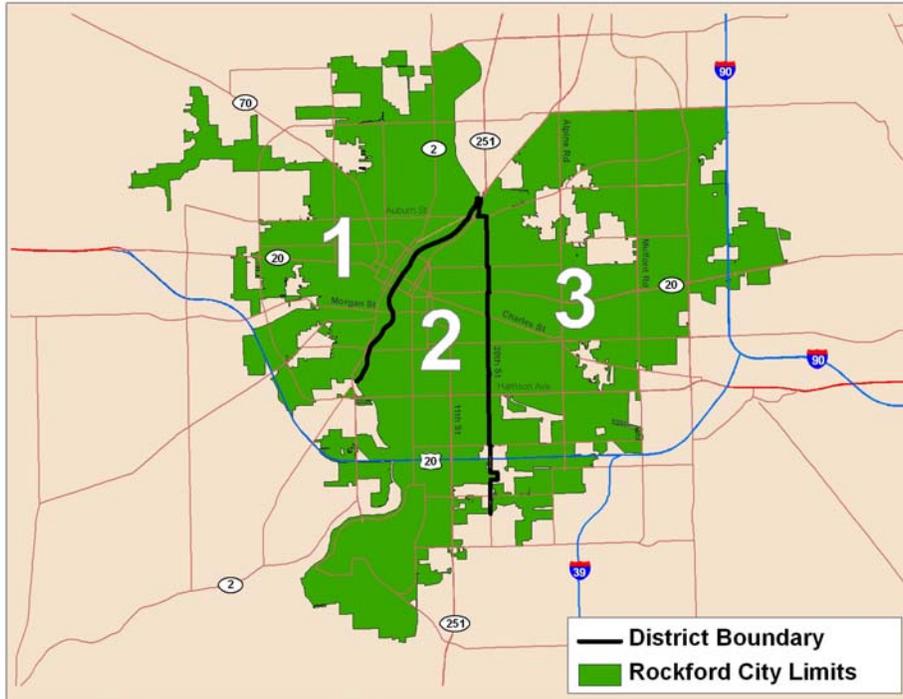
1. *Primary* – the collection and analysis of raw data that did not previously exist.
2. *Secondary* – the review of existing data and studies.
3. *Quantitative* – the statistical analysis of objective, measurable or numerical data.
4. *Qualitative* – the evaluation of subjective, in-depth insights of people’s beliefs, feelings, attitudes, opinions and experiences.

Combining all four kinds of research provides a rich data set for analyzing impediments to fair housing choice. Some findings are presented for the entire city, others by each of the three newly created planning districts, as seen in Map I.1 on the following page, and still others for census tracts or block groups within the city.

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<sup>1</sup> *Fair Housing Planning Guide*. U.S. Department of Housing and Urban Development. March 1996, pg.1-3.

**Map I.1  
Rockford Planning Districts**



Some of the baseline secondary and quantitative data providing a picture of the city's housing marketplace were drawn from the 2000 census and intercensal estimates. These data included population, personal income, poverty estimates, housing units by tenure, cost burdens and housing conditions. Other data were drawn from records provided by the Rockford Township Assessor, the Bureau of Economic Analysis, the Bureau of Labor Statistics and a variety of other statistics depicting the socio-economic context in which consumers make housing choices. The entirety of these data can be found in Rockford's *2010-2014 Consolidated Plan for Housing and Community Development*. The narrative below offers a brief description of the key data sources employed for the 2009 AI.

### **Home Mortgage Disclosure Act Data**

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and has since been amended several times. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities and to assist in identifying possible discriminatory lending patterns. HMDA requires lenders to publicly disclose the race, ethnicity and sex of mortgage applicants, along with loan application amounts, household income and census tract in which the home is located, and information concerning actions related to the loan application. For this analysis, HMDA data from 1999 through 2007 was analyzed, with denial rates by race and ethnicity of applicants as one of the key research objectives.

## **Fair Housing Complaint Data**

HUD provided fair housing complaint data for the city from 2001 through 2008 and the Illinois Department of Human Rights provided fair housing complaint data for 2003 through 2008. The information included basis of complaint, issue pursuant to the grievance and closure status of the alleged fair housing infraction. This review allowed for inspection of the tone and relative degree and frequency of certain types of unfair housing practices seen in Rockford.

## **2008 Fair Housing Survey**

One of the methods HUD recommends for gathering public input about perceived impediments to fair housing is surveys of stakeholders. The Rockford Department of Community Development solicited nearly 300 survey responses to the 2008 fair housing survey, which was conducted entirely online.

## **LEAD AGENCY**

The Rockford Department of Community Development (DCD) is the lead agency for HUD housing and community development for the city of Rockford. Western Economic Services, LLC, a Portland, Oregon-based consulting firm specializing in analysis and research in support of housing and community development planning, prepared this AI.

## **Commitment to Fair Housing**

In accordance with the applicable statutes and regulations governing the consolidated plan, the Rockford DCD certifies that it will *affirmatively further fair housing*. This statement means that the DCD has conducted an AI within the city of Rockford, will take appropriate actions to overcome the effects of any impediments identified through that analysis, and will maintain records reflecting that analysis and actions in this regard.

## **PUBLIC INVOLVEMENT**

The DCD held five fair housing focus groups between March 10 and March 12, 2009. The focus groups, held at City Hall and the City Council Chambers, addressed five specific topic areas: economic development, healthy neighborhoods, homeowner housing, infrastructure and rental housing.

The DCD also hosted three public input meetings, held April 1 through 2, 2009, at the Goodwill Abilities Center, the Rockford Housing Authority and Anderson Gardens. The purpose of these meetings was to present preliminary findings of the AI to the public.

A draft report for public review was released on September 27, 2009, which initiated a 30-day public review period. Three public presentations of the draft report were made on October 6, 7 and 8, 2009. Acceptance of the report was acquired by the City Council on November 9, 2009.

## SECTION II. SOCIO-ECONOMIC CONTEXT

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### INTRODUCTION

This section presents general demographic, economic and housing information collected from: the U.S. Census Bureau, the Bureau of Economic Analysis, the Bureau of Labor Statistics and other resources. These data were used to describe a broad range of socioeconomic characteristics including population, race, ethnicity, disability, low-income households, employment, poverty concentrations and housing trends. These data illustrate the underlying conditions that have helped shape housing market behavior and housing choice, as well as highlight potential impediments to fair housing choice.

### DEMOGRAPHICS

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#### POPULATION

In August of 2008, the U.S. Census Bureau released the most recent population estimates for the nation by county and city for the period ending July 1, 2007. As Diagram II.1 illustrates, the total population of Rockford grew from 150,115 in 2000 to 156,596 in 2007, an increase of about 4.3 percent. The growth rate showed a slight increase between 2000 and 2003, a plateau between 2003 and 2005, and a significant increase between 2006 and 2007.

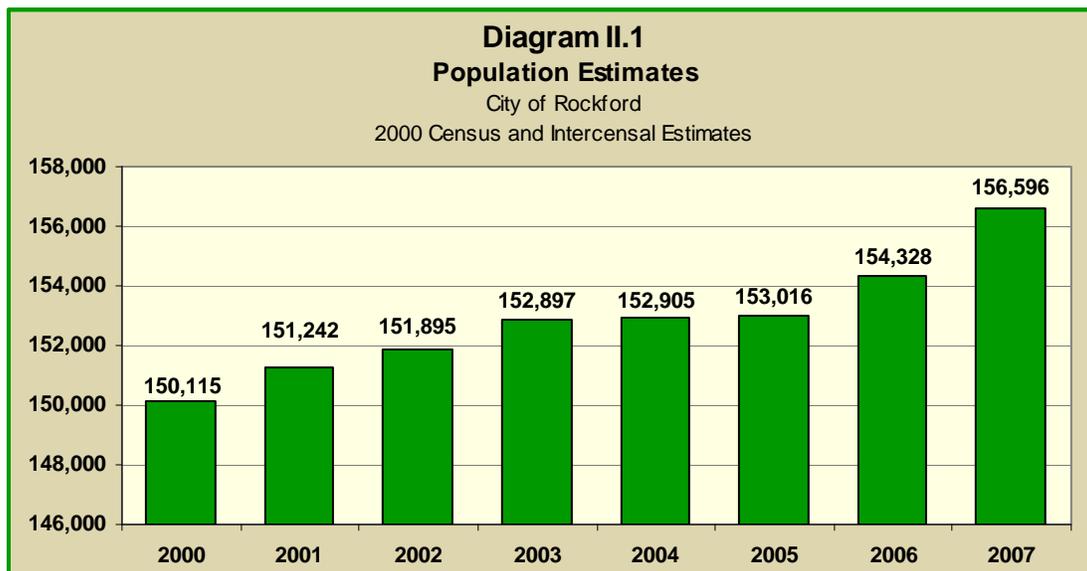


Table II.1 presents the 2000 census population distribution by age for Rockford by district. These data show that the population in Rockford was roughly balanced between those age 34 or younger (50.8 percent) and those age 35 or older (49.2 percent). However, District 3 had a relatively larger share of persons over 35 (46.2 percent), while District 1 had a slightly larger portion of those under the age of 20 (39.9 percent)

<b>Table II.1</b>								
<b>Population by Age</b>								
City of Rockford								
Census 2000 SF1 Data								
<b>Place</b>	<b>Under 5</b>	<b>5 to 19</b>	<b>20 to 24</b>	<b>25 to 34</b>	<b>35 to 54</b>	<b>55 to 64</b>	<b>64 and Over</b>	<b>Total</b>
District 1	4,399	13,165	3,550	7,848	13,756	3,641	6,467	52,826
District 2	3,186	7,672	2,785	6,188	9,552	2,605	3,680	35,668
District 3	4,035	11,552	3,499	8,378	17,609	5,586	10,962	61,621
<b>Rockford</b>	<b>11,620</b>	<b>32,389</b>	<b>9,834</b>	<b>22,414</b>	<b>40,917</b>	<b>11,832</b>	<b>21,109</b>	<b>150,115</b>

## RACIAL COMPOSITION

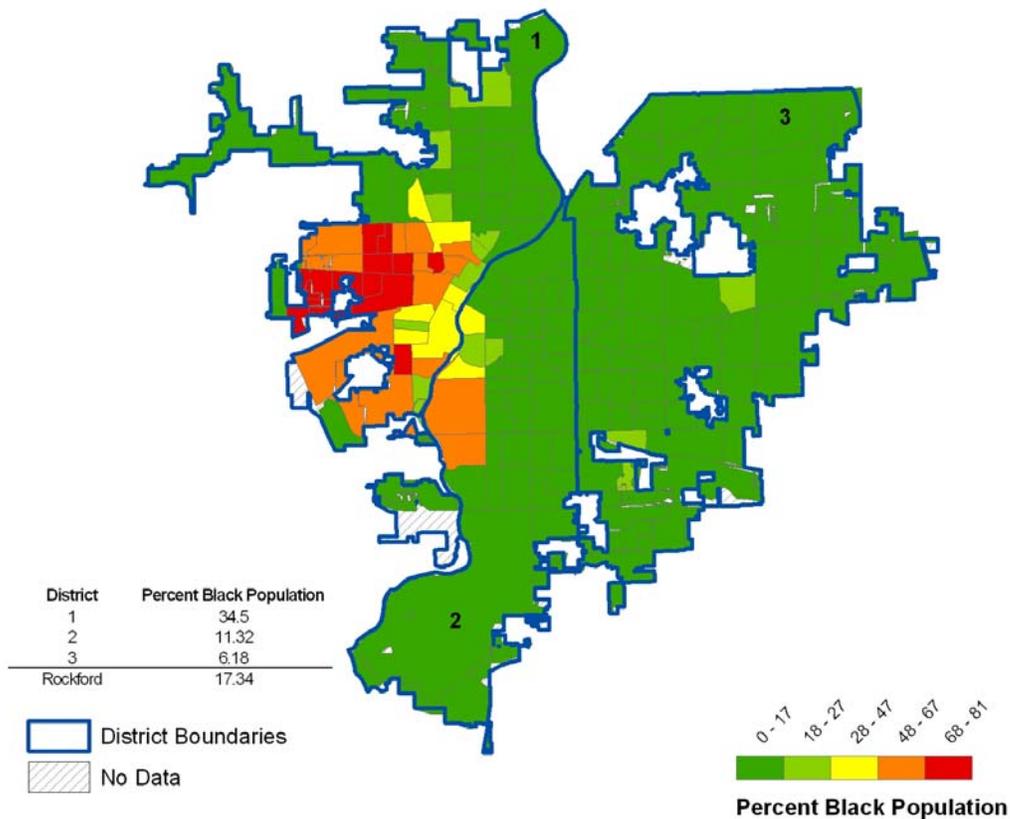
At the time that the 2000 census was taken, the racial composition of Rockford was 72.8 percent white and 17.3 percent black. The next most populous group was listed as other race with 4.8 percent, followed by two or more races with 2.4 percent, and Asian with 2.2 percent. Both American Indian and Native Hawaiian/Pacific Islander populations comprised less than 1.0 percent of the population. The Hispanic population in the area equated to roughly 10.0 percent of the total population, or 15,278 people, as seen below in Table II.2. However, the geographic distribution of these racial and ethnic minorities was not even throughout the city of Rockford. Table II.2 also shows that 69.9 percent of black persons resided in District 1 at the time the census was taken. Whites, however, tended to be concentrated in District 3, with 48.7 percent of all whites living in this district.

<b>Table II.2</b>									
<b>Population by Race</b>									
City of Rockford									
2000 Census SF1 Data									
<b>Place</b>	<b>White</b>	<b>Black</b>	<b>American Indian</b>	<b>Asian</b>	<b>Native Hawaiian/Pacific Islander</b>	<b>Other</b>	<b>Two or More Races</b>	<b>Total</b>	<b>Hispanic</b>
District 1	28,964	18,227	209	259	31	3,598	1,538	52,826	6,942
District 2	27,060	4,037	170	1,109	17	2,156	1,119	35,668	4,868
District 3	53,279	3,808	95	1,933	19	1,446	1,041	61,621	3,468
<b>Rockford</b>	<b>109,303</b>	<b>26,072</b>	<b>474</b>	<b>3,301</b>	<b>67</b>	<b>7,200</b>	<b>3,698</b>	<b>150,115</b>	<b>15,278</b>

HUD defines a population as having a disproportionate share when the portion of that population is more than 10 percentage points higher than the jurisdiction average. For example, the citywide black population in Rockford in 2000 was 17.3 percent. Therefore, any area that had a black population higher than 27.3 percent had a disproportionate share of blacks. This analysis of racial distribution was conducted by calculating race as the percentage share of total population and then plotting the data on a geographic map of

block groups for Rockford. As Map II.1, below, illustrates, several block groups had concentrations of black populations that ranged well above 27.3 percent, with some block groups in the range of 68.0 to 81.0 percent black, clearly a disproportionate share by HUD’s definition. The map demonstrates that these areas of disproportionate share were heavily concentrated in District 1. These high levels of disproportionate share could imply that past housing location policies might not have been inclusive or in the spirit of affirmatively furthering fair housing.

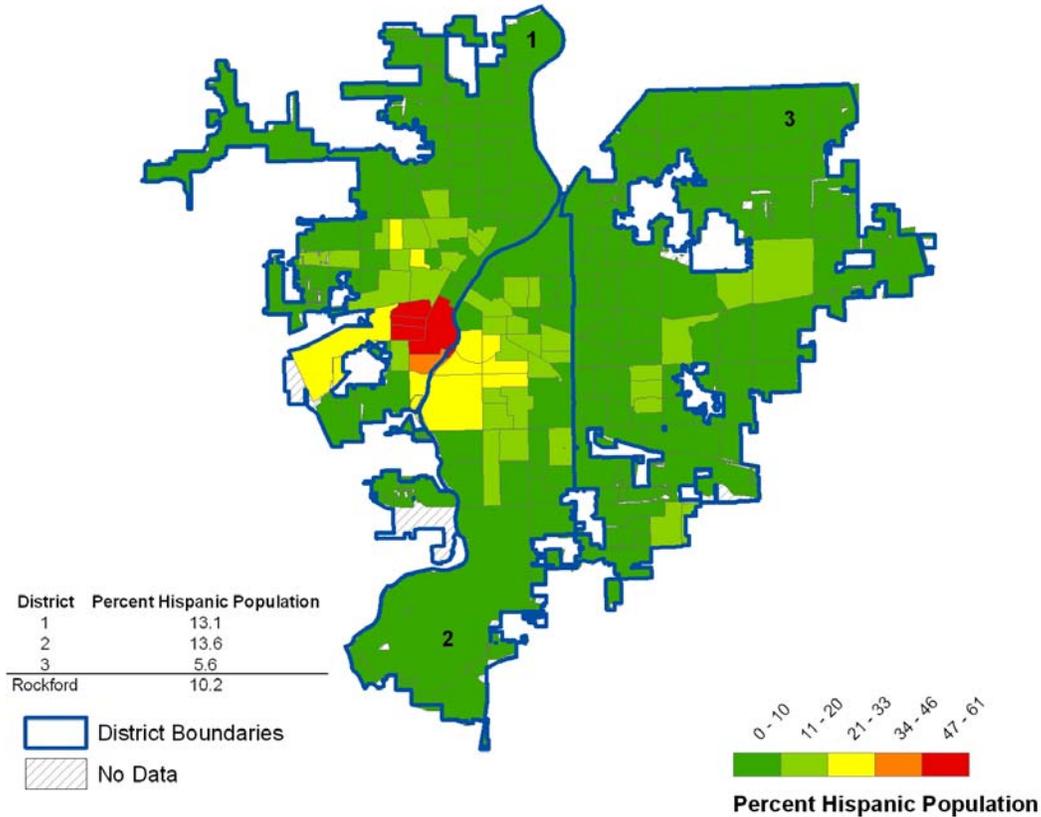
**Map II.1<sup>2</sup>**  
**Percent Black Population by Census Block Group**  
 City of Rockford  
 2000 Census Data



While the Hispanic population in the city was smaller than the black population, a similar evaluation was conducted and revealed that several areas of the city had very high Hispanic concentrations. Map II.2, on the following page, shows that some block groups contained more than 47.0 percent of Hispanic persons, with these highly concentrated block groups located primarily in District 1 and to a lesser extent in northwestern sections of District 2.

<sup>2</sup> The “no data” portions of the map represent geographic areas that have been incorporated into the Rockford city limits since the time of the 2000 census.

**Map II.2**  
**Percent Hispanic Population by Census Block Group**  
 City of Rockford  
 2000 Census Data



## DISABILITY STATUS

Disability is defined by the Census Bureau as a lasting physical, mental or emotional condition that makes it difficult for a person to conduct daily activities of living or impedes them from being able to go outside the home alone or to work.<sup>3</sup> Defined in this fashion, Rockford’s disabled population comprised 21.0 percent of the area’s total population aged

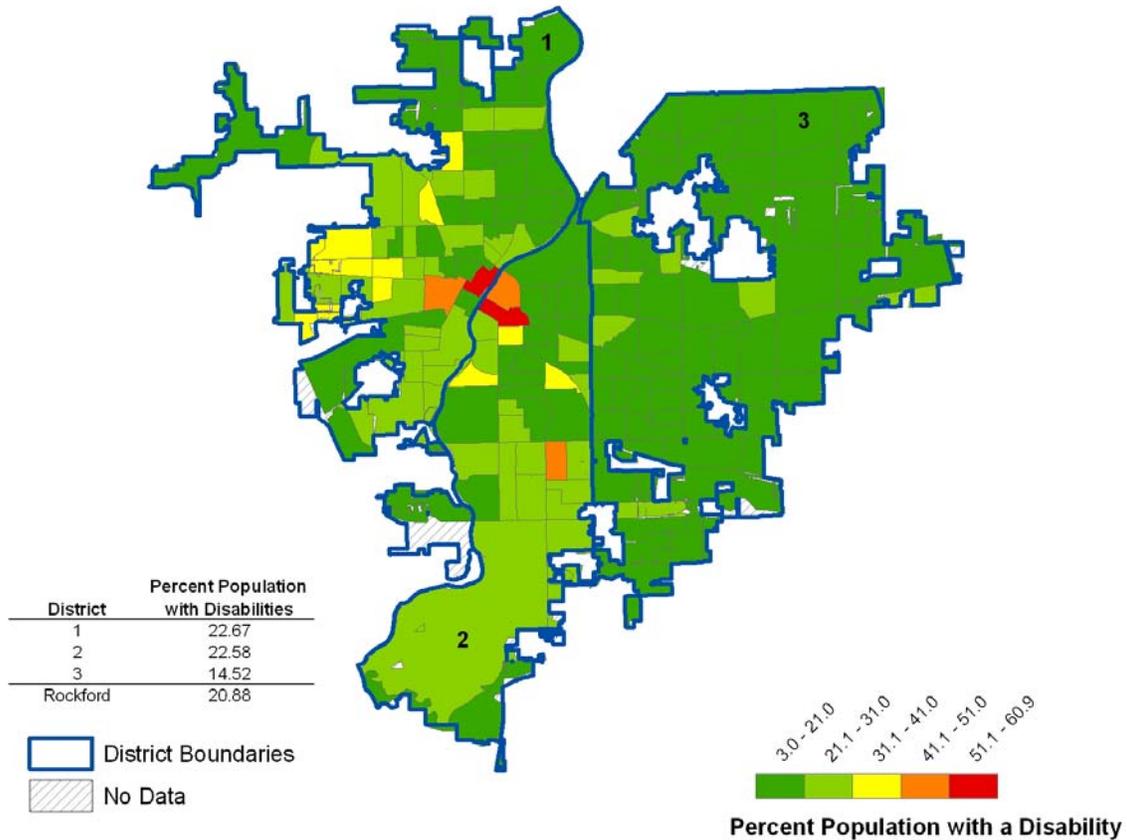
<sup>3</sup> The data on disability status were derived from answers to long-form questionnaire items 16 and 17 for the 1-in-6 sample. Item 16 asked about the existence of the following long-lasting conditions: (a) blindness, deafness, or a severe vision or hearing impairment, (sensory disability) and (b) a condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying (physical disability). Item 16 was asked of a sample of the population five years old and over. Item 17 asked if the individual had a physical, mental, or emotional condition lasting 6 months or more that made it difficult to perform certain activities. The four activity categories were: (a) learning, remembering, or concentrating (mental disability); (b) dressing, bathing, or getting around inside the home (self-care disability); (c) going outside the home alone to shop or visit a doctor’s office (going outside the home disability); and (d) working at a job or business (employment disability). Categories 17a and 17b were asked of a sample of the population five years old and over; 17c and 17d were asked of a sample of the population 16 years old and over. For data products which use the items individually, the following terms are used: sensory disability for 16a, physical disability for 16b, mental disability for 17a, self-care disability for 17b, going outside the home disability for 17c, and employment disability for 17d. For data products which use a disability status indicator, individuals were classified as having a disability if any of the following three conditions was true: (1) they were five years old and over and had a response of "yes" to a sensory, physical, mental or self-care disability; (2) they were 16 years old and over and had a response of "yes" to going outside the home disability; or (3) they were 16 to 64 years old and had a response of "yes" to employment disability.

five or older during the 2000 census or 28,470 people, as seen in Table II.3 below. This figure was relatively comparable to the national rate at that time of slightly under 20.0 percent.

<b>Table II.3</b>					
<b>Disability by Age</b>					
City of Rockford Census 2000 SF3 Data					
<b>Place</b>	<b>5 to 15</b>	<b>16 to 64</b>	<b>Over 65</b>	<b>Total</b>	<b>Disability Rate</b>
District 1	983	8,537	2,783	12,303	26.2%
District 2	304	5,406	1,735	7,445	23.0%
District 3	442	5,347	2,933	8,722	15.6%
<b>Rockford</b>	<b>1,729</b>	<b>19,290</b>	<b>7,451</b>	<b>28,470</b>	<b>21.0%</b>

Map II.3, below, reveals that a few block groups contained a disproportionate share of disabled persons. In fact, five block groups showed areas where 41.0 percent or more of the population was disabled.

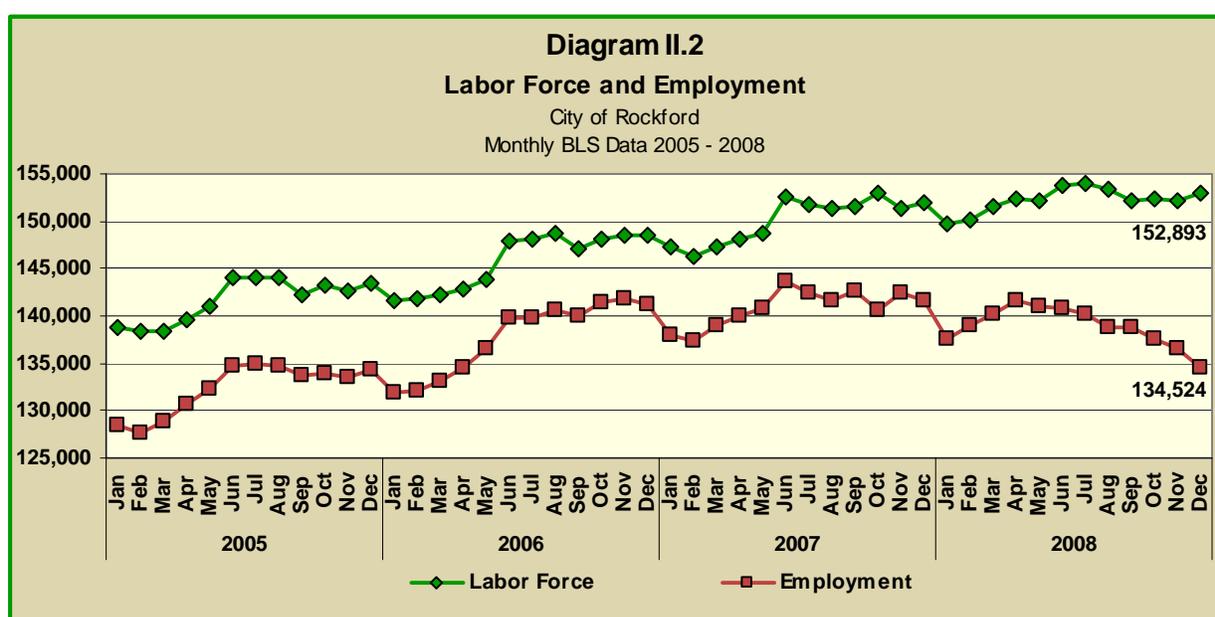
**Map II.3**  
**Percent of Population with a Disability by Census Block Group**  
City of Rockford  
2000 Census Data



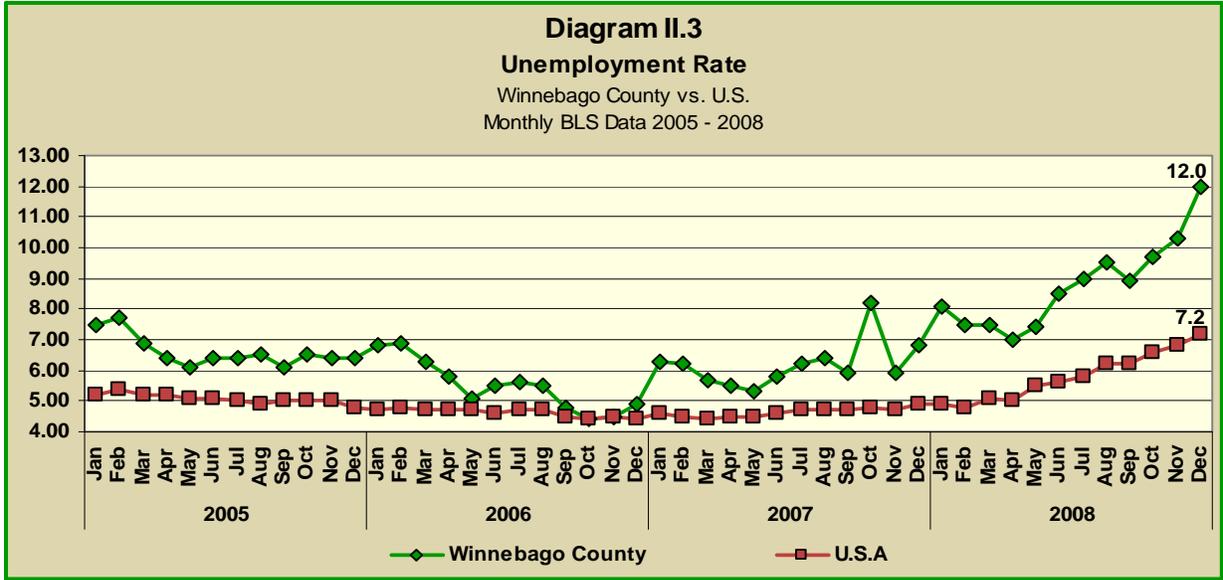
## ECONOMICS

### LABOR FORCE AND EMPLOYMENT

According to data from the Bureau of Labor Statistics (BLS), between 2005 and 2008, the labor force in Winnebago County, defined as people either working or looking for work, rose quite modestly from slightly under 140,000 people to nearly 153,000, an increase of roughly 8.5 percent. However, the number of employed persons alone showed much more fluctuation. Although this figure increased by more than 5,000 persons overall from the 2005 data, the number of employed persons fell from May through December 2008, as seen in Diagram II.2, below.

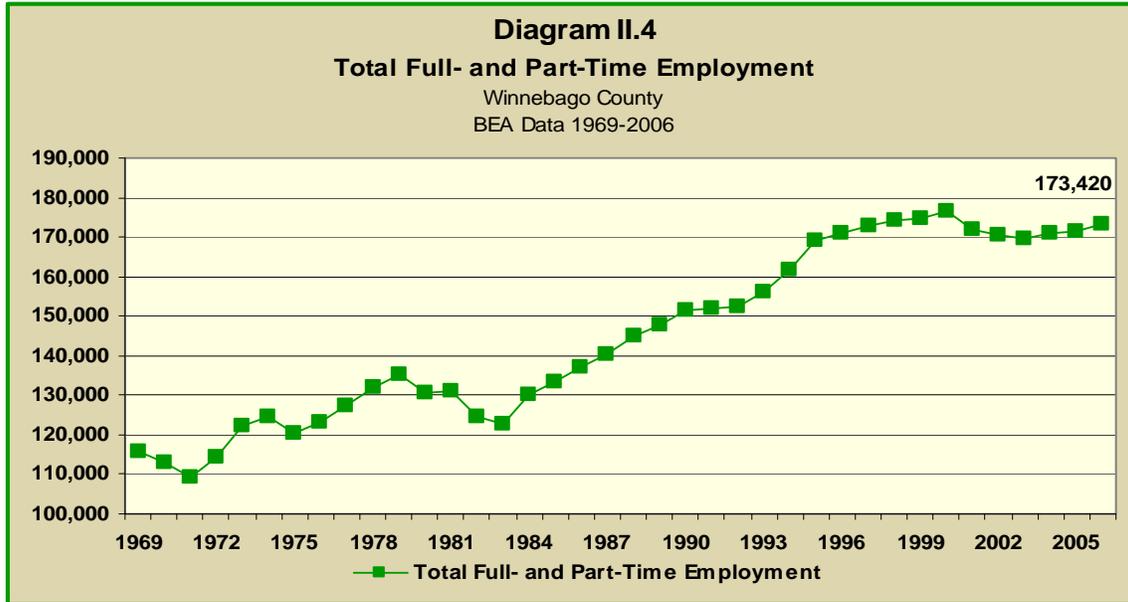


When the number of employed persons grows more slowly than the size of the labor force, unemployment rises. The number of unemployed persons in Winnebago County fluctuated markedly from 2005 to 2008, as compared to the figures from the U.S. as a whole, as seen on the following page in Diagram II.3. The unemployment rate in Winnebago County stood at roughly 7.5 percent in the beginning of 2005, dipped to a low of nearly 4.0 percent at the end of 2006, and reached a high of 12.0 percent at the close of 2008. The unemployment rate in Winnebago County at the end of 2008 was nearly twice that of national figures and grew at an appreciably faster rate than seen nationally.



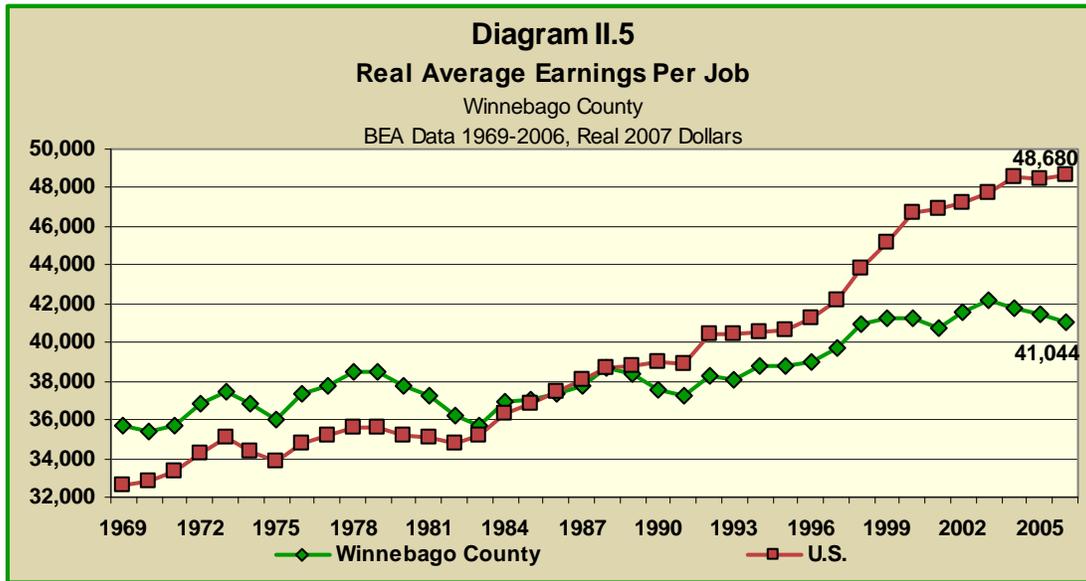
### FULL- AND PART-TIME EMPLOYMENT AND EARNINGS

The Bureau of Economic Analysis (BEA) provides an alternate view of employment: a count of both full- and part-time jobs. Thus, a person working more than one job can be counted more than once. Still, the total number of full- and part-time jobs increased substantially from 1969 through 2006,<sup>4</sup> from nearly 120,000 to more than 173,000 jobs, as seen below in Diagram II.4. This figure was a moderate increase over the 36-year period, but was down from the 2000 peak of 176,592 jobs.

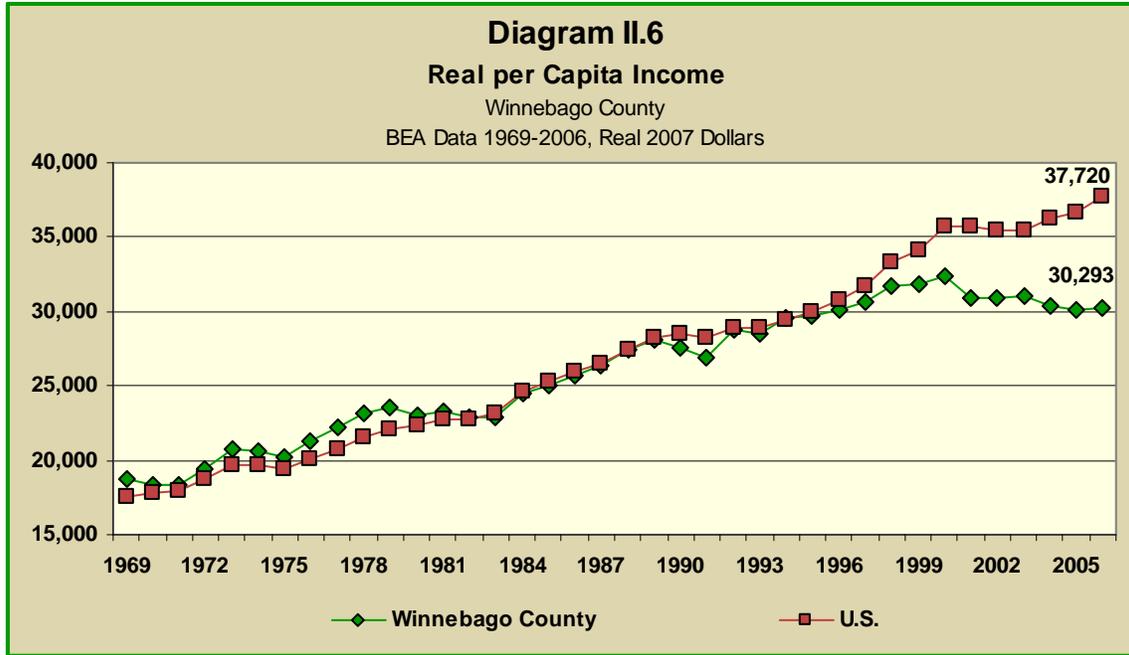


<sup>4</sup> Data are, in part, from administrative records. The most current data available were through 2006.

When the total amount of earnings is divided by the number of jobs and then deflated to remove the effects of inflation, the average real earnings per job is determined. This figure can be compared to national figures. Unfortunately, average earnings per job in Winnebago County have been lagging considerably over recent years, particularly since around 1998, with the absolute difference between the national and county estimates reaching more than \$7,500 by 2006, as Diagram II.5, below, illustrates.



Another gauge of economic standing involves comparing the total of all forms of income: wages earned, transfer payments, and property income, such as dividends, interest and rents. When these data are added together and divided by population, per capita income is the result. Diagram II.6, on the following page, compares real per capita income in Winnebago County to that in the U.S. from 1969 through 2006. Per capita income grew relatively steadily from 1969 through 2000, rising from just under \$18,700 in 1969 to \$32,360 in 2000, with some stalls in 1975, 1983 and 1991. In 2006, this figure slipped about 6.4 percent to \$30,293 and was still approximately \$7,400 less than national figures.



## HOUSEHOLD AND FAMILY INCOME

At the time that the 2000 census was taken, nearly 19,000 households in Rockford had an income under \$25,000, about 32.0 percent of all households. Households whose income was from \$25,000 to \$74,999 represented another 50.8 percent of households, and 17.2 percent of households had incomes exceeding \$75,000. The distribution of family income levels tended to weigh toward higher-income groupings. For example, only 23.0 percent of families had incomes less than \$25,000 and 23.0 percent of families had incomes over \$75,000. These households are presented by income range and by district in Table II.4, below.

Place	Under 15,000	15,000 - 19,999	20,000 - 24,999	25,000 - 34,999	35,000 - 49,999	50,000 - 74,999	75,000 - 99,999	100,000 and above	Total
<b>Households</b>									
District 1	4,662	1,568	1,639	2,754	3,641	3,162	1,280	1,004	19,710
District 2	3,653	1,213	1,117	2,242	2,609	2,313	789	551	14,487
District 3	2,258	1,323	1,469	3,348	4,322	5,642	2,982	3,573	24,917
<b>Rockford</b>	<b>10,573</b>	<b>4,104</b>	<b>4,225</b>	<b>8,344</b>	<b>10,572</b>	<b>11,117</b>	<b>5,051</b>	<b>5,128</b>	<b>59,114</b>
<b>Families</b>									
District 1	2,284	831	988	1,726	2,651	2,298	993	791	12,562
District 2	1,247	546	682	1,364	1,739	1,730	619	462	8,389
District 3	748	573	659	1,947	2,710	4,287	2,671	3,105	16,700
<b>Rockford</b>	<b>4,279</b>	<b>1,950</b>	<b>2,329</b>	<b>5,037</b>	<b>7,100</b>	<b>8,315</b>	<b>4,283</b>	<b>4,358</b>	<b>37,651</b>

## POVERTY

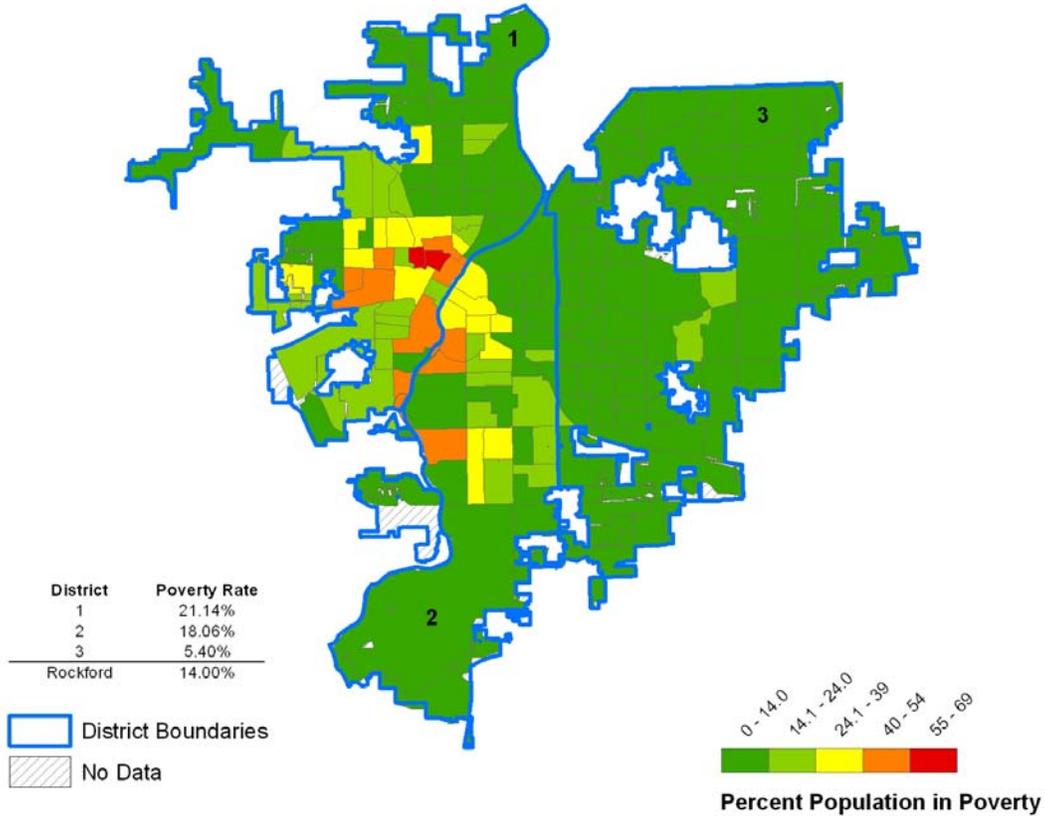
The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family's total income is less than the threshold for their size, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index. The official poverty definition counts income before taxes and does not include capital gains and non-cash benefits, such as public housing, Medicaid and food stamps. Poverty is not defined for people in military barracks, institutional group quarters or for unrelated individuals under age 15, such as foster children. These groups are excluded from the poverty designation and are considered neither poor nor non-poor.

In Rockford, the poverty rate in 2000 was 14.0 percent with 20,351 people considered to be in poverty, as noted in Table II.5, below. This rate was only slightly higher than the national average of 12.4 percent. Further, the city had 3,014 children under five years of age in poverty and 1,567 people aged 65 or older living in poverty.

<b>Table II.5</b>						
<b>Poverty Rate by Age</b>						
City of Rockford						
Census 2000 SF3 Data						
<b>Place</b>	<b>5 and Below</b>	<b>6 to 18</b>	<b>18 to 64</b>	<b>65 and Older</b>	<b>Total</b>	<b>Poverty Rate</b>
District 1	1,682	2,826	5,574	688	10,770	21.1%
District 2	981	1,336	3,575	480	6,372	18.1%
District 3	351	610	1,849	399	3,209	5.4%
<b>Rockford</b>	<b>3,014</b>	<b>4,772</b>	<b>10,998</b>	<b>1,567</b>	<b>20,351</b>	<b>14.0%</b>

Equally important, the poverty rate was not uniform throughout the city, as some areas had much higher concentrations of poverty than others. Map II.4, on the following page, presents the poverty rate for all block groups in the city. These data have been segmented to illustrate the areas in Rockford that have a disproportionate share of poverty or areas where more than 24.0 percent of residents were poor.

**Map II.4**  
**Percent of Population in Poverty by Census Block Group**  
 City of Rockford  
 2000 Census Data

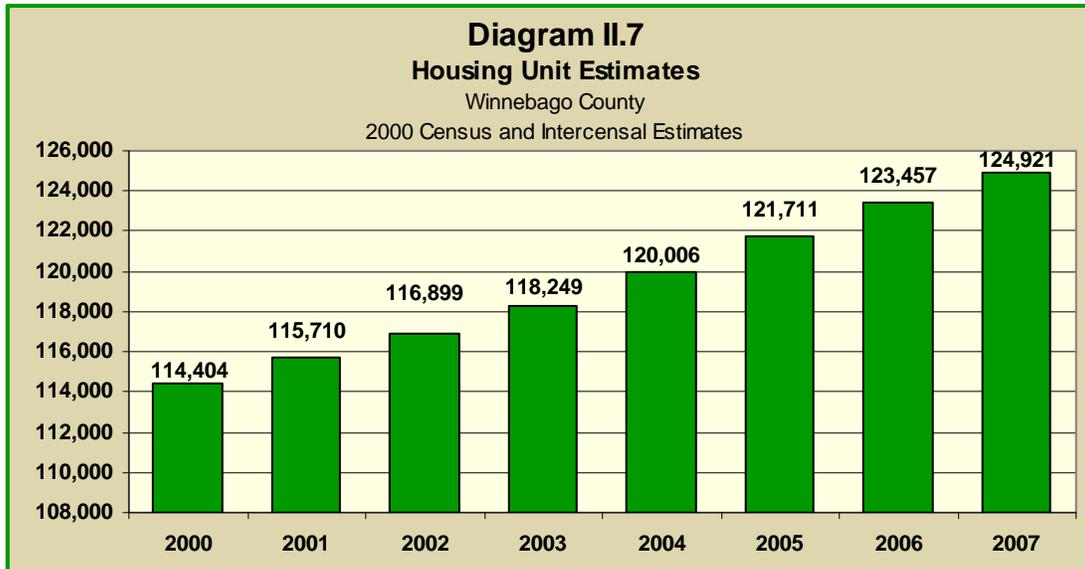


## HOUSING

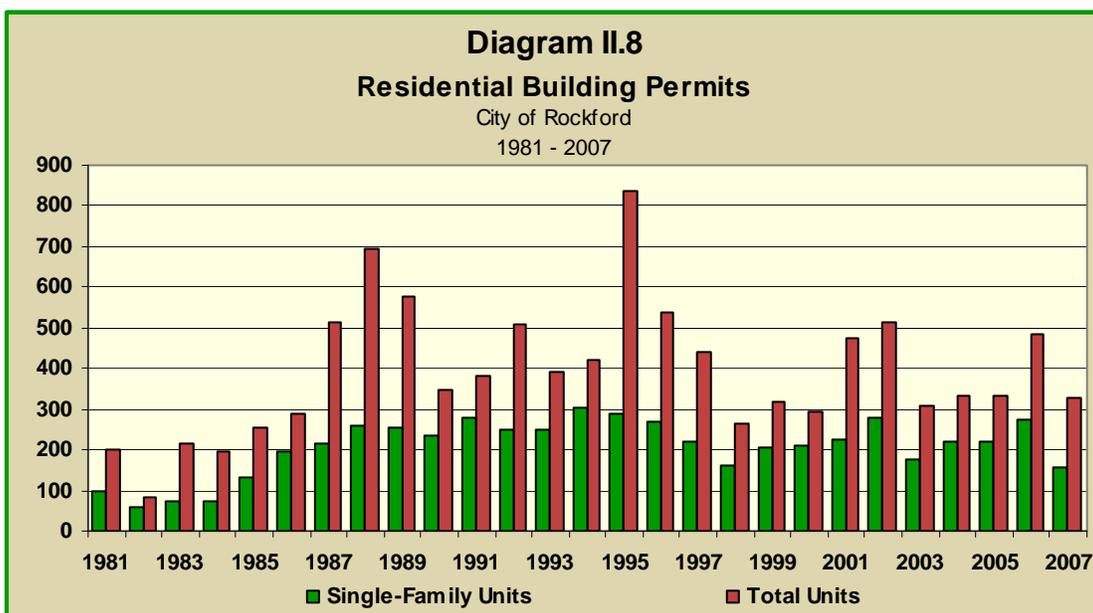
The 2000 census reported a total of 63,607 housing units in Rockford, 93.1 of which were occupied, as seen in Table II.6, below. Of these occupied housing units, 61.3 percent were owned and 38.7 were rented. The portion of owner-occupied units was below the national average of 69.0 percent at that time.

<b>Table II.6</b>					
<b>Housing Units by Tenure</b>					
City of Rockford Census 2000 SF3 Data					
Place	Owner-Occupied	Renter-Occupied	Occupied Housing Units	Vacant Housing Units	Total Housing Units
District 1	11,042	8,632	19,674	1,865	21,539
District 2	7,437	7,160	14,597	1,569	16,166
District 3	17,825	7,105	24,930	972	25,902
<b>Rockford</b>	<b>36,304</b>	<b>22,897</b>	<b>59,201</b>	<b>4,406</b>	<b>63,607</b>

As seen in Diagram II.7, since the 2000 census the total number of housing units in Winnebago County expanded from 114,404 units in 2000 to 124,921 units in 2007, an increase of more than 10,517 units or 9.2 percent over this time period.



The city of Rockford issues building permits for new single-family and other residential housing units. Diagram II.8 shows the number of building permits issued for the city of Rockford from 1981 through 2007. Peak building periods occurred in the latter 1980s, but an all-time high was reached in 1995 when more than 800 residential permits were issued. From 2000 through 2007, approximately 3,500 units were permitted, of which roughly 2,000 were single-family units and 1,500 were other residential units.



In total, Rockford's housing stock grew from 63,607 units to around 66,400 units or by about 2,800 units from 2000 through 2007. Given this large expansion of the housing stock occurring at the same time that the population rose by 4,213 people, it appears that the new residents comprised only 1.5 persons per household or that housing unit production outpaced new household formation.

However, some housing stock has been demolished due to efforts to reduce or eliminate vacant, poor quality residential units. As seen in Table II.7, at right, Rockford has reduced some of its poor housing stock, with about 2,331 units eliminated from 1981 through 2008 and 779 units demolished since the 2000 census. However, this relatively small number of demolitions has not effectively offset the pace of household formation.

### VACANT HOUSING UNITS

As shown in Table II.8, at the time of the decennial census, vacant units represented 4,406 units, a relatively large portion of the entire housing stock. Data on the disposition of this stock indicate that 48.5 percent of units were for rent, 20.6 percent of units were for sale, 7.2 percent of units were rented or sold but unoccupied, and 4.9 percent of units were available for seasonal, recreational or occasional use. However, nearly 20.0 percent of vacant units were classified as "other vacant" units. Other vacant housing includes units that have been abandoned or boarded up, as well as unsuitable or unavailable empty housing units and are likely to contribute to blight. Substantive increases in housing unit production, as noted above, have likely led to the least desirable housing units becoming vacant and contributing to the blighting influence in the city.

Year	Demolitions
1981	69
1982	54
1983	44
1984	74
1985	60
1986	58
1987	74
1988	86
1989	108
1990	123
1991	84
1992	87
1993	89
1994	96
1995	88
1996	78
1997	74
1998	104
1999	102
2000	146
2001	169
2002	131
2003	50
2004	65
2005	63
2006	45
2007	68
2008	42
<b>Total</b>	<b>2,331</b>

Place	For Rent	For Sale	Rented or Sold, Not Occupied	For Seasonal, Recreational, or Occasional Use	For Migrant Workers	Other Vacant	Total
District 1	803	458	141	81	0	382	1865
District 2	856	199	112	41	0	361	1569
District 3	478	250	64	95	0	85	972
<b>Rockford</b>	<b>2,137</b>	<b>907</b>	<b>317</b>	<b>217</b>	<b>0</b>	<b>828</b>	<b>4,406</b>

As part of the process of evaluating the housing market, the Rockford Township Assessor provided an extract of its appraisal database for all residential property class records within the city,<sup>5</sup> which documented the overall condition of the housing stock from the description of the building as determined by the assessor. These physical condition ratings can be helpful in determining market value and are described as follows:

- Excellent – perfect condition; very attractive and highly desirable,
- Very good – slight evidence of deterioration; still attractive and quite desirable,
- Good – minor deterioration visible; slightly less attractive and desirable, but useful,
- Average – normal wear and tear is apparent; average attractiveness and desirability,
- Fair – marked deterioration, but quite usable; rather unattractive and undesirable,
- Poor – definite deterioration is obvious; definitely undesirable and barely usable,
- Very poor – approaches unsoundness; extremely undesirable and barely usable,
- Poor minus – nearly unsound; extremely undesirable and barely usable,
- Very poor minus – moderately unsound; almost unfit for use,
- Unsound – definitely unsound; practically unfit for use.

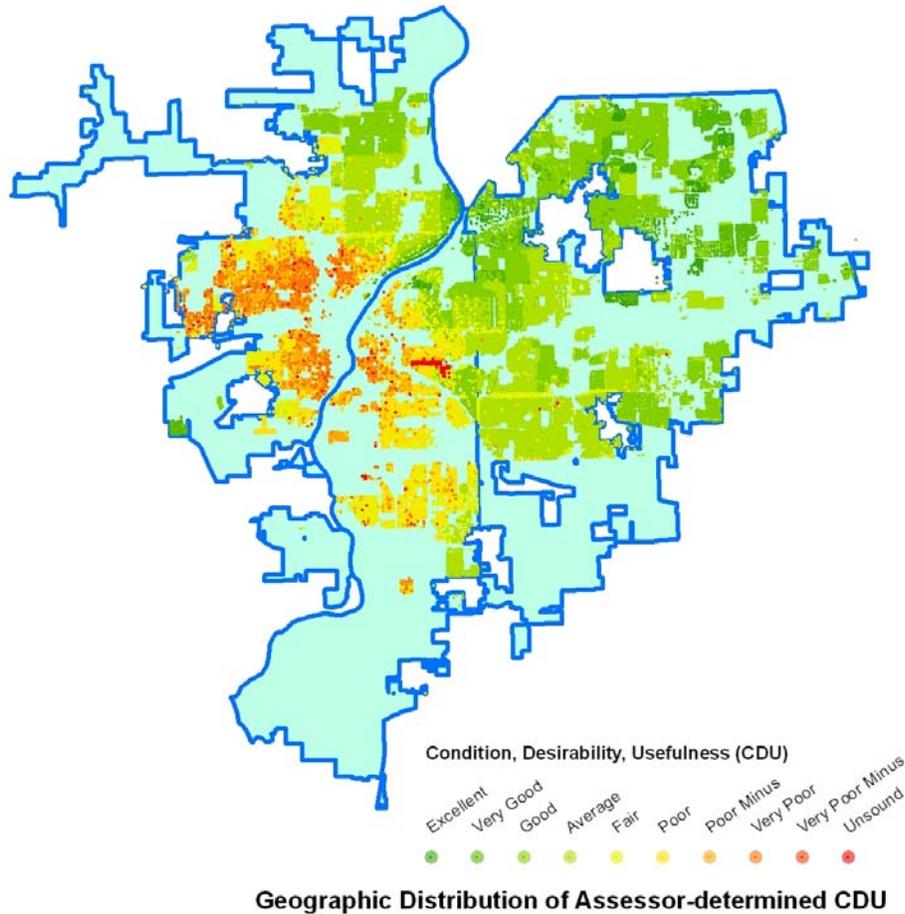
As seen in Table II.9, as of January 2009 there were more than 8,600 housing units in Rockford in poor or worse condition, meaning that they were undesirable and barely useable or worse. More than 5,400 of these units were located in District 1, with nearly all of the rest of the less suitable units located in District 2.

<b>Table II.9</b>				
<b>Condition, Desirability and Usefulness of Dwellings</b>				
City of Rockford				
Rockford Township Assessor Data: January 2009				
<b>Condition</b>	<b>District 1</b>	<b>District 2</b>	<b>District 3</b>	<b>Total</b>
Excellent	92	30	461	583
Very Good	163	46	1,225	1,434
Good	1,920	1,109	7,086	10,115
Average	4,351	2,452	10,422	17,225
Fair	2,723	3,018	353	6,094
Poor	2,583	2,221	32	4,836
Poor Minus	1,749	658	2	2,409
Very Poor	992	163	6	1,161
Very Poor Minus	46	26	0	72
Unsound	38	104	4	146
<b>Total</b>	<b>14,657</b>	<b>9,827</b>	<b>19,591</b>	<b>44,075</b>

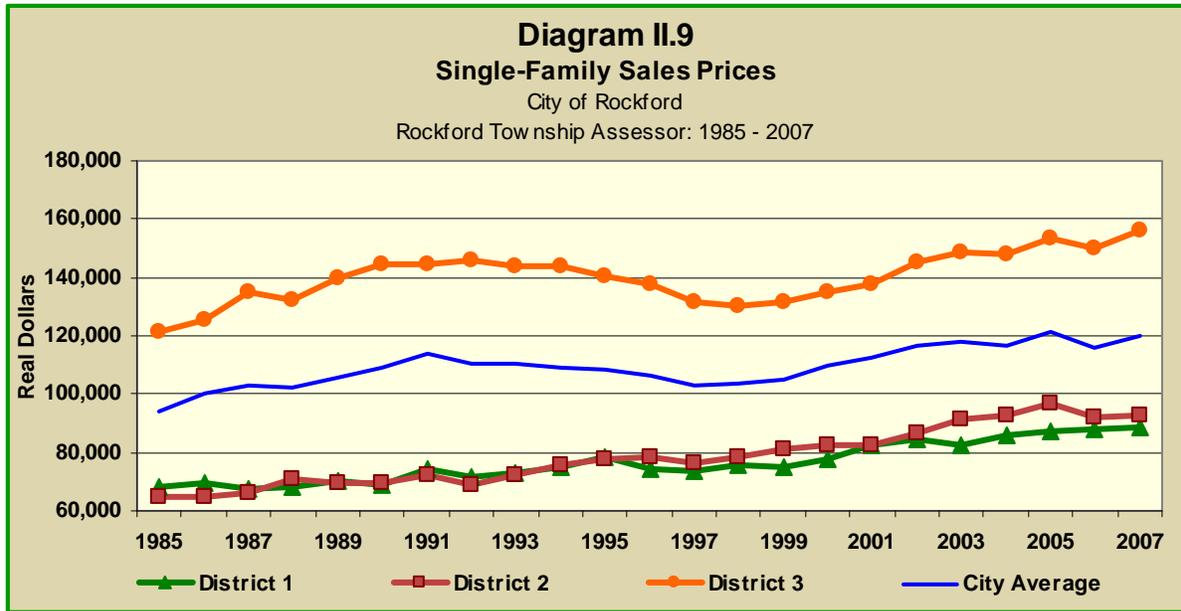
After correlating the address of each property in the Township Assessor database to longitude and latitude lines, the location of each property was plotted on a geographic map. By characterizing these property conditions to a color-coded scheme, the location of lower-quality housing stock can be easily identified. As seen in Map II.5 on the following page, low-quality housing stock was highly concentrated in areas within Districts 1 and 2.

<sup>5</sup> These data do not include all residential units; apartment buildings are considered “commercial property” used for residential services.

**Map II.5**  
**Geographic Distribution of Condition, Desirability, Usefulness of Housing Units**  
 City of Rockford  
 Rockford Township Assessor Parcel Database



Data on the sale prices of housing units and the year that the home was sold over the period of 1985 through 2007 were also extracted from the Assessor's database. As seen in Diagram II.9, on the following page, citywide housing prices rose very little over the entire period, from just under \$100,000 in 1985 to about \$120,000 in 2007. This diagram also shows that prices of for-sale housing were considerably more depressed in Districts 1 and 2, with housing prices only about \$90,000 in 2007 in these two districts.



Additionally, prices for rental property were also relatively low. Table II.10 shows that the average rent for a studio unit in Rockford was \$370 in January 2009, and the average rent for a 5-bedroom rental unit was \$869.

**Table II.10**  
**Average Rental Prices for Available Section 8 Housing**  
City of Rockford  
Data from RHA website – January 2009

Number of Bedrooms	Number Available	Average Price
Studio	2	\$370
1 Bedroom	18	\$460
2 Bedroom	95	\$577
3 Bedroom	116	\$713
4 Bedroom	43	\$763
5 Bedroom	4	\$869

## HOUSING PROBLEMS

While the 2000 census did not report significant details regarding the physical condition of housing units, some information can be derived from the one in six sample, also called SF3 data.<sup>6</sup> These data relate to overcrowding, incomplete plumbing or kitchen facilities, and cost burdens.

Overcrowding is defined as having from 1.01 to 1.5 people per room per residence, with severe overcrowding defined as having more than 1.5 people per room. At the time the

<sup>6</sup> Summary File 3 (SF3) consists of 813 detailed tables of 2000 census social, economic and housing characteristics compiled from a sample of approximately 19 million housing units (about 1 in 6 households) that received the 2000 census long-form questionnaire. Source: <http://www.census.gov/Press-Release/www/2002/sumfile3.html>. These sample data include sampling error and may not sum precisely to the 100 percent sample typically presented in the 2000 census.

2000 census was taken, 757 renter-occupied units were overcrowded and another 580 units were severely overcrowded in Rockford, as seen in Table II.11. This problem was less common in owner-occupied housing, where 551 units were overcrowded and another 298 were severely overcrowded.

<b>Table II.11</b>				
<b>Overcrowding and Severe Overcrowding</b>				
City of Rockford				
Census 2000 SF3 Data				
<b>Place</b>	<b>No Overcrowding</b>	<b>Overcrowding</b>	<b>Severe Overcrowding</b>	<b>Total</b>
<b>Renter-Occupied</b>				
District 1	8,034	296	302	8,632
District 2	6,694	280	186	7,160
District 3	6,832	181	92	7,105
<b>Rockford</b>	<b>21,560</b>	<b>757</b>	<b>580</b>	<b>22,897</b>
<b>Owner-Occupied</b>				
District 1	10,610	301	131	11,042
District 2	7,217	142	78	7,437
District 3	17,628	108	89	17,825
<b>Rockford</b>	<b>35,455</b>	<b>551</b>	<b>298</b>	<b>36,304</b>
<b>Total</b>				
District 1	18,644	597	433	19,674
District 2	13,911	422	264	14,597
District 3	24,460	289	181	24,930
<b>Rockford</b>	<b>57,015</b>	<b>1,308</b>	<b>878</b>	<b>59,201</b>

Incomplete plumbing and kitchen facilities are another indicator of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator. At the time of the 2000 census, 573 units were without complete kitchen facilities and 409 units lacked complete plumbing facilities in Rockford. Table II.12 shows that a total of 1.5 percent of units were missing complete facilities in the city at that time.

<b>Table II.12</b>				
<b>Housing Units with Incomplete Plumbing or Kitchen Facilities</b>				
City of Rockford				
Census 2000 SF3 Data				
<b>Place</b>	<b>Lacking Complete Kitchen Facilities</b>	<b>Lacking Complete Plumbing Facilities</b>	<b>Total</b>	<b>Percent Missing Complete Facilities</b>
District 1	199	182	381	1.77%
District 2	155	132	287	1.78%
District 3	219	95	314	1.21%
<b>Rockford</b>	<b>573</b>	<b>409</b>	<b>982</b>	<b>1.5%</b>

The third type of consideration pertaining to housing problems reported in the 2000 census is cost burden. Cost burden is defined as gross housing costs that range from 30.0 to 50.0 percent of gross household income; severe cost burden is defined as gross housing costs that exceed 50.0 percent of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and selected electricity and natural gas energy charges. Table II.13 shows that in Rockford, 17.7 percent of renters experienced a cost burden and 16.7 percent had a severe cost burden in 2000. These figures compared favorably to the national averages of 20.8 percent and 19.1 percent, respectively. Roughly 16.0 percent of homeowners with a mortgage experienced a cost burden, less than the national rate of 17.7, and 7.5 percent of homeowners with a mortgage experienced a severe cost burden, below the national rate of 11.6 percent. In total, nearly 14,000 householders experienced some type of cost burden at the time the 2000 census was taken.

<b>Table II.13</b>					
<b>Cost Burden by Tenure</b>					
City of Rockford Census 2000 SF3 Data					
<b>Place</b>	<b>No Cost Burden</b>	<b>Cost Burden</b>	<b>Severe Cost Burden</b>	<b>Not Computed</b>	<b>Total</b>
<b>Renter-Occupied</b>					
District 1	4,716	1,496	1,716	697	8,625
District 2	4,154	1,253	1,146	607	7,160
District 3	4,568	1,303	957	269	7,097
<b>Rockford</b>	<b>13,438</b>	<b>4,052</b>	<b>3,819</b>	<b>1,573</b>	<b>22,882</b>
<b>Owner-Occupied with a Mortgage</b>					
District 1	4,924	1,134	669	63	6,790
District 2	3,202	747	324	31	4,304
District 3	8,794	1,599	674	13	11,080
<b>Rockford</b>	<b>16,920</b>	<b>3,480</b>	<b>1,667</b>	<b>107</b>	<b>22,174</b>
<b>Owner-Occupied without a Mortgage</b>					
District 1	2,669	203	158	70	3,100
District 2	1,480	165	56	69	1,770
District 3	4,681	202	183	11	5,077
<b>Rockford</b>	<b>8,830</b>	<b>570</b>	<b>397</b>	<b>150</b>	<b>9,947</b>
<b>Total</b>					
District 1	12,309	2,833	2,543	830	18,515
District 2	8,836	2,165	1,526	707	13,234
District 3	18,043	3,104	1,814	293	23,254
<b>Rockford</b>	<b>39,188</b>	<b>8,102</b>	<b>5,883</b>	<b>1,830</b>	<b>55,003</b>

People who experience a severe cost burden are at risk of homelessness. For example, cost-burdened renters who experience one financial setback are likely to have to choose between rent and food or rent and healthcare for their family. Similarly, such homeowners

with a mortgage and just one unforeseen financial constraint, such as temporary illness, divorce or the loss of employment, may be forced to face foreclosure or bankruptcy. Furthermore, households that no longer have a mortgage yet still experience a severe cost burden may be unable to conduct periodic maintenance and repair of their home, contributing to dilapidation and blight. All three of these situations should be of concern to policy makers and program managers.

## **SUMMARY**

Rockford experienced an increase in population of about 4.3 percent from 2000 to 2007, growing from 150,115 to 156,596 persons. The population was roughly balanced between those age 34 or younger (50.8 percent) and those age 35 or older (49.2 percent). The racial composition of the city was 72.8 percent white and 17.3 percent black, followed by other race with 4.8 percent, two or more races with 2.4 percent, and Asian with 2.2 percent. Both American Indian and Native Hawaiian/Pacific Islander populations comprised less than 1.0 percent of the population. However, the distribution of racial and ethnic minorities was not geographically balanced, with extremely high concentrations of such populations in census block groups located primarily in District 1 and partially in District 2.

The labor force in Winnebago County, defined as people either working or looking for work, rose quite modestly from just under 140,000 people to nearly 153,000, an increase of roughly 8.5 percent. The unemployment rate in Winnebago County at the end of 2008 was 12.0 percent, nearly twice that of national figures, and it grew at an appreciably faster rate than seen nationally. Average earnings per job and per capita income were at least \$7,000 less than national averages, and this disparity expanded in recent years. In Rockford, the poverty rate in 2000 was 14.0 percent with 20,351 people considered to be in poverty; poverty was highly concentrated in selected block groups primarily located in District 1.

The 2000 census reported a total of 63,607 housing units in Rockford, 93.1 of which were occupied. Of these occupied housing units, 61.3 percent were owned and 38.7 were rented. The total number of housing units in Winnebago County continued to expand from 114,404 units in 2000 to 124,921 units in 2007, an increase of more than 10,517 units or 9.2 percent over this time period, with about 2,800 units in the city of Rockford. Nearly 20.0 percent of vacant housing was qualified as "other vacant" units, which included housing that had been abandoned or boarded up, as well as unsuitable or unavailable empty housing units. This large rise in housing stock, combined with modest population growth, may have contributed to continued blighting influences associated with vacant and unsuitable housing. The Rockford Township assessment data indicated that much of the lower-quality housing was located in Districts 1 and 2.



## SECTION III. LENDING PRACTICES

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Since the 1970s, the federal government has enacted several laws aimed at promoting fair lending practices in the banking and financial services industries. Although the record is improving, discriminatory practices have not been entirely eliminated. A brief description of selected federal laws aimed at promoting fair lending follows:

The 1968 **Fair Housing Act** prohibits discrimination in housing based on race, color, religion or national origin. Later amendments added sex, familial status and disability. Under the Fair Housing Act, it is illegal to discriminate against any of the protected classes in the following types of residential real estate transactions: making loans to buy, build or repair a dwelling; selling, brokering or appraising residential real estate; or selling or renting a dwelling.

The **Equal Credit Opportunity Act** was passed in 1974 to prohibit discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance or the exercise of any right under the Consumer Credit Protection Act.<sup>7</sup>

The **Community Reinvestment Act** was enacted in 1977 to require each federal financial supervisory agency to encourage financial institutions to help meet the credit needs of their entire community, including low- and moderate-income neighborhoods within those communities.

Under the **Home Mortgage Disclosure Act (HMDA)**, enacted in 1975 and later amended, financial institutions are required to publicly disclose the race, sex, ethnicity and income of mortgage applicants and borrowers by the census tract in which the loan is proposed, as well as outcome of the loan application. Analysis presented herein is from the HMDA data system.

### HOME MORTGAGE DISCLOSURE ACT DATA ANALYSIS

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The HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and applications for such loans.<sup>8</sup> Both types of lending institutions must meet a set of reporting criteria, as follows:

1. The institution must be a bank, credit union or savings association.
2. The total assets must exceed the coverage threshold.<sup>9</sup>

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<sup>7</sup> *Closing the Gap: A Guide to Equal Opportunity Lending*, The Federal Reserve Bank of Boston, April 1993.

<sup>8</sup> Data are considered "raw" because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, as well as the reporting of multifamily loan applications.

<sup>9</sup> Each December the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year, based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

3. The institution must have had a home or branch office in a metropolitan statistical area (MSA).
4. The institution must have originated at least one home purchase loan or refinancing of a home purchase loan secured by a first lien on a one- to four-family dwelling.
5. The institution must be federally insured or regulated.
6. The mortgage loan must have been insured, guaranteed or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

For other institutions, including non-depository institutions, the reporting criteria are as follows:

1. The institution must be a for-profit organization.
2. The institution's home purchase loan originations must equal or exceed 10.0 percent of the institution's total loan originations, or more than \$25 million.
3. The institution must have had a home or branch office in an MSA or have received applications for, originated or purchased five or more home purchase loans, home improvement loans, or refinancing mortgages on property located in an MSA in the preceding calendar year.
4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

HMDA data represent most mortgage lending activity and are thus the most comprehensive collection of information regarding home purchase originations, home remodel loan originations and refinancing available.

As presented in Table III.1, at right, HMDA information was collected for Rockford for 1999 through 2007. During this time, nearly 150,000 loan applications were processed for home purchases, home improvements, refinancing mortgages and multi-family properties. About 51,900 of these loan applications were specifically for home purchases.

<b>Table III.1</b>					
<b>Purpose of Loan by Year</b>					
City of Rockford					
HMDA Data 1999 - 2007					
<b>Year</b>	<b>Home Purchase</b>	<b>Home Improvement</b>	<b>Refinancing</b>	<b>Multi-family Dwelling</b>	<b>Total</b>
1999	4,690	1,404	7,754	47	13,895
2000	4,439	1,267	4,926	25	10,657
2001	4,069	1,096	9,593	39	14,797
2002	4,711	801	10,601	47	16,160
2003	6,093	884	17,754	51	24,782
2004	6,565	1,290	9,654	0	17,509
2005	7,767	1,298	8,823	0	17,888
2006	8,101	1,398	8,084	0	17,583
2007	5,467	1,280	6,986	0	13,733
<b>Total</b>	<b>51,902</b>	<b>10,718</b>	<b>84,175</b>	<b>209</b>	<b>147,004</b>

Home purchases and access to the ability to enter into homeownership are the focus of this particular analysis. As seen in Table III.2, of the 51,902 home purchase loan applications, 43,693 were specifically for owner-occupied homes. The other categories typically apply to units purchased for investment property and do not reflect the ability of an individual to choose these owner-occupied homes. The number of owner-occupied loan applications was highest in 2006 at 6,483.

Year	Owner-Occupied	Not Owner-Occupied	Not Applicable	Total
1999	4,211	450	29	4,690
2000	4,027	387	25	4,439
2001	3,633	417	19	4,069
2002	4,061	615	35	4,711
2003	5,227	833	33	6,093
2004	5,419	1,104	42	6,565
2005	6,112	1,552	103	7,767
2006	6,483	1,580	38	8,101
2007	4,520	912	35	5,467
<b>Total</b>	<b>43,693</b>	<b>7,850</b>	<b>359</b>	<b>51,902</b>

After a loan application is submitted, the financing institution can apply one of several designations:

- “Originated” indicates that the loan was made by the lending institution.
- “Approved but not accepted” represents loans approved by the lender, but not accepted by the applicant. This generally occurs if better terms are found at another lending institution.
- “Application denied by financial institution” defines a situation where the loan application failed.
- “Application withdrawn by applicant” means that the applicant closed the application process.
- “File closed for incompleteness” means that the loan application process was closed by the institution due to incomplete information.
- “Loan purchased by the institution” indicates that the previously originated loan was purchased on the secondary market.

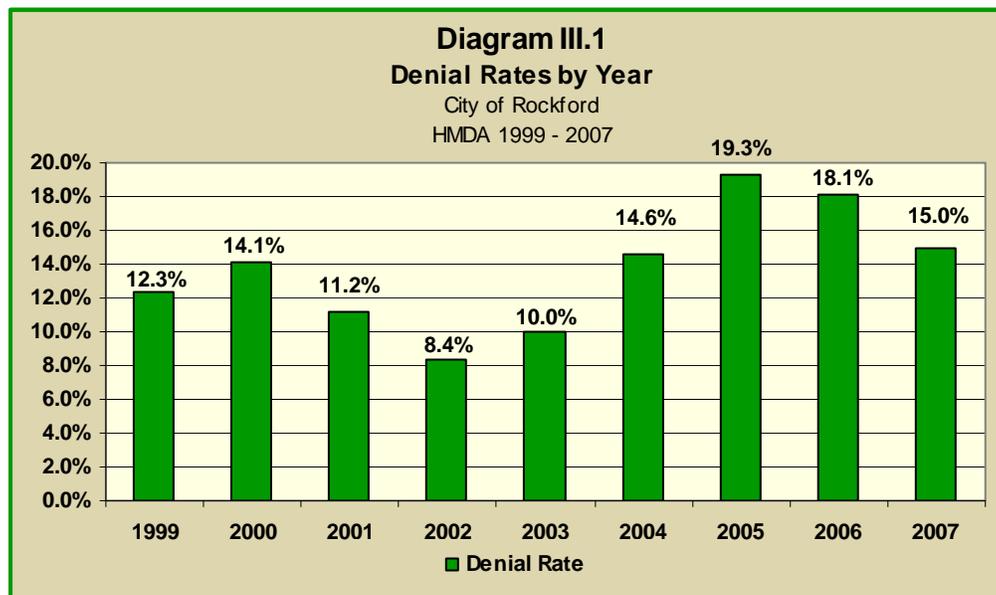
For this analysis, only loan originations and loan denials were inspected as an indicator of the underlying success or failure of home purchase loan applicants. Altogether, there were 25,110 loan originations and 4,094 loan denials, for an average nine-year loan denial rate of 14.0 percent, as seen on the following page in Table III.3. This denial rate was relatively low.

**Table III.3**  
**Owner-Occupied Home Purchase Loan Applications by Action Taken**

City of Rockford  
HMDA Data 1999 - 2007

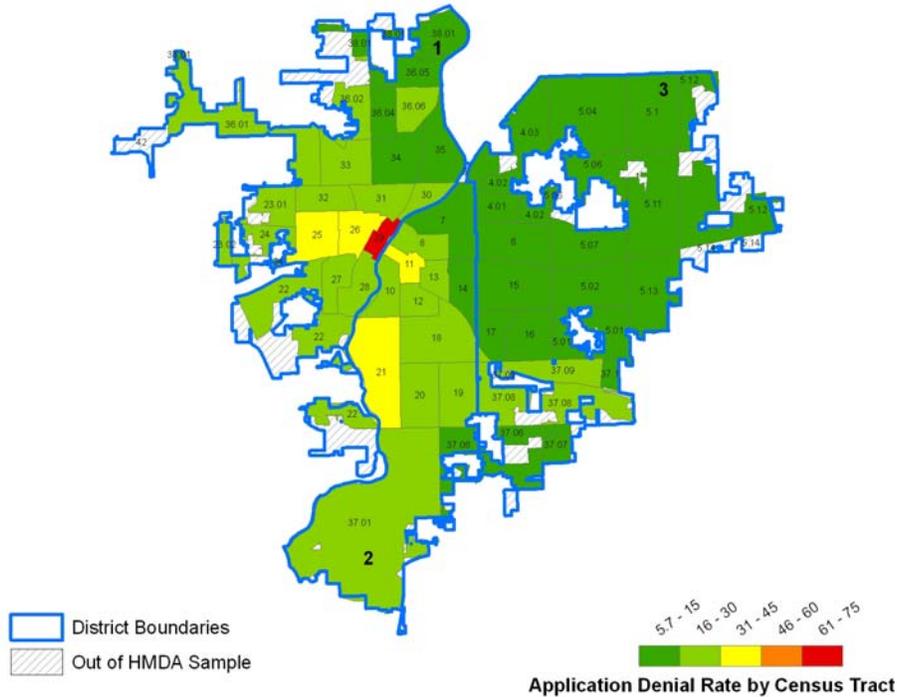
Year	Loan Originated	Application Approved But Not Accepted	Application Denied	Application Withdrawn By Applicant	File Closed for Incompleteness	Loan Purchased by the Institution	Preapproval Request Denied	Denial Rate
1999	2,402	185	337	278	56	953	0	12.3%
2000	2,385	174	391	200	43	834	0	14.1%
2001	2,367	113	298	182	25	648	0	11.2%
2002	2,592	146	237	203	37	846	0	8.4%
2003	3,244	219	362	357	74	971	0	10.0%
2004	3,098	329	528	343	82	1,039	0	14.6%
2005	3,174	485	758	381	124	1,180	10	19.3%
2006	3,420	391	755	303	88	1,522	4	18.1%
2007	2,428	216	428	212	55	1,176	5	15.0%
<b>Total</b>	<b>25,110</b>	<b>2,258</b>	<b>4,094</b>	<b>2,459</b>	<b>584</b>	<b>9,169</b>	<b>19</b>	<b>14.0%</b>

Denial rates varied by year and, as seen in Diagram III.1 below, ranged between 8.4 and 19.3 percent.



Importantly, denial rates were not evenly distributed throughout the city. Some census tracts in Districts 1 and 2 had average denial rates above 31.0 percent, and one census tract in this area experienced a rate above 61.0 percent, as shown on the following page in Map III.1.

**Map III.1**  
**HMDA Denial Rate by Census Tract**  
 City of Rockford  
 HMDA Data 1999 – 2007

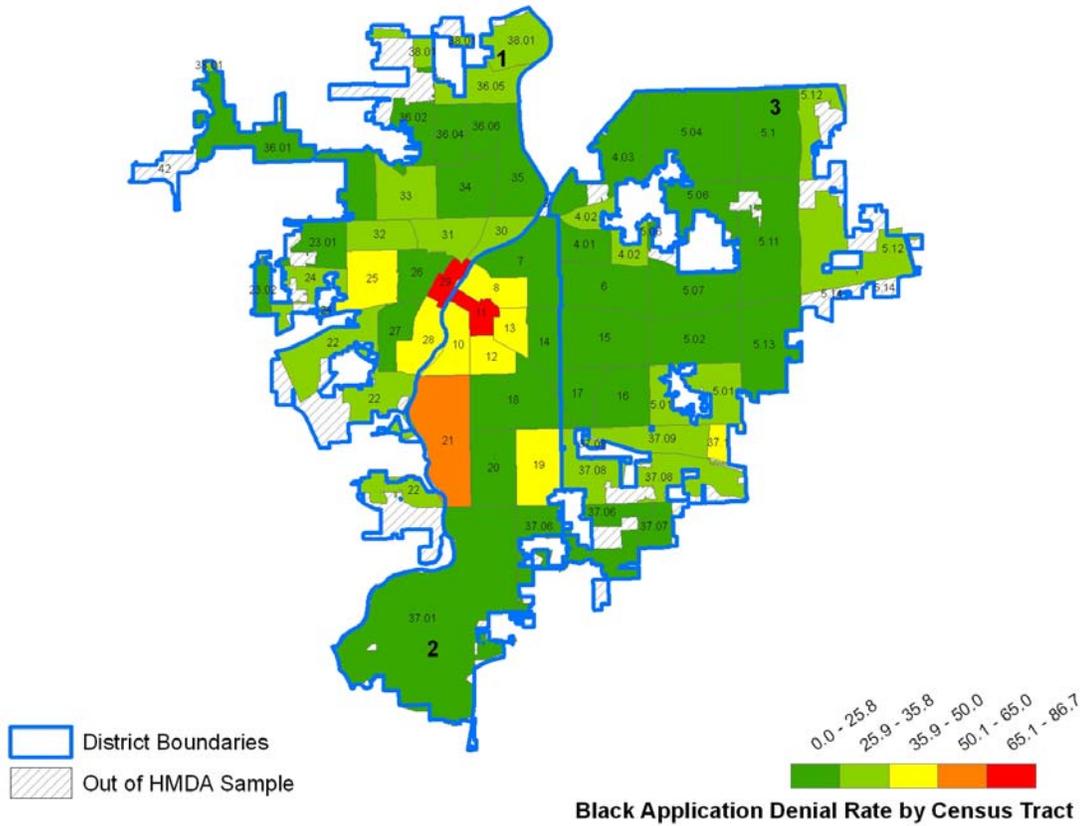


Denial rates were calculated by race and ethnicity of the loan applicants as well. In general, blacks and Hispanics tended to have higher denial rates than whites over the nine-year period. Denial rates by race and ethnicity are presented below in Table III.4. As seen therein, black applicants experienced the highest rates of loan denials at 25.8 percent, compared to 11.7 percent for white applicants. From 1999 through 2007, Hispanic applicants also had a relatively high denial rate at 24.1 percent.

<b>Table III.4</b>									
<b>Denial Rate for Owner-Occupied Home Purchase Loan Applications by Race</b>									
City of Rockford									
HMDA Data 1999 - 2007									
Year	American Indian or Alaskan Native	Asian or Pacific Islander	Black	Hispanic (Race)	White	Not Provided by Applicant	Not Applicable	Total	Hispanic (Ethnicity)
1999	6.1%	8.6%	20.6%	14.1%	9.9%	16.7%	29.0%	12.3%	.
2000	14.3%	11.1%	25.6%	13.1%	10.0%	18.2%	39.5%	14.1%	.
2001	0.0%	12.2%	23.9%	7.9%	8.4%	10.0%	28.5%	11.2%	.
2002	0.0%	5.6%	13.2%	6.6%	7.9%	11.1%	9.9%	8.4%	.
2003	0.0%	15.4%	16.9%	11.1%	8.0%	15.6%	16.5%	10.0%	.
2004	14.9%	15.7%	25.1%	.	11.6%	29.8%	20.8%	14.6%	20.2%
2005	30.3%	17.2%	34.9%	.	16.1%	30.3%	0.0%	19.3%	23.7%
2006	16.0%	15.0%	33.9%	.	15.2%	26.8%	.	18.1%	27.7%
2007	26.7%	11.1%	24.3%	.	13.7%	16.8%	.	15.0%	23.7%
<b>Total</b>	<b>16.5%</b>	<b>13.5%</b>	<b>25.8%</b>	<b>10.6%</b>	<b>11.7%</b>	<b>25.4%</b>	<b>21.4%</b>	<b>14.0%</b>	<b>24.1%</b>

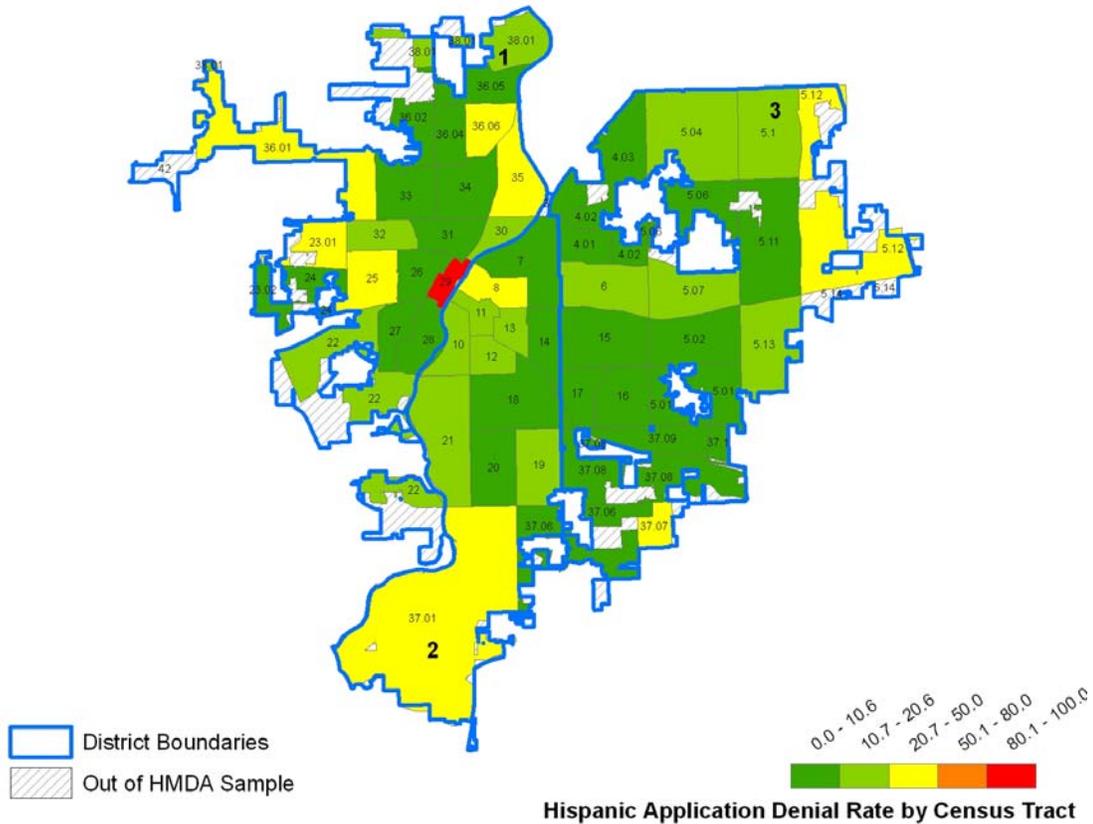
Map III.2 presents the geographic distribution of HMDA denial rates for black applicants in Rockford and shows that most areas with high denial rates were found in Districts 1 and 2. Three census tracts in these districts had denial rates higher than 50.0 percent.

**Map III.2**  
**Denial Rate for Black Applicants by Census Tract**  
 City of Rockford  
 HMDA Data 1999 – 2007



Map III.3 presents geographic data on denial rates for Hispanics in Rockford. While one central census tract showed denial rates in excess of 80.0 percent, other areas of moderate denial rate for Hispanics were distributed mostly in the outskirts of the city.

**Map III.3**  
**Denial Rate for Hispanic Applicants by Census Tract**  
 City of Rockford  
 HMDA Data 1999 – 2007



Part of the HMDA data includes information about the reason for the loan denial, although financial institutions are not uniformly required to fill out this field. Nevertheless, the most frequently cited category of denials was credit history, as seen on the following page in Table III.5. This problem could be rectified through enhancing programs for consumers to better understand credit and the importance of maintaining good credit history.

**Table III.5**  
**Owner-Occupied Home Purchase Loan Applications by Reason for Denial by Race**

City of Rockford  
HMDA Data 1999 - 2007

Reason for Denial	Native American	Asian	Black	Hispanic	White	Not Provided	Not Applicable	Total
Debt-to-Income Ratio	3	11	91	30	318	33	24	510
Employment History	3	1	11	8	60	6	3	92
Credit History	9	19	223	57	747	59	73	1,187
Collateral	8	8	43	14	213	19	13	318
Insufficient Cash	1	2	10	3	40	8	4	68
Unverifiable Information	2	4	21	10	131	17	4	189
Credit Application Incomplete	0	7	40	5	151	16	13	232
Mortgage Insurance Denied	0	0	1	0	1	1	0	3
Other	5	17	131	18	374	48	28	621
Missing	3	12	166	62	468	74	89	874
<b>Total</b>	<b>34</b>	<b>81</b>	<b>737</b>	<b>207</b>	<b>2,503</b>	<b>281</b>	<b>251</b>	<b>4,094</b>
Percent Missing by Race	8.8%	14.8%	22.5%	30.0%	18.7%	26.3%	35.5%	21.3%

Table III.6 presents denial rates segmented by both income and race. As to be expected, these data show that individuals with lower incomes tended to have much higher rates of denial, regardless of race. However, when income exceeded \$60,000, the denial rates diverged, with whites having the lowest denial rates and blacks and Hispanics having much higher denial rates, 25.3 percent and 29.7 percent respectively, as compared to a white denial rate of 8.8 percent. This trend remained delineated at incomes above \$75,000, with blacks and Hispanics having denial rates of 19.3 and 22.5 percent, respectively, compared to a white denial rate of 7.0 percent.

**Table III.6**  
**Percent Denial Rates by Income by Race**

City of Rockford  
HMDA Data 1999 - 2007

Race	<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	> \$75K	Data Missing	Total
American Indian or Alaskan Native	0.0%	16.9%	18.0%	13.3%	42.9%	0.0%	0.0%	16.5%
Asian or Pacific Islander	50.0%	15.1%	15.0%	9.6%	16.3%	11.8%	15.0%	13.5%
Black	42.7%	29.5%	23.9%	23.2%	25.3%	19.3%	30.6%	25.8%
Hispanic (Race)	20.0%	9.1%	11.7%	9.0%	9.8%	19.0%	18.8%	10.6%
White	38.7%	15.6%	12.0%	10.8%	8.8%	7.0%	14.3%	11.7%
Other	50.0%	25.0%	11.4%	14.3%	0.0%	6.3%	0.0%	14.5%
Not Provided by Applicant	56.5%	30.8%	24.8%	23.7%	15.4%	13.6%	25.5%	23.8%
Not Applicable	.	30.0%	37.5%	100.0%	0.0%	0.0%	0.0%	21.2%
<b>Total</b>	<b>38.6%</b>	<b>17.6%</b>	<b>14.1%</b>	<b>12.7%</b>	<b>11.2%</b>	<b>8.5%</b>	<b>17.3%</b>	<b>14.0%</b>
Hispanic (Ethnicity)	40.4%	24.7%	23.6%	21.3%	29.7%	22.5%	16.7%	24.1%

In addition to modifications implemented in 2004 for documenting loan applicants' race and ethnicity, the HMDA reporting requirements were changed in response to the Predatory Lending Consumer Protection Act of 2002, as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans;
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of high annual percentage rate loans (HALs), defined as more than three percentage points for home purchases when contrasted with comparable treasury instruments or five percentage points for subordinate liens.

Originated owner-occupied home purchase loans qualifying as HALs were identified for 2004 through 2007. For the purpose of this discussion, HALs will be considered predatory in nature.<sup>10</sup> Table III.7 presents the total number of originated loans and originated loans that showed high annual percentage rates. As seen therein, over the four-year period, 3,392 or 28.0 percent of all originated loans were HALs. The number of HALs rose from 585 in 2004 to 1,114 in 2005 and 1,103 in 2006, but dropped by 46.5 percent in 2007 to 590.

<b>Table III.7</b>					
<b>Originated Owner-Occupied Home Purchase Loans by Predatory Status</b>					
City of Rockford					
FFIEC HMDA 2004 - 2007					
<b>Loan Type</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>Total</b>
Other Originated	2,513	2,060	2,317	1,838	8,728
High APR Loan	585	1,114	1,103	590	3,392
<b>Total</b>	<b>3,098</b>	<b>3,174</b>	<b>3,420</b>	<b>2,428</b>	<b>12,120</b>
Percent High APR	18.9%	35.1%	32.3%	24.3%	28.0%

Evaluation of who acquired these HALs revealed that an unusually high proportion of HALs were made to American Indian, black and Hispanic householders. Table III.8, on the following page, for example, shows that by 2005, roughly twice as many loans originated to black households were predatory (62.1 percent) as compared to white applicants (31.6 percent). Overall, 46.5 percent of all loans to black applicants were HALs, as compared to 25.7 percent for whites. The rate of HALS was also much higher for American Indian applicants.

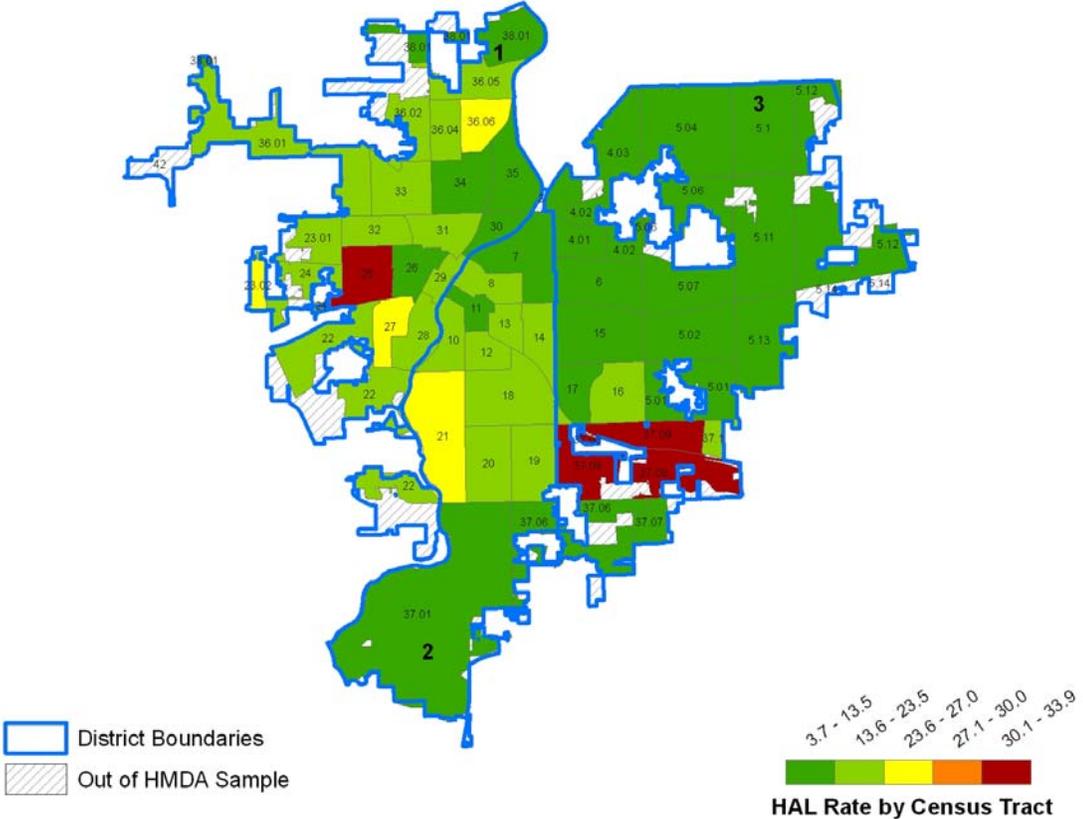
<sup>10</sup> The term "predatory loan" usually refers to borrowers being deceptively persuaded by lenders to agree to abusive or unfair terms.

**Table III.8**  
**Rate of High APR Loans of Originated Owner-Occupied Home Purchase Loans by Race**  
 City of Rockford  
 FFIEC HMDA Data 2004 - 2007

Race	2004	2005	2006	2007	Total
American Indian	22.5%	56.5%	47.6%	63.6%	43.4%
Asian	14.3%	29.3%	32.9%	13.9%	23.3%
Black or African American	31.1%	62.1%	52.8%	36.1%	46.5%
White	17.4%	31.6%	29.7%	22.6%	25.7%
Total	18.9%	35.1%	32.3%	24.3%	28.0%
Hispanic	27.2%	50.5%	49.7%	48.5%	44.0%

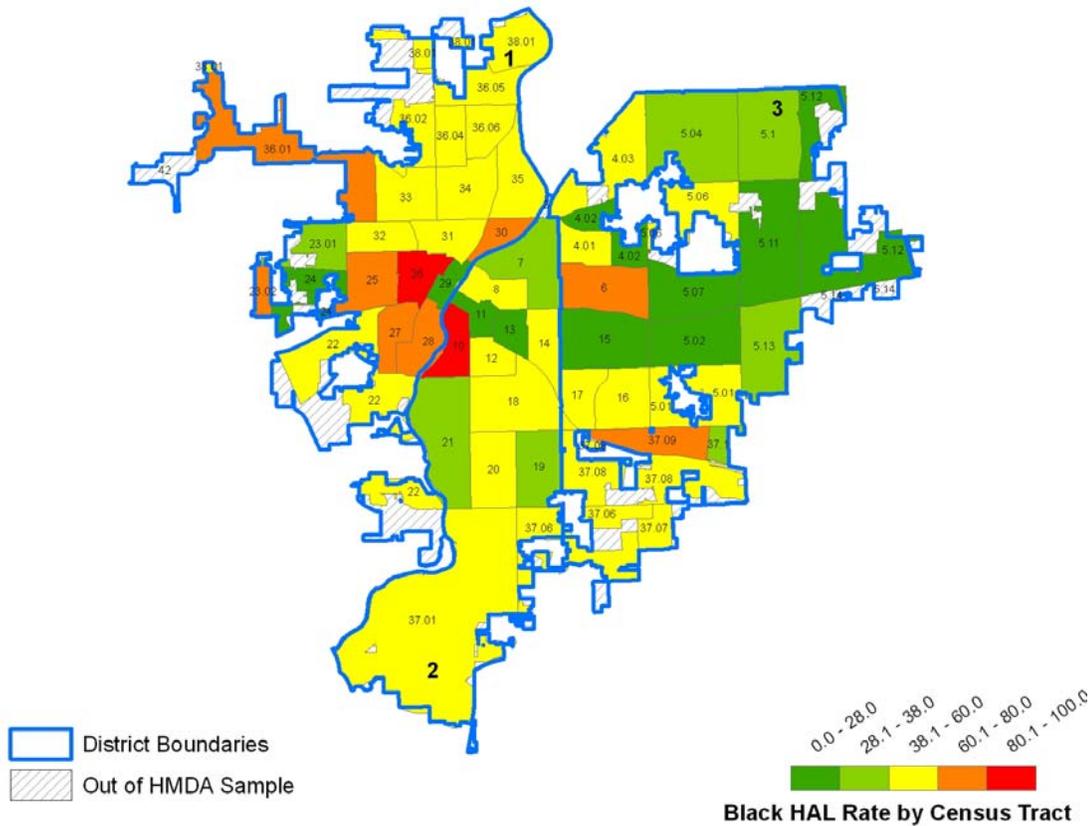
Map III.4, below, illustrates that the distribution of HALs was not uniform throughout the city and appear to have occurred much more frequently in particular areas, such as District 1 and the southern section of District 3.

**Map III.4**  
**High Annual Percentage Rate Loans by Census Tract**  
 City of Rockford  
 HMDA Data 2004 – 2007



Map III.5 presents the high APR loan geographic distribution for blacks in Rockford. This type of loan was widespread across all three districts; a significant number of census tracts showed rates above 60.0 percent.

**Map III.5**  
**High Annual Percentage Rate Loans for Blacks by Census Tract**  
 City of Rockford  
 HMDA Data 2004 – 2007



## SUMMARY

According to HMDA data from 2004 through 2007, about 51,900 loan applications were filed for home purchases. Excluding loan applications that were withdrawn, incomplete or approved by the lender but not accepted by the applicant, there were 25,110 loan originations and 4,094 loan denials, for an average nine-year loan denial rate of 14.0 percent. Denial rates were not evenly distributed throughout the city. Many census tracts on the central west side of the city had average denial rates above 24.1 percent, and a few census tracts in this area experienced rates above 40.0 percent. In general, blacks and Hispanics tended to have significantly higher denial rates than whites over the nine-year period, even within similar household income groupings. From 2004 to 2007, 3,392 or 28.0 percent of all originated loans were HALs; roughly twice as many loans originated to black households were predatory as compared to whites.



## ***SECTION IV. FAIR HOUSING AGENCIES AND PROGRAMS***

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The following narrative provides an enumeration of key agencies and organizations contributing to affirmatively furthering fair housing in the city of Rockford. It concludes with a succinct review of the complaint process within each organization.

### **MAJOR FAIR HOUSING ORGANIZATIONS**

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#### **THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

The United States Department of Housing and Urban Development (HUD) oversees, administers and enforces the Fair Housing Act. HUD's regional office in Chicago oversees housing, community development and fair housing enforcement in Illinois, as well as Wisconsin, Michigan, Ohio, Minnesota and Indiana.<sup>11</sup> The Office of Fair Housing and Equal Opportunity (FHEO), within HUD's Chicago office, enforces the federal Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending and other related transactions in Rockford. HUD also provides education and outreach, monitors agencies that receive HUD funding for compliance with civil rights laws, and works with state and local agencies under the Fair Housing Assistance Program and Fair Housing Initiative Program.

#### **Fair Housing Assistance and Fair Housing Initiative Programs**

In the U.S., many agencies receive funding directly from HUD as Fair Housing Assistance Programs (FHAPs) or Fair Housing Initiative Programs (FHIPs). The fundamental difference between the two programs is that FHAPs require an ordinance or law that empowers a local governmental agency to enforce fair housing laws; if HUD determines that the local entity can operate on a "substantially equivalent" level to federal agency enforcement activities, HUD contracts with that agency to process fair housing complaints and reimburses the jurisdiction on a per case basis.<sup>12</sup> FHAP grants are given to public, not private, entities and are given on a noncompetitive, annual basis to substantially equivalent state and local fair housing enforcement agencies.

FHIPs, on the other hand, may be a government agency, a private non-profit or a for-profit organization. A competitive grant program provides funds to organizations to carry out projects and activities designed to enforce and enhance compliance with the Fair Housing Act. Eligible activities include education and outreach to the public and the housing industry on fair housing rights and responsibilities, as well as enforcement of activities in response to fair housing complaints, including testing and litigation. The following FHIP initiatives provide funds and competitive grants to eligible organizations:

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<sup>11</sup> <http://www.hud.gov/offices/fheo/aboutfheo/fhhubs.cfm#hdcent>

<sup>12</sup> <http://www.hud.gov/offices/fheo/progdsc/title8.cfm>

**The Fair Housing Organizations Initiative (FHOI)** provides funding that builds the capacity and effectiveness of non-profit fair housing organizations by providing funds to handle fair housing enforcement and education initiatives more effectively. FHOI also strengthens the fair housing movement nationally by encouraging the creation and growth of organizations that focus on the rights and needs of underserved groups, particularly people with disabilities.

**Grantee eligibility:**

Applicants must be qualified fair housing enforcement organizations with at least two years of experience in complaint intake, complaint investigation, testing for fair housing violations and meritorious claims in the three years prior to the filing of their application.

**Eligible activities:**

The operation and activities of new and existing non-profit fair housing organizations.

**The Private Enforcement Initiative (PEI)** offers a range of assistance to the nationwide network of fair housing groups. This initiative funds non-profit fair housing organizations to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices.

**Grantee eligibility:**

Fair housing enforcement organizations that meet certain requirements related to the length and quality of previous fair housing enforcement experience may apply for PEI funding.

**Eligible activities:**

Conducting complaint-based and targeted testing and other investigations of housing discrimination, linking fair-housing organizations in regional enforcement activities, and establishing effective means of meeting legal expenses in support of fair housing litigation.

**The Education and Outreach Initiative (EOI)** offers a comprehensive range of support for fair housing activities, providing funding to state and local government agencies and non-profit organizations for initiatives that explain to the general public and housing providers what equal opportunity in housing means and what housing providers need to do to comply with the Fair Housing Act.

**Grantee eligibility:**

State or local governments, qualified fair housing enforcement organizations (those with at least two years of experience), other fair housing organizations, and other public or private nonprofit organizations representing groups of people protected by the Fair Housing Act may apply for EOI funding.

**Eligible activities:**

A broad range of national, regional, local or community-based educational activities that can be in scope including: developing education materials, providing housing counseling and classes, convening meetings that bring together the housing industry with fair housing groups, developing technical materials on accessibility and mounting public information campaigns. National projects that demonstrate cooperation with the real estate industry or focus on resolving the community

tensions that arise as people expand their housing choices may be eligible to receive preference points.

**The Administrative Enforcement Initiative (AEI)** helps state and local governments who administer laws that include rights and remedies similar to those in the Fair Housing Act implement specialized projects that broaden an agency's range of enforcement and compliance activities. No funds are available currently for this program.

In 2006, the FHIP program awarded \$18.1 million to different programs: \$13.9 million for PEI grants and \$4.2 million for EOI. One organization in the Rockford area received a FHIP grant in 2006:

Prairie Legal Services, Inc.

Education and Outreach Initiative – General Component

Award Amount: \$100,000

“Prairie State Legal Services, Inc. will conduct education and outreach activities in the northernmost 35 counties in Illinois (excluding Cook and Will counties). PLS will conduct a series of presentations for social service agencies and a series of workshops for the public on recognizing and reporting unlawful discrimination in the rental, sale or financing of housing. PLS expects that its activities will increase the number of complaints filed with HUD from its service area.”<sup>13</sup>

In 2007, the FHIP program awarded \$18.1 million: \$14 million for PEI and \$4.1 for EOI. No organizations operating in the Rockford area received FHIP grants that year.

In 2008 the FHIP program awarded \$21.8 million: \$20 million for PEI and \$1.3 million for EOI. An additional \$500,000 was granted for an EOI Clinical Law School Component. One organization in the Rockford area received a FHIP grant in 2008:

Prairie Legal Services, Inc.

Education and Outreach Initiative – General Component

Award Amount: \$100,000

“Prairie State Legal Services, Inc. will engage in Fair Housing activities in 35 counties in Illinois (excluding Cook and Will counties). Some grant activities will include: legal education presentations on fair housing rights to all protected classes under the Fair Housing Act and Illinois Human Rights Act; a series of workshops on default/foreclosure; special presentations directed to homeless individuals and their advocates addressing housing discrimination and financial literacy issues; two presentations to the disabled and their advocates; and translation of all new project materials into Spanish and conduct presentations to the Spanish speaking population.”<sup>14</sup>

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<sup>13</sup> <http://www.hud.gov/offices/fheo/partners/FHIP/FY2006FHIP.cfm>

<sup>14</sup> <http://www.hud.gov/offices/fheo/partners/FHIP/FY2008FHIP.cfm#il>

## **Creating A FHAP - A Substantially Equivalent Agency**

To create a substantially equivalent agency, a state or local jurisdiction must first enact a fair housing law that is substantially equivalent to federal laws. In addition, the local jurisdiction must have both the administrative capability and fiscal ability to carry out the law. With these elements in place, the jurisdiction may apply to HUD in Washington D.C. for substantially equivalent status. The jurisdiction's law would then be examined, and the federal government would make a determination as to whether it was substantially equivalent to federal fair housing law.

When substantially equivalent status has been granted, complaints of housing discrimination are dually filed with the state or local agency and with HUD. The state or local agency investigates most complaints; however, when federally subsidized housing is involved, HUD will typically investigate the complaint. Still, the state or local agencies are reimbursed for complaint intake and investigation and are awarded funds for fair housing training and education.

The state of Illinois has a substantially equivalent agency: the Illinois Department of Human Rights.

### **ILLINOIS DEPARTMENT OF HUMAN RIGHTS**

The Fair Housing Division of the Illinois Department of Human Rights (IDHR) enforces the Illinois Human Rights Act, which prohibits discrimination in residential real estate transactions on the grounds of race, color, religion, sex, sexual orientation, national origin, ancestry, age (persons aged 40 or older), marital status, physical or mental handicap, military service, or unfavorable military discharge. The IDHR takes and investigates charges of housing discrimination in the state of Illinois and also offers education and advocacy for persons involved in fair housing.

## **LOCAL FAIR HOUSING ORGANIZATIONS**

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### **ROCKFORD FAIR HOUSING BOARD**

The city of Rockford has another entity devoted to fair housing concerns in the city: the Rockford Fair Housing Board. The board is appointed by the mayor and approved by the city council and consists of nine members who are residents of the city of Rockford. Each member serves on the board for three years, and the list of members must include: an attorney-at-law; a licensed real estate broker who is also a member of the local board of Realtors; and representatives of the business community, labor community and racial minority community. The board is self-governed and exists to: conference with those who are familiar with housing issues, conduct studies regarding fair housing, publish and disperse results from said studies, assist other organizations in fair housing efforts, assist the community in the promotion of fair housing policies and the identification of fair housing violations, and submit a yearly report to the mayor regarding the status of fair housing and recommendations for the future of fair housing projects in the city.

## **PRAIRIE STATE LEGAL SERVICES**

Prairie State Legal Services, with an office located in Rockford, exists as a means of providing no-cost legal aid for elderly, low-income and disabled persons, including families and groups. This organization includes issues of fair housing discrimination in its available legal services. No charges, beyond court filing fees, are required for access to attorneys, paralegals and knowledgeable volunteers.

## **COMPLAINT AND COMPLIANCE REVIEW**

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### **COMPLAINT PROCESS FOR THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

According to the HUD website, any person who feels their housing rights have been violated may submit a complaint to HUD via phone, mail or the Internet. A complaint can be submitted to the national HUD office at:

Office of Fair Housing and Equal Opportunity  
Department of Housing and Urban Development  
Room 5204  
451 Seventh St. SW  
Washington, DC 20410-2000  
(202) 708-1112  
1-800-669-9777  
<http://www.hud.gov/offices/fheo/online-complaint.cfm>

In Rockford, the contact information for the regional HUD office in Chicago is:

Chicago Regional Office of FHEO  
U.S. Department of Housing and Urban Development  
Ralph H. Metcalfe Federal Building  
77 West Jackson Boulevard, Room 2101  
Chicago, Illinois 60604-3507  
(312) 353-7776 ext. 2453  
1-800-765-9372

When a complaint is submitted, intake specialists review the information and contact the complainant in order to gather additional details and to determine if the case qualifies as possible housing discrimination. Complaints that are specific to a state or locality that is part of HUD's Fair Housing Assistance Program are referred to the appropriate parties, who have 30 days to address the complaint. If HUD is handling the case, the formal complaint is sent to the complainant for review and is then forwarded to the alleged violator for review and response.

Next, the circumstances of the complaint are investigated through conducting interviews and examining relevant documents. During this time, the investigator attempts to rectify the situation through mediation, if possible.

The case is closed if mediation of the two parties is achieved or if the investigator determines that there was no reasonable cause of discrimination. If reasonable cause is found, then either a federal judge or a HUD Administrative Law Judge hears the case and determines damages, if any.<sup>15</sup> A respondent may be ordered:

- To compensate for actual damages, including humiliation, pain and suffering.
- To provide injunctive or other equitable relief, for example, to make the housing available.
- To pay the Federal Government a civil penalty to vindicate the public interest. The maximum penalties are \$10,000 for a first violation and \$50,000 for an additional violation within seven years.
- To pay reasonable attorney's fees and costs.<sup>16</sup>

### **Section 504 Complaints**

In addition to general fair housing discrimination complaints, HUD accepts specific complaints that violate Section 504 of the Rehabilitation Act of 1973, which prohibits programs or organizations that receive federal funds from discriminating against persons with disabilities. In relation to housing, this means that any housing program that accepts federal monies must promote equal access of units, regardless of disability status. Both mental and physical handicap are included in Section 504. An example of a Section 504 violation is a public housing manager who demands a higher housing deposit to a person in a wheelchair because of the anticipated damage that a wheelchair may cause. This violates Section 504 in that a person cannot be held to different standards or liabilities due to disability.

Complaints that are in violation of Section 504 are filed and processed in the same manner as general fair housing complaints.<sup>17</sup>

### **COMPLAINT PROCESSES FOR STATE OF ILLINOIS FAIR HOUSING ORGANIZATIONS**

A person has one year to submit a fair housing complaint when filing with the Illinois Department of Human Rights (IDHR). A complaint can be filed over the phone, in person or in writing. The contact information for the IDHR is:

The Illinois Department of Human Rights  
Fair Housing Division  
100 West Randolph Street, Suite 10-100  
Chicago, IL 60601  
(312) 814-6219 or (800) 662-3942

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<sup>15</sup> <http://www.hud.gov/offices/fheo/complaint-process.cfm>

<sup>16</sup> <http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm>

<sup>17</sup> <http://www.hud.gov/offices/fheo/disabilities/sect504faq.cfm>

When a complaint is received, a staff member reviews the complaint, interviews the complainant and determines if the complaint warrants possible fair housing discrimination. The charge is drafted, signed by the complainant and notarized and is then sent to the alleged violator for response within ten days of the charge being filed.

After the response is received, IDHR staff will investigate the claim neutrally through collecting records, interviews and other relevant information. The IDHR may conduct a “fact-finding conference,” or face-to-face meeting between investigators and parties involved in order to hear both sides and reach a possible resolution.

At completion of the investigation, IDHR staff draft a document indicating if “substantial evidence” of discriminatory behavior was found. A finding of substantial evidence means that the case can be presented to an administrative law judge or a state circuit court. Either of these powers has the capacity to take testimony and evidence and determine if discrimination occurred. If the alleged violator is found guilty, the court may determine punishment.<sup>18</sup>

## **COMPLAINT PROCESSES FOR CITY OF ROCKFORD FAIR HOUSING ORGANIZATIONS**

If a person feels a fair housing policy has been violated in the city of Rockford, the aggrieved person may report the violation to the Fair Housing Board. The complaint must be written and include facts about the purported incident, including information such as the names of those involved, address of the property and names of witnesses, and must be filed within 180 days of the occurrence of the violation with the city’s human resource department Legal Director. This differs from the state policy, which allows one year for persons to report the incident.

The Legal Director refers the complaint to the Department of Community and Economic Development as well as to persons who committed said discrimination, who may then submit a response to allegations.

The human resources department investigates the complaint within 30 days and reports their findings to the fair housing board of Rockford. The board has the right to collect evidence in the matter, including documents and records, and the ability to issue subpoenas and administer oaths.

If the board makes the decision that a violation has occurred, the board then notifies the violator and makes the effort to resolve the discriminatory practice and prevent it from occurring in the future. If he/she feels that the violation may be a recurring practice, the legal director of the board has the right to take action including injunctions, restraining orders or other means to thwart the pattern of denying rights.<sup>19</sup>

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<sup>18</sup> [http://www.state.il.us/dhr/Charges/Chg\\_Pamp.pdf](http://www.state.il.us/dhr/Charges/Chg_Pamp.pdf)

<sup>19</sup> <http://www.municode.com/resources/gateway.asp?pid=14387&sid=13>

The Rockford Fair Housing Board can be contacted at:

425 E State Street  
Rockford, IL 61104  
815-967-6934

## **SUMMARY**

There are many organizations that play a role in fair housing in Rockford, including the U.S. Department of Housing and Urban Development, the Illinois Department of Human Rights and the Rockford Fair Housing Board. These entities exist to address fair housing complaints in the city and to rectify fair housing disputes as well as to offer education and advocacy for the general public.

## **SECTION V. EVALUATION OF THE FAIR HOUSING PROFILE**

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The following narratives present several perspectives about the status of the fair housing system in the city of Rockford, including national and regional fair housing studies and cases, regional U.S. Department of Justice fair housing cases, housing complaint data and results of the 2008 fair housing survey.

### **RELATED NATIONAL AND REGIONAL FAIR HOUSING STUDIES**

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#### **NATIONAL FAIR HOUSING STUDIES AND ARTICLES**

In 2000, The United States Department of Housing and Urban Development (HUD) released a publication entitled “Discrimination in Metropolitan Housing Markets” (HDS2000), measuring the prevalence of housing discrimination based on race or color in the U.S. The third nationwide effort to measure discrimination against minority home seekers since 1977, HDS2000 measured discrimination in metropolitan areas with populations greater than 100,000 and with significant black, Hispanic and/or Native American minorities. The study found that discrimination persists in both rental and sales markets of large metropolitan areas nationwide, but that its incidence has generally declined since 1989. The exception was for Hispanic renters, who faced essentially the same incidence of discrimination in 2000 as they did in 1989.

In April of 2002, HUD released, “How Much Do We Know?,” a national study which assessed public awareness of and support for fair housing law. The study found that only one-half of the general public was able to identify six or more of eight scenarios describing illegal conduct. In addition, 14.0 percent of the nationwide survey’s adult participants believed that they had experienced some form of housing discrimination in their lifetime. However, only 17.0 percent of those who had experienced housing discrimination had done something about it. Last, two-thirds of all respondents said that they would vote for a fair housing law.<sup>20</sup>

As a follow-up, HUD later released a study in February of 2006 called “Do We Know More Now? Trends in Public Knowledge, Support and Use of Fair Housing Law.” One aim of the study was to determine whether a nationwide media campaign had proven effective in increasing the public’s awareness of housing discrimination, as well as its desire to report such discrimination. Unfortunately, the study found that overall public knowledge of fair housing laws had not improved between 2000 and 2005. As before, just half of the public knew the law with respect to six or more illegal housing activities. In the 2006 report, 17.0 percent of the study’s adult participants claimed to have experienced discrimination when seeking housing; however, after reviewing descriptions of the perceived discrimination, it was determined that only about 8.0 percent of the situations might be covered by the Fair Housing Act. Four out of five individuals who felt they had been discriminated against did not file a fair housing complaint, indicating that they felt it “wasn’t worth it” or that it

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<sup>20</sup> *How Much Do We Know?* United States Department of Housing and Urban Development, Office of Policy Development and Research, 2002. Document available at <http://www.huduser.org/Publications>.

“wouldn’t have helped.” Others didn’t know where to complain, assumed it would cost too much, were too busy or feared retribution.<sup>21</sup> One positive finding of the survey was that public support for fair housing laws increased from 66.0 percent in 2000 to 73.0 percent in 2005.

In 2004, the U.S. General Accounting Office’s (GAO) released a report titled “Fair Housing: Opportunities to Improve HUD’s Oversight and Management of the Enforcement Process.” The GAO report found that, although the process had improved in recent years, between 1996 and 2003 the median number of days required to complete fair housing complaint investigations was 259 for HUD’s Fair Housing and Equal Opportunity Offices and 195 for FHAP agencies. The report did find a higher percentage of investigations completed within the FHA’s 100-day mandate.<sup>22</sup> The GAO report also identified the following trends between 1996 and 2003:

- The number of fair housing complaints filed each year steadily increased since 1998. An increasing proportion of grievances alleged discrimination based on disability, and a declining proportion alleged discrimination based on race, though race was still the most cited basis of housing discrimination over the period.
- FHAP agencies conducted more fair housing investigations than FHEO agencies over the eight-year period. The total number of investigations completed each year increased somewhat after declining in 1997 and 1998.
- Investigation outcomes changed during this time, and an increasing percentage closed without a finding of reasonable cause to believe discrimination occurred. A declining percentage of investigations were resolved by the parties themselves or with help from FHEO or FHAP agencies.

In January of 2005, the Center for Community Capital at the University of North Carolina at Chapel Hill reported that the following three predatory loan terms increase the risk of mortgage foreclosure in subprime home loans: prepayment penalties, balloon payments and adjustable rates. The study examined recent home mortgages while controlling for credit scores, loan terms and varying economic conditions.<sup>23</sup> For example, in the prime lending market only 2.0 percent of home loans carry prepayment penalties of any length. Conversely, up to 80.0 percent of all subprime mortgages carry a prepayment penalty, which is a fee for paying off a loan early. An abusive prepayment penalty extends more than three years and/or costs more than six months’ interest.<sup>24</sup> While previous studies have linked subprime lending with home loss, this study was the first to identify specific abusive terms that lead to foreclosure.

In May of 2005, HUD published “Discrimination against Persons with Disabilities: Barriers at Every Step.” The study documented findings about rental discrimination toward two groups in the Chicago Metropolitan Area: deaf individuals using a telephone relay service,

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<sup>21</sup> *Do We Know More Now?* United States Department of Housing and Urban Development, Office of Policy Development and Research, 2006. Document available at <http://www.huduser.org/Publications>.

<sup>22</sup> *Fair Housing: Opportunities to Improve HUD’s Oversight and Management of the Enforcement Process*, United States General Accounting Office, Report to Congressional Requesters, April 2004.

<sup>23</sup> <http://www.kenan-flagler.unc.edu/assets/documents/foreclosurerelease.pdf>

<sup>24</sup> <http://www.responsiblelending.org/pdfs/2b003-mortgage2005.pdf>

and persons in wheelchairs. The research resulted in three significant findings: landlords refused to speak to one in four of the deaf callers, both groups received less encouragement than able individuals, and most landlords agreed to reasonable accommodations and modification requests.<sup>25</sup>

Released by the Poverty and Race Research Action Council in January 2008, "Residential Segregation and Housing Discrimination in the United States" asserts that many current governmental efforts to further fair housing actually result in furthering unfair housing practices across the U.S. This article suggests that fair housing efforts can cause residential segregation. For example, the majority of public housing residents are non-white and most public housing accommodations are grouped in the same census tracts, which results in residential segregation. Similarly, many Section 8 voucher holders are racial or ethnic minorities and most housing that accepts Section 8 vouchers is grouped in a few select areas, which again results in residential segregation. The report offers recommendations to curb such residential segregation, which include:

- Dispersing public housing developments throughout cities and communities; and
- Providing greater incentives for landlords with properties throughout an area to accept the coupons.<sup>26</sup>

In December 2008, the National Commission on Fair Housing and Equal Opportunity, sponsored by the National Fair Housing Alliance, released "The Future of Fair Housing," a report focusing on the status of fair housing across the U.S. Through hearings in several major cities, the Commission took testimony from hundreds of witnesses who offered their experiences or concerns regarding fair housing, as well as their ideas for fair housing solutions. The Commission found that despite the presence of numerous fair housing laws and regulations, housing discrimination still exists. And while fair housing violations have decreased in recent decades, roughly four million housing violations are reported to occur each year. Based on the information gathered from the hearings and from other fair housing data sources, the Commission formulated a detailed list of fair housing issues and possible ways to resolve these problems. Examples of identified issues and proposed remedies are:

- *Problem:* There is an inadequate enforcement of fair housing laws.  
*Solution:* Create a new, independent "fair housing enforcement agency," separate from HUD, and dedicated to providing fair housing support and advocacy; highlight the need for a "regional approach" to fair housing so that metropolitan areas can combine their efforts.
- *Problem:* People are not readily able to recognize the benefits of fair housing policies and/or violations of fair housing rights.  
*Solution:* Devote greater funding and marketing efforts to educate the country on fair housing issues and why diversified neighborhoods can be beneficial to communities; increase support for fair housing on the federal issue, perhaps through a fair housing council, to coordinate the work of agencies and allot greater attention to fair housing issues.

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<sup>25</sup> *Discrimination Against Persons with Disabilities: Barriers at Every Step*, United States Department of Housing and Urban Development, May 2005. Document available at <http://www.huduser.org/publications/hsgspec/dd.html>.

<sup>26</sup> <http://www.prrac.org/pdf/FinalCERDHousingDiscriminationReport.pdf>

- *Problem:* Current fair housing efforts mostly take a reactive approach to fair housing through penalizing fair housing violators.  
*Solution:* Adjust efforts to more proactively further fair housing; revise current plans that can lead to different fair housing problems, such as grouping Section 8 housing and/or disabled housing in clumped locations that often lack access to decent jobs and opportunities for education.<sup>27</sup>

## **OTHER CASES WITH NATIONAL IMPLICATIONS**

In a landmark fraud case, Westchester County, New York, was ordered to pay more than \$50 million dollars to resolve allegations of misusing federal funds for public housing projects and falsely furthering fair housing. The lawsuit, which was filed in 2007 by an anti-discrimination center, alleged that the County failed to reduce racial segregation of public housing projects in larger cities within the county and to provide affordable housing options in its suburbs. The County had accepted more than \$50 million from HUD between 2000 and 2006 with promises of addressing these problems. In a summary judgment in February of 2009, a judge ruled that the county did not properly factor in race as an impediment to fair housing and that the county did not accurately represent its efforts of integration in its analysis of impediments. In the settlement, Westchester County will be forced to pay more than \$30 million to the federal government, with roughly \$20 million eligible to return to the county to aid in public housing projects. The County must also set aside \$20 million to build public housing units in suburbs and areas with mostly white populations. The ramifications of this case are expected to affect housing policies of entitlement communities across the nation, which will likely be held to higher levels of scrutiny to ensure that federal funds are being spent in the best interest of protected classes.

## **ILLINOIS FAIR HOUSING CASES AND STUDIES**

In federal court in 2005, a settlement was reached that resolved a reported violation of fair housing laws in rural Illinois. In a lawsuit filed against property owners and managers, it was alleged that fair housing violations occurred when reasonable accommodations were not made for a tenant with disabilities, specifically allowing the tenant to move into a larger unit that had fewer steps to climb and more room for therapy equipment. The plaintiff was to receive more than \$30,000 from the apartment owners, who have also agreed to pay more than \$4,000 to the HOPE Fair Housing Center. In addition to the financial stipulations of the settlement, the defendants agreed to undergo training in fair housing policy and to adopt fair housing policies in their rental properties.<sup>28</sup>

In 2007, HUD charged an Illinois rental property owner with posting advertisements for rental housing that violated fair housing laws. The advertisements were posted on a popular internet site and indicated the availability of apartments, but noted a preference for adults without children. Although the man was advertising housing that was exempt from fair housing laws, it is illegal for any housing to be advertised on discriminatory terms,

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<sup>27</sup> [http://www.nationalfairhousing.org/Portals/33/reports/Future\\_of\\_Fair\\_Housing.PDF](http://www.nationalfairhousing.org/Portals/33/reports/Future_of_Fair_Housing.PDF)

<sup>28</sup> <http://www.ada.gov/newsltr0805.pdf>

including familial status. The man owns a number of other rental properties that are included under fair housing laws.<sup>29</sup>

A study conducted by the Chicago Area Fair Housing Alliance, revealed that more than 2,000 fair housing complaints were registered within the Chicago region in 2007 and that discrimination in housing in the area is a frequent occurrence. Other highlights from the study include:

- A non-white person may experience discrimination as often as they do not experience discrimination in renting or purchasing property.
- Whites often are found to “self-segregate” in their search for housing, seeking out predominantly white neighborhoods and leading to a lack of diversified housing areas.<sup>30</sup>

In December 2007, the *Rockford Register Star* reported that the Boone County Housing Authority was being investigated on allegations of discriminating against white residents. Many witnesses within the Authority noted that white residents were treated unfairly in their attempts to obtain Section 8 vouchers. According to the article, HUD was conducting a review of the practices of the housing authority, including whether or not fair housing policies regarding race were violated.<sup>31</sup>

## **SUITS FILED BY THE U.S. DEPARTMENT OF JUSTICE**

The U.S. Department of Justice (DOJ) enacts lawsuits on behalf of individuals based on referrals from HUD. Under the Fair Housing Act, the DOJ may file lawsuits in the following instances:

- Where there is reason to believe that a person or entity is engaged in what is termed a “pattern or practice” of discrimination or where a denial of rights to a group of people raises an issue of general public importance;
- Where force or threat of force is used to deny or interfere with fair housing rights;
- Where people who believe that they have been victims of an illegal housing practice file a complaint with HUD or file their own lawsuit in federal or state court.

While there were no suits filed with the DOJ specifically regarding the city of Rockford, the following is a list of recent cases from the region processed by the DOJ:

In 2006, a DOJ case involving a city in the Chicago region was resolved. According to the case, the city would not grant a permit for an organization to run a home for persons recovering from alcohol and drug additions. The city was required to pay penalties to the housing company, to persons who were turned away because the permit was not granted and to the government as civil penalties.<sup>32</sup>

A real estate firm and one of its former employees reached a settlement in response to allegations filed in 2008 that prospective buyers were shown houses in particular areas

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<sup>29</sup> <http://fhasecure.gov/offices/ftheo/library/newsletterfall07.pdf>

<sup>30</sup> <http://www.chicagoareafairhousing.org/node/41>

<sup>31</sup> <http://www.rstar.com/archive/x1059342502>

<sup>32</sup> [http://www.usdoj.gov/crt/housing/documents/elgin\\_pr.pdf](http://www.usdoj.gov/crt/housing/documents/elgin_pr.pdf)

based on race or nationality. The lawsuit originated from testing conducted by the National Fair Housing Alliance (NFHA) that found that the company was steering non-white clients to mostly non-white neighborhoods and white clients to predominantly white neighborhoods. The settlement terms include \$120,000 to be awarded to the NFHA and the state and an order to provide fair housing training to the employees of the real estate firm.<sup>33</sup>

A lawsuit was filed in early 2009 against the Wayne County Housing Authority and the Authority’s executive and assistant directors for discouraging a white couple to rent property to a black woman. The directors allegedly made racially disparaging remarks regarding the black woman, who was attempting to rent the property using Section 8 vouchers. The directors then “failed” the property in an inspection for Section 8 status when the white couple persisted in their attempts to allow the black woman to rent the property, despite the fact that properties with similar conditions passed inspections. A complaint was filed against the directors, and enough evidence was found through investigation by HUD that the matter was referred to the Justice Department.<sup>34</sup>

## FAIR HOUSING COMPLAINTS

### COMPLAINTS FILED WITH HUD

HUD maintains records of all complaints filed that represent violations of federal housing law. Over the 2001 through 2008 time period, HUD reported 39 housing complaints in Rockford, as seen in Table V.1. The majority of the complaints were filed on the basis of race, followed by disability, sex, religion and national origin. Complainants may cite more than one protected class violation; hence the number of bases cited can exceed the total number of complaints.

Year	Race	Disability	Sex	Religion	National Origin	Total	Total Complaints
2001	1	2	.	.	.	3	3
2002	1	3	.	.	.	4	3
2003	1	1	.	.	.	2	3
2004	2	2	.	2	.	6	2
2005	7	1	.	.	.	8	8
2006	3	3	.	.	1	7	6
2007	1	4	5	.	1	11	10
2008	3	1	.	.	.	4	4
<b>Total</b>	<b>19</b>	<b>17</b>	<b>5</b>	<b>2</b>	<b>2</b>	<b>45</b>	<b>39</b>

HUD also records the issue that spurred the complaint. Table V.2, on the following page, shows that the majority of fair housing complaints in Rockford between 2001 and 2008 were filed due to discrimination in terms, conditions or privileges relating to rental and failure to make reasonable accommodations, indicating that most complaints were related to renting.

<sup>33</sup> <http://www.usdoj.gov/opa/pr/2009/February/09-crt-131.html>

<sup>34</sup> <http://www.usdoj.gov/opa/pr/2009/February/09-crt-155.html>

**Table V.2**  
**Fair Housing Complaints by Issue**  
 City of Rockford  
 HUD Data, Fiscal Years 2001 - 2008

Issue	2001	2002	2003	2004	2005	2006	2007	2008	Total
Discrimination in term, conditions or privileges relating to rental	.	1	1	2	1	4	6	2	17
Failure to make reasonable accommodation	1	2	1	.	1	1	2	1	9
Discriminatory refusal to sell	.	.	.	.	4	.	.	.	4
Discriminatory acts under Section 818	.	.	1	.	.	1	2	.	4
Discriminatory financing	1	.	.	.	.	1	1	.	3
Discriminatory terms, conditions, privileges, or services and facilities	.	.	1	.	1	.	1	.	3
Discriminatory refusal to sell and negotiate for sale	.	.	.	.	2	.	.	.	2
Discriminatory refusal to rent	1	.	.	.	.	.	.	1	2
False denial or representation of availability	.	.	.	.	2	.	.	.	2
Discrimination in terms, conditions, privileges relating to sale	.	.	.	.	2	.	.	.	2
Discriminatory refusal to rent and negotiate for rental	.	.	.	.	.	.	.	1	1
Discrimination in the selling of residential real property	1	.	.	.	.	.	.	.	1
<b>Total</b>	<b>4</b>	<b>3</b>	<b>4</b>	<b>2</b>	<b>13</b>	<b>7</b>	<b>12</b>	<b>5</b>	<b>50</b>

Of these 39 complaints, 15 or nearly 40.0 percent were determined to be without cause, as noted in Table V.3. This finding means that through HUD's investigation, it was determined that no violation of federal fair housing law occurred. This figure represents a fairly high share of dismissals.

**Table V.3**  
**Fair Housing Complaints by Closure**  
 HUD Data, Fiscal Years 2001 - 2008

Closure	2001	2002	2003	2004	2005	2006	2007	2008	Total
No cause determination	2	.	1	2	1	3	6	.	15
Complaint withdrawn by complainant without resolution	.	.	.	.	4	2	1	.	7
Conciliation/settlement successful	1	1	1	.	1	1	1	.	6
Complaint withdrawn by complainant after resolution	.	1	1	.	.	.	1	1	4
Unable to locate complainant	.	1	.	.	.	.	.	2	3
Complainant failed to cooperate	.	.	.	.	1	.	1	.	2
Open	.	.	.	.	1	.	.	1	2
<b>Total</b>	<b>3</b>	<b>3</b>	<b>3</b>	<b>2</b>	<b>8</b>	<b>6</b>	<b>10</b>	<b>4</b>	<b>39</b>

## COMPLAINTS FILED WITH THE IDHR

The Illinois Department of Human Rights, as a substantially equivalent agency, receives federal housing complaints that are filed dually with both HUD and the IDHR. Violations of Illinois fair housing law, however, are addressed solely by the IDHR.

Table V.4, at right, presents a tabulation of data received from the IDHR. In the five-year time period between 2003 and 2008, 19 complaints were filed.

<b>Table V.4</b> <b>Fair Housing Complaints</b> City of Rockford IDHR Data, Fiscal Years 2003 - 2008	
Year	Total
2003	1
2005	6
2006	3
2007	6
2008	3
<b>Total</b>	<b>19</b>

Of the 19 complaints filed, the IDHR data show that most complaints were filed on the bases of race and physical handicap. Discrimination based on sex, mental handicap, family status and age were also cited. These data are presented in Table V.5, below.

<b>Table V.5</b>							
<b>Fair Housing Complaints by Basis of Complaint</b>							
City of Rockford							
IDHR Data, Fiscal Years 2003 - 2008							
<b>Year</b>	<b>Age</b>	<b>Race</b>	<b>Family Status</b>	<b>Physical Handicapped</b>	<b>Mentally Handicapped</b>	<b>Sex</b>	<b>Total</b>
2003	1	.	.	.	.	.	1
2005	.	4	1	1	.	.	6
2006	.	1	.	1	1	.	3
2007	.	.	.	2	1	3	6
2008	.	2	.	1	.	.	3
<b>Total</b>	<b>1</b>	<b>7</b>	<b>1</b>	<b>5</b>	<b>2</b>	<b>3</b>	<b>19</b>

Table V.6 reveals that during the five-year period the IDHR received complaints citing discrimination in terms or conditions of sale or rental, as well as refusing to rent or buy housing and in financing a home or commercial property.

<b>Table V.6</b>						
<b>Fair Housing Complaints by Issue of Complaint</b>						
City of Rockford						
IDHR Data, Fiscal Years 2003 - 2008						
<b>Issue</b>	<b>2003</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>Total</b>
Discriminated against in terms or conditions of sale, rental occupancy, or in services or facilities	.	1	1	6	.	8
Refused an opportunity to rent or buy housing	.	1	2	.	2	5
Discriminated against in financing of a home or commercial property	.	4	.	.	.	4
Other	.	.	.	.	1	1
<b>Total</b>	<b>.</b>	<b>6</b>	<b>3</b>	<b>6</b>	<b>3</b>	<b>18</b>

## COMPLAINTS FILED WITH ROCKFORD FAIR HOUSING BOARD

While the Rockford Fair Housing Board is designed to accept fair housing complaints, a tabulation of such complaints was not made available.

## FAIR HOUSING SURVEY

Additional evaluation of Rockford’s fair housing profile was conducted via a survey of stakeholders in the city. The purpose of the 2008 fair housing survey, a relatively more qualitative component of the analysis of impediments, was to gather the knowledge, experiences, opinions and feelings of stakeholders regarding fair housing, as well as to gauge the ability of housing stakeholders to understand and affirmatively further fair housing.

The DCD solicited nearly 300 participants for the 2008 fair housing survey, with just fewer than 200 respondents completing the survey. Stakeholders solicited for participation included representatives of: housing groups, minority organizations, disability resource groups, real estate and property management associations, banking entities, and others groups involved in the fair housing arena. Survey questions were used to assess the respondent's knowledge of fair housing laws; awareness of barriers, policies or codes related to fair housing; and knowledge of fair housing violations.

The first section of the survey addressed fair housing laws and revealed that the majority of respondents, 127, were aware of Rockford's fair housing ordinance, while 33 were unaware, and 18 did not know. In the second question, the majority of persons surveyed, 123, answered that they believed that fair housing laws serve a useful purpose, as compared to 22 persons who did not and 31 persons who did not know. In terms of the comprehensibility of these laws, an equal number of persons, 70, answered either "no" or "don't know," while 35 persons indicated that the laws are difficult to understand. Nearly 60.0 percent of respondents were unaware of fair housing training processes available and roughly 40.0 percent were unaware of the availability of fair housing training through the workplace. These data can be seen below in Table V.7.

<b>Table V.7</b>				
<b>Fair Housing Laws</b>				
City of Rockford 2008 Fair Housing Survey				
	<b>Yes</b>	<b>No</b>	<b>Don't Know</b>	<b>Total</b>
Are you aware that Rockford has a fair housing ordinance?	127	33	18	178
Do fair housing laws serve a useful purpose?	123	22	31	176
Are they difficult to follow or understand?	35	70	71	176
Is there a specific fair housing training process available to you?	41	33	101	175
Is this process available to you in your career or profession?	46	53	73	172

Fair housing violations were addressed in the second section. More than 120 people were not aware of fair housing testing occurring, 24 persons were aware and 32 did not know as seen below in Table V.8. Most respondents were unaware of any fair housing planning and most respondents did not feel that fair housing ordinances in the city needed to be strengthened. In terms of need, more than 50.0 percent of respondents indicated that the current level of fair housing outreach and education is lacking, while nearly 40.0 percent indicated that the level is ideal and less than 10.0 percent indicated that the level was too high.

<b>Table V.8</b>				
<b>Possibilities for Fair Housing Violations</b>				
City of Rockford 2008 Fair Housing Survey				
	<b>Yes</b>	<b>No</b>	<b>Don't Know</b>	<b>Total</b>
Are you aware of any fair housing testing?	24	124	32	180
Are you aware of any fair housing planning by the City of Rockford?	49	96	33	178
Does the Rockford fair housing ordinance need to be strengthened?	36	42	99	177
	<b>Too Little</b>	<b>Right Amount</b>	<b>Too Much</b>	<b>Total</b>
What is the current level of fair housing outreaching and education?	86	60	15	161

The third section of the survey focusing on fair housing barriers, policies and codes, showed that 99 persons were unaware of any barriers preventing fair housing in the city, while 53 persons indicated that barriers exist, and 26 indicated no such problem. Persons who cited that barriers did exist were asked to list these barriers; this list can be found in Appendix C. The majority again were unaware if specific areas of the city had fair housing problems, with 50 persons responding “yes” and 19 persons responding “no.” In terms of existing city polices that hinder fair housing, 26 persons responded that these problematic codes exist, 54 responded that they do not, and 98 person said that they did not know. Likewise, similar numbers were seen in response to a question asking if any city codes adversely affect fair housing, as seen below in Table V.9.

	Yes	No	Don't Know	Total
Are there barriers to addressing or improving fair housing in Rockford?	53	26	99	178
Are there specific areas in the city that have fair housing problems?	50	19	111	180
Do you think any City policies, actions or decisions adversely affect fair housing?	26	54	98	178
Do you think that any city codes or regulations adversely affect fair housing?	24	59	97	180

Additionally, respondents were asked to elaborate on the questions asked in the previous section by providing written answers. The comments were compiled and trends were identified for each question. A complete list of the survey responses can be found in Appendix C.

Survey respondents were asked to identify “barriers to addressing or improving fair housing in Rockford.” Responses showed the following trends:

- **Lack of Education:** Comments indicated that tenants need better education about rights to fair housing, including the complaint filing process; landlords and real estate agents need to know how to prevent violations in fair housing policy, such as steering practices.
- **Discrimination:** Respondents reported that landlords and real estate agents rely on classism, racism and other biases in their business practices.
- **Lack of Enforcement:** Comments indicated that the fair housing laws are not regularly enforced and that punishments are not severe enough.

Patterns were also identified in regard to a request for “the specific policies, actions or decisions that adversely affect fair housing” in Rockford. Trends in comments included:

- **Lack of Availability:** Respondents asserted that fair housing rules and regulations are not made accessible enough for average citizens.
- **Misdirection of Funds:** Comments suggested that there is too much focus on incentives and resources for developments in new, higher-income areas rather than existing, low-income development areas.
- **Counterproductive Nature of Fair Housing Policies:** Respondents indicated that numerous fair housing policies and programs, such as Section 8 vouchers, disability

housing regulations and public housing, were adversely affecting fair housing. These comments substantiated national studies discussed earlier in this document.

Survey participants were also asked to identify “codes or regulations that adversely affect fair housing” in Rockford. While no codes or regulations were mentioned specifically, the following trends were identified from the responses:

- Lack of Awareness: Comments suggest that the general public is unaware of or does not completely understand housing codes or regulations.
- Overcomplicated Nature of Codes: Respondents noted that the large number of complex codes has made following regulations difficult and applying new codes to renovation of old properties makes rehabilitation or renovation very challenging.
- Lack of Accountability: Comments indicated that there is a lack of accountability or enforcement of codes in general and that poorer areas of the city are held to tougher fair housing standards.

In the survey, respondents were also asked to express their knowledge of protected classes under fair housing laws. More than one answer could be offered on this question. As established previously, in Rockford there are 13 state and federally protected classes protected under fair housing laws: race, color, religion, sex, national origin, ancestry, age, marital status, disability, military status, familial status, sexual orientation and unfavorable military discharge. Table V.10, at right, reveals that when asked to name protected classes, the majority of respondents were unable to provide a complete list. While some respondents were able to correctly identify disability, race, religion and sexual orientation, the remaining protected classes were either recognized by very few persons or not at all. For example, unfavorable military discharge was not listed by any respondents. Additionally, many respondents listed a number of broad, general groups which are currently not protected under state or federal law, such as “landlords,” “tenants,” and “everyone.”

<b>Table V.10</b>			
<b>What Classes Are Protected by Fair Housing Laws?</b>			
City of Rockford 2008 Fair Housing Survey			
<b>Protected Class</b>	<b>Responses</b>	<b>Protected Class</b>	<b>Responses</b>
Disability	30	Landlords	4
Low Income	20	National Origin	4
Minorities	19	Senior Citizens	4
Race	19	Color	3
Religion	11	Creed	3
Age	10	Marital Status	3
Sexual Orientation	10	Mentally Ill	3
Familial Status	9	Homeless	3
Other	9	Blacks	2
Elderly	8	Hispanics	2
Gender	8	Women	2
Don't Know	7	Ancestry	1
All Groups	5	Education Level	1
Ethnicity	5	Immigrants	1
Sex	5	Special Needs Population	1
Tenants	5	Substance Abusers	1
Children	5	Veterans	1
Everyone	5	<b>Total</b>	<b>229</b>

Ultimately, the data derived from this question support the idea that current knowledge of fair housing laws is lacking and that education of these policies needs to be expanded. These data further highlight the need for additional fair housing education in the stakeholder community.

Another survey question asked respondents where they would refer a housing consumer who expressed that they had been a victim of an unfair housing practice. The responses to this question are telling, as noted in Table V.9, below. Respondents indicated little agreement on where to turn for fair housing guidance or assistance. Most referred to the city of Rockford or to an “other” source not listed. Some referred to finding an attorney or legal council, others to the court system or HUD, and others to housing authorities.

<b>Table V.9</b> <b>Where Would You Refer Someone Who Said They</b> <b>Were a Victim of Fair Housing Laws?</b> City of Rockford 2008 Fair Housing Survey	
<b>Referral</b>	<b>Responses</b>
City of Rockford	27
Lawyer	13
Don't Know	12
U.S. Department of Housing and Urban Development	9
City Hall	8
Prairie State Legal Service	6
Rockford Housing Authority	6
Human Services	2
Realtors	2
Other	19
<b>Total</b>	<b>102</b>

## FAIR HOUSING FOCUS GROUPS AND FORUMS

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The DCD hosted five fair housing focus groups in Rockford during March 10 through 12, 2009. The focus groups were designed to allow invitees to disclose their opinions in a non-judgmental environment and were constructed around five specific topic areas: economic development, healthy neighborhoods, homeowner housing, infrastructure and rental housing. The DCD also held three public input meetings April 1 through 2, 2009, in Rockford. These meetings were held concurrently with the Consolidated Plan input sessions. Key findings from these meetings related to housing issues are summarized as follows:

- The rental stock in many cases is in poor shape; efforts should focus on rehabilitation or elimination of dilapidated units of housing stock.
- It may be more beneficial to the community to remove unsound housing stock than it would be to rehabilitate said stock.
- There is a high distribution of dilapidated housing in high poverty areas.
- Accessibility of housing for the handicapped is still an issue in the city.

## SUMMARY

Information gathered from articles regarding housing discrimination in the region show that discrimination has occurred relatively recently in the forms of failure to make reasonable accommodations and advertising discrimination, while a regional study showed that problems with steering and racial segregation are common in the real estate industry.

Additionally, lawsuits filed with the U.S. Department of Justice from the region also revealed problems of steering, as well as possible discrimination in a nearby housing authority.

Fair Housing complaint data from HUD from 2001 to 2008 was gathered and analyzed. HUD complaint data was most often related to discrimination against renters, including problems with making reasonable accommodations and rental conditions. Most complaints submitted to HUD were either dismissed or withdrawn by the complainant.

Complaint data from the IDHR showed that between 2003 and 2008 nearly 20 complaints were filed. Of these complaints, most were related to discrimination in terms or conditions of renting or selling property.

Findings from the 2008 Fair Housing Survey revealed that most persons surveyed were aware of fair housing laws and their purpose, however fewer persons felt that the laws were easy to understand. Most persons surveyed were unaware of fair housing testing or planning conducted by the city, and a significant number of respondents indicated that there are barriers or other issues affecting fair housing in the city. Most persons surveyed were unable to correctly identify the protected classes or to name an organization to which they would refer someone with a fair housing complaint or concern. Nevertheless, survey respondents did indicate that some housing program guidelines, tax credit criteria, current locations of public housing, and areas where Section 8 vouchers are accepted as contributing factors to segregation.

Comments gathered from the public input sessions highlighted the public opinion that the quality of housing stock in Rockford is questionable and that reasonable accommodations for the handicapped are not always provided.



## ***SECTION VI. IMPEDIMENTS AND SUGGESTED ACTIONS***

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### **IDENTIFIED IMPEDIMENTS TO FAIR HOUSING CHOICE**

The 2009 Analysis of Impediments for the city of Rockford uncovered several issues that can be considered barriers to affirmatively furthering fair housing and, consequently, impediments to fair housing choice. These issues are as follows:

1. Several areas of the city of Rockford have extremely high concentrations of selected racial and ethnic minorities. These areas also tend to have lower-quality and older housing units. High concentrations of assisted housing units, public housing and Section 8 voucher use exist in the same areas of the city. This situation has resulted in racial and ethnic minority segregation.
2. Potential history of steering is a concern.
3. Very few housing complaints tend to lead to several concerns:
  - a. Insufficient fair housing system capacity for enforcement,
  - b. Lack of effective referral system,
  - c. Lack of understanding of the fair housing system,
  - d. Lack of concern by residents on the east side of Rockford,
  - e. Questionable effectiveness of the Rockford Fair Housing Board fair housing complaint process.
4. HMDA data indicate that minorities are denied home loans much more often than whites, even after correcting for income.
5. Concentration of high annual percentage rate loans tends to occur more frequently in areas with high concentrations of racial and ethnic minorities. Hence, the geographic distribution of sales is a concern and it seems that subprime and potentially predatory lending has been occurring in marketplace and has been targeted to areas with higher concentrations of poverty and ethnic and racial minorities.

### **SUGGESTED ACTIONS TO CONSIDER**

In response to these listed impediments, the city of Rockford should consider taking the following actions:

1. Work with Realtors to issue a policy statement that discourages steering and exclusionary location policies and encourages inclusive housing location patterns and activities.
2. In order to prevent or remedy concentrations of assisted housing, public housing and Section 8 voucher use, incentives or disincentives can be offered to encourage better integration. This approach could include working more closely with the Rockford Housing Authority to dissipate its public housing stock throughout the city.
3. Enhance the capacity of Rockford's fair housing system.

- a. Increase the effectiveness of the Rockford Fair Housing Board by:
    - i. Posting the annual report to the Mayor on the City's Web site,
    - ii. Tracking the number of complaints that have come to the Board over the year and the referrals to the Illinois Department of Human Rights,
    - iii. Making the online information more user-friendly, such as:
      - Making a link directly to the City's Fair Housing Ordinance,
      - Being sure that the voice mail box is available and not full,
      - Posting the mailing address of the Board and indicating a contact person,
      - Explaining the process of filing a complaint more simply.
    - iv. Listing other resources where a person might also go for support, such as Prairie Legal Services, Inc. or the Illinois Department of Human Rights.
  - b. Engage an existing Fair Housing Initiative Program (FHIP) grant recipient, or entity receiving funds from HUD for various fair housing activities, to conduct outreach and education activities in Rockford.
    - i. This effort would include outreach and education to the general population.
    - ii. This effort could include fair housing trainings for city staff, management and public safety offices.
    - iii. This effort could include a focus area, such as the eastern side of the city, thereby encouraging greater understanding and knowledge of the current fair housing situation in Rockford.
4. Enhance the education of prospective homebuyers and report the attributes of loans with predatory characteristics, such as high annual percentage rate terms, balloon payments, teaser introductory rates and constrained refinancing terms.

## APPENDIX A. ADDITIONAL CENSUS MAP DATA

Table A.1 Demographics for Block Groups City of Rockford 2000 Census SF1 and SF3 Data						
Block Group	Black	Hispanic	Poverty Rate	Disability Rate	Median Rent	Median Home Price
Block Group 4, Census Tract 3	2.5	3.7	3.5	8.9	665	82,900
Block Group 1, Census Tract 4.01	3.4	3.1	4.3	14.4	525	87,000
Block Group 2, Census Tract 4.01	0.5	3.8	4.5	20.6	856	83,800
Block Group 3, Census Tract 4.01	3.6	3.1	0.0	8.8	823	91,200
Block Group 1, Census Tract 4.02	1.3	2.3	1.2	9.0	967	110,100
Block Group 2, Census Tract 4.02	1.7	3.8	6.6	25.4	944	81,000
Block Group 3, Census Tract 4.02	2.4	4.3	6.4	17.0	721	86,500
Block Group 4, Census Tract 4.02	3.2	3.1	1.9	24.6	0	120,300
Block Group 1, Census Tract 4.03	2.8	1.3	3.5	7.6	686	105,000
Block Group 2, Census Tract 4.03	12.1	4.8	13.0	18.7	607	102,700
Block Group 3, Census Tract 4.03	4.5	3.1	2.6	15.6	486	97,200
Block Group 4, Census Tract 4.03	0.6	3.2	0.5	11.5	575	159,900
Block Group 1, Census Tract 5.01	2.9	7.7	3.6	19.4	637	95,100
Block Group 2, Census Tract 5.01	2.9	1.9	2.3	17.5	1,514	119,000
Block Group 3, Census Tract 5.01	6.7	8.2	6.6	14.8	536	85,000
Block Group 4, Census Tract 5.01	7.9	6.7	11.8	11.5	541	79,500
Block Group 5, Census Tract 5.01	7.0	9.6	8.5	19.3	621	79,800
Block Group 1, Census Tract 5.02	5.8	4.5	7.4	14.0	762	91,300
Block Group 2, Census Tract 5.02	7.2	9.0	14.4	14.4	565	89,600
Block Group 3, Census Tract 5.02	11.0	15.5	11.9	14.5	569	108,400
Block Group 1, Census Tract 5.04	3.9	1.4	3.4	17.9	359	133,300
Block Group 2, Census Tract 5.04	3.1	1.9	4.2	8.5	900	135,400
Block Group 3, Census Tract 5.04	4.6	3.9	3.6	16.3	680	139,900
Block Group 4, Census Tract 5.04	5.9	2.9	0.0	3.0	0	116,600
Block Group 5, Census Tract 5.04	4.6	2.3	0.8	14.7	0	118,400
Block Group 1, Census Tract 5.06	3.6	5.1	2.2	14.2	775	94,100
Block Group 2, Census Tract 5.06	2.9	2.0	4.4	10.4	0	119,100
Block Group 3, Census Tract 5.06	3.5	1.3	0.9	9.9	0	145,200
Block Group 4, Census Tract 5.06	1.4	1.3	0.5	7.3	675	143,700
Block Group 5, Census Tract 5.06	2.3	2.9	3.7	15.4	820	86,800
Block Group 1, Census Tract 5.07	5.3	6.6	12.6	20.4	530	126,800
Block Group 2, Census Tract 5.07	0.8	2.1	0.0	12.4	1,006	119,000
Block Group 3, Census Tract 5.07	18.0	13.6	19.3	21.8	556	164,600
Block Group 1, Census Tract 5.10	3.5	1.8	0.0	10.8	1,273	143,800
Block Group 2, Census Tract 5.10	4.4	2.1	4.0	15.7	724	157,400
Block Group 1, Census Tract 5.11	5.9	3.5	2.6	12.2	0	158,900
Block Group 2, Census Tract 5.11	6.4	10.4	4.4	12.5	795	91,100
Block Group 1, Census Tract 5.12	7.3	4.2	3.6	8.1	862	121,000
Block Group 2, Census Tract 5.12	2.2	2.3	2.1	10.4	0	169,500
Block Group 3, Census Tract 5.12	5.0	3.6	6.9	10.7	842	102,000
Block Group 4, Census Tract 5.12	3.1	1.4	0.0	11.2	475	125,000
Block Group 1, Census Tract 5.13	3.2	2.1	4.6	11.3	1,092	124,800
Block Group 2, Census Tract 5.13	2.9	1.6	4.0	18.4	945	121,000

**Table A.1 Continued**  
**Demographics for Block Groups**  
City of Rockford  
2000 Census SF1 and SF3 Data

Block Group 1, Census Tract 5.14	2.9	3.4	1.5	9.0	850	131,300
Block Group 2, Census Tract 5.14	1.9	2.6	0.0	21.1	950	105,500
Block Group 1, Census Tract 6	1.8	0.9	7.7	25.3	646	93,800
Block Group 2, Census Tract 6	5.5	7.8	0.8	11.8	607	96,900
Block Group 3, Census Tract 6	3.0	6.4	1.5	10.8	661	87,000
Block Group 4, Census Tract 6	1.3	2.2	5.4	15.7	933	88,300
Block Group 1, Census Tract 7	4.0	5.2	7.4	9.8	578	110,400
Block Group 2, Census Tract 7	1.3	3.1	0.0	9.2	564	109,600
Block Group 3, Census Tract 7	2.7	4.0	1.8	6.6	929	81,800
Block Group 4, Census Tract 7	0.5	2.6	1.6	6.8	546	86,800
Block Group 1, Census Tract 8	15.1	9.9	33.3	41.4	365	51,200
Block Group 2, Census Tract 8	5.9	17.8	11.4	9.6	477	63,000
Block Group 3, Census Tract 8	4.0	13.6	10.4	19.1	517	81,000
Block Group 1, Census Tract 10	40.5	10.0	33.4	29.6	192	65,500
Block Group 2, Census Tract 10	22.4	24.1	42.4	21.9	507	36,500
Block Group 3, Census Tract 10	41.1	22.1	49.4	31.2	358	47,200
Block Group 1, Census Tract 11	10.2	11.2	39.0	60.9	305	0
Block Group 2, Census Tract 11	15.2	18.6	36.5	33.2	319	37,500
Block Group 1, Census Tract 12	18.6	24.9	17.8	16.7	447	53,900
Block Group 2, Census Tract 12	14.6	16.9	36.9	20.5	443	60,800
Block Group 3, Census Tract 12	9.6	28.2	18.1	16.9	427	54,400
Block Group 1, Census Tract 13	6.7	18.1	36.1	16.8	451	48,600
Block Group 2, Census Tract 13	10.3	8.9	12.3	15.2	493	62,800
Block Group 3, Census Tract 13	4.8	18.5	6.3	14.6	509	62,800
Block Group 1, Census Tract 14	5.9	8.0	7.7	15.5	542	73,800
Block Group 2, Census Tract 14	4.5	13.2	8.8	21.4	478	67,300
Block Group 3, Census Tract 14	2.6	12.0	14.3	17.7	576	64,400
Block Group 4, Census Tract 14	2.8	4.4	4.5	22.2	434	67,400
Block Group 1, Census Tract 15	3.8	6.1	2.0	13.3	435	84,500
Block Group 2, Census Tract 15	6.2	6.7	0.9	11.4	672	84,100
Block Group 3, Census Tract 15	3.6	7.4	2.8	16.2	575	79,300
Block Group 4, Census Tract 15	4.2	10.2	7.3	14.1	514	73,700
Block Group 5, Census Tract 15	1.9	4.5	5.6	24.9	466	78,300
Block Group 6, Census Tract 15	4.9	8.2	7.6	7.6	540	76,900
Block Group 1, Census Tract 16	5.7	12.3	5.0	12.7	595	72,700
Block Group 2, Census Tract 16	9.1	11.4	3.3	14.9	523	76,300
Block Group 3, Census Tract 16	6.5	13.5	8.3	16.2	493	84,700
Block Group 4, Census Tract 16	13.1	7.0	4.1	9.5	544	80,400
Block Group 5, Census Tract 16	8.4	6.2	3.9	17.0	546	76,800
Block Group 6, Census Tract 16	2.2	1.8	4.6	7.4	632	76,800
Block Group 1, Census Tract 17	2.2	7.2	1.5	17.2	663	82,900
Block Group 2, Census Tract 17	9.7	4.5	6.2	13.0	502	78,100
Block Group 3, Census Tract 17	1.8	6.2	2.4	17.0	615	73,200
Block Group 1, Census Tract 18	7.3	12.4	2.7	32.0	455	60,400
Block Group 2, Census Tract 18	14.1	6.9	15.3	15.3	464	52,200
Block Group 3, Census Tract 18	6.1	13.8	11.6	10.9	443	50,200
Block Group 4, Census Tract 18	12.5	14.1	17.2	23.9	459	53,700
Block Group 5, Census Tract 18	9.6	19.4	4.4	24.8	514	54,100

**Table A.1 Continued**  
**Demographics for Block Groups**  
City of Rockford  
2000 Census SF1 and SF3 Data

Block Group 6, Census Tract 18	8.6	22.7	18.4	13.9	453	55,100
Block Group 1, Census Tract 19	2.0	6.9	4.5	41.4	489	46,800
Block Group 2, Census Tract 19	10.8	14.3	13.9	21.0	388	50,800
Block Group 3, Census Tract 19	4.9	9.4	15.1	23.7	684	56,400
Block Group 4, Census Tract 19	3.5	9.7	5.1	22.7	185	73,400
Block Group 1, Census Tract 20	5.5	16.5	35.2	24.8	512	58,000
Block Group 2, Census Tract 20	1.2	7.7	21.4	28.9	428	42,000
Block Group 3, Census Tract 20	6.9	12.8	27.9	23.0	506	49,300
Block Group 1, Census Tract 21	51.3	20.7	7.6	20.4	479	46,700
Block Group 2, Census Tract 21	52.3	8.2	52.7	22.1	291	61,000
Block Group 3, Census Tract 21	5.8	10.1	4.8	20.5	550	46,100
Block Group 1, Census Tract 22	53.7	29.8	15.4	19.6	602	45,100
Block Group 2, Census Tract 22	53.1	10.0	22.4	24.0	548	63,700
Block Group 3, Census Tract 22	25.9	26.2	42.1	24.6	523	36,300
Block Group 4, Census Tract 22	8.5	3.6	2.3	17.4	398	75,900
Block Group 1, Census Tract 23.01	2.6	6.4	12.8	21.9	490	53,900
Block Group 2, Census Tract 23.01	47.1	7.6	7.8	38.7	525	64,300
Block Group 3, Census Tract 23.01	58.3	11.4	12.3	32.1	549	50,500
Block Group 1, Census Tract 23.02	7.8	6.1	8.3	33.8	591	47,000
Block Group 2, Census Tract 23.02	9.4	3.8	14.3	25.0	396	58,700
Block Group 1, Census Tract 24	68.2	6.6	35.5	29.3	380	37,100
Block Group 2, Census Tract 24	77.1	5.7	7.7	23.6	615	28,700
Block Group 3, Census Tract 24	74.9	5.7	18.1	39.9	608	41,400
Block Group 1, Census Tract 25	67.2	9.8	27.6	31.7	567	43,000
Block Group 2, Census Tract 25	68.2	19.8	42.8	30.6	494	29,800
Block Group 3, Census Tract 25	75.1	11.4	47.4	27.1	543	43,700
Block Group 4, Census Tract 25	81.3	8.2	39.1	35.6	425	47,200
Block Group 1, Census Tract 26	53.9	11.4	59.0	15.6	401	42,900
Block Group 2, Census Tract 26	56.0	16.9	38.1	43.6	506	39,000
Block Group 3, Census Tract 26	55.3	20.8	20.2	23.6	525	40,700
Block Group 4, Census Tract 26	79.4	3.9	68.3	12.7	434	55,000
Block Group 1, Census Tract 27	28.4	57.0	18.6	17.1	416	42,800
Block Group 2, Census Tract 27	27.0	60.1	19.0	22.2	429	54,800
Block Group 3, Census Tract 27	29.8	51.8	23.4	22.6	449	52,500
Block Group 4, Census Tract 27	78.8	12.9	15.8	29.6	503	45,200
Block Group 1, Census Tract 28	35.1	54.5	48.3	25.2	360	42,100
Block Group 2, Census Tract 28	52.6	33.7	10.6	24.7	579	41,000
Block Group 1, Census Tract 29	20.4	3.4	42.9	52.9	270	129,200
Block Group 2, Census Tract 29	41.1	5.2	20.4	19.9	227	0
Block Group 1, Census Tract 30	3.1	2.5	1.8	16.4	733	98,400
Block Group 2, Census Tract 30	5.0	7.5	10.1	24.1	490	89,500
Block Group 1, Census Tract 31	35.9	10.5	29.4	21.1	454	68,800
Block Group 2, Census Tract 31	14.3	9.5	21.1	18.2	446	58,800
Block Group 3, Census Tract 31	21.7	11.5	15.6	21.4	489	62,300
Block Group 4, Census Tract 31	20.5	12.1	35.3	30.2	449	56,400
Block Group 5, Census Tract 31	50.2	8.8	40.9	18.0	415	50,000
Block Group 1, Census Tract 32	52.7	15.6	31.4	19.6	482	42,800
Block Group 2, Census Tract 32	58.4	21.2	24.7	21.7	546	36,500

**Table A.1 Continued**  
**Demographics for Block Groups**  
 City of Rockford  
 2000 Census SF1 and SF3 Data

Block Group 3, Census Tract 32	67.3	10.9	12.7	18.5	600	43,600
Block Group 4, Census Tract 32	71.3	7.1	27.0	28.7	405	56,100
Block Group 1, Census Tract 33	15.0	10.0	5.3	24.5	544	54,600
Block Group 2, Census Tract 33	18.5	12.7	12.0	20.2	554	57,100
Block Group 3, Census Tract 33	35.0	9.0	15.9	32.1	439	59,200
Block Group 4, Census Tract 33	15.5	8.0	14.4	24.1	517	37,700
Block Group 1, Census Tract 34	9.8	4.6	7.3	24.8	850	68,200
Block Group 2, Census Tract 34	7.1	10.1	7.5	12.9	614	63,400
Block Group 3, Census Tract 34	11.0	7.0	11.9	17.2	569	66,300
Block Group 4, Census Tract 34	9.5	9.0	4.6	17.0	527	60,000
Block Group 1, Census Tract 35	2.3	2.3	5.2	14.3	456	94,400
Block Group 2, Census Tract 35	0.7	1.9	0.0	8.1	675	118,900
Block Group 3, Census Tract 35	5.0	3.5	6.4	15.2	534	72,200
Block Group 1, Census Tract 36.01	3.9	5.8	14.9	26.0	483	53,800
Block Group 2, Census Tract 36.01	2.9	2.9	2.5	15.7	470	111,400
Block Group 1, Census Tract 36.02	10.3	3.1	7.3	17.8	489	93,200
Block Group 2, Census Tract 36.02	25.1	8.8	32.0	32.4	438	61,900
Block Group 3, Census Tract 36.02	3.5	4.3	14.0	25.9	464	62,500
Block Group 1, Census Tract 36.04	15.0	6.8	10.7	21.4	424	89,900
Block Group 2, Census Tract 36.04	9.9	8.0	11.6	16.6	525	72,500
Block Group 3, Census Tract 36.04	9.0	7.7	2.4	18.4	529	67,900
Block Group 1, Census Tract 36.05	20.7	4.3	11.5	19.3	604	79,200
Block Group 2, Census Tract 36.05	11.7	1.3	12.7	10.8	469	99,300
Block Group 1, Census Tract 36.06	13.2	5.6	8.6	24.0	470	82,100
Block Group 2, Census Tract 36.06	10.1	3.7	18.0	20.8	506	77,000
Block Group 3, Census Tract 36.06	15.9	5.7	17.2	10.7	486	65,800
Block Group 4, Census Tract 37.01	4.1	8.1	11.7	21.6	495	58,000
Block Group 5, Census Tract 37.01	0.0	0.5	3.1	19.2	563	89,200
Block Group 6, Census Tract 37.01	2.1	1.9	1.7	13.0	525	149,500
Block Group 1, Census Tract 37.06	3.7	5.5	4.7	24.1	396	91,500
Block Group 2, Census Tract 37.06	6.8	6.6	0.0	19.0	0	88,100
Block Group 3, Census Tract 37.06	6.4	3.2	0.4	9.8	0	108,600
Block Group 1, Census Tract 37.07	11.0	10.9	10.6	13.3	485	93,400
Block Group 1, Census Tract 37.08	10.9	8.5	8.5	9.8	591	81,200
Block Group 2, Census Tract 37.08	8.6	7.0	3.9	25.0	725	94,200
Block Group 3, Census Tract 37.08	19.4	8.4	7.7	20.1	449	85,900
Block Group 1, Census Tract 37.09	18.5	8.8	9.9	10.2	534	75,500
Block Group 2, Census Tract 37.09	16.9	10.0	11.7	18.1	556	80,100
Block Group 1, Census Tract 37.10	5.4	9.3	5.7	6.4	1,078	103,000
Block Group 2, Census Tract 38.01	5.8	2.7	11.8	17.2	1,054	130,600
Block Group 3, Census Tract 38.01	2.9	2.1	2.9	12.6	943	133,200
Block Group 1, Census Tract 42	0.8	1.6	1.5	8.8	549	151,300

**Table A.2**  
**Population Estimates**

City of Rockford  
 2000 Census and Intercensal Estimates

Place	2000	2001	2002	2003	2004	2005	2006	2007
Rockford	150,115	151,242	151,895	152,897	152,905	153,016	154,328	156,596

<b>Table A.3</b>			
<b>Percent Overcrowded</b>			
City of Rockford Census 2000 SF3 Data			
<b>Place</b>	<b>No Overcrowding</b>	<b>Overcrowding</b>	<b>Severe Overcrowding</b>
<b>Renter-Occupied</b>			
District 1	93.1%	3.4%	3.5%
District 2	93.5%	3.9%	2.6%
District 3	96.2%	2.5%	1.3%
<b>Rockford</b>	<b>94.2%</b>	<b>3.3%</b>	<b>2.5%</b>
<b>Owner-Occupied</b>			
District 1	96.1%	2.7%	1.2%
District 2	97.0%	1.9%	1.0%
District 3	98.9%	0.6%	0.5%
<b>Rockford</b>	<b>97.7%</b>	<b>1.5%</b>	<b>0.8%</b>
<b>Total</b>			
District 1	94.8%	3.0%	2.2%
District 2	95.3%	2.9%	1.8%
District 3	98.1%	1.2%	0.7%
<b>Rockford</b>	<b>96.3%</b>	<b>2.2%</b>	<b>1.5%</b>

<b>Table A.4</b>				
<b>Percent Cost Burdened by Tenure</b>				
City of Rockford Census 2000 SF3 Data				
<b>Place</b>	<b>No Cost Burden</b>	<b>Cost Burden</b>	<b>Severe Cost Burden</b>	<b>Not Computed</b>
<b>Renter-Occupied</b>				
District 1	54.7%	17.3%	19.9%	8.1%
District 2	58.0%	17.5%	16.0%	8.5%
District 3	64.4%	18.4%	13.5%	3.8%
<b>Rockford</b>	<b>58.7%</b>	<b>17.7%</b>	<b>16.7%</b>	<b>6.9%</b>
<b>Owner-Occupied with a Mortgage</b>				
District 1	72.5%	16.7%	9.9%	0.9%
District 2	74.4%	17.4%	7.5%	0.7%
District 3	79.4%	14.4%	6.1%	0.1%
<b>Rockford</b>	<b>76.3%</b>	<b>15.7%</b>	<b>7.5%</b>	<b>0.5%</b>
<b>Owner-Occupied without a Mortgage</b>				
District 1	86.1%	6.5%	5.1%	2.3%
District 2	83.6%	9.3%	3.2%	3.9%
District 3	92.2%	4.0%	3.6%	0.2%
<b>Rockford</b>	<b>88.8%</b>	<b>5.7%</b>	<b>4.0%</b>	<b>1.5%</b>
<b>Total</b>				
District 1	62.5%	34.0%	29.7%	9.0%
District 2	132.4%	34.9%	23.5%	9.2%
District 3	143.7%	32.8%	19.6%	3.9%
<b>Rockford</b>	<b>67.4%</b>	<b>16.7%</b>	<b>12.2%</b>	<b>3.7%</b>



## APPENDIX B. ADDITIONAL HMDA DATA

<b>Table B.1</b> <b>Owner-Occupied Home Purchase Loan Applications by Loan Type</b> City of Rockford HMDA Data 1999 - 2007					
Year	Conventional	FHA - Insured	VA - Guaranteed	Rural Housing Service or Farm Service Agency	Total
1999	2,502	1,570	132	7	4,211
2000	2,461	1,464	100	2	4,027
2001	2,181	1,357	94	1	3,633
2002	2,422	1,551	83	5	4,061
2003	3,438	1,702	87	0	5,227
2004	4,193	1,154	72	0	5,419
2005	5,236	798	77	1	6,112
2006	5,432	973	78	0	6,483
2007	3,634	841	43	2	4,520
<b>Total</b>	<b>31,499</b>	<b>11,410</b>	<b>766</b>	<b>18</b>	<b>43,693</b>

<b>Table B.2</b> <b>Owner-Occupied Home Purchase Loan Applications by Loan Type</b> City of Rockford HMDA Data 1999 - 2007			
Year	Male	Female	Total
1999	11.0%	14.3%	12.3%
2000	11.6%	15.4%	14.1%
2001	8.5%	13.9%	11.2%
2002	7.5%	9.6%	8.4%
2003	9.3%	10.9%	10.0%
2004	13.5%	16.1%	14.6%
2005	17.8%	21.1%	19.3%
2006	16.6%	20.5%	18.1%
2007	14.1%	16.6%	15.0%
<b>Total</b>	<b>12.6%</b>	<b>16.0%</b>	<b>14.0%</b>

**Table B.3**  
**Denial Rates by Income**  
 City of Rockford  
 HMDA Data 1999 - 2007

Income Group	1999	2000	2001	2002	2003	2004	2005	2006	2007	Total
\$15,000 or less	33.3%	41.4%	32.6%	29.6%	50.0%	48.4%	44.4%	34.0%	35.3%	38.6%
\$15,001 to \$30,000	14.2%	19.7%	15.1%	10.0%	12.5%	20.6%	25.7%	21.3%	19.3%	17.6%
\$30,001 to \$45,000	11.9%	13.2%	11.3%	8.6%	10.4%	13.6%	19.4%	20.1%	16.0%	14.1%
\$45,001 to \$60,000	11.2%	11.2%	7.5%	7.1%	9.1%	11.2%	17.1%	19.5%	13.3%	12.7%
\$60,001 to \$75,000	7.2%	9.4%	6.5%	4.5%	4.8%	12.1%	18.8%	14.5%	15.8%	11.2%
More than \$75,000	6.0%	4.0%	7.1%	4.4%	7.8%	7.0%	12.4%	12.2%	8.4%	8.5%
Data Missing	48.3%	23.1%	13.5%	13.8%	8.6%	27.2%	15.7%	17.1%	22.0%	17.3%
<b>Total</b>	<b>12.3%</b>	<b>14.1%</b>	<b>11.2%</b>	<b>8.4%</b>	<b>10.0%</b>	<b>14.6%</b>	<b>19.3%</b>	<b>18.1%</b>	<b>15.0%</b>	<b>14.0%</b>

**Table B.4**  
**Percent Denial Rates by Income by Race**  
 City of Rockford  
 HMDA Data 1999 - 2007

Race	<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	> \$75K	Data Missing	Total
American Indian or Alaskan Native	0.0%	16.9%	18.0%	13.3%	42.9%	0.0%	0.0%	16.5%
Asian or Pacific Islander	50.0%	15.1%	15.0%	9.6%	16.3%	11.8%	15.0%	13.5%
Black	42.7%	29.5%	23.9%	23.2%	25.3%	19.3%	30.6%	25.8%
Hispanic (Race)	20.0%	9.1%	11.7%	9.0%	9.8%	19.0%	18.8%	10.6%
White	38.7%	15.6%	12.0%	10.8%	8.8%	7.0%	14.3%	11.7%
Other	50.0%	25.0%	11.4%	14.3%	0.0%	6.3%	0.0%	14.5%
Not Provided by Applicant	56.5%	30.8%	24.8%	23.7%	15.4%	13.6%	25.5%	23.8%
Not Applicable	.	30.0%	37.5%	100.0%	0.0%	0.0%	0.0%	21.2%
<b>Total</b>	<b>38.6%</b>	<b>17.6%</b>	<b>14.1%</b>	<b>12.7%</b>	<b>11.2%</b>	<b>8.5%</b>	<b>17.3%</b>	<b>14.0%</b>
Hispanic (Ethnicity)	40.4%	24.7%	23.6%	21.3%	29.7%	22.5%	16.7%	24.1%

**Table B.5**  
**Owner-Occupied Home Purchase Loan Applications by Race:**  
**Originated and Denied**  
City of Rockford  
HMDA Data 1999 - 2007

<b>Action Taken</b>	<b>American Indian or Alaskan Native</b>	<b>Asian or Pacific Islander</b>	<b>Black</b>	<b>Hispanic (Race)</b>	<b>White</b>	<b>Not Provided by Applicant</b>	<b>Not Applicable</b>	<b>Total</b>	<b>Hispanic (Ethnicity)</b>	
1999	Loan Originated	31	32	200	310	1,726	15	88	2,402	.
	Application Denied	2	3	52	51	190	3	36	337	.
	Denial Rate %	6.1%	8.6%	20.6%	14.1%	9.9%	16.7%	29.0%	12.3%	.
2000	Loan Originated	18	40	224	345	1,636	18	104	2,385	.
	Application Denied	3	5	77	52	182	4	68	391	.
	Denial Rate %	14.3%	11.1%	25.6%	13.1%	10.0%	18.2%	39.5%	14.1%	.
2001	Loan Originated	7	36	178	328	1,662	18	138	2,367	.
	Application Denied	0	5	56	28	152	2	55	298	.
	Denial Rate %	0.0%	12.2%	23.9%	7.9%	8.4%	10.0%	28.5%	11.2%	.
2002	Loan Originated	5	34	211	353	1,673	16	300	2,592	.
	Application Denied	0	2	32	25	143	2	33	237	.
	Denial Rate %	0.0%	5.6%	13.2%	6.6%	7.9%	11.1%	9.9%	8.4%	.
2003	Loan Originated	5	66	222	408	2,243	27	273	3,244	.
	Application Denied	0	12	45	51	195	5	54	362	.
	Denial Rate %	0.0%	15.4%	16.9%	11.1%	8.0%	15.6%	16.5%	10.0%	.
2004	Loan Originated	40	70	283	.	2,493	193	19	3,098	394
	Application Denied	7	13	95	.	326	82	5	528	100
	Denial Rate %	14.9%	15.7%	25.1%	.	11.6%	29.8%	20.8%	14.6%	20.2%
2005	Loan Originated	23	82	280	.	2,603	184	2	3,174	402
	Application Denied	10	17	150	.	501	80	0	758	125
	Denial Rate %	30.3%	17.2%	34.9%	.	16.1%	30.3%	0.0%	19.3%	23.7%
2006	Loan Originated	21	85	322	.	2,804	188	.	3,420	441
	Application Denied	4	15	165	.	502	69	.	755	169
	Denial Rate %	16.0%	15.0%	33.9%	.	15.2%	26.8%	.	18.1%	27.7%
2007	Loan Originated	22	72	202	.	1,964	168	.	2,428	326
	Application Denied	8	9	65	.	312	34	.	428	101
	Denial Rate %	26.7%	11.1%	24.3%	.	13.7%	16.8%	.	15.0%	23.7%
Total	Loan Originated	172	517	2,122	1,744	18,804	827	924	25,110	1,563
	Application Denied	34	81	737	207	2,503	281	251	4,094	495
	Denial Rate %	16.5%	13.5%	25.8%	10.6%	11.7%	25.4%	21.4%	14.0%	24.1%

**Table B.6**  
**Owner-Occupied Home Purchase Loan Applications by Gender:**  
**Originated and Denied**

City of Rockford  
HMDA Data 1999 - 2007

<b>Action Taken</b>	<b>Male</b>	<b>Female</b>	<b>Not Provided by Applicant</b>	<b>Not Applicable</b>	<b>Total</b>	
1999	Loan Originated	1,789	533	78	2	2,402
	Application Denied	221	89	27	0	337
	Denial Rate %	11.0%	14.3%	25.7%	0.0%	12.3%
2000	Loan Originated	1,662	653	68	2	2,385
	Application Denied	218	119	54	0	391
	Denial Rate %	11.6%	15.4%	44.3%	0.0%	14.1%
2001	Loan Originated	1,667	628	71	1	2,367
	Application Denied	155	101	42	0	298
	Denial Rate %	8.5%	13.9%	37.2%	0.0%	11.2%
2002	Loan Originated	1,694	727	171	.	2,592
	Application Denied	138	77	22	.	237
	Denial Rate %	7.5%	9.6%	11.4%	.	8.4%
2003	Loan Originated	2,192	898	153	1	3,244
	Application Denied	226	110	26	0	362
	Denial Rate %	9.3%	10.9%	14.5%	0.0%	10.0%
2004	Loan Originated	2,081	927	90	.	3,098
	Application Denied	324	178	26	.	528
	Denial Rate %	13.5%	16.1%	22.4%	.	14.6%
2005	Loan Originated	2,091	996	85	2	3,174
	Application Denied	454	266	38	0	758
	Denial Rate %	17.8%	21.1%	30.9%	0.0%	19.3%
2006	Loan Originated	2,286	1,040	94	.	3,420
	Application Denied	454	268	33	.	755
	Denial Rate %	16.6%	20.5%	26.0%	.	18.1%
2007	Loan Originated	1,578	772	78	.	2,428
	Application Denied	260	154	14	.	428
	Denial Rate %	14.1%	16.6%	15.2%	.	15.0%
Total	Loan Originated	17,040	7,174	888	8	25,110
	Application Denied	2,450	1,362	282	0	4,094
	Denial Rate %	12.6%	16.0%	24.1%	0.0%	14.0%

**Table B.7**  
**Owner-Occupied Home Purchase Loan Applications by Ethnicity:**  
**Originated and Denied**

City of Rockford  
HMDA Data 2004 - 2007

<b>Ethnicity</b>		<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>Total</b>
Hispanic or Latino	Loan Originated	394	402	441	326	1,563
	Application Denied	100	125	169	101	495
	Denial Rate %	20.2%	23.7%	27.7%	23.7%	24.1%
Not Hispanic of Latino	Loan Originated	2,286	2,590	2,803	1,943	9,622
	Application Denied	320	536	520	304	1,680
	Denial Rate %	12.3%	17.1%	15.6%	13.5%	14.9%
Not Provided by Applicant	Loan Originated	222	180	176	159	737
	Application Denied	91	97	66	23	277
	Denial Rate %	29.1%	35.0%	27.3%	12.6%	27.3%
Not Applicable	Loan Originated	196	2	.	.	198
	Application Denied	17	0	.	.	17
	Denial Rate %	8.0%	0.0%	.	.	7.9%
Total	Loan Originated	3,098	3,174	3,420	2,428	12,120
	Application Denied	528	758	755	428	2,469
	Denial Rate %	14.6%	19.3%	18.1%	15.0%	16.9%

**Table B.8**  
**Action of Owner-Occupied Home Purchase Loan Applications by Income:**  
**Originated and Denied**  
City of Rockford  
HMDA Data 1999 - 2007

Income Group		1999	2000	2001	2002	2003	2004	2005	2006	2007	Total
\$15,000 or less	Loan Originated	42	34	31	38	19	32	25	35	22	278
	Application Denied	21	24	15	16	19	30	20	18	12	175
	Denial Rate %	33.3%	41.4%	32.6%	29.6%	50.0%	48.4%	44.4%	34.0%	35.3%	38.6%
More than \$15,000 up to \$30,000	Loan Originated	681	675	637	711	706	656	617	578	482	5,743
	Application Denied	113	166	113	79	101	170	213	156	115	1,226
	Denial Rate %	14.2%	19.7%	15.1%	10.0%	12.5%	20.6%	25.7%	21.3%	19.3%	17.6%
More than \$30,000 up to \$45,000	Loan Originated	734	679	705	721	914	874	908	853	639	7,027
	Application Denied	99	103	90	68	106	138	218	214	122	1,158
	Denial Rate %	11.9%	13.2%	11.3%	8.6%	10.4%	13.6%	19.4%	20.1%	16.0%	14.1%
More than \$45,000 up to \$60,000	Loan Originated	446	434	457	419	647	628	648	734	495	4,908
	Application Denied	56	55	37	32	65	79	134	178	76	712
	Denial Rate %	11.2%	11.2%	7.5%	7.1%	9.1%	11.2%	17.1%	19.5%	13.3%	12.7%
More than \$60,000 up to \$75,000	Loan Originated	219	231	230	278	340	328	346	447	255	2,674
	Application Denied	17	24	16	13	17	45	80	76	48	336
	Denial Rate %	7.2%	9.4%	6.5%	4.5%	4.8%	12.1%	18.8%	14.5%	15.8%	11.2%
More than \$75,000	Loan Originated	265	312	262	344	458	505	544	686	503	3,879
	Application Denied	17	13	20	16	39	38	77	95	46	361
	Denial Rate %	6.0%	4.0%	7.1%	4.4%	7.8%	7.0%	12.4%	12.2%	8.4%	8.5%
Data Missing	Loan Originated	15	20	45	81	160	75	86	87	32	601
	Application Denied	14	6	7	13	15	28	16	18	9	126
	Denial Rate %	48.3%	23.1%	13.5%	13.8%	8.6%	27.2%	15.7%	17.1%	22.0%	17.3%
Total	Loan Originated	2,402	2,385	2,367	2,592	3,244	3,098	3,174	3,420	2,428	25,110
	Application Denied	337	391	298	237	362	528	758	755	428	4,094
	Denial Rate %	12.3%	14.1%	11.2%	8.4%	10.0%	14.6%	19.3%	18.1%	15.0%	14.0%

**Table B.9**  
**Action of Owner-Occupied Home Purchase Loan Applications by Income By Race:**  
**Originated and Denied**  
City of Rockford  
HMDA Data 1999 - 2007

Race		<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	> \$75K	Data Missing	Total
American Indian or Alaskan Native	Loan Originated	5	54	50	39	8	13	3	172
	Application Denied	0	11	11	6	6	0	0	34
	Denial Rate %	0.0%	16.9%	18.0%	13.3%	42.9%	0.0%	0.0%	16.5%
Asian or Pacific Islander	Loan Originated	2	73	136	132	67	90	17	517
	Application Denied	2	13	24	14	13	12	3	81
	Denial Rate %	50.0%	15.1%	15.0%	9.6%	16.3%	11.8%	15.0%	13.5%
Black	Loan Originated	43	623	621	387	201	222	25	2,122
	Application Denied	32	261	195	117	68	53	11	737
	Denial Rate %	42.7%	29.5%	23.9%	23.2%	25.3%	19.3%	30.6%	25.8%
Hispanic (Race)	Loan Originated	44	850	534	182	74	34	26	1,744
	Application Denied	11	85	71	18	8	8	6	207
	Denial Rate %	20.0%	9.1%	11.7%	9.0%	9.8%	19.0%	18.8%	10.6%
White	Loan Originated	163	3,796	5,233	3,879	2,126	3,194	413	18,804
	Application Denied	103	704	714	468	206	239	69	2,503
	Denial Rate %	38.7%	15.6%	12.0%	10.8%	8.8%	7.0%	14.3%	11.7%
Other	Loan Originated	1	21	39	12	4	15	2	94
	Application Denied	1	7	5	2	0	1	0	16
	Denial Rate %	50.0%	25.0%	11.4%	14.3%	0.0%	6.3%	0.0%	14.5%
Not Provided by Applicant	Loan Originated	20	319	409	277	192	306	108	1,631
	Application Denied	26	142	135	86	35	48	37	509
	Denial Rate %	56.5%	30.8%	24.8%	23.7%	15.4%	13.6%	25.5%	23.8%
Not Applicable	Loan Originated	.	7	5	0	2	5	7	26
	Application Denied	.	3	3	1	0	0	0	7
	Denial Rate %	.	30.0%	37.5%	100.0%	0.0%	0.0%	0.0%	21.2%
Total	Loan Originated	278	5,743	7,027	4,908	2,674	3,879	601	25,110
	Application Denied	175	1,226	1,158	712	336	361	126	4,094
	Denial Rate %	38.6%	17.6%	14.1%	12.7%	11.2%	8.5%	17.3%	14.0%
Hispanic (Ethnic)	Loan Originated	28	484	504	307	90	110	40	1,563
	Application Denied	19	159	156	83	38	32	8	495
	Denial Rate %	40.4%	24.7%	23.6%	21.3%	29.7%	22.5%	16.7%	24.1%

**Table B.10**  
**Owner-Occupied Home Purchase Loan Applications by Income:**  
**Originated and Denied**

City of Rockford  
HMDA Data 1999 - 2007

Lender Type		<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	> \$75K	Data Missing	Total
Prime Lender	Loan Originated	259	5,281	6,449	4,459	2,498	3,664	565	23,175
	Application Denied	122	850	796	499	243	251	100	2,861
	Denial Rate %	32.0%	13.9%	11.0%	10.1%	8.9%	6.4%	15.0%	11.0%
Sub Prime Lender	Loan Originated	16	440	555	438	172	214	36	1,871
	Application Denied	51	348	341	206	91	110	26	1,173
	Denial Rate %	76.1%	44.2%	38.1%	32.0%	34.6%	34.0%	41.9%	38.5%
Manufactured Home Lender	Loan Originated	3	22	23	11	4	1	.	64
	Application Denied	2	28	21	7	2	0	.	60
	Denial Rate %	40.0%	56.0%	47.7%	38.9%	33.3%	0.0%	.	48.4%
Total	Loan Originated	278	5,743	7,027	4,908	2,674	3,879	601	25,110
	Application Denied	175	1,226	1,158	712	336	361	126	4,094
	Denial Rate %	38.6%	17.6%	14.1%	12.7%	11.2%	8.5%	17.3%	14.0%

**Table B.11**  
**Owner-Occupied Home Purchase Loan Applications by Income:**  
**Originated and Denied**

City of Rockford  
HMDA Data 1999 - 2007

Lender Type	<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	> \$75K	Data Missing	Total
Prime Lender	32.0%	13.9%	11.0%	10.1%	8.9%	6.4%	15.0%	11.0%
Sub Prime Lender	76.1%	44.2%	38.1%	32.0%	34.6%	34.0%	41.9%	38.5%
Manufactured Home Lender	40.0%	56.0%	47.7%	38.9%	33.3%	0.0%	.	48.4%
Total	38.6%	17.6%	14.1%	12.7%	11.2%	8.5%	17.3%	14.0%

**Table B.12**  
**Originated and Denied Loan Applications by Type of Lender:**  
**Originated and Denied**  
 City of Rockford  
 HMDA Data 1999 - 2007

<b>Type of Lender</b>		<b>1999</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>Total</b>
Prime Lender	Loan Originated	2,260	2,260	2,254	2,469	3,015	2,711	2,682	3,126	2,398	23,175
	Application Denied	239	274	215	157	248	333	476	529	390	2,861
	Denial Rate	9.6%	10.8%	8.7%	6.0%	7.6%	10.9%	15.1%	14.5%	14.0%	11.0%
Subprime Lender	Loan Originated	118	108	94	123	225	387	492	294	30	1,871
	Application Denied	73	100	74	78	107	195	282	226	38	1,173
	Denial Rate	38.2%	48.1%	44.0%	38.8%	32.2%	33.5%	36.4%	43.5%	55.9%	38.5%
Manufactured Home Lender	Loan Originated	24	17	19	0	4	0	0	0	0	64
	Application Denied	25	17	9	2	7	0	0	0	0	60
	Denial Rate	51.0%	50.0%	32.1%	100.0%	63.6%	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	48.4%
Total	Loan Originated	2,402	2,385	2,367	2,592	3,244	3,098	3,174	3,420	2,428	25,110
	Application Denied	337	391	298	237	362	528	758	755	428	4,094
	Denial Rate	12.3%	14.1%	11.2%	8.4%	10.0%	14.6%	19.3%	18.1%	15.0%	14.0%

**Table B.13**  
**Prime Lender Owner-Occupied Home Purchase Loan Applications:**  
**Originated and Denied**  
City of Rockford  
HMDA Data 1999 - 2007

<b>Action Taken</b>	<b>American Indian or Alaskan Native</b>	<b>Asian or Pacific Islander</b>	<b>Black</b>	<b>Hispanic (Race)</b>	<b>White</b>	<b>Other</b>	<b>Not Provided by Applicant</b>	<b>Not Applicable</b>	<b>Total</b>	<b>Hispanic (Ethnicity)</b>	
1999	Loan Originated	6	32	188	304	1,652	15	61	2	2,260	.
	Application Denied	1	3	40	38	139	1	17	0	239	.
	Denial Rate %	14.3%	8.6%	17.5%	11.1%	7.8%	6.3%	21.8%	0.0%	9.6%	.
2000	Loan Originated	17	40	203	334	1,565	18	83	.	2,260	.
	Application Denied	3	4	47	47	133	1	39	.	274	.
	Denial Rate %	15.0%	9.1%	18.8%	.	7.8%	5.3%	32.0%	.	10.8%	.
2001	Loan Originated	7	36	159	324	1,585	16	126	1	2,254	.
	Application Denied	0	5	36	24	107	2	41	0	215	.
	Denial Rate %	0.0%	12.2%	18.5%	6.9%	6.3%	11.1%	24.6%	0.0%	8.7%	.
2002	Loan Originated	5	32	193	347	1,594	15	283	.	2,469	.
	Application Denied	0	1	16	24	95	2	19	.	157	.
	Denial Rate %	0.0%	3.0%	7.7%	6.5%	5.6%	11.8%	6.3%	.	6.0%	.
2003	Loan Originated	5	62	179	385	2,115	27	241	1	3,015	.
	Application Denied	0	8	26	41	145	1	27	0	248	.
	Denial Rate %	0.0%	11.4%	12.7%	9.6%	6.4%	3.6%	10.1%	0.0%	7.6%	.
2004	Loan Originated	32	64	236	.	2,203	.	159	17	2,711	343
	Application Denied	4	12	52	.	219	.	42	4	333	73
	Denial Rate %	11.1%	15.8%	18.1%	.	9.0%	.	20.9%	19.0%	10.9%	17.5%
2005	Loan Originated	19	75	197	.	2,235	.	154	2	2,682	301
	Application Denied	8	8	78	.	335	.	47	0	476	95
	Denial Rate %	29.6%	9.6%	28.4%	.	13.0%	.	23.4%	0.0%	15.1%	24.0%
2006	Loan Originated	19	76	270	.	2,598	.	163	.	3,126	385
	Application Denied	4	14	100	.	364	.	47	.	529	122
	Denial Rate %	17.4%	15.6%	27.0%	.	12.3%	.	22.4%	.	14.5%	24.1%
2007	Loan Originated	22	71	201	.	1,942	.	162	.	2,398	321
	Application Denied	7	8	65	.	278	.	32	.	390	94
	Denial Rate %	24.1%	10.1%	24.4%	.	12.5%	.	16.5%	.	14.0%	22.7%
Total	Loan Originated	132	488	1,826	1,694	17,489	91	1,432	23	23,175	1,350
	Application Denied	27	63	460	174	1,815	7	311	4	2,861	384
	Denial Rate %	17.0%	11.4%	20.1%	9.3%	9.4%	7.1%	17.8%	14.8%	11.0%	22.1%

**Table B.14**  
**Sub-Prime Lender Owner-Occupied Home Purchase Loan Applications:**  
**Originated and Denied**  
City of Rockford  
HMDA Data 1999 - 2007

<b>Action Taken</b>	<b>American Indian or Alaskan Native</b>	<b>Asian or Pacific Islander</b>	<b>Black</b>	<b>Hispanic (Race)</b>	<b>White</b>	<b>Other</b>	<b>Not Provided by Applicant</b>	<b>Not Applicable</b>	<b>Total</b>	<b>Hispanic (Ethnicity)</b>
1999 Loan Originated	25	.	12	6	50	0	25	0	118	.
1999 Application Denied	1	.	12	11	31	1	15	2	73	.
1999 Denial Rate %	3.8%	.	50.0%	64.7%	38.3%	100.0%	37.5%	100.0%	38.2%	.
2000 Loan Originated	1	0	21	11	55	0	20	.	108	.
2000 Application Denied	0	1	30	4	40	3	22	.	100	.
2000 Denial Rate %	0.0%	100.0%	58.8%	26.7%	42.1%	100.0%	52.4%	.	48.1%	.
2001 Loan Originated	.	.	19	4	59	2	10	.	94	.
2001 Application Denied	.	.	19	3	41	0	11	.	74	.
2001 Denial Rate %	.	.	50.0%	42.9%	41.0%	0.0%	52.4%	.	44.0%	.
2002 Loan Originated	.	2	18	6	79	1	16	1	123	.
2002 Application Denied	.	1	16	1	47	0	13	0	78	.
2002 Denial Rate %	.	33.3%	47.1%	14.3%	37.3%	0.0%	44.8%	.	38.8%	.
2003 Loan Originated	.	4	42	23	128	0	28	.	225	.
2003 Application Denied	.	4	18	9	45	4	27	.	107	.
2003 Denial Rate %	.	50.0%	30.0%	28.1%	26.0%	100.0%	49.1%	.	32.2%	.
2004 Loan Originated	8	6	47	.	290	.	34	2	387	51
2004 Application Denied	3	1	43	.	107	.	40	1	195	27
2004 Denial Rate %	27.3%	14.3%	47.8%	.	27.0%	.	54.1%	33.3%	33.5%	34.6%
2005 Loan Originated	4	7	83	.	368	.	30	.	492	101
2005 Application Denied	2	9	72	.	166	.	33	.	282	30
2005 Denial Rate %	33.3%	56.3%	46.5%	.	31.1%	.	52.4%	.	36.4%	22.9%
2006 Loan Originated	2	9	52	.	206	.	25	.	294	56
2006 Application Denied	0	1	65	.	138	.	22	.	226	47
2006 Denial Rate %	0.0%	10.0%	55.6%	.	40.1%	.	46.8%	.	43.5%	45.6%
2007 Loan Originated	0	1	1	.	22	.	6	.	30	5
2007 Application Denied	1	1	0	.	34	.	2	.	38	7
2007 Denial Rate %	100.0%	50.0%	0.0%	.	60.7%	.	25.0%	.	55.9%	58.3%
Total Loan Originated	40	29	295	50	1,257	3	194	3	1,871	213
Total Application Denied	7	18	275	28	649	8	185	3	1,173	111
Total Denial Rate %	14.9%	38.3%	48.2%	35.9%	34.1%	72.7%	48.8%	50.0%	38.5%	34.3%

**Table B.15**  
**Sub-Prime Lender Owner-Occupied Home Purchase Loan Applications:**  
**Originated and Denied**  
City of Rockford  
HMDA Data 1999 - 2003

<b>Action Taken</b>	<b>Black</b>	<b>Hispanic (Race)</b>	<b>White</b>	<b>Other</b>	<b>Not Provided by Applicant</b>	<b>Total</b>
1999 Loan Originated	.	0	24	0	0	24
1999 Application Denied	.	2	20	1	2	25
1999 Denial Rate %	.	100.0%	45.5%	100.0%	100.0%	51.0%
2000 Loan Originated	.	0	16	.	1	17
2000 Application Denied	.	1	9	.	7	17
2000 Denial Rate %	.	100.0%	36.0%	.	87.5%	50.0%
2001 Loan Originated	0	0	18	.	1	19
2001 Application Denied	1	1	4	.	3	9
2001 Denial Rate %	100.0%	100.0%	18.2%	.	75.0%	32.1%
2002 Loan Originated	.	.	0	.	0	0
2002 Application Denied	.	.	1	.	1	2
2002 Denial Rate %	.	.	100.0%	.	100.0%	100.0%
2003 Loan Originated	1	0	0	.	3	4
2003 Application Denied	1	1	5	.	0	7
2003 Denial Rate %	50.0%	100.0%	100.0%	.	0.0%	63.6%
Total Loan Originated	1	0	58	0	5	64
Total Application Denied	2	5	39	1	13	60
Total Denial Rate %	66.7%	100.0%	40.2%	100.0%	72.2%	48.4%

**Table B.16**  
**Prime Lender Owner-Occupied Home Purchase Loan Applications:**  
**Originated and Denied**

City of Rockford  
HMDA Data 1999 - 2007

<b>Action Taken</b>	<b>Male</b>	<b>Female</b>	<b>Not Provided by Applicant</b>	<b>Not Applicable</b>	<b>Total</b>
1999 Loan Originated	1,708	491	59	2	2,260
1999 Application Denied	158	66	15	0	239
1999 Denial Rate %	8.5%	11.8%	20.3%	0.0%	9.6%
2000 Loan Originated	1,587	611	60	2	2,260
2000 Application Denied	161	79	34	0	274
2000 Denial Rate %	9.2%	11.4%	36.2%	0.0%	10.8%
2001 Loan Originated	1,597	588	68	1	2,254
2001 Application Denied	115	65	35	0	215
2001 Denial Rate %	6.7%	10.0%	34.0%	0.0%	8.7%
2002 Loan Originated	1,619	688	162	.	2,469
2002 Application Denied	98	45	14	.	157
2002 Denial Rate %	5.7%	6.1%	8.0%	.	6.0%
2003 Loan Originated	2,049	825	140	1	3,015
2003 Application Denied	159	71	18	0	248
2003 Denial Rate %	7.2%	7.9%	11.4%	0.0%	7.6%
2004 Loan Originated	1,850	779	82	.	2,711
2004 Application Denied	215	97	21	.	333
2004 Denial Rate %	10.4%	11.1%	20.4%	.	10.9%
2005 Loan Originated	1,787	827	66	2	2,682
2005 Application Denied	290	159	27	0	476
2005 Denial Rate %	14.0%	16.1%	29.0%	0.0%	15.1%
2006 Loan Originated	2,112	932	82	.	3,126
2006 Application Denied	329	174	26	.	529
2006 Denial Rate %	13.5%	15.7%	24.1%	.	14.5%
2007 Loan Originated	1,562	759	77	.	2,398
2007 Application Denied	236	140	14	.	390
2007 Denial Rate %	13.1%	15.6%	15.4%	.	14.0%
Total Loan Originated	15,871	6,500	796	8	23,175
Total Application Denied	1,761	896	204	0	2,861
Total Denial Rate %	10.0%	12.1%	20.4%	0.0%	11.0%

**Table B.17**  
**Sub-Prime Lender Owner-Occupied Home Purchase Loan**  
**Applications: Originated and Denied**

City of Rockford  
HMDA Data 2001 - 2006

<b>Action Taken</b>	<b>Male</b>	<b>Female</b>	<b>Not Provided by Applicant</b>	<b>Total</b>
1999 Loan Originated	68	31	19	118
1999 Application Denied	46	16	11	73
1999 Denial Rate %	40.4%	34.0%	36.7%	38.2%
2000 Loan Originated	63	37	8	108
2000 Application Denied	52	35	13	100
2000 Denial Rate %	45.2%	48.6%	61.9%	48.1%
2001 Loan Originated	55	36	3	94
2001 Application Denied	37	33	4	74
2001 Denial Rate %	40.2%	47.8%	57.1%	44.0%
2002 Loan Originated	75	39	9	123
2002 Application Denied	39	32	7	78
2002 Denial Rate %	34.2%	45.1%	43.8%	38.8%
2003 Loan Originated	143	71	11	225
2003 Application Denied	62	37	8	107
2003 Denial Rate %	30.2%	34.3%	42.1%	32.2%
2004 Loan Originated	231	148	8	387
2004 Application Denied	109	81	5	195
2004 Denial Rate %	32.1%	35.4%	38.5%	33.5%
2005 Loan Originated	304	169	19	492
2005 Application Denied	164	107	11	282
2005 Denial Rate %	35.0%	38.8%	36.7%	36.4%
2006 Loan Originated	174	108	12	294
2006 Application Denied	125	94	7	226
2006 Denial Rate %	41.8%	46.5%	36.8%	43.5%
2007 Loan Originated	16	13	1	30
2007 Application Denied	24	14	0	38
2007 Denial Rate %	60.0%	51.9%	0.0%	55.9%
Total Loan Originated	1,129	652	90	1,871
Total Application Denied	658	449	66	1,173
Total Denial Rate %	36.8%	40.8%	42.3%	38.5%

**Table B.18**  
**Mobile Home Lender Owner-Occupied Home Purchase Loan**  
**Applications: Originated and Denied**  
City of Rockford  
HMDA Data 1999 - 2007

<b>Action Taken</b>	<b>Male</b>	<b>Female</b>	<b>Not Provided by Applicant</b>	<b>Total</b>	
1999	Loan Originated	13	11	0	24
	Application Denied	17	7	1	25
	Denial Rate %	56.7%	38.9%	100.0%	51.0%
2000	Loan Originated	12	5	0	17
	Application Denied	5	5	7	17
	Denial Rate %	29.4%	50.0%	100.0%	50.0%
2001	Loan Originated	15	4	0	19
	Application Denied	3	3	3	9
	Denial Rate %	16.7%	42.9%	100.0%	32.1%
2002	Loan Originated	0	.	0	0
	Application Denied	1	.	1	2
	Denial Rate %	100.0%	.	100.0%	100.0%
2003	Loan Originated	0	2	2	4
	Application Denied	5	2	0	7
	Denial Rate %	100.0%	50.0%	0.0%	63.6%
Total	Loan Originated	40	22	2	64
	Application Denied	31	17	12	60
Denial Rate %	43.7%	43.6%	85.7%	48.4%	

**Table B.19**  
**HMDA Denial Rates By Census Tract**  
 City of Rockford  
 HMDA Data 1999 - 2007

Census Tract	White Denial Rate	Minority Denial Rate	Total Denial Rate
3.00	.	.	.
4.01	5.7%	2.4%	5.7%
4.02	8.3%	14.5%	9.0%
4.03	8.8%	9.9%	9.1%
5.01	8.2%	16.8%	10.2%
5.02	11.5%	15.3%	12.5%
5.04	5.2%	17.4%	7.3%
5.06	7.4%	13.3%	8.6%
5.07	8.0%	7.3%	7.2%
5.10	7.7%	12.9%	9.6%
5.11	13.0%	0.0%	10.9%
5.12	10.1%	24.8%	12.8%
5.13	4.6%	5.8%	5.9%
5.14	.	.	.
6.00	7.2%	18.5%	9.0%
7.00	6.9%	11.7%	7.3%
8.00	13.6%	25.0%	16.2%
10.00	20.8%	28.3%	24.4%
11.00	34.2%	48.4%	41.8%
12.00	32.8%	19.1%	29.7%
13.00	15.6%	22.2%	18.9%
14.00	12.9%	12.6%	14.6%
15.00	10.0%	9.5%	10.4%
16.00	8.2%	10.4%	8.8%
17.00	5.7%	7.4%	6.8%
18.00	19.0%	14.8%	18.4%
19.00	18.4%	21.0%	18.6%
20.00	16.2%	8.8%	15.5%
21.00	32.3%	27.4%	30.1%
22.00	22.3%	20.8%	22.7%
23.01	25.0%	19.8%	26.7%
23.02	17.2%	10.5%	16.7%
24.00	29.8%	24.2%	26.7%
25.00	38.9%	38.5%	40.4%
26.00	41.3%	25.0%	34.5%

**Table B.19 Continued**  
**HMDA Denial Rates By Census Tract**  
 City of Rockford  
 HMDA Data 1999 - 2007

Census Tract	White Denial Rate	Minority Denial Rate	Total Denial Rate
27.00	33.1%	16.4%	25.0%
28.00	25.9%	23.2%	28.0%
29.00	60.0%	85.7%	73.1%
30.00	13.7%	25.0%	15.5%
31.00	17.8%	30.9%	21.8%
32.00	23.4%	24.4%	25.2%
33.00	17.0%	21.3%	19.5%
34.00	12.6%	15.6%	13.4%
35.00	6.5%	17.2%	6.8%
36.01	15.0%	16.7%	18.4%
36.02	9.9%	18.4%	15.4%
36.04	10.4%	17.2%	12.7%
36.05	9.3%	21.1%	12.0%
36.06	13.7%	17.5%	15.2%
37.01	17.5%	23.0%	21.8%
37.06	10.7%	14.2%	11.9%
37.07	6.5%	18.6%	9.4%
37.08	19.5%	26.3%	20.5%
37.09	18.3%	22.6%	19.1%
37.1	9.7%	22.0%	11.8%
38.01	6.9%	25.0%	9.6%
42.00	.	.	.
<b>Total</b>	<b>11.7%</b>	<b>18.9%</b>	<b>14.0%</b>

**Table B.20**  
**Rate of Predatory Loans of Originated Owner-Occupied Home**  
**Purchase Loans by Race**

City of Rockford  
 FFIEC HMDA Data 2004 - 2007

<b>Race</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>Total</b>
American Indian	22.5%	56.5%	47.6%	63.6%	43.4%
Asian	14.3%	29.3%	32.9%	13.9%	23.3%
Black or African American	31.1%	62.1%	52.8%	36.1%	46.5%
White	17.4%	31.6%	29.7%	22.6%	25.7%
Not Provided by Applicant	21.2%	44.0%	33.5%	29.8%	32.1%
Not Applicable	10.5%	0.0%	.	0.0%	9.5%
<b>Total</b>	<b>18.9%</b>	<b>35.1%</b>	<b>32.3%</b>	<b>24.3%</b>	<b>28.0%</b>

**Table B.21**  
**Rate of Predatory Loans of Originated Owner-Occupied Home**  
**Purchase Loans by Gender**

City of Rockford  
 FFIEC HMDA Data 2004 - 2007

<b>Gender</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>Total</b>
Male	17.2%	32.9%	30.8%	23.1%	26.3%
Female	23.5%	40.2%	35.9%	27.1%	32.1%
Not Provided by Applicant	11.1%	30.6%	27.7%	21.8%	22.8%
<b>Total</b>	<b>18.9%</b>	<b>35.1%</b>	<b>32.3%</b>	<b>24.3%</b>	<b>28.0%</b>

**Table B.22**  
**Rate of Predatory Loans of Originated Owner-Occupied Home**  
**Purchase Loans by Hispanic Ethnicity**

City of Rockford  
 FFIEC HMDA Data 2004 - 2007

<b>Ethnicity</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>Total</b>
Hispanic or Latino	27.2%	50.5%	49.7%	48.5%	44.0%
Not Hispanic or Latino	18.2%	32.0%	29.5%	20.2%	25.6%
Not Provided by Applicant	23.0%	46.1%	33.0%	25.2%	31.5%
Not Applicable	6.1%	.	.	.	6.1%
<b>Total</b>	<b>18.9%</b>	<b>35.1%</b>	<b>32.3%</b>	<b>24.3%</b>	<b>28.0%</b>

**Table B.23**  
**Originated Owner-Occupied Home Purchase Loans by Race and by**  
**Predatory Loan Status**

City of Rockford  
FFIEC HMDA Data 2004 - 2007

Race	Loan Type	2004	2005	2006	2007	Total
American Indian	Other Originated	31	10	11	8	60
	High APR Loan	9	13	10	14	46
	Percent High APR	22.5%	56.5%	47.6%	63.6%	43.4%
Asian	Other Originated	60	58	57	62	237
	High APR Loan	10	24	28	10	72
	Percent High APR	14.3%	29.3%	32.9%	13.9%	23.3%
Black or African American	Other Originated	195	106	152	129	582
	High APR Loan	88	174	170	73	505
	Percent High APR	31.1%	62.1%	52.8%	36.1%	46.5%
White	Other Originated	2,058	1,781	1,972	1,521	7,332
	High APR Loan	435	822	832	443	2,532
	Percent High APR	17.4%	31.6%	29.7%	22.6%	25.7%
Not Provided by Applicant	Other Originated	152	103	125	118	498
	High APR Loan	41	81	63	50	235
	Percent High APR	21.2%	44.0%	33.5%	29.8%	32.1%
Not Applicable	Other Originated	17	2	.	0	19
	High APR Loan	2	0	.	0	2
	Percent High APR	10.5%	0.0%	.	.	9.5%
Total	Other Originated	2,513	2,060	2,317	1,838	8,728
	High APR Loan	585	1,114	1,103	590	3,392
	Percent High APR	18.9%	35.1%	32.3%	24.3%	28.0%

**Table B.24**  
**Originated Owner-Occupied Home Purchase Loans by Ethnicity and by**  
**Predatory Loan Status**

City of Rockford  
FFIEC HMDA Data 2004 - 2007

Ethnicity	Loan Type	2004	2005	2006	2007	Total
Hispanic or Latino	Other Originated	287	199	222	168	876
	High APR Loan	107	203	219	158	687
	Percent High APR	27.2%	50.5%	49.7%	48.5%	44.0%
Not Hispanic or Latino	Other Originated	1,871	1,762	1,977	1,551	7,161
	High APR Loan	415	828	826	392	2,461
	Percent High APR	18.2%	32.0%	29.5%	20.2%	25.6%
Not Provided by Applicant	Other Originated	171	97	118	119	505
	High APR Loan	51	83	58	40	232
	Percent High APR	23.0%	46.1%	33.0%	25.2%	31.5%
Not Applicable	Other Originated	184	2	.	.	186
	High APR Loan	12	0	.	.	12
	Percent High APR	6.1%	0.0%	.	.	6.1%
Total	Other Originated	2,513	2,060	2,317	1,838	8,728
	High APR Loan	585	1,114	1,103	590	3,392
	Percent High APR	18.9%	35.1%	32.3%	24.3%	28.0%

**Table B.25**  
**Originated Owner-Occupied Home Purchase Loans by Gender and by**  
**Predatory Loan Status**  
 City of Rockford  
 FFIEC HMDA 2004 - 2007

<b>Gender</b>	<b>Loan Type</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>Total</b>
Male	Other Originated	1,724	1,403	1,582	1,214	5,923
	High APR Loan	357	688	704	364	2,113
	Percent High APR	17.2%	32.9%	30.8%	23.1%	26.3%
Female	Other Originated	709	596	667	563	2,535
	High APR Loan	218	400	373	209	1,200
	Percent High APR	23.5%	40.2%	35.9%	27.1%	32.1%
Not Provided by Applicant	Other Originated	80	59	68	61	268
	High APR Loan	10	26	26	17	79
	Percent High APR	11.1%	30.6%	27.7%	21.8%	22.8%
Not Applicable	Other Originated	.	2	.	.	2
	High APR Loan	.	0	.	.	0
	Percent High APR	.	0.0%	.	.	0.0%
Total	Other Originated	2,513	2,060	2,317	1,838	8,728
	High APR Loan	585	1,114	1,103	590	3,392
	Percent High APR	18.9%	35.1%	32.3%	24.3%	28.0%

**Table B.26**  
**Percentage of HALs Originated by Race**  
 City of Rockford  
 FFEIC HMDA Data 1999 - 2007

Census Tract	White	Minority	Total Percent HALs
3.00	.	.	.
4.01	7.9%	15.0%	8.4%
4.02	7.4%	5.1%	7.3%
4.03	11.9%	12.2%	11.1%
5.01	10.8%	15.4%	11.7%
5.02	11.5%	8.6%	11.0%
5.04	7.4%	12.8%	7.7%
5.06	6.2%	9.7%	6.6%
5.07	6.6%	7.9%	6.6%
5.10	5.5%	16.4%	7.4%
5.11	10.1%	9.8%	10.0%
5.12	11.6%	17.1%	13.1%
5.13	12.6%	14.3%	13.3%
5.14	.	.	.
6.00	8.3%	11.9%	9.0%
7.00	5.2%	11.3%	5.6%
8.00	16.8%	10.0%	16.2%
10.00	28.3%	14.0%	22.8%
11.00	16.0%	6.3%	13.0%
12.00	22.7%	5.6%	16.1%
13.00	23.3%	2.9%	17.5%
14.00	14.8%	11.4%	14.7%
15.00	12.5%	4.6%	11.2%
16.00	14.0%	11.6%	13.7%
17.00	11.7%	10.0%	11.5%
18.00	29.1%	11.2%	23.3%
19.00	24.1%	4.4%	19.0%
20.00	26.5%	12.3%	23.2%
21.00	30.3%	11.1%	25.7%
22.00	17.8%	11.6%	15.0%
23.01	27.1%	17.2%	20.8%
23.02	26.2%	14.7%	24.2%
24.00	32.5%	13.9%	22.1%
25.00	48.3%	24.3%	33.9%
26.00	11.1%	5.6%	9.7%

**Table B.26 Continued**  
**HMDA Denial Rates By Census Tract**  
 City of Rockford  
 FFEIC HMDA Data 1999 - 2007

Census Tract	White	Minority	Total Percent HALs
27.00	47.0%	13.9%	25.0%
28.00	34.9%	17.5%	23.0%
29.00	16.7%	0.0%	14.3%
30.00	3.8%	18.5%	5.2%
31.00	20.5%	18.4%	19.7%
32.00	21.2%	17.8%	19.6%
33.00	19.9%	14.8%	18.0%
34.00	12.3%	18.4%	13.2%
35.00	6.5%	29.2%	7.6%
36.01	16.6%	6.7%	14.9%
36.02	12.7%	20.6%	15.5%
36.04	19.2%	14.2%	18.3%
36.05	14.3%	40.0%	19.7%
36.06	21.3%	44.2%	26.3%
37.01	11.2%	19.1%	12.5%
37.06	14.6%	10.8%	13.5%
37.07	2.7%	5.7%	3.7%
37.08	30.6%	31.0%	30.9%
37.09	30.9%	37.5%	32.3%
37.1	21.4%	12.8%	19.6%
38.01	10.7%	16.0%	10.8%
42.00	.	.	.
<b>Total</b>	<b>13.5%</b>	<b>13.7%</b>	<b>13.5%</b>

## **APPENDIX C. ADDITIONAL 2008 FAIR HOUSING SURVEY DATA**

<b>Table C.1</b> <b>What part of the city are you addressing?</b> City of Rockford 2008 Fair Housing Survey	
<b>Part</b>	<b>Responses</b>
Entire City of Rockford	206
Specific Part of City	68
Missing	15
<b>Total</b>	<b>289</b>

<b>Table C.2</b> <b>Fair Housing</b> City of Rockford 2008 Fair Housing Survey				
<b>Need</b>	<b>Yes</b>	<b>No</b>	<b>Don't Know</b>	<b>Total</b>
<b>Fair Housing Laws</b>				
Are you aware that Rockford has a fair housing ordinance	139	45	30	214
Do fair housing laws serve a useful purpose	144	25	42	211
Are they difficult to follow or understand	41	87	83	211
Is there a specific fair housing training process available to you	48	45	116	209
Is this process available to you in your career or profession	53	60	88	201
<b>Barriers, Policies and Codes</b>				
Are there barriers to addressing or improving fair housing in Rockford	58	34	123	215
Are there specific areas in the city that have fair housing problems	57	26	134	217
Do you think any city policies, actions or decisions adversely affect fair housing	33	64	118	215
Do you think that any city codes or regulations adversely affect fair housing	27	68	122	217
<b>Possibilities for Fair Housing Violations</b>				
Are you aware of any fair housing testing	27	142	45	214
Are you aware of any fair housing planning by the City of Rockford	56	110	46	212
Does the Rockford Fair Housing Ordinance need to be strengthened	52	46	112	210
<b>Need</b>	<b>Too Little</b>	<b>Right Amount</b>	<b>Too Much</b>	<b>Total</b>
What is the current level of fair housing outreach and education	96	70	21	187

**Table C.3**  
**What are the barriers to addressing or improving fair housing in Rockford?**

City of Rockford  
 2008 Fair Housing Survey

**Perceived Barriers**

1) Historic "red lining" and housing ethnic segregation reinforced by property owners and neighborhood groups 2) Lack of a clear local process for filing complaints 3) Lack of local enforcement of fair housing standards 4) Local poverty density and lack of mixed income neighborhoods and rental properties 5) Weak local ordinances

All

Community perspective

Crime

Criminal backgrounds

Dealing with absentee landlords

education levels, income levels, age, race

Felons

Financing such efforts

From what I understand the HUD system itself is in the way at times. Another barrier would be public education or knowledge about the challenges faced in public housing so we can all work together for the greater good of our entire city.

Funding and enforcement

FUNDING!

Getting citizen participation

Getting people to report incidents and then having adequate resources to investigate and address complaints.

I don't feel that the "powers that be" really care to address the issue.

I think people should not be able to pick or choose who get a home and who's homeless

I think the Fair Housing Board should do something to help educate tenants and home buyers about things they should know to help them have greater success at gaining housing. If no one helps educate people then they aren't helping the population. There could be greater public awareness to help educate the public about acceptance of others without pre-judgment. The Fair Housing Board shouldn't just sit back not doing anything to help and only get active to respond to complaints.

If any problems contact city hall and or RHA for information or whom to contact

Ignorance of the laws on the part of the general public and specifically small landlord and non-adherence to the law by these same groups

Income and nationality

Interests that want to maintain the status quo represent these barriers to fair housing in Rockford.

Lack of available housing units

Lack of Home Rule

Lack of knowledge

Lack of knowledge about housing rights; people don't know where to go if they have a complaint; lack of training for real estate professionals, landlords, etc.;

Landlords and realtors who discriminate because no one's watching them. In my opinion, a City Desk should be dedicated to calling every public offering for housing in order to inform of fair housing laws and preempt this type of discrimination.

Landlords who only want to rent to Section 8 and/or slum landlords.

Making it accessible and known that such services are available to all people within our community.

Need laws with penalties and not a spank on the hand.

Not everyone knows about it. Some of those who do take every advantage & make it difficult for others who need it.

People ignore it, or slip it under the carpet. I think some are afraid to speak out. In many cases people just don't have the time and energy to make a stand and fight for their rights. I think the majority of citizens in this area don't even realize their is still a lot of discrimination going on.

Politically motivated special interest groups and leadership that looks poorly at those less educated

Previous criminal history

Program outreach.

**Table C.3 Continued**  
**What are the barriers to addressing or improving fair housing in Rockford?**

City of Rockford  
 2008 Fair Housing Survey

**Perceived Barriers**

Public awareness & interest. Come on, let's face it: this is the You Tube era, and how many citizens are even \*aware\* that such a program exists?

Publicity

Racism and classism (sic)

Racism and slum landlords

Real estate agents continue to engage in steering; all low income housing is in poorer areas and concentrate poverty; it needs to be more evenly spaced throughout the city, particularly in areas where jobs are more accessible

Realtors

Red tape, limited zones, neighborhood plight, slum lords, unemployment

Rockford has the same racial issues as the rest of this country. You only have to look at the make up of the various quadrants of the city and the breakdown by income and race to see it.

Slumlords

Stereotypes and cultural norms established by residents of Rockford who have never experienced life outside the area and therefore there tends to be narrow minded views regarding low income people and life in general.

Stupid people that abuse the system. people who rent or own & don't take care of the property or actually damage or destroy the property on purpose

The people who buy or rent need to know how to maintain property

There seems to be a general apathy in this city, as in many others, concerning housing and many other needed services. From what I have observed, quite often even those who need services don't seek them.

**THEY NEED TO CLEAN UP THE HOUSING SITES AND MAKE IT MORE LIVEABLE.**

This cannot be approached as a City of Rockford issue only. If you do not include the entire county and probably need to include the 12 county state line area, then you will only redistribute problems with housing to those areas that can least afford to absorb it. Use the past 30 years of school desegregation as a road map of how a lofty principle was lost through localized implementation...it will only make matters worse if not approached on a regional basis.

We need more funds to educate the population on fair housing, and we need to be able to have the resources to check and make sure that fair housing laws are followed and being enforced.

Would you want some deadbeat tearing your property up? If you turn them down then your discriminating.

**Table C.4**  
**What are the specific areas in the city that have fair housing problems?**

City of Rockford  
 2008 Fair Housing Survey

**Areas**

All areas with low income levels, where minimum housing standards frequently are not met.

ALL OF THEM.

All over town

Areas of low minority concentration

Areas such as the Apartment community near Bienterra.

Areas that are predominately white

Areas with low income and run down properties with landlords who do not invest in improving their properties (use rental properties as a "cash cow")

Blighted areas are overvalued

But those areas reflect the individual decisions of landlords personally and not reflecting any entire specific neighborhood.

East side - Most affordable properties available are on the west side in high crime areas. There are no funds available through the City of Rockford (according to Community Development) for down payment assistance for any properties other than on the West side or if you are a City of Rockford employee.

EAST/SOUTH EAST

Everything, they are not very good at protecting the people that live there

Everywhere, do to one sided laws.

General lack of knowledge. People point fingers at landlords to take the attention away from the prevalence of prejudice in the entire community. If the community really cared about other human beings, then things would start to change to help educate people and help people help themselves and each other.

I don't think there are any areas that have fair housing problems. I do know land costs in certain sectors keeps out new affordable housing (i.e. Habitat For Humanity new construction) reasonably priced lots aren't available northeast.

I think the discrimination happens in all areas of the city. I personally witnessed it 30+ years ago when trying to rent a house in Churchill's Grove. The landlord made no apology about wanting to only rent to a Caucasian couple. We didn't want to live there after hearing that. At the time, I didn't know where to report it.

If it is fair housing, why does it look as though all the lower income people are in the same area instead of being blended in everywhere, which would be fair.

It seems like the traditional housing projects (ie Orton Keyes) are not in the best benefit for anyone long term. It has been proven that model doesn't work very well. (ie Chicago)

Low income, high renter occupied homes on the West and Near East sides.

NE quadrant

No, it works just fine. You take the criminals and problem people for Weed and Seed areas and bring them into my area to cause problems. At that, you give them a nice house to live in when they don't have a job. All they do is drink alcohol, use drugs, and have sex all day long so now they have more babies that the government is supporting.

Northeast quadrant

Northeast, because of incorrect perceptions of affordable housing.

Not to be too blunt, but yes - from about the river West.

Professions moving to Rkfd discouraged from the West side of river

Rental units in mid-high income neighborhoods that accept low-income renters

Rockford - West and South West sides

South side, west side, southeast side

SW and SE

The entire City of Rockford.

The heavily minority populated areas.

The problem areas in Rockford include the depressed housing areas that lack neighborhood leadership, the remaining public housing sites, and other areas where residents are dismissed based on their low economic status and low educational level.

**Table C.4 Continued**

***What are the specific areas in the city that have fair housing problems?***

City of Rockford  
2008 Fair Housing Survey

**Areas**

The West Side

There are issues everywhere, but especially on the West side, people are taken advantage off because the housing is lower and their are more minorities.

There is a perception that the West side of Rockford has more problems. I think it exists in all areas of the city, but because there are more lower cost rental units and lower cost housing on the West side I think it might happen in that area more. The housing tends to be older also, and not set up for people with certain disabilities. I think that the northeast side, all areas of Rockford have discriminatory issues. I know that people are steered away from or steered towards certain areas by some of those in real estate depending on their race.

Typically places where stupid blockheads (I think that is what Ed Wells calls them, but the rest of us call them the N word) move into.

West Side

West side has too many slum landlords

West side neighborhoods. underdeveloped housing, substandard housing

West side of Rockford with slum Lords and East side with undisclosed profiling activities.

West side of the river and also much of the east side. Housing owners expect too much and give far to little as to maintenance.

West side. Landlords taking advantage of the poor & not keeping their houses up to code. Then blaming the tenants for their code problems.

Westside owners not cleaning properties and southeast

**Table C.5**  
**What are the specific policies, actions or decisions that adversely affect fair housing?**

City of Rockford  
2008 Fair Housing Survey

**Policies, Actions or Decisions**

City policy appears to discourage the development of affordable housing.

Emphasis of resources on private market upscale developments for higher income households, and emphasis on direction of resources into home buying, as well as creation of incentives and benefits that reduce number of affordable rental units. Such policies and focuses take away resources from older, lower income areas where the greatest percentage of the populations that are more subject to housing discrimination and exploitation are found.

Giving these blockheads any rights at all. like the people who care BS. Now instead of the disease being contained in one area, it is spreading throughout the city.

Housing code or regulations for people with disabilities.

I wish we could get better laws for landlords and tenants rights. Landlords are often stuck because the state's loose rental laws, and this is contributing to infrastructure and downgrading of neighborhoods that are otherwise filled with mostly good people

If the policies are created by close minded thinkers, then the actions and decisions will not be implemented.

It only good to dose who have high paying jobs

Lack of power to deal w/absentee landlords and landlords that rent to "drug element".

Lack of protection to certain neighborhoods, vandalism, limited resources for some areas.

Most of the affordable housing initiatives are concentrated in lower income areas. It exacerbates problems associated with concentrated poverty such as crime, poor schools, etc.

No, but I think there are things the City might be able to do in order to better inform people of their rights. They don't have enough staff or budget to address the issues in a stronger and more timely manner.

Not that I am aware

Section 8!!!!!!!!!!!!!!!!!!!!

See above questions!!! Thank God that Homerule was voted down.

The City and the County pay more attention to developers who want to put up new housing on virgin land. The local government turns its back on making substantial improvements to existing neighborhoods. Putting up more housing than demand in the market causes the devaluation of existing residential. When the value is lost, owners do not reinvest, the city looks really bad and the housing is falling in disrepair in large numbers. Not just rental but owner/occupied as well. It is time to stop outward growth and fix what we have first. I think we need to start neighborhood planning for each neighborhood or neighborhood clusters to make strong determinations about what to do about the neighborhoods. Either rebuild them to be livable or relocate the last surviving residents and reforest or farm the area. The situation of neglect has persisted way too long.

There are so many elements involved in this problem. Education, crime, income, race - we have terrible housing available in parts of this city. No one, no matter what their income should have to live in a dangerous, run-down, unsafe home or rental property. There are parts of Rockford that are more dangerous now than ever, and I don't think we have fair housing in this city.

Urban sprawl

We have never had customer friendly policies in Rockford that segments of our population can interpret.

**Table C.6**  
***What are the codes or regulations that adversely affect fair housing?***

City of Rockford  
2008 Fair Housing Survey

**Codes or Regulations**

Again, we have historically complicated various systems, making it impossible for residents to move forward.

I believe that the codes and regulations are well-intended and have positive goals, but it seems that they often end up putting further constraints on landlords and homeowners who are struggling already to maintain housing in lower income areas of the city. It would benefit the city and its citizens if significantly more resources could be directed into property and neighborhood improvement programs, and then hold landlords very accountable for the outcomes when they access such programs.

In the general sense, I believe we have created so many codes and requirements that it has become increasingly expensive to develop affordable housing.

**INCOME LEVEL AND FIRST TIME PEOPLE ONLY**

Many landlords think that the codes are too cumbersome, so they don't always follow the rules

No idea of the codes. I am a homeowner so I am privileged in a manner of speaking

No, but I think the general public does not even know what these codes and regulations are.

Not enough inspection of rental units

Not that I am aware

Over enforcement of codes in poor areas but no follow through from officers

Owner should be able to do what he or she like on there property

Same as above, not sure which came first.

Slum landlords and disreputable business owners are given too much opportunity, and too many chances, before they are held accountable for their unfair housing practices.

Some cultures bring extended family into the same home, making it difficult for these families to find appropriate housing.

The codes are there to help all of us. Sometimes they just need to be put into a better public eye.

Using new construction codes on housing renovation creates unnecessary cost and thus limits the profitability of housing renovation in older sections of the city

Yes, you allow developers to rezone and get special use permits. We should do neighborhood plans and know where certain structures are needed then we could say "yes, we are looking for a developer to do this project in this location" You are allowing the developers to call the shots and it should be the other way around. You are paying attention to new development and not to existing taxpayers.

