



CITY OF Rockford

*425 E. State Street
Rockford, IL 61104*

Analysis of Impediments to Fair Housing Choice for FY 2020

February 3, 2020



Table of Contents

Executive Summary	2
I. Introduction	7
II. Background Data	8
A. Population and Race:.....	9
B. Households:	27
C. Income and Poverty:	32
D. Employment:	43
E. Housing Profile:.....	45
F. Financing:.....	50
G. Household Types:	55
H. Cost Overburden:.....	63
I. Housing Problems:.....	64
J. Disproportionately Greater Need: Severe Housing Problems:	67
K. Disabled Households:	70
III. Review/Update to Original Plan	72
IV. Impediments to Fair Housing 2019	102
A. Fair Housing Complaints:.....	102
B. Public Sector:	124
C. Private Sector:.....	174
D. Citizen Participation:	198
V. Actions and Recommendations.....	206
VI. Approval.....	210
VII. Appendix	211

Executive Summary

The City of Rockford, Illinois is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG), Home Investment Partnerships Program Funding (HOME), and Emergency Solutions Grants (ESG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to "affirmatively further fair housing," each entitlement community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice.

The City of Rockford has prepared an Analysis of Impediments to Fair Housing Choice for FY 2020-2024. The analysis focuses on the status and interaction of six (6) fundamental conditions within the community:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

The methodology employed to undertake this Analysis of Impediments included:

- **Research**
 - A review of the City's Zoning Ordinance, Comprehensive Plan, land use policies and procedures was undertaken
 - Demographic data for the City was analyzed from the U.S. Census, American Community Survey, and the HUD-CHAS data and tables
 - A review of the real estate and mortgage practices was undertaken
 - A review of prior year plans

- **Interviews & Meetings**
 - Meetings and interviews were conducted with the Rockford Housing Authority, community advocacy groups and social services agencies for the disabled, housing providers, the local Board of Realtors, and real estate firms.
- **Analysis of Data**
 - Low- and moderate-income areas were identified
 - Concentrations of minority populations were identified
 - Concentrations of rental and owner housing were identified
 - Awareness of fair housing in the community was evaluated
- **Potential Impediments**
 - Public sector policies that may be viewed as impediments were analyzed
 - Private sector policies that may be viewed as impediments were analyzed

The City of Rockford's FY 2020-2024 Analysis of Impediments to Fair Housing Choice has identified the following impediments, along with the goals and strategies to address those impediments.

- **Impediment 1: Fair Housing Education and Outreach**

There is a need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities and the disabled population who fear retaliation if they lodge a complaint.

Goal: The public in general and local officials will become knowledgeable and aware of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing in the city.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **1-A:** Continue to promote Fair Housing awareness through the media, seminars, testing, and training to provide educational opportunities for all persons to learn more about their rights under the Fair Housing Act and Americans With Disabilities Act.
- **1-B:** Continue to distribute literature and informational material concerning fair housing issues, an individual's housing rights, and landlord's responsibilities to affirmatively further fair housing.

- **1-C:** Promote housing choice so residents with the same financial means may choose to live anywhere in the City.

- **Impediment 2: Need for Decent, Safe, and Affordable Rental Housing**

The City of Rockford does not have a sufficient supply of rental housing that is decent, safe, and sound. In many cases, landlords don't maintain their property to code standard which results in unsafe living conditions for tenants. However, the monthly cost of rent for apartments has steadily increased due to the limited supply of rental housing, despite the condition of the rental unit.

Goal: The supply of affordable rental housing that is decent, safe, and sound will meet the needs of all renter households throughout the City of Rockford, through new construction and in-fill housing, the rehabilitation of existing occupied structures and vacant buildings, and the development of mixed-income buildings.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **2-A:** Support and encourage both private developers and non-profit housing providers to develop and construct new affordable mixed and middle income rental housing that would be located throughout the City of Rockford.
- **2-B:** Support and encourage the rehabilitation of existing housing units in the City to create decent, safe, and sound rental housing that is affordable to lower income households.
- **2-C:** Continue to provide funding for Code Enforcement to identify buildings and units that need to be maintained and rehabilitated in accordance with local codes.

- **Impediment 3: Lack of Affordable Homeownership Opportunities**

The population of Rockford has decreased since the 2010 U.S. Census and the percentage of share of renters has increased from 39%-46%. In some areas the share of renters is as high as 70% or more.

Home values and access to traditional mortgage financing have decreased since the recession, partly due to significantly higher credit standards and the age of Rockford's housing stock. Homes within an affordable price range require rehabilitation, which limits the availability of mortgage financing programs for lower income households.

Goal: For-sale single family homes for lower income households will be developed through new construction, in-fill housing, and rehabilitation of substandard houses.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **3-A:** Support homebuyer education and training programs to improve homebuyer awareness and increase the opportunities for lower-income households to become homebuyers.
- **3-B:** Support and provide funds for downpayment assistance to lower-income households to become homeowners.
- **3-C:** Support and encourage plans from both private developers and non-profit housing providers to develop and construct new affordable housing that is for-sale.
- **3-D:** Support and encourage the acquisition, rehabilitation and resale of existing housing units to become decent, safe, and sound.
- **3-E:** Partner with private and non-profit developers to increase opportunities for 'lease purchase' housing.

• **Impediment 4: Need for Accessible Housing Units That Are For-Sale or Rent**

There is a lack of accessible housing units in the City of Rockford. Most of the existing housing units do not have accessible features. The City's disabled population has grown to 15.5% of the total population.

Goal: Increase the number of accessible housing units through new construction and rehabilitation of existing housing units for the physically disabled and developmentally delayed.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **4-A:** Support home rehabilitation programs that financially assist seniors and people with disabilities to provide a safe and accessible home in order to continue to age in place.
- **4-B:** Support and encourage the development of accessible housing units in the City.
- **4-C:** Provide fair housing education and outreach to seniors and people with disabilities to address fear of reporting housing and code violations.
- **4-D:** Enforce the ADA and Fair Housing requirements for landlords to make "reasonable accommodations" to their rental properties so they become accessible to tenants with disabilities.

- **Impediment 5: Economic Issues that affect Fair Housing Choice**

There is a lack of economic opportunities in the City which prevent low-income households from improving their income and ability to live outside areas with concentrations of low-income households, which makes this a fair housing concern.

Goal: The local economy will provide new job opportunities, which will increase household income, and will promote fair housing choice.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken.

- **5-A:** Continue to provide support, education, and technical assistance opportunities to minority, women owned and small businesses.
- **5-B:** Support and enhance workforce development and skills training that result in a “livable wage” and increases job opportunities.
- **5-C:** Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities.
- **5-D:** Support and encourage efforts for improvements in public transportation options in the City to allow for second and third shift workers.
- **5-E:** Support and encourage private and non-profit developers and businesses to provide assets (grocery stores, services, etc.) in low to moderate income neighborhoods.

I. Introduction

The City of Rockford is a CDBG, HOME, and ESG Entitlement Community under the U.S. Department of Housing and Urban Development's Community Planning & Development. In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to "affirmatively further fair housing" the community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice.

"Fair housing choice" is defined as:

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

The Fair Housing Analysis consists of the following six (6) conditions:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

The City of Rockford has now prepared this FY 2020-2024 Analysis of Impediments to Fair Housing Choice to coincide with the City's Five Year Consolidated Plan for FY 2020-2024. The Analysis of Impediments was on public display from the period of December 10, 2019 to January 8, 2020.

II. Background Data

In order to perform an analysis of fair housing in the City of Rockford, the demographic and socio-economic characteristics of the City were evaluated as a basis for determining and identifying if there are any existing impediments to fair housing choice.

Rockford is a city in Winnebago County in the U.S. state of Illinois, in far northern Illinois. Located on the banks of the Rock River, Rockford is the county seat of Winnebago County (a small portion of the city is located in Ogle County). The largest city in Illinois outside of the Chicago metropolitan area, Rockford is the third-largest city in the state and the 171st most populous in the United States.

Settled in the mid-1830s, the position of the city on the Rock River made its location strategic for industrial development. In the second half of the 19th century, Rockford was notable for its output of heavy machinery, hardware and tools; by the twentieth century, it was the second leading center of furniture manufacturing in the nation, and 94th largest city. During the second half of the 20th century, Rockford struggled alongside many Rust Belt cities. Since the late 1990s, efforts in economic diversification have led to growth of automotive, aerospace, and healthcare industries, as well as the undertaking of various tourism and downtown revitalization efforts. Nicknamed the Forest City, Rockford is presently known for various venues of cultural or historical significance, including Anderson Japanese Gardens, Klehm Arboretum, Tinker Swiss Cottage, the BMO Harris Bank Center, the Coronado Theatre, the Laurent House, and the Burpee Museum of Natural History. Its contributions to music are noted in the Mendelssohn Club, the oldest music club in the nation, and performers such as Phantom Regiment and Cheap Trick.



Based on the size of the City of Rockford, the data from the 2010 U.S. Census is the most recent complete set of data available. However, the 2013-2017 American Community Survey offers more current estimates of general demographics for Rockford. This Census data, along with other databases such as the CHAS Data, have been used to evaluate the City of Rockford's demographic and socio-economic characteristics, and other conditions affecting fair housing choice.

A. Population and Race:

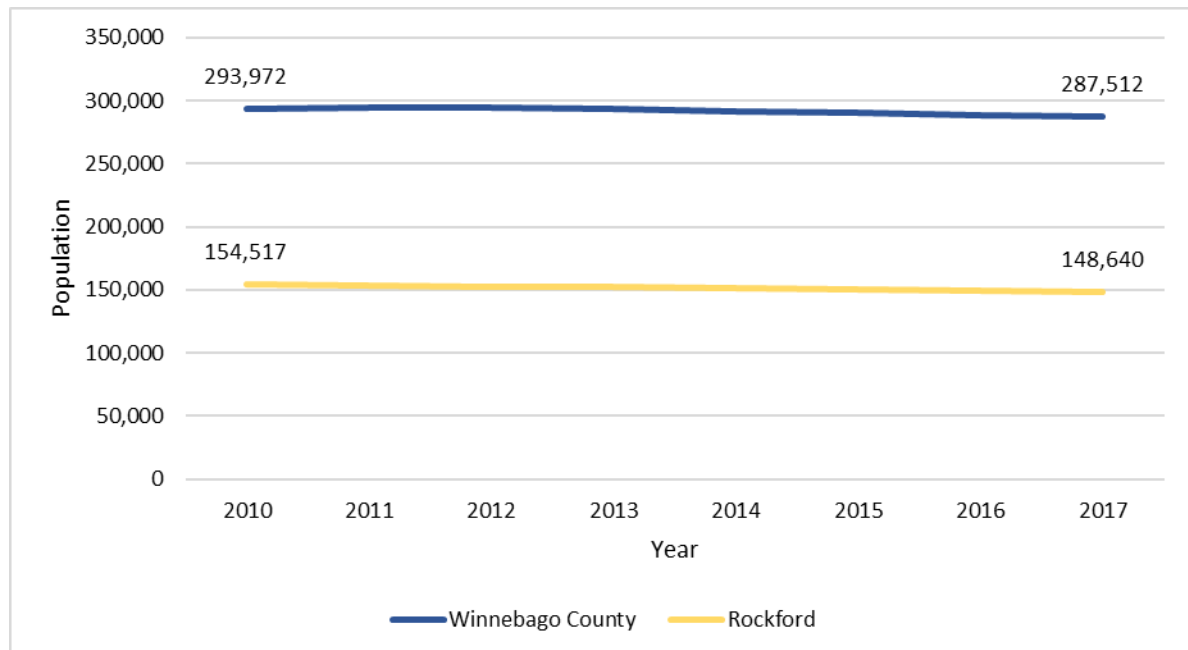
Population

The total population for the City of Rockford at the time of the 2010 Census was 154,517 the American Community Survey Estimate for 2012 was 152,948, and the 2017 estimate was 148,640. This illustrates a stable, yet slightly declining, population.

The U.S. Census Bureau has used the population at the time of the 2010 Census to make annual estimates as to the change in population. The population estimate for 2017 is the most recent available. Between 2010 and 2017, the City's population decreased by about 3.8%, or an estimated 5,877 people. Over the same period, Winnebago County population decreased from 293,972 people in 2010 to 287,512 people in 2017 (a decrease of 2.20%) and the State of Illinois's population increased from 12,745,359 people in 2010 to 12,854,526 people in 2017 (an increase of 0.86%).

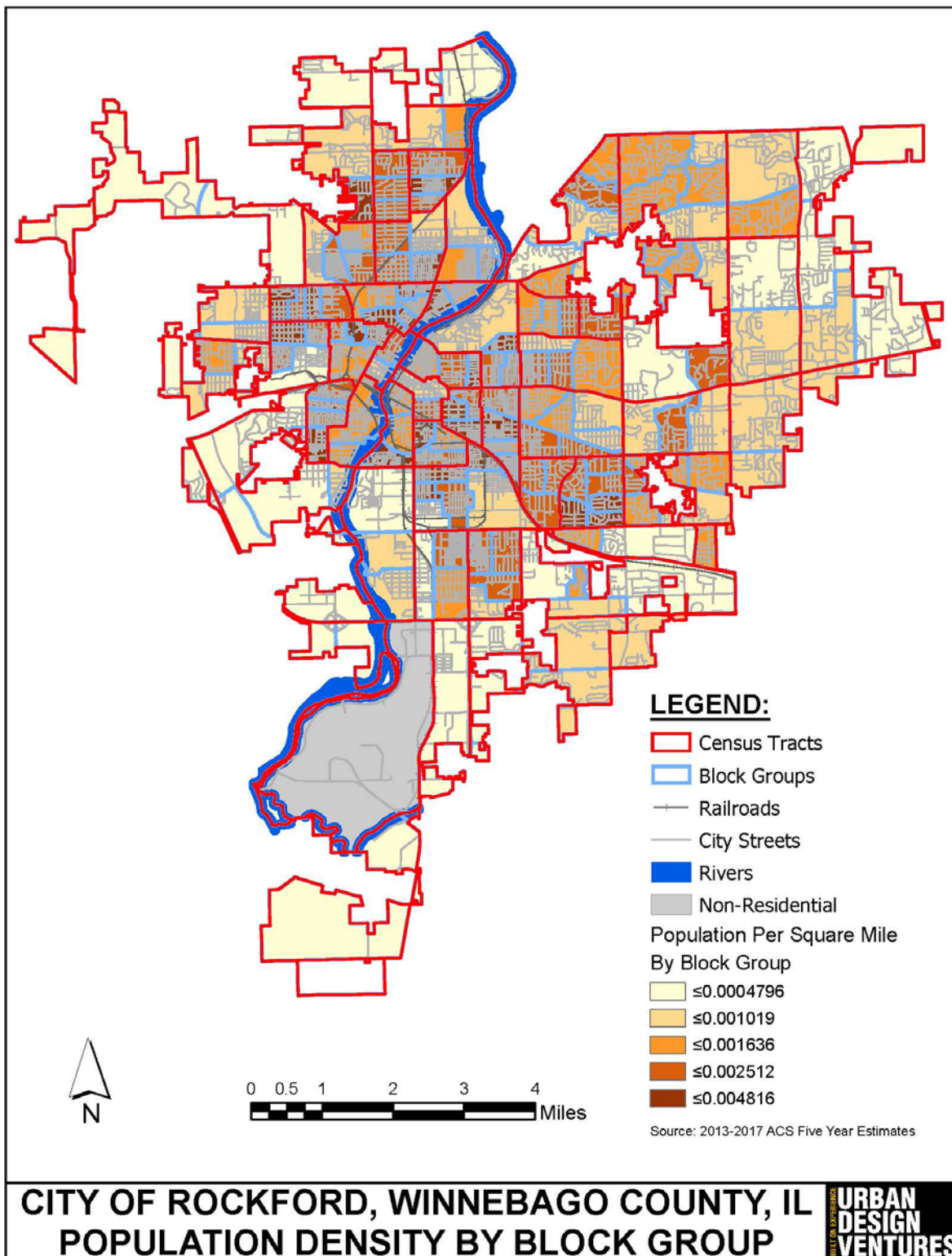
In 2017, there were an estimated 72,451 females (48.7%) and 76,189 males (51.3%) living in the City of Rockford.

Chart I-1 Population Trend in the City of Rockford, IL



Source: 2008-2012 ACS and 2013-2017 ACS

The population density map below shows that the City's population tends to reside in the Central, Northern Central, and Eastern parts of the City.



Racial Makeup of Population

Table II-1 below illustrates that “White alone” is the largest racial cohort in Rockford, making up 67.0% of the City’s population in 2017. “Black or African American alone” remains the largest minority cohort, at 21.6%. The Asian population has slightly increased between 2012 and 2017, rising from 2.8% to 3.2% of the population.

**Table II-1 – Racial Makeup of the Population
in the City of Rockford, IL**

Race and Hispanic or Latino	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total	152,948	-	148,640	-
One race	147,903	96.7%	142,859	96.1%
White alone	105,830	69.2%	99,522	67.0%
Black or African American alone	31,926	20.8%	32,084	21.6%
American Indian and Alaska Native alone	453	0.3%	639	0.4%
Asian alone	4,250	2.8%	4,827	3.2%
Native Hawaiian and Other Pacific Islander alone	42	0.0%	4	0.0%
Some other race alone	5,402	3.5%	5,783	3.9%
Hispanic or Latino	24,961	16.3%	27,298	18.4%

Source: 2008-2012 ACS and 2013-2017 ACS

The City of Rockford’s total percentage of minority population (non-white alone) increased from 30.8% in 2012, to 33.0% in 2017.

Table II-2 outlines the comparison of the minority populations in each Census Tract in the City at the time of the 2012 and 2017 ACS.

Table II-2 – Concentrations of Minority Residents for 2012 and 2017

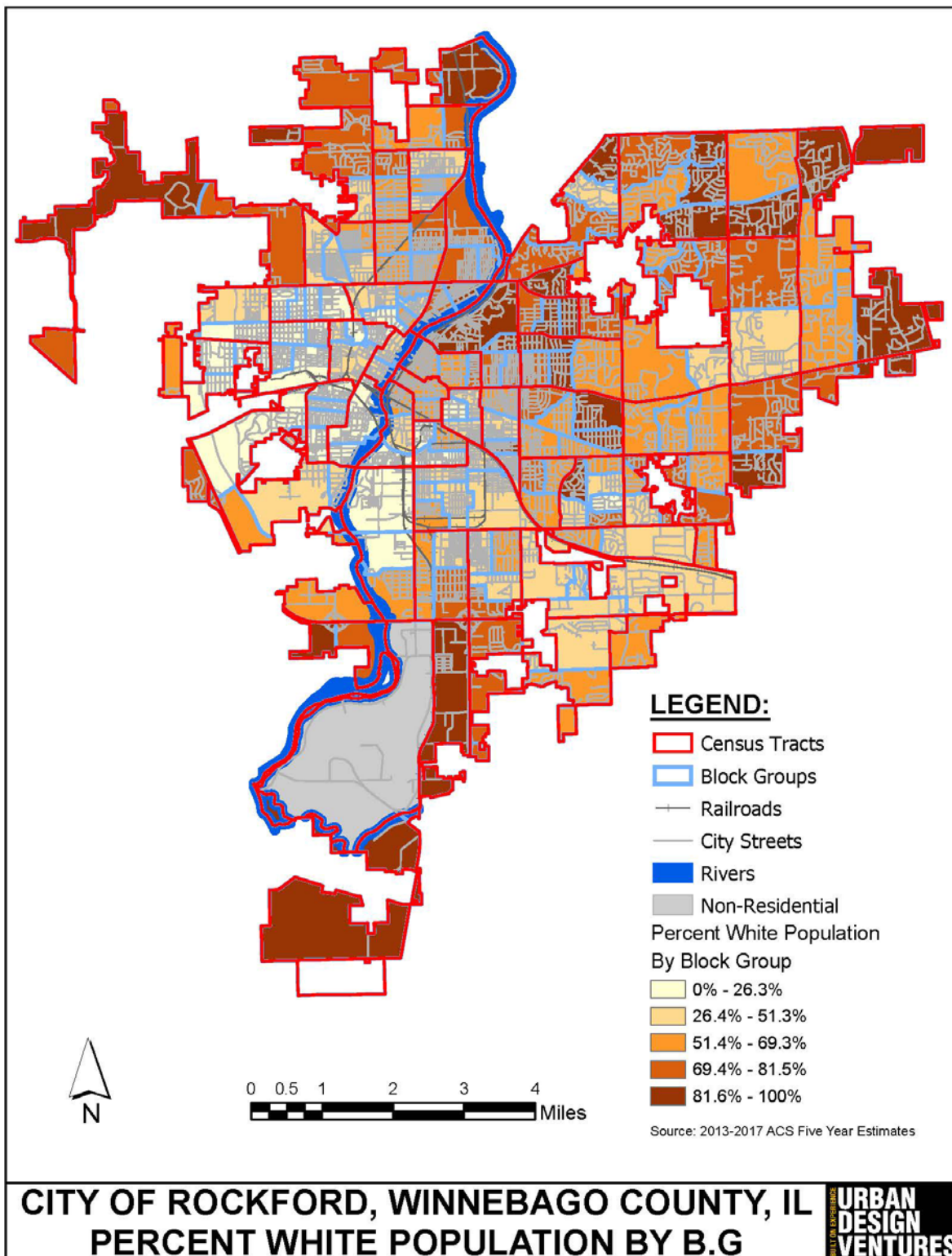
Census Tract	2008-2012 ACS			2013-2017 ACS		
	Total Population	Minority Population	% Minority Population	Total Population	Minority Population	% Minority Population
3	4,212	378	9.0%	4,028	473	11.7%
4.01	2,272	329	14.5%	2,032	281	13.8%
4.02	3,029	446	14.7%	3,043	398	13.1%
4.03	4,281	863	20.2%	4,247	872	20.5%
5.01	4,718	693	14.7%	4,287	1,150	26.8%
5.02	4,078	853	20.9%	3,219	697	21.7%
5.04	6,580	698	10.6%	7,137	1,055	14.8%
5.06	4,176	566	13.6%	4,269	905	21.2%
5.07	3,943	948	24.0%	4,127	734	17.8%
5.10	3,109	397	12.8%	3,179	517	16.3%
5.11	2,567	797	31.0%	2,661	669	25.1%
5.12	5,237	1,008	19.2%	5,070	1,033	20.4%
5.13	4,028	313	7.8%	3,785	743	19.6%
5.14	3,818	407	10.7%	3,511	351	10.0%
6	4,204	354	8.4%	4,356	676	15.5%
7	3,179	321	10.1%	3,353	390	11.6%
8	2,545	595	23.4%	2,493	561	22.5%
10	2,182	1,221	56.0%	2,665	1,560	58.5%

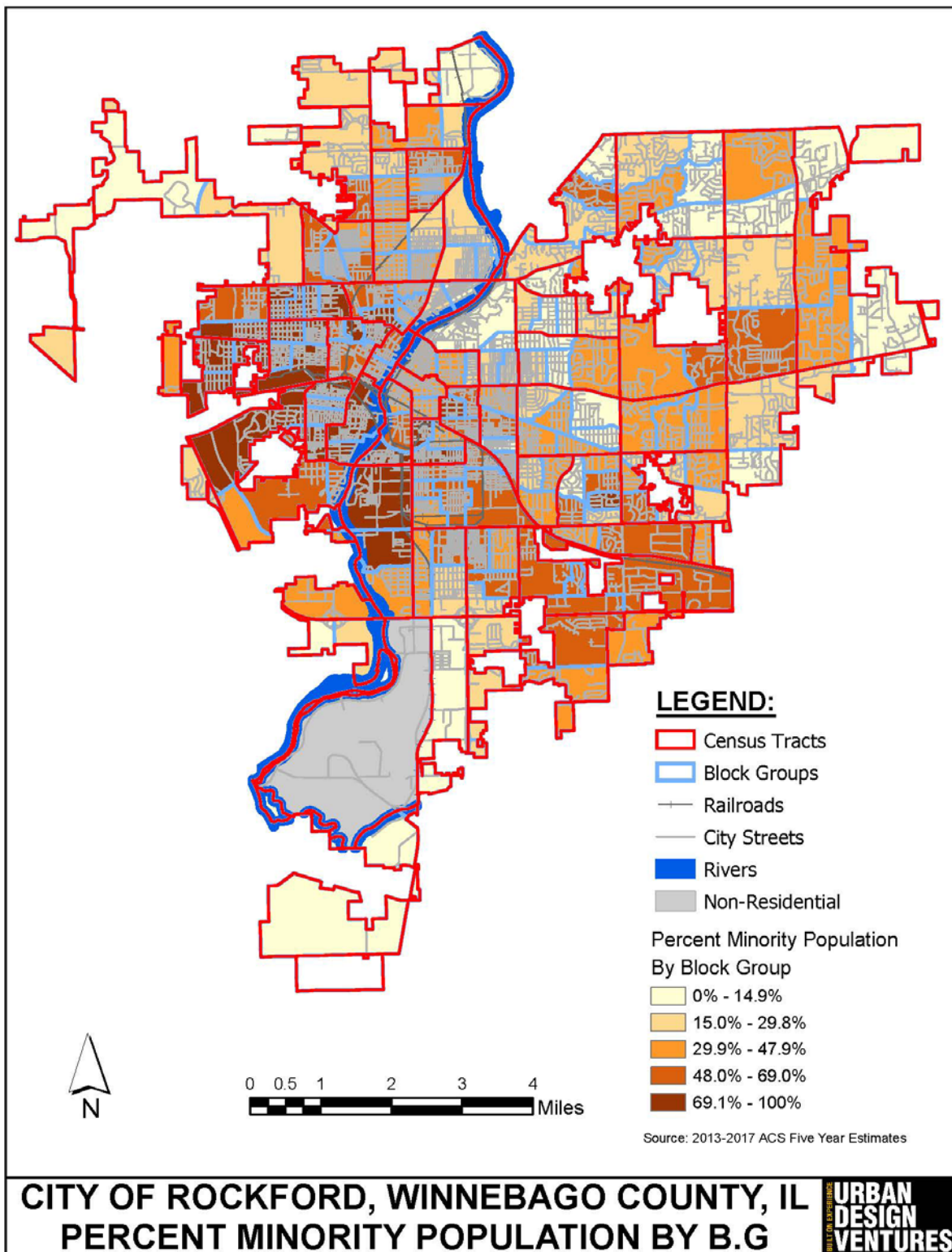
11	1,093	409	37.4%	1,074	383	35.7%
12	2,193	822	37.5%	2,199	977	44.4%
13	2,236	776	34.7%	2,589	1,216	47.0%
14	4,040	760	18.8%	4,051	1,255	31.0%
15	5,352	996	18.6%	4,692	588	12.5%
16	5,171	1,548	29.9%	5,600	1,953	34.9%
17	3,112	540	17.4%	3,195	711	22.3%
18	5,177	1,719	33.2%	6,039	2,171	35.9%
19	3,516	567	16.1%	3,673	1,042	28.4%
20	2,323	497	21.4%	2,760	407	14.7%
21	2,190	1,155	52.7%	1,865	817	43.8%
22	3,351	1,463	43.7%	3,696	1,953	52.8%
23.01	2,627	1,388	52.8%	2,377	972	40.9%
23.02	1,476	357	24.2%	1,252	214	17.1%
24	2,307	1,900	82.4%	2,409	1,816	75.4%
25	4,377	3,296	75.3%	2,786	2,078	74.6%
26	3,468	2,578	74.3%	3,239	2,071	63.9%
27	3,565	1,527	42.8%	3,139	1,363	43.4%
28	1,483	745	50.2%	1,786	893	50.0%
29	1,088	311	28.6%	1,090	614	56.3%
30	1,732	257	14.8%	1,677	134	8.0%
31	4,345	2,140	49.3%	3,541	1,801	50.9%
32	3,646	2,510	68.8%	3,640	2,497	68.6%
33	4,289	1,918	44.7%	3,096	1,399	45.2%

34	4,800	1,233	25.7%	4,826	1,472	30.5%
35	2,337	343	14.7%	2,419	388	16.0%
36.01	1,669	125	7.5%	1,584	158	10.0%
36.02	4,213	1,274	30.2%	3,838	1,416	36.9%
36.04	3,168	979	30.9%	2,891	787	27.2%
36.05	2,330	873	37.5%	2,015	421	20.9%
36.06	2,624	713	27.2%	3,033	1,253	41.3%
37.01	5,136	239	4.7%	4,925	435	8.8%
37.06	6,491	1,389	21.4%	6,407	1,186	18.5%
37.07	3,758	785	20.9%	3,818	1,186	31.1%
37.08	3,167	927	29.3%	2,851	1,344	47.1%
37.09	2,198	584	26.6%	1,545	419	27.1%
37.10	2,478	286	11.5%	2,474	330	13.3%
37.11	4,629	374	8.1%	4,443	498	11.2%
38.01	6,355	571	9.0%	6,206	389	6.3%
42	6,373	251	3.9%	6,234	525	8.4%
9800	0	0	0.00%	8	4	50.0%
Census Tract Totals	152,948	47,118	30.8%	148,640	49,118	33.0%

Source: 2008-2012 & 2013-2017 ACS

Twenty-two (or 37.2%) of all the census tracts saw a decrease in minority populations and the overall minority population of the City of Rockford increased from 30.8% in 2012 to 33.0% in 2017. The maps below illustrate the percentages of White and Minority Populations in further detail, by Block Group, in the City of Rockford. The lighter shaded areas represent a deconcentration of the particular group identified. Most of these population shifts were minor, with 78% of Census Tracts posting minority population changes less than 10%, and only two Census Tracts posting changes greater than 20%.





Another way to consider racial distribution in a community is to look at the dissimilarity indices for an area. Dissimilarity indices measure the separation or integration of races across all parts of the city, county, or state. The dissimilarity index is based on the data from the 2010 U.S. Census and was calculated as part of Brown University's American Communities Project (<http://www.s4.brown.edu/us2010/>). The dissimilarity index measures whether one particular group is distributed across census tracts in the metropolitan area in the same way as another group. A high value indicates that the two groups tend to live in different tracts. It compares the integration of racial groups with the White population of the City, or MSA, on a scale from 0 to 100, with 0 being completely integrated and 100 being completely separate. A value of 60 (or above) is considered very high. It means that 60% (or more) of the members of one group would need to move to a different tract in order for the two groups to be equally distributed. Values of 40 or 50 are usually considered a moderate level of segregation, and values of 30 or below are considered to be fairly low. The chart below highlights the dissimilarity indices for various racial and ethnic groups, as compared to the White population in the City of Rockford.

According to the 2013-2017 ACS, the Black/African American population is the largest minority group in the City, making up approximately one-quarter (25.8%) of the population. According to the American Communities Project, this population had a dissimilarity index of 45.7. The Asian population has a dissimilarity index of 30 and the Hispanic Population has a dissimilarity index of 32.3. All other minority groups have relatively small populations, which introduces some error into the calculation of the dissimilarity indices. More specifically, for populations under 1,000 people, the dissimilarity index may be high even if the population is evenly distributed across the City, MSA, or State.

The dissimilarity numbers are higher across the board from the 2000 Census and is indicative of a City that is moderately segregated. Over time, per the 2010 Census, Rockford has become more integrated, shown by the dissimilarity indices values in the 30 to low 40 ranges. However, it is still moderately segregated between Black/African Americans and Whites (45.7).

Exposure indices refer to the racial/ethnic composition of the tract where the average member of a given group lives. For example, the average Hispanic in some metropolis might live in a tract that is 40% Hispanic, 40% non-Hispanic white, 15% black, and 5% Asian. (Note that these various indices must add up to 100%.) These are presented in two categories: exposure of the group to itself (which is called the Index of Isolation) and exposure of the group to other groups.

The isolation index is the percentage of same-group population in the census tract where the average member of a racial/ethnic group lives. It has a lower bound of zero (for a very small group that is quite dispersed) to 100 (meaning that group members are entirely isolated from other groups). It should be kept in mind that this index is affected by the size of the group -- it is almost inevitably smaller for smaller groups, and it is likely to rise over time if the group becomes larger. The isolation index of White to White in the City of Rockford is 66.4, Black to Black is 36.4, Hispanic to Hispanic is 21.8, and Asian to Asian is 45.8.

Indices of exposure to other groups also range from 0 to 100, where a larger value means that the average group member lives in a tract with a higher percentage of persons from the other group. These indices depend on two conditions: the overall size of the other group and each group's settlement pattern. The exposure to other groups index for Black to White in Rockford is 42.7, and for White to Black, 15.9. The index for Hispanic to White is 49.4, and Asian to White is 64.5.

Table II-3 – Dissimilarity and Exposure Indices – City of Rockford

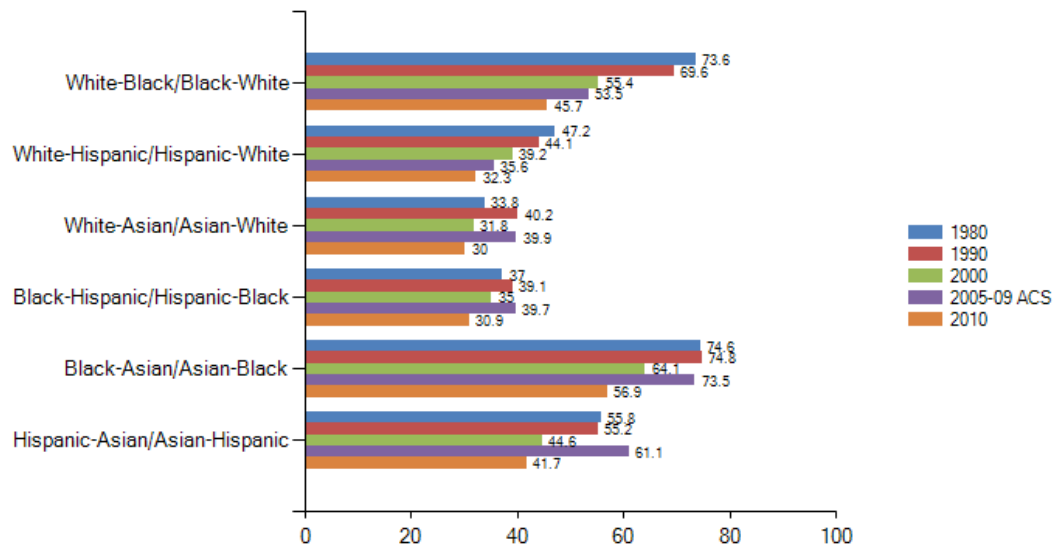
	Dissimilarity Index With Whites	Isolation Index	Exposure to Other Groups*
White	--	66.4	15.9**
Black	45.7	36.4	42.7
Asian	30	45.8	64.5
Hispanic	32.3	21.8	49.4

Source: American Communities Project, 2010 Census

* *Exposure of minorities to Whites*

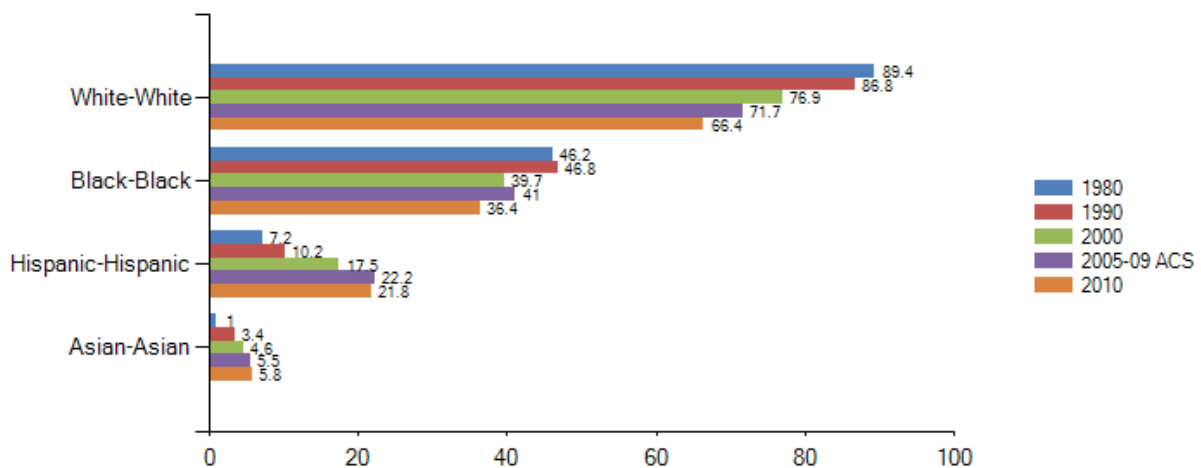
** *Exposure of Whites to Blacks*

Chart II-2 – Dissimilarity Index in the City of Rockford



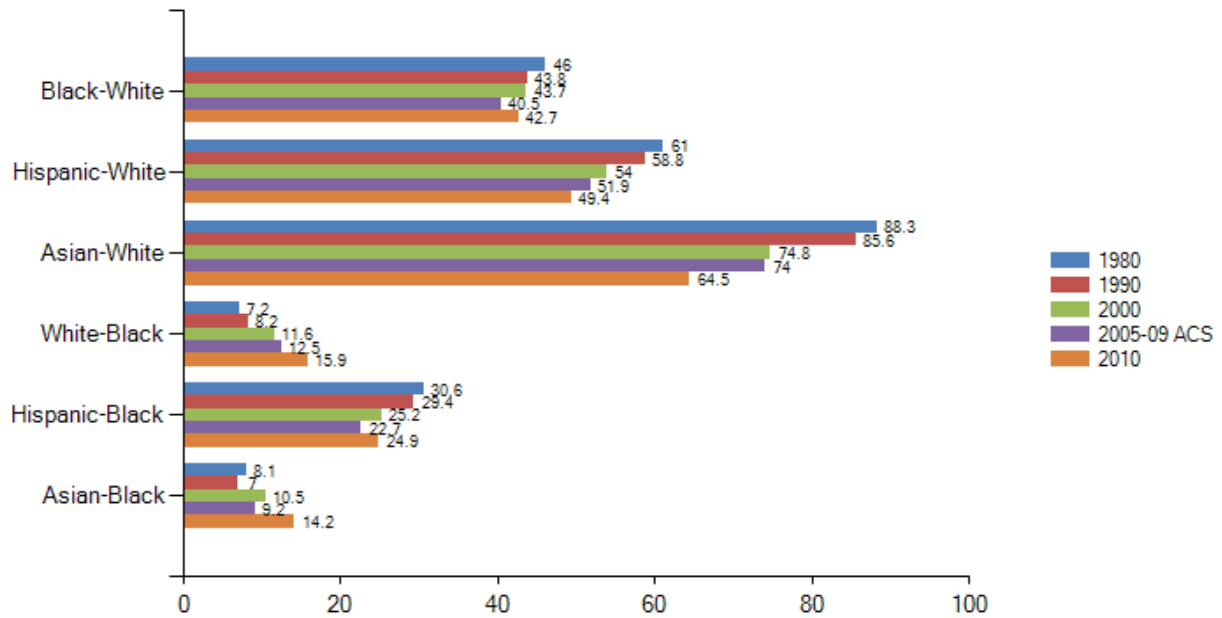
Source: American Communities Project, U.S. Census

Chart II-3 – Isolation Index in the City of Rockford



Source: American Communities Project, U.S. Census

Chart II-4 – Exposure Index in the City of Rockford



Source: American Communities Project, U.S. Census

Ethnicity and Ancestry

Table II-4 highlights the ethnicities of Rockford's residents at the time of the 2008-2012 ACS and more recent reports from the 2013-2017 American Community Survey.

Table II-4 – Population by Ethnicity in the City of Rockford, IL

Ethnicity and Ancestry in the City of Rockford				
ANCESTRY	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total population	152,948	-	148,640	-
American	10,331	6.7%	4,237	2.9%
Arab	643	0.4%	1,126	0.8%
Czech	515	0.3%	548	0.4%
Danish	778	0.5%	580	0.4%
Dutch	2,106	1.3%	1,981	1.3%
English	9,844	6.4%	8,728	5.9%

French (except Basque)	3,017	1.9%	2,430	1.6%
French Canadian	458	0.3%	436	0.3%
German	29,100	19.0%	25,637	17.2%
Greek	323	0.2%	549	0.4%
Hungarian	448	0.3%	315	0.2%
Irish	15,832	10.3%	14,317	9.6%
Italian	9,875	6.4%	9,123	6.1%
Lithuanian	747	0.5%	523	0.4%
Norwegian	3,773	2.5%	3,755	2.5%
Polish	5,136	3.3%	4,307	2.9%
Portuguese	45	0.02%	26	0.0%
Russian	461	0.3%	453	0.3%
Scotch-Irish	752	0.5%	736	0.5%
Scottish	1,360	0.9%	1,301	0.9%
Slovak	83	0.05%	71	0.0%
Sub-Saharan African	721	0.5%	1,565	1.1%
Swedish	11,402	7.4%	9,651	6.5%
Swiss	530	0.3%	417	0.3%
Ukrainian	302	0.2%	360	0.2%
Welsh	554	0.4%	603	0.4%
West Indian (excluding Hispanic origin groups)	191	0.1%	344	0.2%
Other/No Answer	43,621	28.5%	54,521	36.7%

Source: 2008-2012 & 2013-2017 ACS

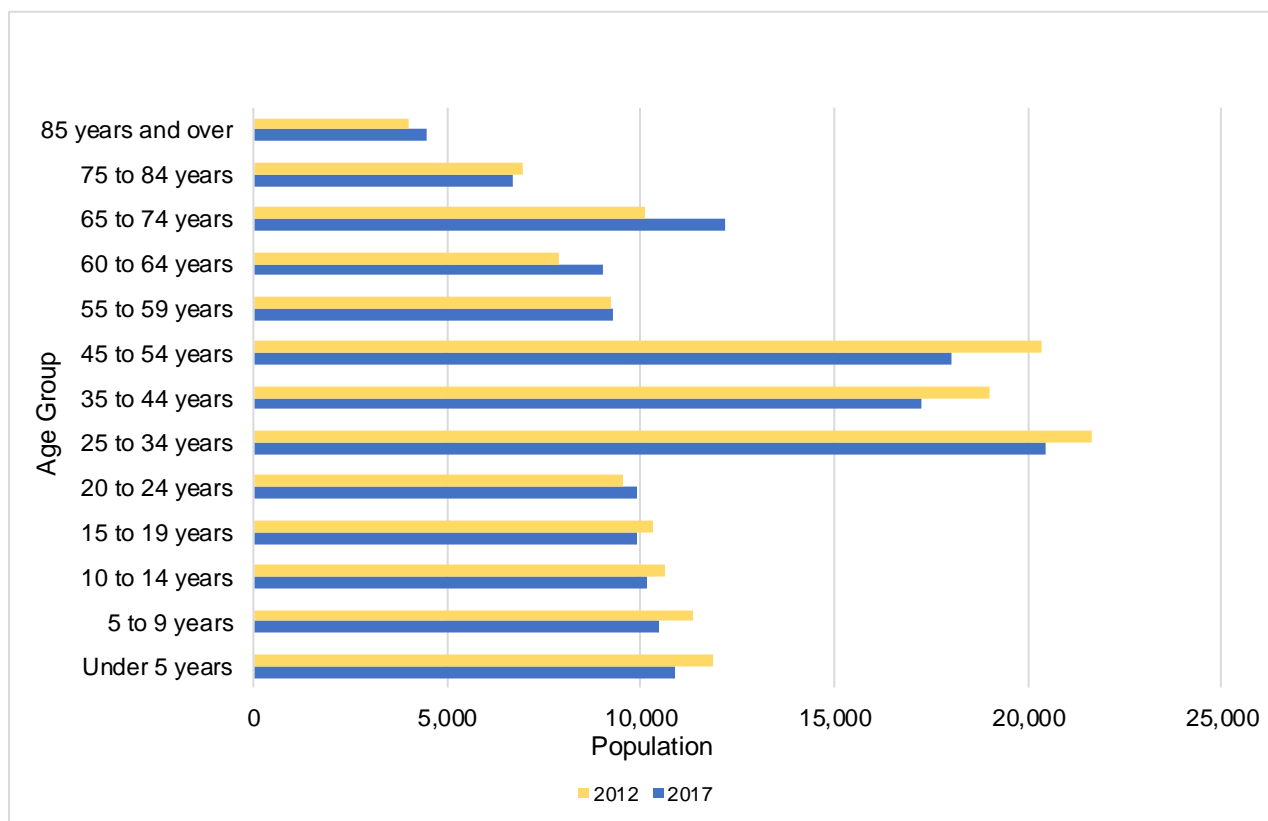
The most common ancestral group identified in the City of Rockford based on the 2008-2012 ACS data was German with 29,100 residents comprising of 19.0% of the population. The second most common ancestral group identified in the City of Rockford in 2012 was Irish with 15,832 residents comprising of 10.3% of the population.

The most common ancestral group identified in the City of Rockford based on the 2013- 2017 ACS data was German with 25,637 residents comprising of 17.2% of the population. The second most common ancestral group identified in the City of Rockford based on the 2013- 2017 was Irish with 14,317 residents comprising of 9.6% of the population.

Age

Chart II-5 below illustrates age distribution within the City for the 2008-2012 and 2013-2017 American Community Survey. In 2017 children under five years of age represented 7.3% of the population; 27.8% of the City's population was under 20 years of age; and 15.7% were 65 years of age or older.

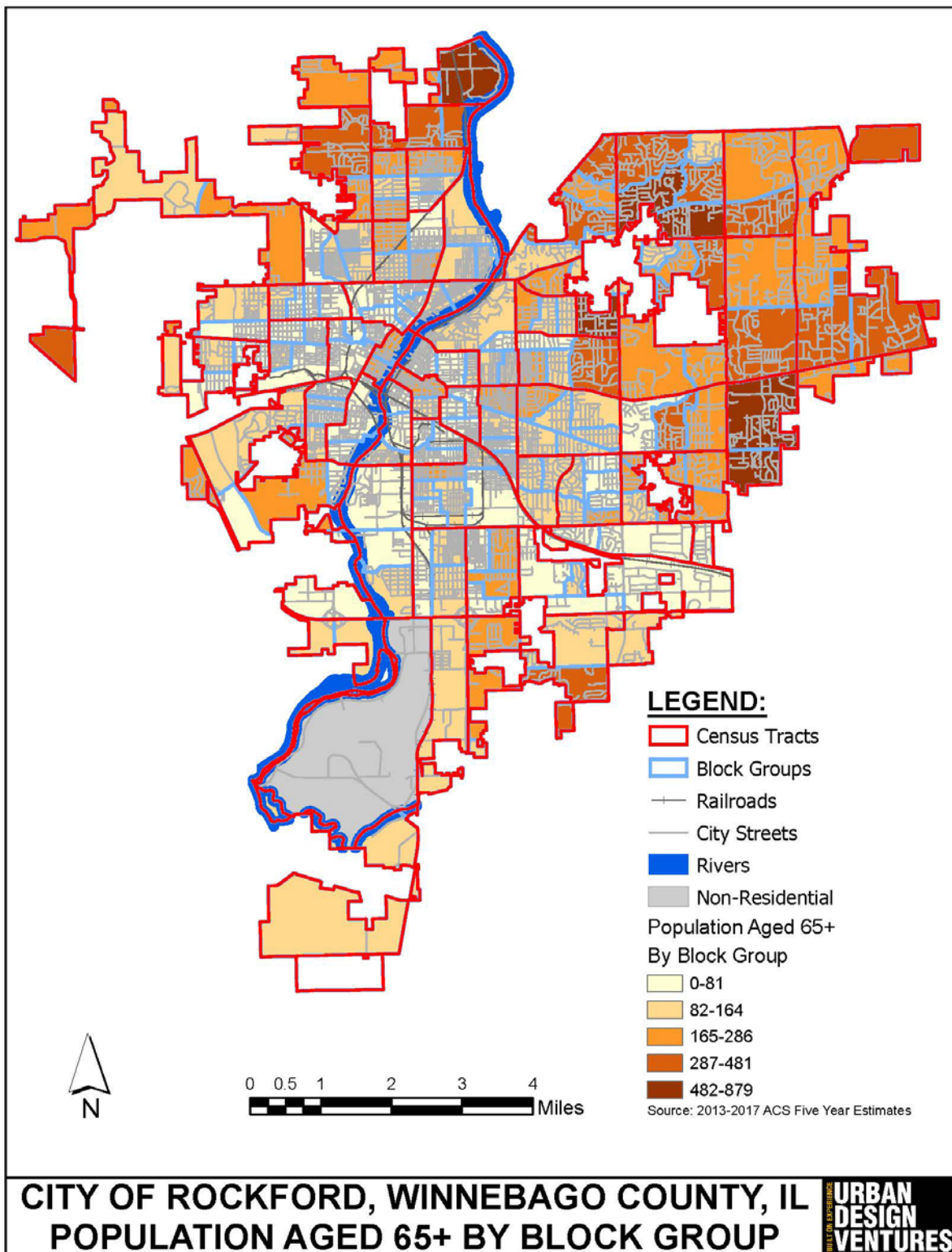
Chart II-5 – Age of Population in the City of Rockford, IL

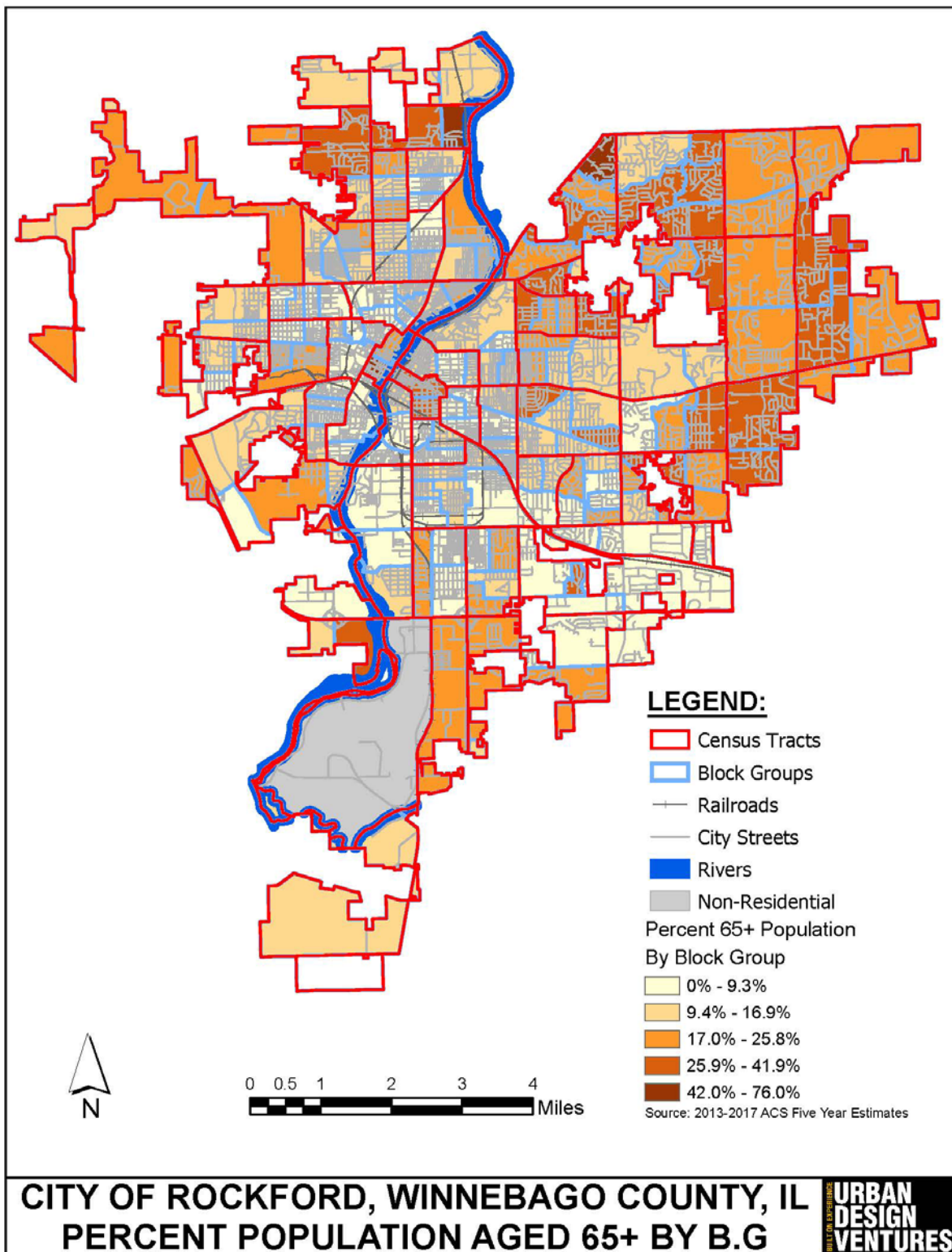


Source: 2008-2012 & 2013-2017 ACS

The median age in the City of Rockford at the time of the 2013-2017 American Community Survey was 36.5 years. The median age during the 2013-2017 American Community Survey in Winnebago County is slightly higher at 39.6 years, and the median age in the State of Illinois is higher at 37.7 years.

The following maps illustrate the count and percentage of the population Age 65 and Over by Block Group in the City of Rockford. There has been a national increase in the percentage of the population Age 65 and over, and as a result, a greater need for ADA improvements in housing. Age 65 and over individuals and households can be presumed to be low- or moderate-income, because many are living on fixed incomes.





Religion

The U.S. Census does not collect data on the religious affiliations of the population in the United States. In an effort to better understand the religious affiliations of the residents of Rockford, the City used the data made available by the Association of Religion Data Archives (ARDA). ARDA surveys the congregation members, their children, and other people who regularly attend church services within counties across the country. Although this data appears to be the most comprehensive data that is available, it is unfortunately not entirely complete as it does not accurately include traditional African American denominations. The total number of regular attendees was adjusted in 2010 (the most recent year for which data is available) to represent the population including historic African American denominations. Also, no data for African American denominations was available for the year 2000. However, the total number cannot be disaggregated to determine the distribution across denominational groups. The table below shows the distribution of residents of Winnebago County across various denominational groups, as a percentage of the population which reported affiliation with a church.

Table II-5 compares religious affiliation in Winnebago County from 1990 through 2010. Data from the Association of Religious Data Archives was used.

Table II-5: Religious Affiliation in Winnebago County

	1990		2000		2010	
	#	%	#	%	#	%
Total Population:	283,719	-	320,204	-	349,431	-
Total Adherents:	138,698	48.9%	156,779	49.0%	175,012	50.1%
Evangelical Protestant	33,052	23.8%	36,540	23.3%	59,123	33.8%
Black Protestant	0	0.0%	0	0.0%	5,544	3.2%
Mainline Protestant	51,970	37.5%	46,071	29.4%	34,426	19.7%
Catholic	51,000	36.8%	69,797	44.5%	69,793	39.9%
Orthodox	113	0.1%	833	0.5%	1,248	0.7%
Other	2,563	1.8%	3,538	2.3%	4,878	2.8%

Unclaimed:	145,021	51.1%	163,425	51.0%	174,419	49.9%
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Source: The Association of Religious Data Archives; <http://www.thearda.com>

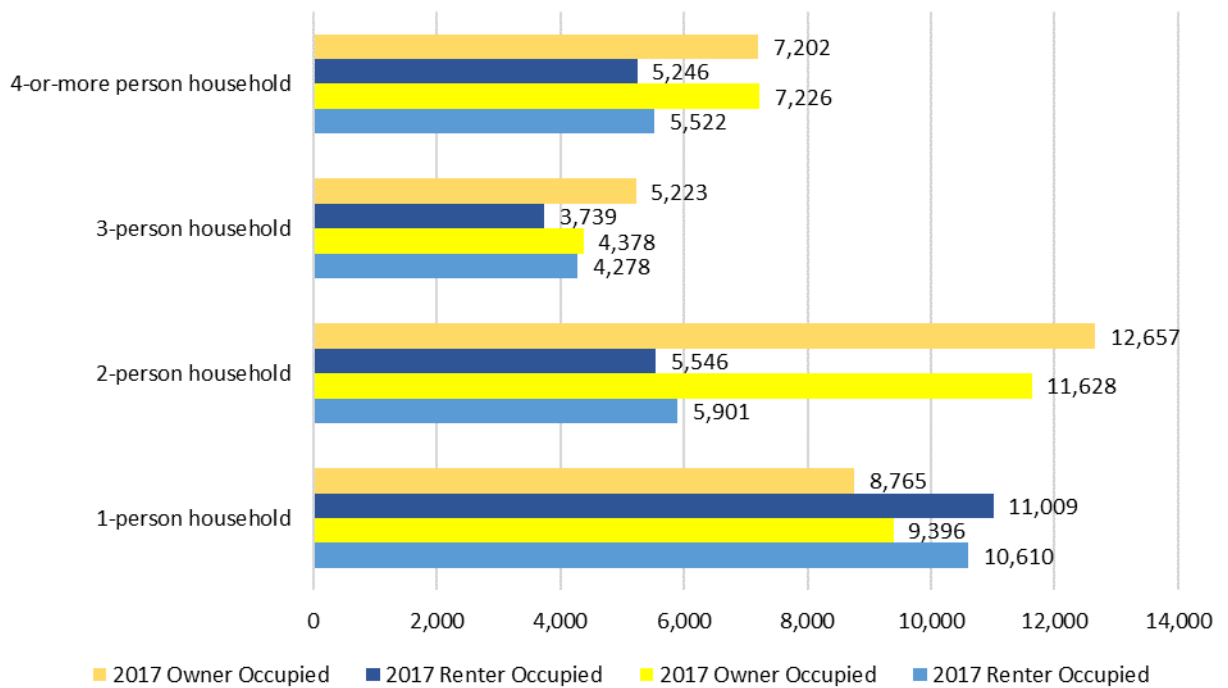
Between 1990 and 2010, Winnebago County experienced a decrease in people identifying themselves as “Mainline Protestants,” and an overall increase in the portion of the religious population identifying itself as “Evangelical Protestants.” Between 1990 and 2010, Winnebago County saw little change in the number of people identifying with religious traditions. The percentage of total adherents and the percentage of unclaimed population followed similar such holding patterns each decade.

B. Households:

According to the American Community Survey for the 2008-2012, there were 67,708 housing units in the City of Rockford. Of these housing units, 59,387 (87.7%) were occupied and 8,321 (12.3%) were vacant. Of the occupied housing units, 36,191 (60.5%) were owner-occupied and 23,636 (39.5%) were renter-occupied. According to the 2013-2017 ACS 5-Year estimates, there were 66,321 housing units in the City of Rockford. Of these housing units, 58,939 (88.9%) were occupied and 7,382 (11.1%) were vacant. Of the occupied housing units, 32,628 (55.4%) were owner-occupied and 26,311 (44.6%) were renter-occupied.

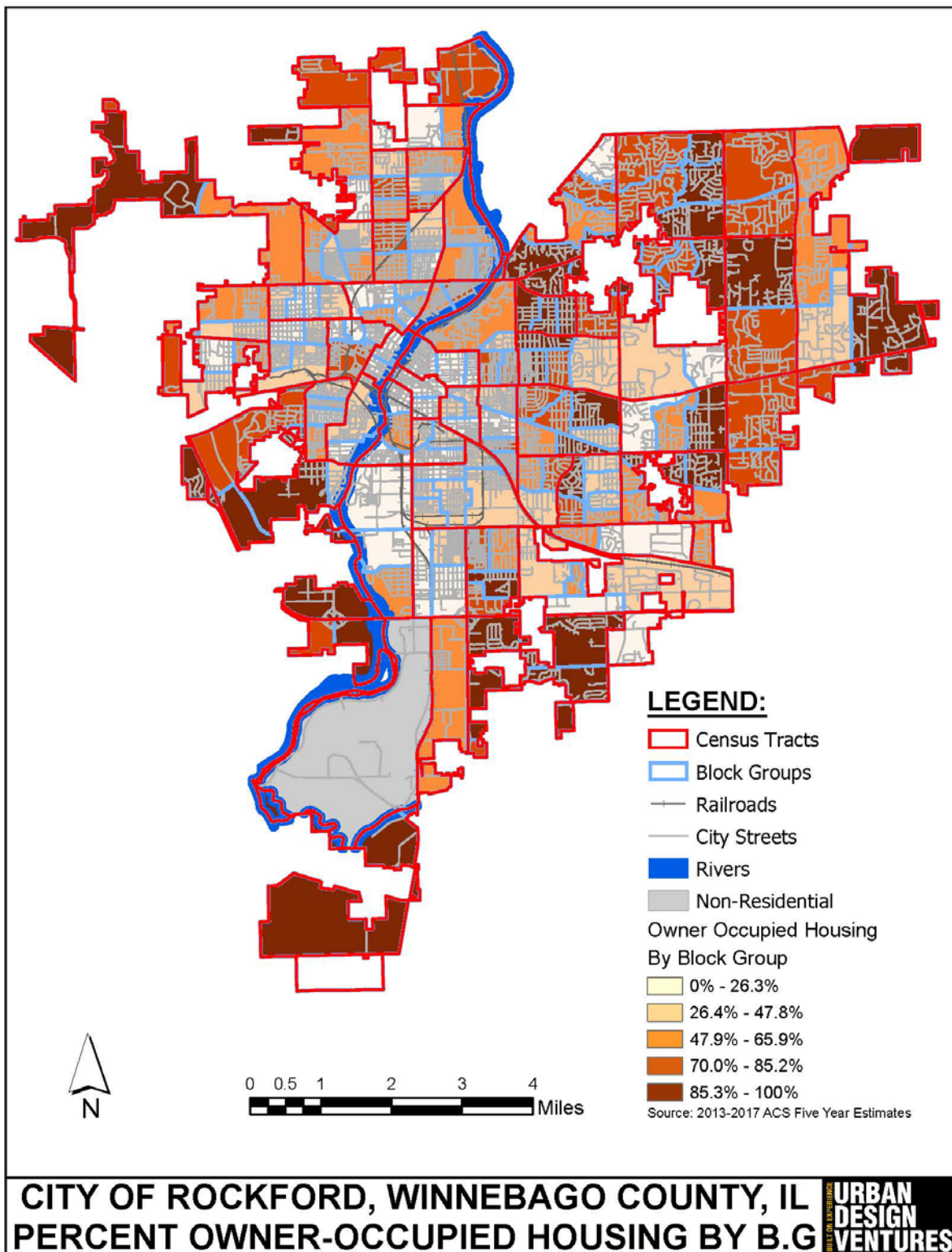
The significant changes in Household Tenure in the City of Rockford from 2012 to 2017 were the 3.6% (1,219 units) decrease in the number of owner-occupied units and the 3.01% (771 units) increase in the number of renter-occupied units. Also significant is the overall decrease in the City’s population. In 2017 the average size of the owner-occupied households was 2.51 persons, and the average renter household was 2.38 persons. **Chart II-6** illustrates household size breakdown for owner and renter households.

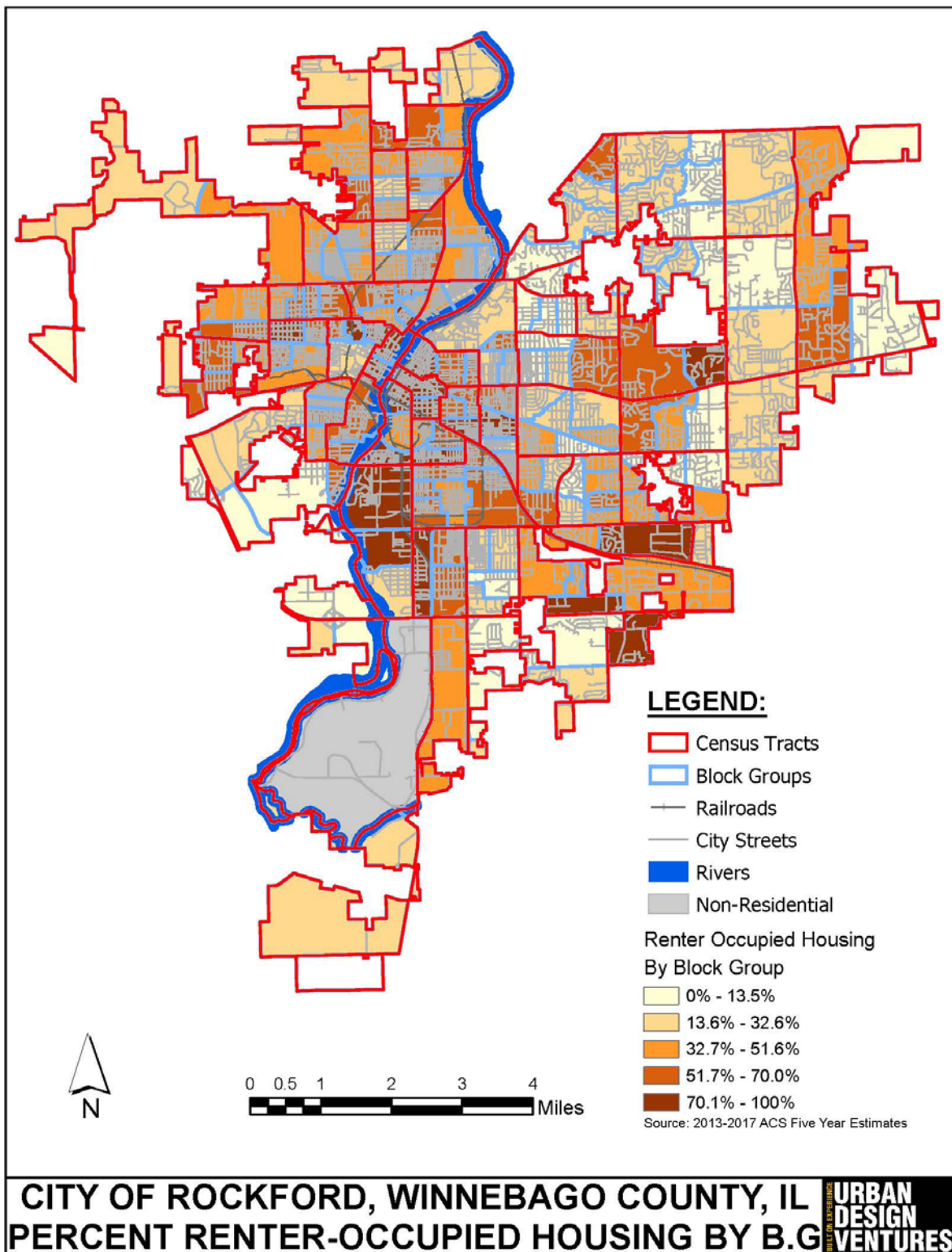
Chart II-6 – Occupancy by Tenure in the City of Rockford, IL



Source: 2008-2012 & 2013-2017 ACS

The following maps illustrate the percentages of Owner and Renter-Occupied Housing Units by Block Group in the City of Rockford.





The following **Table II-6** compares homeowners and renters by race. This table shows that “White” households represent the largest percentage of homeownership (83.1%) with “Black or African American” households comprising 9.5% of the total homeowners.

Homeownership rates continue to decline in the City. Homeowners represented 57% (33,847 households) of all households in 2012 and 55.4% (32,628 households) of all households in 2017. In response, rental rates increased in the City. Renters represented 43.0% (25,540 households) of all households in 2012 and 44.6 percent (26,311 households) of all households in 2017.

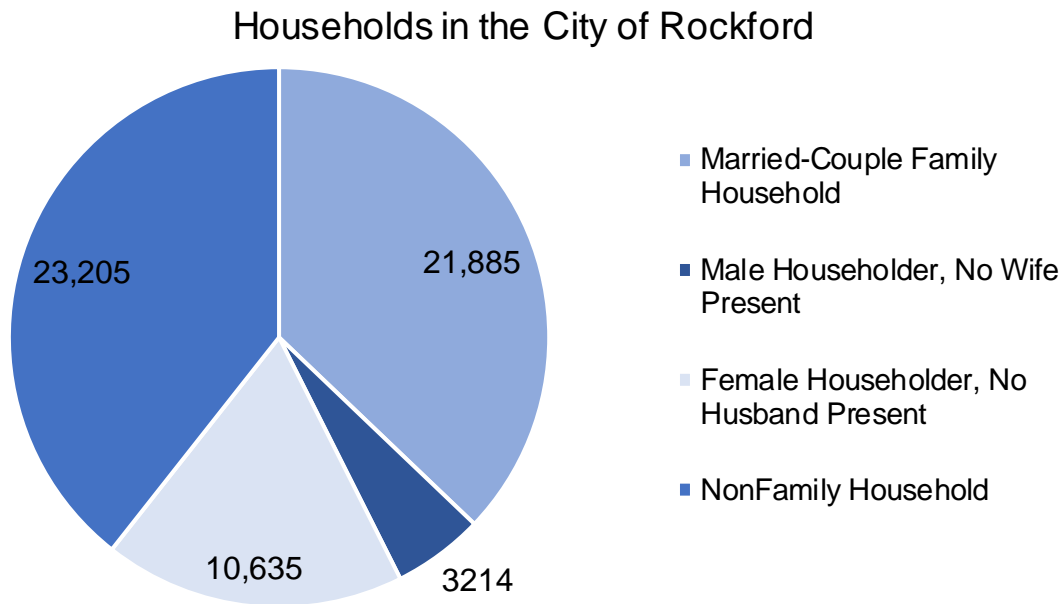
Table II-6 – Household Tenure by Race

Cohort	2008-2012 ACS				2013-2017 ACS			
	Owner	%	Renter	%	Owner	%	Renter	%
Householder who is White alone	28,335	47.7%	15,916	26.8%	27,110	46.0%	15,390	26.1%
Householder who is Black or African American alone	3,718	6.3%	7,831	13.2%	3,099	5.3%	8,476	14.4%
Householder who is American Indian and Alaska Native alone	65	0.1%	86	0.1%	12	0.0%	285	0.5%
Householder who is Asian alone	680	1.1%	551	0.9%	1,086	1.8%	506	0.9%
Householder who is Native Hawaiian and Other Pacific Islander alone	0	0.0%	0	0.0%	0	0.0%	3	0.0%
Householder who is some other race alone	666	1.1%	737	1.2%	894	1.5%	780	1.3%
Householder who is two or more races	383	0.6%	419	0.7%	427	0.7%	871	1.5%
Householder who is Hispanic or Latino	2,884	4.9%	3,185	5.4%	3,670	6.2%	3,602	6.1%
Householder who is not Hispanic or Latino	26,234	44.2%	13,621	22.9%	24,460	41.5%	13,052	22.1%

Source: 2008-2012 & 2013-2017 ACS

In 2017, non-family households comprised 39.4% of all households, married-couple family households comprised 37.1% of all households, female householders with no husband present comprised 18.0% of all households, and male householders with no wife present comprised 5.5% of all households in the City. The chart below illustrates the breakdown of households by type in the City of Rockford as of 2017 using data from the 2013-2017 ACS.

Chart II-7 – Households by Type in the City of Rockford, IL



Source: 2013-2017 ACS Data

C. Income and Poverty:

The 2013-2017 American Community Survey reported that the per capita income for the City was \$23,297 in 2017. The median household income for the City of Rockford was \$41,991, much lower than \$51,110 for Winnebago County, and \$61,229 for the State of Illinois. **Table II-7** illustrates household income trends.

Table II-7 – Household Income in the City of Rockford, IL

Items	2008-2012 ACS		2013-2017 ACS	
	Number of Households	Percentage	Number of Households	Percentage
Total Households	59,387	-	58,939	-
Less than \$10,000	7,406	12.5%	6,469	11.0%

\$10,000 to \$14,999	4,211	7.1%	4,104	7.0%
\$15,000 to \$24,999	8,830	14.9%	7,606	12.9%
\$25,000 to \$34,999	6,694	11.3%	6,718	11.4%
\$35,000 to \$49,999	9,327	15.7%	9,151	15.5%
\$50,000 to \$74,999	10,041	16.9%	10,698	18.2%
\$75,000 to \$99,999	5,883	9.9%	6,131	10.4%
\$100,000 to \$149,999	4,296	7.1%	5,093	8.6%
\$150,000 to \$199,999	1,236	2.1%	1,566	2.6%
\$200,000 or more	1,436	2.4%	1,403	2.4%
Median Household Income	\$38,517	-	\$41,991	-
Mean Household Income	\$53,257	-	\$57,162	-

Source: 2008-2012 and 2013-2017 ACS

Table II-8 below identifies the Section 8 Income Limits in the Rockford Metropolitan Statistical Area (MSA) based on household size for FY 2019. The Median Family Household Income for a family of 4 living in the Rockford MSA was \$44,988 in 2017.

Table II-8 – Section 8 Income Limits for 2019 for the Rockford MSA

Income Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low (30%) Income Limits (\$)	\$13,950	\$16,910	\$21,330	\$25,750	\$30,170*	\$34,590*	\$39,010*	\$43,430*
Very Low (50%) Income Limits (\$)	\$23,350	\$26,550	\$29,850	\$33,150	\$35,850	\$38,500	\$41,150	\$43,800
Low (80%) Income Limits (\$)	\$37,150	\$42,450	\$47,750	\$53,050	\$57,300	\$61,550	\$65,800	\$70,050

Data obtained from hud.gov

* The FY 2014 Consolidated Appropriations Act changed the definition of extremely low-income to be the greater of 30/50ths (60 percent) of the Section 8 very low-income limit or the poverty guideline as established by the Department of Health and Human Services (HHS), provided that this amount is not greater than the Section 8 50% very low-income limit. Consequently, the extremely low (30%) income limits may equal the very low (50%) income limits.

Table II-9 below highlights the low- and moderate-income population in the City of Rockford.

Table II-9 – Low- and Moderate-Income in the City of Rockford, IL

TRACT	BLK GRP	LOW/MOD	LOWMOD UNIV	LOWMOD PCT
000300	1	285	610	46.72%
000300	2	435	840	51.79%
000300	3	410	775	52.90%
000300	4	530	980	54.08%
000300	5	260	830	31.33%
000401	1	240	635	37.80%
000401	2	260	635	40.94%
000401	3	155	655	23.66%
000402	1	50	705	7.09%
000402	2	180	675	26.67%
000402	3	405	1370	29.56%
000403	1	230	605	38.02%
000403	2	345	1055	32.70%
000403	3	550	1655	33.23%
000403	4	145	700	20.71%
000501	1	210	940	22.34%
000501	2	80	770	10.39%
000501	3	290	740	39.19%
000501	4	730	1025	71.22%
000501	5	450	810	55.56%
000502	1	255	705	36.17%
000502	2	810	1515	53.47%
000502	3	340	820	41.46%
000504	1	180	1235	14.57%
000504	2	375	1890	19.84%
000504	3	515	2190	23.52%
000504	4	0	555	0.00%
000504	5	140	1000	14.00%
000506	1	140	855	16.37%
000506	2	265	550	48.18%
000506	3	120	1110	10.81%
000506	4	95	1050	9.05%
000506	5	120	835	14.37%
000507	1	560	1190	47.06%

000507	2	130	1020	12.75%
000507	3	875	1480	59.12%
000510	1	225	1355	16.61%
000510	2	220	1765	12.46%
000511	1	215	1105	19.46%
000511	2	450	1545	29.13%
000512	1	335	845	39.64%
000512	2	225	1000	22.50%
000512	3	480	1905	25.20%
000512	4	260	1485	17.51%
000513	1	655	1970	33.25%
000513	2	235	1620	14.51%
000514	1	420	1390	30.22%
000514	2	190	1115	17.04%
000514	3	245	1060	23.11%
000600	1	205	435	47.13%
000600	2	955	1890	50.53%
000600	3	420	905	46.41%
000600	4	170	1055	16.11%
000700	1	455	980	46.43%
000700	2	380	795	47.80%
000700	3	405	905	44.75%
000700	4	15	520	2.88%
000800	1	565	670	84.33%
000800	2	810	1195	67.78%
000800	3	615	865	71.10%
001000	1	325	355	91.55%
001000	2	460	530	86.79%
001000	3	1110	1225	90.61%
001100	1	480	590	81.36%
001100	2	325	495	65.66%
001200	1	505	820	61.59%
001200	2	360	570	63.16%
001200	3	555	765	72.55%
001300	1	685	840	81.55%
001300	2	545	695	78.42%
001300	3	1125	1420	79.23%
001400	1	515	1350	38.15%
001400	2	940	1235	76.11%
001400	3	480	625	76.80%
001400	4	575	685	83.94%

001500	1	280	670	41.79%
001500	2	215	495	43.43%
001500	3	340	825	41.21%
001500	4	850	1315	64.64%
001500	5	315	760	41.45%
001500	6	480	850	56.47%
001600	1	540	945	57.14%
001600	2	350	695	50.36%
001600	3	825	1730	47.69%
001600	4	375	810	46.30%
001600	5	465	835	55.69%
001600	6	405	685	59.12%
001700	1	390	965	40.41%
001700	2	775	1305	59.39%
001700	3	715	1120	63.84%
001800	1	740	905	81.77%
001800	2	945	1005	94.03%
001800	3	680	1025	66.34%
001800	4	385	560	68.75%
001800	5	595	675	88.15%
001800	6	915	1445	63.32%
001900	1	370	865	42.77%
001900	2	820	1100	74.55%
001900	3	475	845	56.21%
001900	4	180	460	39.13%
002000	1	1110	1230	90.24%
002000	2	745	1370	54.38%
002000	3	100	195	51.28%
002100	1	600	635	94.49%
002100	2	810	840	96.43%
002100	3	420	570	73.68%
002200	1	840	1095	76.71%
002200	2	800	1260	63.49%
002200	3	510	625	81.60%
002200	4	290	735	39.46%
002301	1	565	910	62.09%
002301	2	795	960	82.81%
002301	3	555	870	63.79%
002302	1	460	670	68.66%
002302	2	170	585	29.06%
002400	1	895	915	97.81%

002400	2	525	600	87.50%
002400	3	700	760	92.11%
002500	1	1015	1090	93.12%
002500	2	700	850	82.35%
002500	3	665	780	85.26%
002500	4	580	805	72.05%
002600	1	745	910	81.87%
002600	2	180	245	73.47%
002600	3	430	465	92.47%
002600	4	605	640	94.53%
002700	1	540	705	76.60%
002700	2	575	690	83.33%
002700	3	420	565	74.34%
002700	4	820	1070	76.64%
002800	1	1030	1145	89.96%
002800	2	610	710	85.92%
002900	1	870	900	96.67%
002900	2	270	300	90.00%
003000	1	100	585	17.09%
003000	2	500	1130	44.25%
003100	1	560	935	59.89%
003100	2	395	695	56.83%
003100	3	260	430	60.47%
003100	4	670	775	86.45%
003100	5	750	955	78.53%
003200	1	1050	1160	90.52%
003200	2	725	815	88.96%
003200	3	370	605	61.16%
003200	4	1000	1095	91.32%
003300	1	290	670	43.28%
003300	2	700	1300	53.85%
003300	3	605	880	68.75%
003300	4	460	555	82.88%
003400	1	525	910	57.69%
003400	2	530	875	60.57%
003400	3	970	1900	51.05%
003400	4	680	1190	57.14%
003500	1	125	650	19.23%
003500	2	30	865	3.47%
003500	3	310	1020	30.39%
003601	1	560	880	63.64%

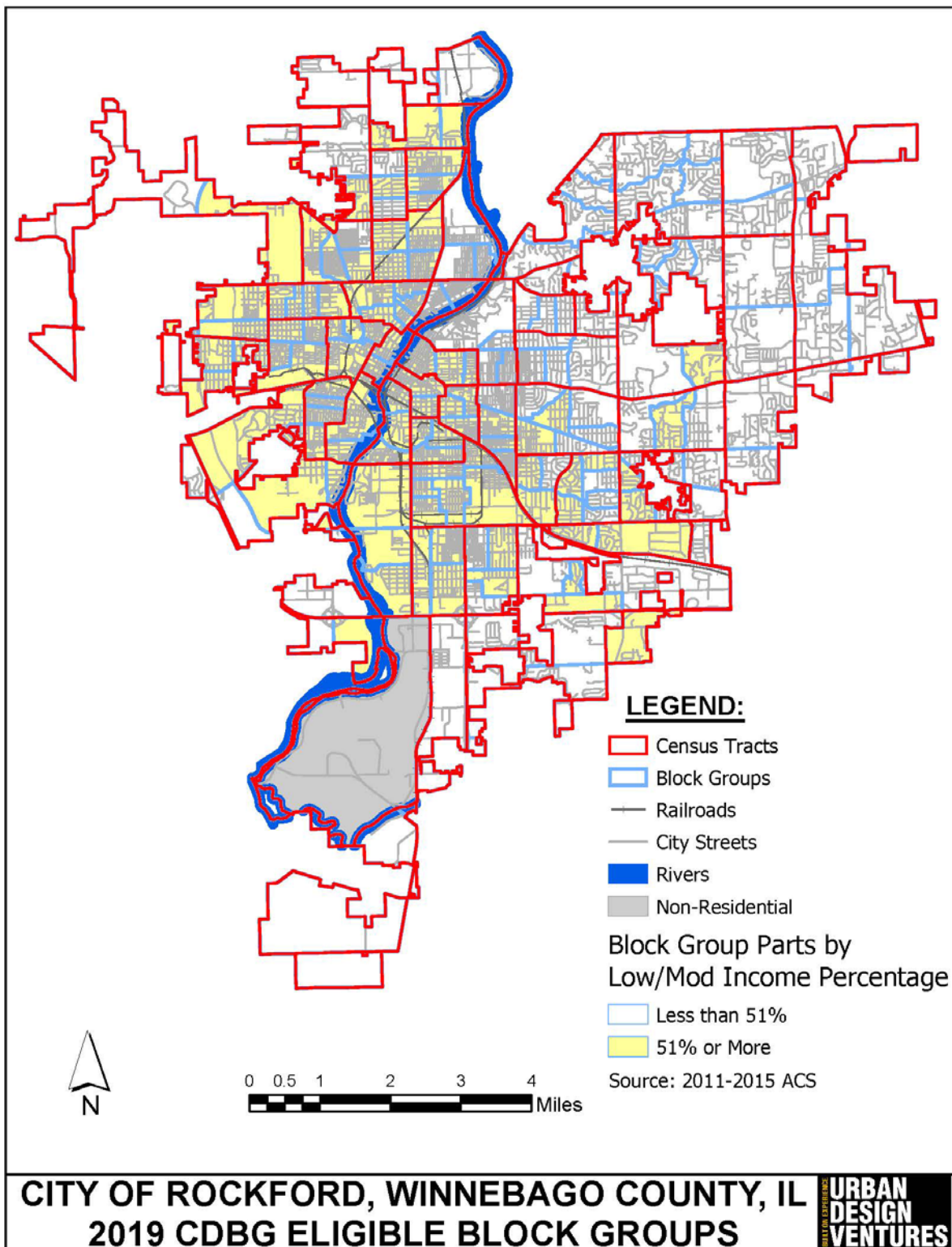
003601	2	115	670	17.16%
003602	1	500	1250	40.00%
003602	2	1065	1670	63.77%
003602	3	440	720	61.11%
003604	1	385	765	50.33%
003604	2	565	940	60.11%
003604	3	330	1095	30.14%
003605	1	670	1070	62.62%
003605	2	265	350	75.71%
003606	1	645	1185	54.43%
003606	2	655	975	67.18%
003606	3	400	515	77.67%
003705	1	90	940	9.57%
003705	2	210	685	30.66%
003705	3	265	790	33.54%
003705	4	345	840	41.07%
003705	5	290	1745	16.62%
003706	1	485	1285	37.74%
003706	2	680	1670	40.72%
003706	3	725	1815	39.94%
003706	4	130	680	19.12%
003706	5	130	985	13.20%
003707	1	1820	2845	63.97%
003707	2	165	1040	15.87%
003708	1	710	1480	47.97%
003708	2	530	795	66.67%
003708	3	320	555	57.66%
003709	1	595	795	74.84%
003709	2	450	800	56.25%
003710	1	170	1115	15.25%
003710	2	285	1345	21.19%
003711	1	335	1780	18.82%
003711	2	490	1365	35.90%
003711	3	140	265	52.83%
003711	4	130	540	24.07%
003711	5	375	810	46.30%
003801	1	220	720	30.56%
003801	2	250	1115	22.42%
003801	3	1255	4245	29.56%
004200	1	205	1320	15.53%
004200	2	535	2720	19.67%

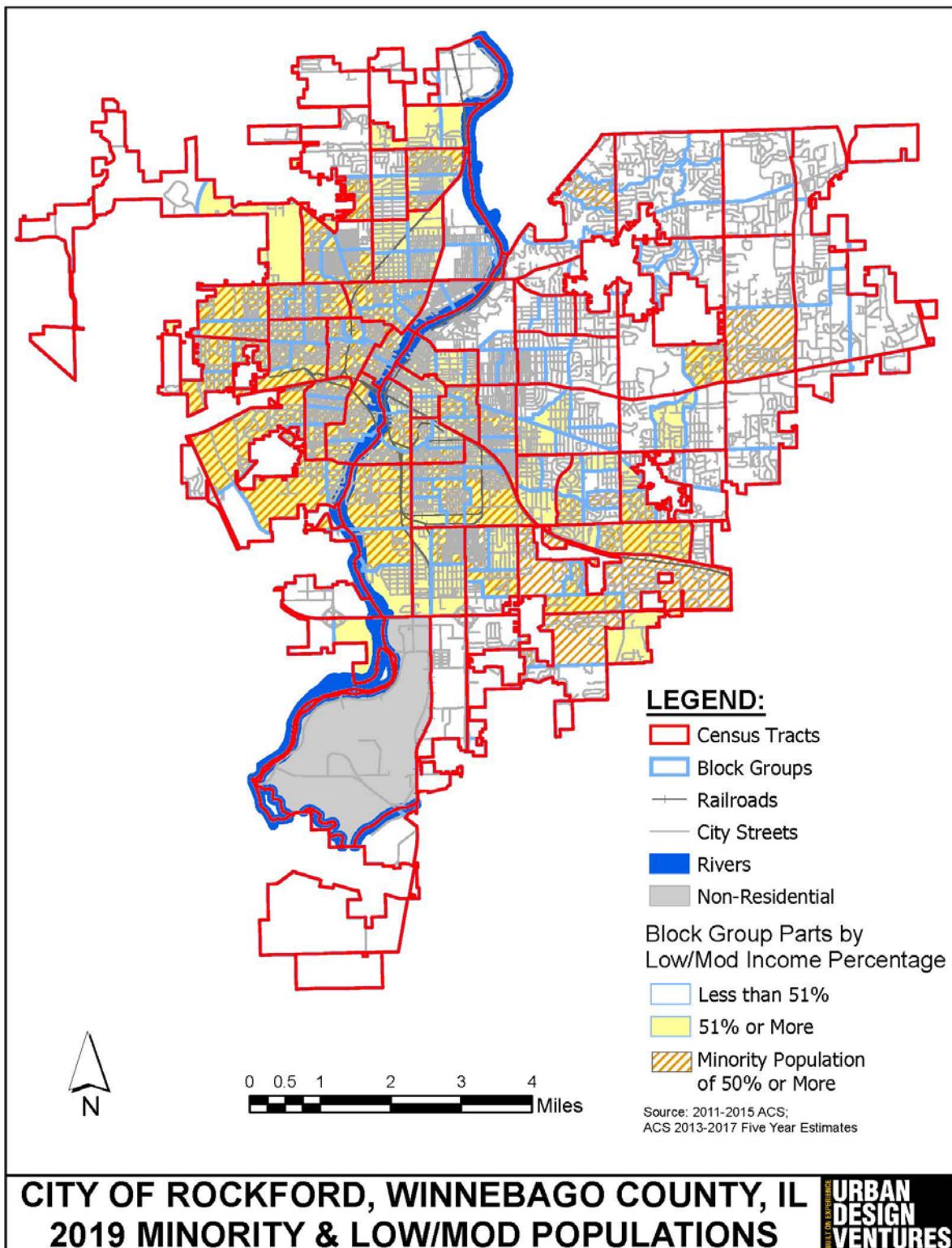
004200	3	350	1530	22.88%
004200	4	25	800	3.13%
980000	1	0	0	0.00%
City of Rockford Total:		79,145	146,470	54.03%

Data obtained from hud.gov

Over half (54.03%) of all residents in the City of Rockford were considered low- to moderate-income at the time of the 2011-2015 American Community Survey. According to American Community Survey data, in 2015 almost twenty-five percent (24.8%) of the population in the City of Rockford living below the poverty level. In comparison 16.8% of the population of Winnebago County and 14.3% of the State of Illinois shared the same economic status. According to a more recent American Community Survey, the data remains relatively consistent, though has slightly decreased. Twenty-two percent (22.2%) of the population in the City of Rockford was living below the poverty level in 2017. Whereas, only 15.3% of the population in Winnebago County, and 13.5% of the population in Illinois was living below the poverty level.

The following maps illustrate the percentages of Low-Income Population and Low-Income/Minority Population by Block Group in the City of Rockford.

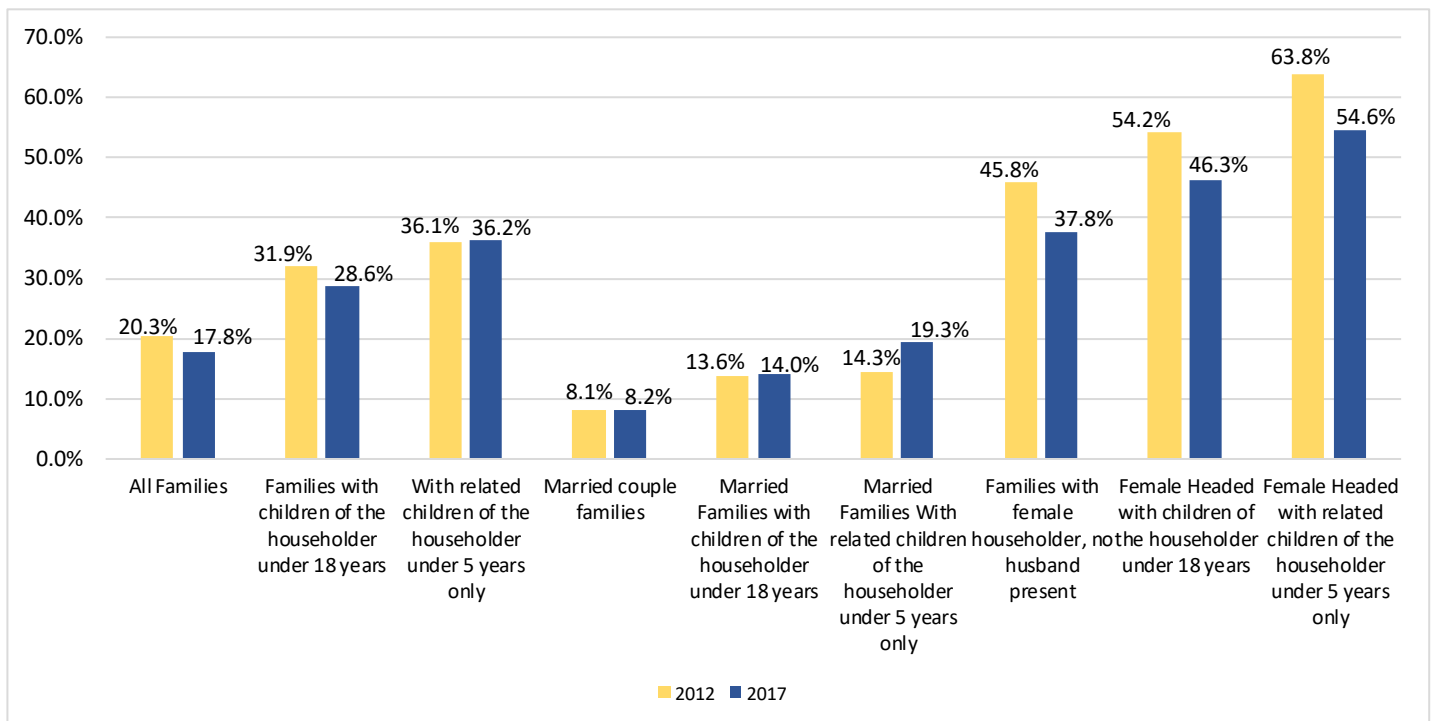




The City's poverty statistics for families with children are significant, particularly for single mothers. **Chart II-8** illustrates the poverty statistics for families living in the City of Rockford. At the time of the 2013-2017 American Community Survey, the percentage of some families with children living below the poverty level was as follows:

- Families with related children under the age of 18 was 28.6%.
- Families with related children under the age of 5 was 36.2%.
- Female-headed families with related children under the age of 18 was 46.3%
- Female-headed families with related children under the age of 5 was 54.6%

Chart II-8 – Families in Poverty in the City of Rockford, IL



Source: 2008-2012 and 2013-2017 ACS

D. Employment:

In 2012, according to 2008-2012 ACS Estimates, the total number of eligible workers (population 16 years and over) in the City of Rockford was 117,005 persons. In 2012, 62.1% of eligible workers were in the labor force and 14.6% of eligible workers in the work force were unemployed.

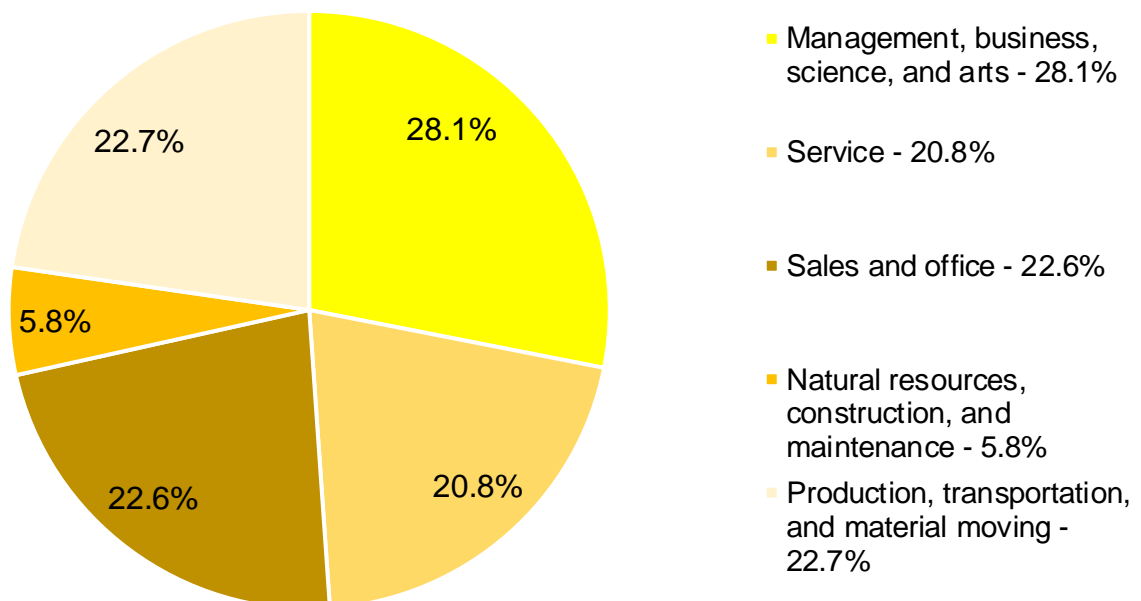
According to 2013-2017 ACS Estimates, the total number of eligible workers (population 16 years and over) in the City of Rockford was 114,905 persons. In 2017, 62.7% (72,019 persons) of eligible workers were in the labor force and 8.0% (9,236 persons) of eligible workers in the work force were unemployed.

Workers in 2017 had a mean travel time to work of 20.6 minutes.

According to the 2013-2017 American Community Survey, an estimated 33.2% (19,568 households) of households in the City of Rockford receive income from Social Security. The mean Social Security Income for 2017 was \$17,975.

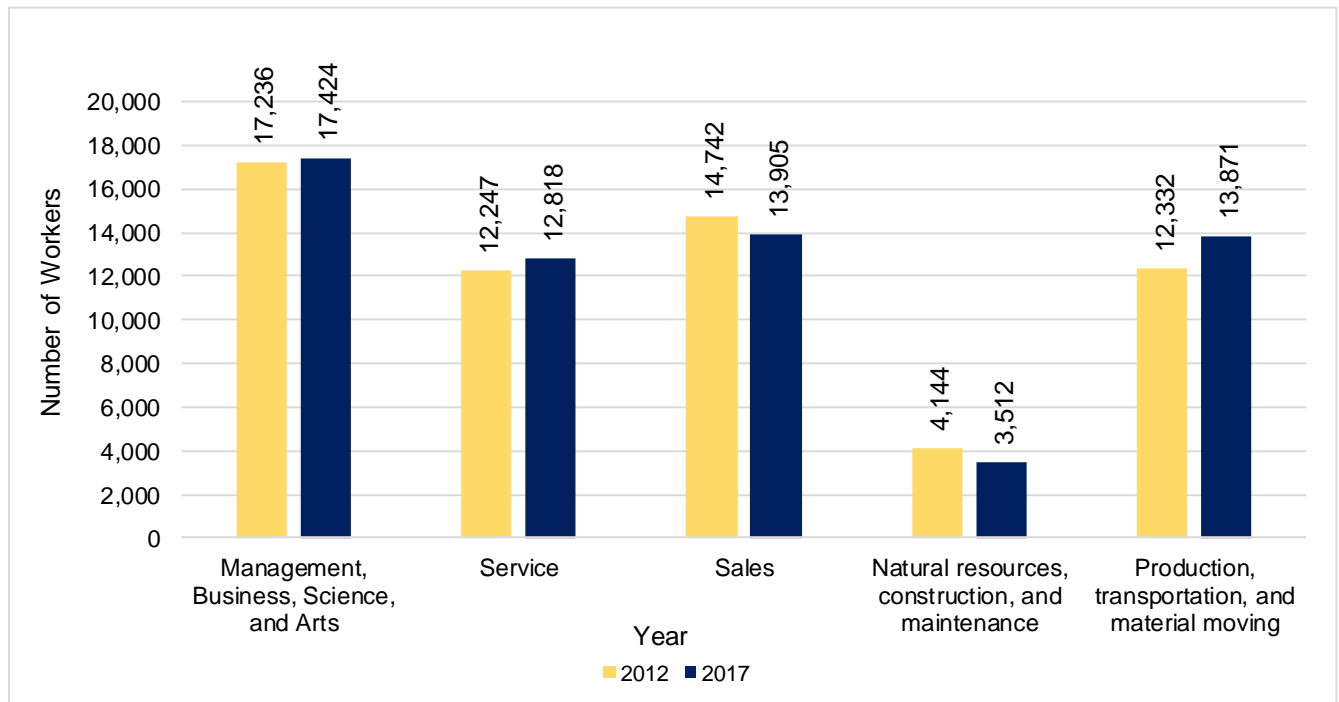
The following charts outline the distribution of the City of Rockford workers by occupation.

Chart II-9 – Rockford Occupations



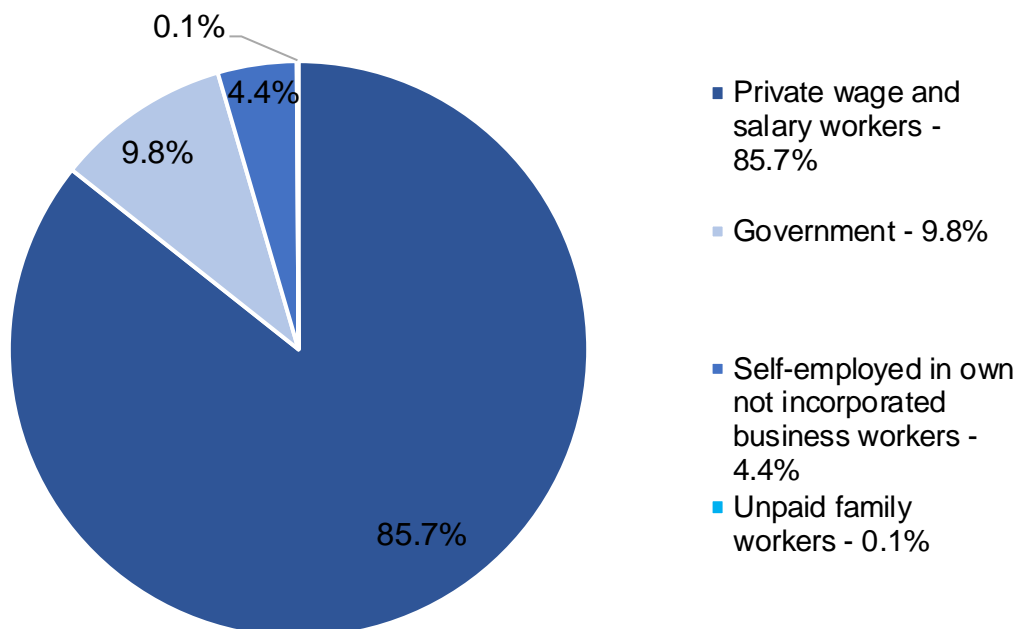
Source: 2013-2017 American Community Survey

Chart II-10 – Worker Distribution by Occupation in the City of Rockford



Source: 2008-2012 ACS and 2013-2017 ACS

Chart II-11 – Rockford Class of Worker



Source: 2013-2017 American Community Survey

Chart II-12 illustrates the unemployment rate trends for section of the Rockford Micropolitan Statistical Area from January 2009 through May 2019 from the Bureau of Labor (www.bls.gov).

Chart II-12 – Rockford Area Unemployment Rate



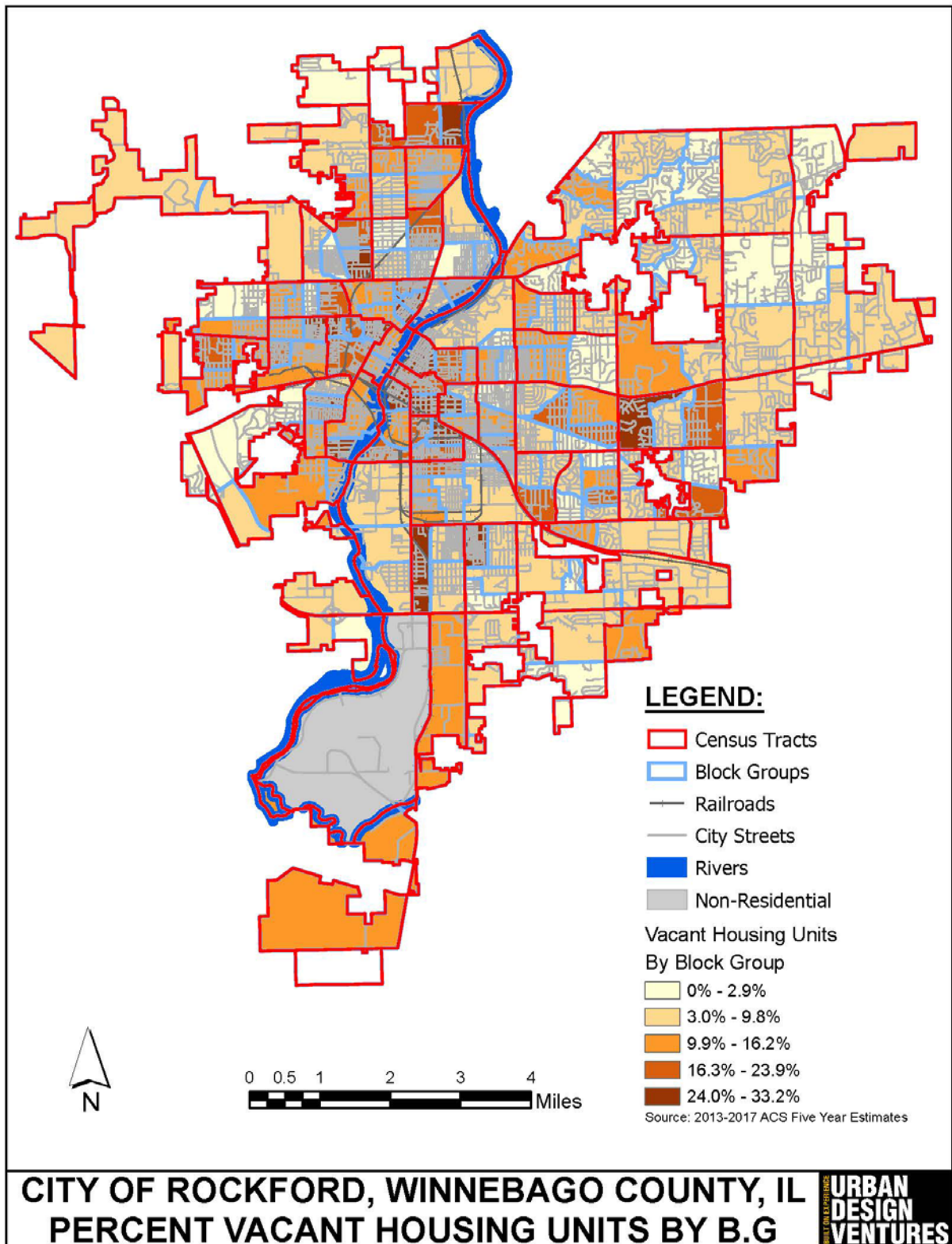
Source: <http://data.bls.gov>

The City of Rockford has experienced several spikes in unemployment in the past ten years. In January 2010, Rockford experienced the highest unemployment rate at 19%. Since 2010 the unemployment rate has slowly decreased however, the City still experienced high rates intermittently throughout the months. In more recent years the City has seen rates as high as 11.4% before reaching a low of 6.5% in May 2019.

E. Housing Profile:

According to the 2013-2017 ACS, there are 66,321 housing units in the City of Rockford, of which 88.8% are occupied; this leaves a vacancy rate of 11.2% in the City. Most of the vacant units are concentrated in the Central parts of the City on the Eastern and Western sides of the River. Some high concentrations of vacancy are scattered in the Northern, Southern, and Eastern sections of the City as indicated by the darkest shade of red.

The maps below illustrate the percentage of Vacant Housing Units by Block Group in the City of Rockford.



Based on the 2013-2017 American Community Survey Data, the City of Rockford's housing stock is considered older, since 21.5% of it was constructed prior to 1939, and 25.8% was constructed between 1940 and 1959. Therefore, nearly half of the City's housing stock (47.28%) was built prior to 1960. It is estimated that the City of Rockford has seen little construction of housing to meet the demands of the City's stable population. Since the year 2000, the City has built 6.9% of their housing stock.

Chart II-10 illustrates the year that housing structures were built in the City of Rockford based on the 2008-2012 and 2013-2017 ACS.

Chart II-10 – Year Structure Built in the City of Rockford, IL

Housing Profile	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total Housing Units	67,708	100%	66,321	100%
Built 2010 or newer	90	0.13%	313	0.6%
Built 2000 to 2009	4,481	6.6%	4,317	6.5%
Built 1990 to 1999	5,418	8.0%	5,460	8.2%
Built 1980 to 1989	5,252	7.7%	5,077	7.7%
Built 1970 to 1979	7,863	11.6%	9,563	14.4%
Built 1960 to 1969	10,881	16.0%	10,234	15.4%
Built 1950 to 1959	11,257	16.6%	10,907	16.4%
Built 1940 to 1949	6,179	9.1%	6,195	9.3%
Built 1939 or earlier	16,287	24.0%	14,255	21.5%

Source: 2008-2012 ACS and 2013-2017 ACS

The State of Cities Data Systems (SOCDS) provides series of data for individual Metropolitan Areas, Central Cities, and Suburbs. The table below illustrates the number of permits issued during the January-August 2019 period for residential construction for rehabilitation and new construction collected by the Census Bureau's Building Permit Survey:

**Table II-11 - Units Authorized by Building Permits –
Rockford, IL Core Base Statistical Area (CBSA)**

Year	Single Family	Multi Family	5+ Units	Total
2003	2,052	573	13	2,638
2004	2,226	347	22	2,595
2005	2,040	526	23	2,589
2006	1,929	234	19	2,182
2007	1,127	208	120	1,455
2008	358	107	5	470
2009	220	2	0	222
2010	293	6	0	299
2011	109	59	41	209
2012	111	24	8	143
2013	96	0	0	96
2014	134	16	0	150
2015	90	44	0	134
2016	193	20	0	213
2017	228	7	0	235
2018	209	56	0	265

Source: <http://socds.huduser.org/permits/summary.odb>

**Chart II-12 – Number of Residential Permits Issued in the
City of Rockford, IL**

	Through Jan 2019	Through Feb 2019	Through March 2019	Through April 2019	Through May 2019	Through June 2019	Through July 219	Through Aug 2019
Single Family	24	40	47	54	76	102	152	160
Multi- Family	0	0	22	40	40	56	60	68
5+ units	0	0	0	0	0	0	0	0
Total	24	40	69	97	116	158	212	228

Source: State of Cities Data Systems (SOCDS) CBSA Year to Date: August 2019

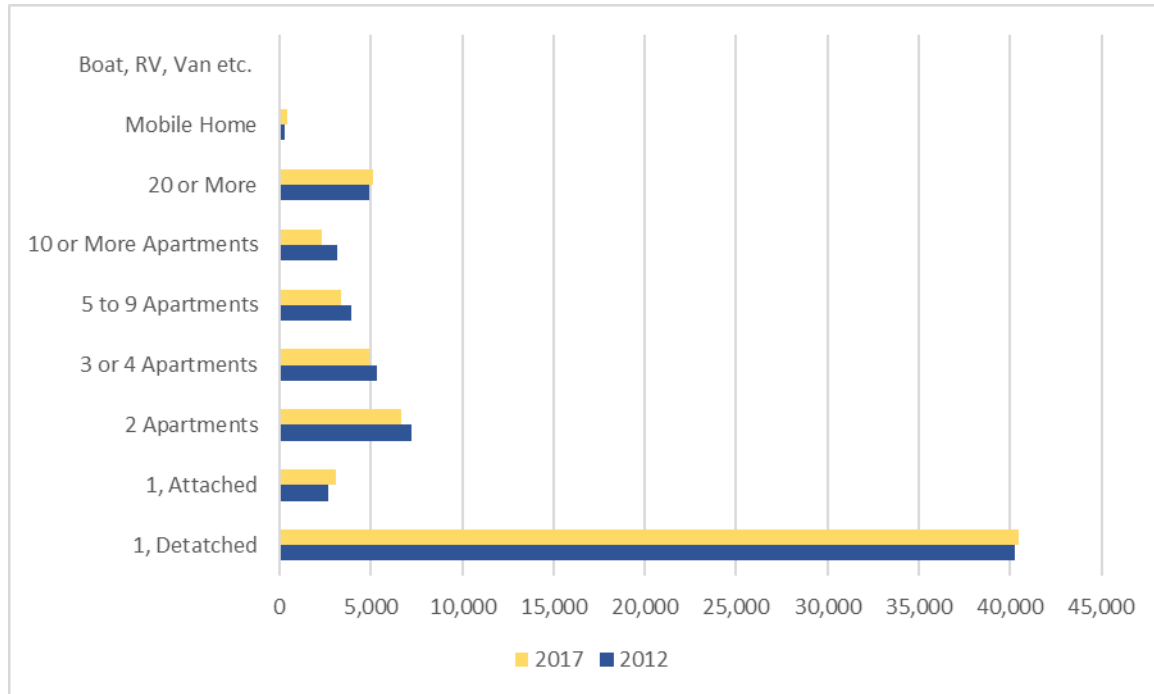
January through August 2019, the City of Rockford issued on average 28 residential permits. The City of Rockford issued the highest number of permits during the Summer months of June through July issuing a total of ninety-six (96) permits over the course of those two months. The majority of permits issued are for single family residences which reflects the most common type of housing stock within the City.

In 2012, the City's housing stock primarily consisted of single-family detached (59.4%) and single-family attached (3.9%). In 2012, multi-family units in the City of Rockford consisted of: two units (10.6%); three to four units (7.9%); five to nine units (5.8%); ten to nineteen units (4.6%); and twenty units or more (7.2%). Mobile homes made up .4% of the housing stock. The median value of owner-occupied homes in the City of Rockford in 2012 was \$109,000 compared to \$133,000 for Winnebago County and \$204,400 for the State of Illinois.

In 2017, the City's housing stock primarily consisted of single-family units, in particular, single-family detached (61.0%) and two unit buildings (10.0%). In 2017, multi-family units in the City of Rockford consisted of: two units (10.0%); three to four units (7.4%); five to nine units (5.1%); ten to nineteen units (3.5%); and twenty units or more (7.7%). Mobile homes made up 0.6% of the housing stock. The median value of owner-occupied homes in the City of Rockford in 2017 was \$89,500, compared to \$115,900 for Winnebago County and \$179,700 for the State of Illinois.

Overall, the values of the housing stock in the City of Rockford are lower than those of Winnebago County and the State of Illinois as a whole and have been decreasing since 2012. **Chart II-13** shows the change in types of housing stock over the last decade.

Chart II-13 – Housing Stock in the City of Rockford, IL



Source: 2008-2012 & 2013-2017 American Community Survey

F. Financing:

Owner Costs

The median mortgage expense in the City of Rockford for 2017 was \$861 per **Table II-13**, compared to \$992 in 2012. **Table II-13** illustrates mortgage status and selected monthly owner costs. Monthly owner costs decreased by 13.2%, while median income during the same time period increased by approximately 9%.

The number of homes in Rockford without a mortgage slightly increased from 31.0% in 2012 to 37.8% in 2017. This is most likely due to the owners having lived in their homes long enough to have paid off their mortgage and individuals aging in place. There was also a slight increase in owner occupied housing from 87.0% in 2012 to 88.9% in 2017.

Table II-13 – Mortgage Status and Selected Monthly Owner Costs

Monthly Owner Cost	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Houses with a Mortgage	23,349	68.9%	20,294	62.2%
Less than \$300	15	0.1%	16	0.1%
\$300 to \$499	328	1.4%	281	1.4%
\$500 to \$799	2,610	11.2%	3,671	18.1%
\$800 to \$999	4,105	17.6%	3,823	18.8%
\$1,000 to \$1,499	9,608	41.1%	7,992	39.4%
\$1,500 to \$1,999	4,603	19.7%	2,972	14.6%
\$2,000 or more	2,080	8.9%	1,539	7.6%
No Cash Rent	-	-	-	-
Median (dollars)	\$992	-	\$861	-
Houses without a Mortgage	10,498	31.0%	12,334	37.8%

Source: 2008-2012 and 2013-2017 American Community Survey

Nearly a third (29.2%) of all owner-occupied households with a mortgage are paying over 30% of their monthly income on housing, indicating a relatively high percentage of owners whose housing is not considered affordable. **Table II-14** illustrates housing costs for owner-households.

Table II-14 – Selected Monthly Owner Costs as a Percentage of Household Income

Owner Costs as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Housing Units with a Mortgage	23,349	68.9%	20,294	62.2%
Less than 20 percent	8,371	24.7%	5,534	17.0%
20 to 24.9 percent	3,803	11.2%	3,140	9.6%
25 to 29.9 percent	2,509	7.4%	2,035	6.2%
30 to 34.9 percent	1,951	5.8%	1,595	4.9%
35 percent or more	6,527	19.3%	4,321	13.2%
Not computed	188	0.6%	129	0.4%
Housing Units without a Mortgage (Excluding	10,498	31.0%	12,334	37.8%

those whose monthly costs cannot be calculated				
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Source: 2008-2012 and 2013-2017 American Community Survey

To determine the median list prices of homes in the City of Rockford, the City researched listings through Trulia Real Estate at trulia.com, the Rockford Area REALTORS listings on their website, and the local paper, *Rockford Register Star*, real estate publications. All sources revealed similar list prices for one, two, three, and four bedroom homes.

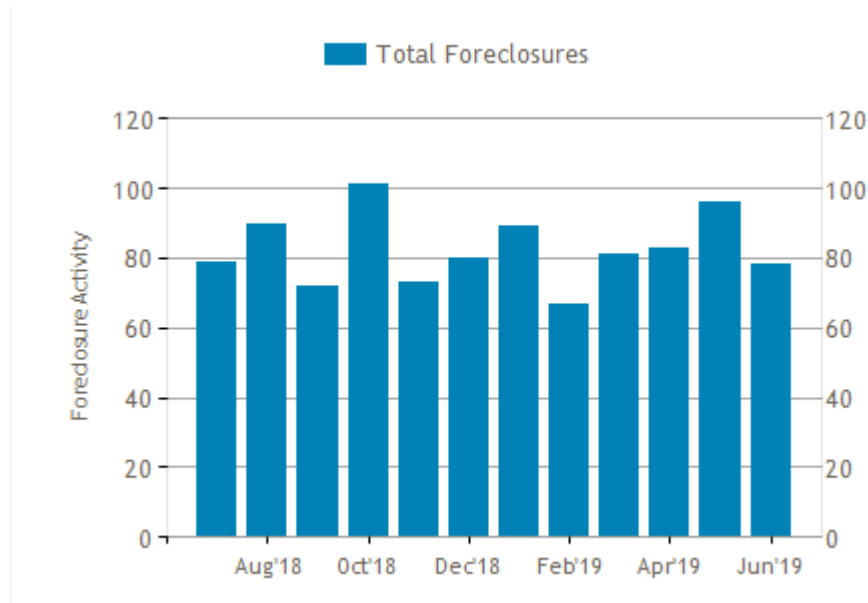
One-bedroom homes in the City list for an approximate value of \$74,200 on average, although there are very few listings for one-bedroom homes. Two-bedroom homes list for an average price of approximately \$85,377. Three-bedroom homes list for the average price of approximately \$98,868. Four-bedroom homes list for an average price of \$146,693.

The median value of owner-occupied homes in the City of Rockford in 2017 was \$89,500, lower than \$119,700 for Winnebago County and \$192,500 for the State of Illinois, according to the 2013-2017 American Community Survey. However, the percent of people living in poverty in Rockford is 22.2%, compared to 15.3% for Winnebago County and 13.5% in Illinois. Nearly a third of all owner-occupied households in the City of Rockford (29.2%) with a mortgage are paying over 30% of their monthly income on housing, indicating a relatively high percentage of owners whose housing is not considered affordable, compared to over a quarter in both Winnebago County (25.9%) and Illinois (27.1%). When factoring in homeowners without a mortgage, 18.0% of Rockford residents are cost overburdened, compared with 9.7% of residents in Winnebago County and 12.4% in the State of Illinois.

Foreclosures

According to RealtyTrac, the City of Rockford had 568 homes in foreclosure in July 2019, which is a foreclosure rate of 1 in every 1,050 housing units. Winnebago County experienced a foreclosure rate of 1 in every 1,095 housing units, and the State of Illinois had a foreclosure rate of 1 in every 1,703 housing units. The following chart illustrates the monthly foreclosure filings in the City of Rockford from August 2018 to June 2019.

Chart II-14 – Foreclosures in the City of Rockford, IL



Source: www.realtytrac.com

The number of foreclosures for the City of Rockford was at its highest in October 2018 with just over 100 foreclosures.

Renter Costs

The median monthly rent increased by 4.3% between 2012 and 2017, from \$701 to \$731, respectively. **Table II-15** illustrates rental rates within the City at the time of the 2008-2012 and 2013-2017 American Community Survey.

Table II-15 – Gross Monthly Rent

Monthly Renter Cost	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	25,540	43.0%	26,311	44.6%
Less than \$300	1,314	5.1%	1,869	7.1%
\$300 to \$499	2,846	11.1%	2,117	8.0%
\$500 to \$799	11,611	45.5%	10,908	41.5%
\$800 to \$999	4,486	17.5%	4,690	17.8%
\$1,000 to \$1,499	3,272	12.8%	4,793	18.2%
\$1,500 to \$1,999	404	1.6%	537	2.0%
\$2,000 or more	320	1.2%	326	1.3%

No Cash Rent	874	3.4%	1,071	4.1%
Median (dollars)	\$701	-	\$731	-

Source: 2008-2012 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. The monthly housing costs for half (50.3%) of all renter-occupied households exceeded 30% of monthly income in 2012, indicating an even higher percentage of renters whose housing is not considered affordable. In 2017, that amount decreased to 48.1%, which is a 2.2% decrease from 2012. **Table II-16** illustrates the housing cost for renter-households.

Table II-16 – Gross Rent as a Percentage of Household Income

Rental Cost as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Rental Units paying rent	25,540	-	26,311	-
Less than 15 percent	2,379	9.3%	2,777	10.6%
15 to 19.9 percent	2,578	10.1%	3,246	12.3%
20 to 24.9 percent	2,792	10.9%	2,917	11.1%
25 to 29.9 percent	2,537	9.9%	3,032	11.5%
30 to 34.9 percent	1,650	6.4%	1,945	7.4%
35 percent or more	11,204	43.9%	10,699	40.1%
Not computed	2,400	-	1,695	-

Source: 2008-2012 and 2013-2017 American Community Survey

The 2019 Fair Market Rents for the Winnebago County, IL FMR Area are shown in **Table II-21** below.

Table II-17 – Final FY 2019 FMRs by Unit Bedrooms

	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Final FY 2019 FMR	\$525	\$605	\$800	\$1,080	\$1,161

Source: www.hud.gov

Trulia Real Estate at Trulia.com, and the *Rockford Register Star* rental listings were reviewed for rental listings and rates. According to Trulia.com the median rental price over the past 12 months for the City of Rockford is \$825 for market rate units. The median rental price for units that accept HUD assistance is \$728. The *Rockford Register Star* published Sunday October 20, 2019 and Tuesday October 22, 2019 had listings for twelve (12) apartments and one (1) property management group, *Anchor Group*. The average rent based on listings available was \$594.83. The lowest rent listing was \$440 and the highest was \$749. None of the apartment listings specified if they accepted HUD assistance or not. *Anchor Group* specified they are an equal opportunity company and offer ADA accessible units.

There are 49 low income housing apartment complexes which contain 4,678 affordable apartments for rent in Rockford. Many of these rental apartments are income based housing with 3,336 apartments that set rent based on renters' income. In Rockford, HUD housing programs support 897 rental assistance apartments through the Project-based Section 8 Voucher Program. There are 1,342 other low income apartments that don't have rental assistance but are lower than market rate rents.

G. Household Types:

Based on a comparison between the 2012 and 2017 American Community Survey estimates, the City of Rockford's population decreased by almost 3%. This follows the population changes of Winnebago County, whereas the State of Illinois saw an increase in population, however the change was minimal (+.86%). The median income of the Rockford area increased by 10%, however, when adjusting for inflation, the purchasing power remains about the same.

Table II-18 – Changes Between 2009 & 2015

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	152,871	150,285	-2%
Households	60,165	58,560	-3%
Median Household Income	\$38,486.00	\$38,716.00	1%

Data Source: 2009 Census (Base Year), 2011-2015 ACS (Most Recent Year)

Table II-19 - Number of Households

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	11,310	8,470	11,025	5,940	21,810
Small Family Households *	3,935	3,055	3,840	2,260	10,470
Large Family Households *	1,195	575	1,070	665	1,580
Household contains at least one person 62-74 years of age	1,410	1,770	2,650	1,355	4,845
Household contains at least one person age 75 or older	1,030	1,760	1,700	729	2,035
Households with one or more children 6 years old or younger *	3,219	1,409	2,060	1,115	1,994
* the highest income category for these family types is >80% HAMFI					

Data Source: 2011-2015 CHAS

A household is considered to have a housing problem if it is cost burdened by more than 30% of their income, is experiencing overcrowding, or has incomplete kitchen or plumbing facilities. The four housing problems are: lacks complete kitchen facilities; lacks complete plumbing facilities; more than one person per room; and cost burden greater than 30%. The following tables illustrate the households that have one or more housing problems, and those that are cost overburdened.

Table II-20 – Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	205	155	155	55	570	65	40	0	15	120
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	190	60	95	140	485	50	20	15	45	130
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	325	75	129	60	589	10	65	125	20	220
Housing cost burden greater than 50% of income (and none of the above problems)	5,125	1,245	159	15	6,544	1,630	1,075	585	120	3,410
Housing cost burden greater than 30% of income (and none of the above problems)	775	2,355	1,630	144	4,904	294	1,045	1,725	655	3,719
Zero/negative Income (and none of the above problems)	1,170	0	0	0	1,170	280	0	0	0	280

Data Source: 2011-2015 CHAS

**Table II-21 – Housing Problems (Households with one or more Severe Housing Problems:
Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)**

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	5,845	1,535	545	270	8,195	1,755	1,205	730	195	3,885
Having none of four housing problems	1,725	3,610	4,480	2,025	11,840	539	2,120	5,275	3,450	11,384
Household has negative income, but none of the other housing problems	1,170	0	0	0	1,170	280	0	0	0	280

Data Source: 2011-2015 CHAS

Table II-22 – Cost Overburdened Greater Than 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	2,675	1,610	675	4,960	515	749	850	2,114
Large Related	770	195	110	1,075	200	205	215	620
Elderly	809	935	604	2,348	740	1,005	794	2,539
Other	2,230	1,090	499	3,819	564	239	464	1,267
Total need by income	6,484	3,830	1,888	12,202	2,019	2,198	2,323	6,540

Data Source: 2011-2015 CHAS

Table II-23 – Cost Overburdened Greater Than 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	2,350	520	25	2,895	440	450	120	1,010
Large Related	655	40	0	695	160	100	30	290
Elderly	584	430	150	1,164	630	425	230	1,285
Other	2,005	375	49	2,429	495	129	210	834
Total need by income	5,594	1,365	224	7,183	1,725	1,104	590	3,419

Data Source: 2011-2015 CHAS

Table II-24 – Overcrowding Conditions (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	505	100	189	165	959	45	85	65	55	250
Multiple, unrelated family households	39	10	35	14	98	10	0	75	4	89
Other, non-family households	0	30	0	20	50	0	0	0	0	0
Total need by income	544	140	224	199	1,107	55	85	140	59	339

Data Source: 2011-2015 CHAS

According to the 2013-2017 American Community Survey (ACS), there were 58,939 households in 2017 in the City of Rockford. Based on this data, 20,006 (33.9%) of all households were single person households living alone. Single person households aged 65 and over comprised 13,716 households, or 23.3% of all single person households. It is presumed that as these seniors age in place, additional accommodations and special care needs will be necessary for this portion of the City's population. The City will need to assist in obtaining funding, and working with housing service and elderly support agencies to provide programs, activities, and accommodations for its elderly population. The majority of 65 and over households are Female living alone (11,132)-which may explain the increase in the aging female homeless population that service providers are seeing.

Disabled Population – Based on the 2013-2017 ACS Data, a total of 22,563 (15.5% of the population) individuals have a disability. A breakdown of the types of disability is as follows: of those individuals who have a disability: 4.0% have a hearing difficulty; 2.8% have a vision difficulty; 6.3% have a cognitive difficulty; 8.6% have an ambulatory difficulty; 3.3% have a self-care difficulty; and 7.8% have an independent living difficulty.

In consultations, interviews and surveys, the lack of affordable accessible housing for the disabled is an unmet housing need and problem. Ramps are the most often requested accommodation to service providers. Much of the housing stock of the City has designated Historic status which limits the type of accommodations that can be made to the property. Accessibility ramps are often required to be built on the side or rear of the home instead of the front, making entry access difficult. Neighborhoods also have incomplete sidewalks, sidewalks in disrepair, or areas where a sidewalk is non-existent, making travel difficult for abled and disabled individuals.

The elderly and disabled populations are the most affected by the high cost of housing in the City of Rockford. The elderly and disabled are on fixed or limited incomes. The lack of affordable housing that is decent, safe, and sound forces them into below code standards housing that is often inaccessible.

Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking – based on the local crime statistics and the Lethality Assessment Program reports from November 1, 2017- June 30, 2019, 3,110 phone calls were made to the domestic violence hotline. According to Rockford police reports, 59% (3,358) of victims were determined to be in "High Danger" of being killed by an intimate partner. Rockford police officers helped connect victims to 750 instances of service.

The number of violent crimes, many related to domestic violence, has decreased by 20% from the reporting years January 2018 - June 2018 and January 2019 - June 2019.

Remedies, a member of the Continuum of Care, is a shelter that services the Boone and Winnebago County areas. Remedies' services include a 24-hour emergency shelter and hotline, non-residential counseling services, as well as transitional housing services. The shelter houses 62 beds, not including cribs or air mattresses that are used as necessary. During the Fiscal Year 2019 Remedies served 1,647 adults and 481 child survivors of domestic violence. Clients of Remedies' are not required to report their level of income, as anyone can become a victim of domestic violence. Of those who voluntarily reported their income: 94% reported having a source of income, of those, 59% reported a monthly net income less than or equal to \$500; 15% reported a monthly income between \$500 and \$1000; and 26% of survivors reported a monthly income greater than \$1,000.

Homelessness –

The other large group affected by the lack of affordable housing is the homeless and persons at-risk of becoming homeless, including persons who are victims of domestic violence. The City of Rockford receives entitlement funds under the Emergency Solutions Grant Program (ESG) for the local shelter activities.

The State of Illinois has twenty-two (22) Continuum of Care Regions. The area servicing the City of Rockford consists of Boone, DeKalb, and Winnebago Counties and is known as the Rock River Homeless Coalition. The coalition consists of 29 service members and 1 individual member. Services are provided at the Community Action Agency in Rockford, and the Hope Haven shelter in DeKalb.

The coalition is a member of Built for Zero, a national movement to end homelessness; Rockford has reached "functional zero" for veterans and those who are chronically homeless. This means the City has reached a target number (seven for veterans and three for chronic) and has been able to maintain that number for over 90 days. It also means service providers rapidly rehouse newly homeless veterans and new chronically homeless in less than 30 days.

The City of Rockford has an aging homeless population and an increasing need for affordable mental health services for the homeless and chronically homeless. Those who are able to receive services often struggle after the service period ends; interviews with stakeholders and service providers confirm this and note these difficulties such as

completing a job training program but not being able to afford a means of transportation to get to work. Others face difficulties of having past evictions or criminal records and are not able to find stable housing.

The City of Rockford has approximately 3,000 youth that are considered homeless by the Rockford School District.

Specific needs of the extremely low-income who are housed, but are at imminent risk of becoming unsheltered or living in shelters, are: food, transportation and job training, including soft skills. Immediate needs are emergency rent, mortgage, and utility assistance for households that will become homeless if they are unable to pay their rent/mortgage and utility bills. The local social service agencies provide food and clothing through food pantries and soup kitchens. Others provide short term rental assistance, and down payment assistance. Job training programs are available however, it is difficult for individuals to secure transportation that is out of the Rockford Mass Transit area or for second or third shift work.

The high cost of decent, safe, and sanitary housing in the City creates instability of housing for the lower income families in the area. Some Ward housing stock is made up of 70% rental housing which is often unsafe or infested. Many families are living from paycheck to paycheck and fear retaliation from landlords if they report housing issues.

Rockford Rescue Mission places a great emphasis on helping individuals who are victims of domestic violence and abuse. Out of 496 women and 940 men served, 24% of women and 13% of men reported domestic violence as a reason for entering the Crisis Shelter. Of those served, many report little to no income.

There are two youth shelters that service the Rockford area. The Bridge Emergency Shelter is for males ages 14-21 and the YSN MELD Shelter is for single or pregnant and parenting women age 14-21. There are 8 beds available in each shelter with the capacity to expand up to 10 as needed. During the 2018-2019 fiscal year, 250 youths were served. Additionally, there are transitional living sites for young women age 18-24, as well as 22 transitional living apartments and 6 permanent housing units for homeless youth.

The local organizations maintain records in the HMIS system and continue to monitor and track assisted households.

H. Cost Overburden:

A central housing problem facing households in the City of Rockford, IL is a lack of affordable housing and the fact that many of the City's lower income households are paying more than 30% of their total household income on the monthly cost for housing. The following information was noted: 9,960 households were cost overburdened by 30% to 50%, and 10,804 households were cost overburdened by greater than 50%. There were 5,975 White households cost overburdened by 30% to 50%, and 5,640 that were cost overburdened by over 50%; 2,285 Black/African American households were cost overburdened by 30% to 50%, and 3,280 Black/African American households were cost overburdened by greater than 50%; 1,320 Hispanic households were cost overburdened by 30%-50%; 1,540 Hispanic households were cost overburdened by over 50%; and lastly, 180 Asian households were cost overburdened by 30% to 50% and 215 Asian households were cost overburdened by over 50%.

Table II-25 – Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	36,234	9,960	10,804	1,565
White	25,875	5,975	5,640	640
Black / African American	4,875	2,285	3,280	690
Asian	1,030	180	215	30
American Indian, Alaska Native	90	15	4	0
Pacific Islander	0	0	0	0
Hispanic	3,870	1,320	1,540	190

Data Source: 2011-2015 CHAS

About 11,615 White households (30.3%) out of a total of 38,130 computed White households were considered cost overburdened by 30% and greater in the City of Rockford. Of the total Black/African American households in the City, there were 5,565 Black/African American households out of a total of 11,130 (50.0%) that were cost overburdened by 30% and greater, nearly twenty percent more than White households. In addition, there were 395 (27.1%) Asian households and 2,860 (41.3%) Hispanic households that were cost overburdened by 30% and greater.

I. Housing Problems:

A household is considered to have a housing problem if it is cost overburdened by more than 30% of their income, is experiencing overcrowding, or has incomplete kitchen, or plumbing facilities.

During the planning process for the preparation of the City of Rockford's Five Year Consolidated Plan, an evaluation and comparison was made to determine the needs of the racial/ethnic groups in comparison to the overall need in the City. Disproportionate need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole.

According to the 2011-2015 American Community Survey, the total number of White Households in the City of Rockford is 42,561 households (72.7%); its number of Black/African American Households is 11,212 households (19.1%); its number of Asian Households is 1,457 households (2.5%); and its number of Hispanic Households is 6,918 households (11.8%). Note: the 2011-2015 ACS was used to match the same years as the 2011-2015 CHAS data available.

The following tables illustrate the disproportionate needs in the City of Rockford:

Table II-26 – 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,670	1,199	1,450
White	4,020	729	605
Black / African American	3,020	320	635
Asian	159	40	30
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	1,340	90	165

Data Source: 2011-2015 CHAS

Table II-27 – 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,140	2,335	0
White	3,380	1,530	0
Black / African American	1,560	500	0
Asian	125	14	0
American Indian, Alaska Native	15	0	0
Pacific Islander	0	0	0
Hispanic	965	230	0

Data Source: 2011-2015 CHAS

Table II-28 – 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,625	6,400	0
White	3,085	4,005	0
Black / African American	750	1,055	0
Asian	64	74	0
American Indian, Alaska Native	0	30	0
Pacific Islander	0	0	0
Hispanic	700	1,070	0

Data Source: 2011-2015 CHAS

Table II-29 – 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,270	4,680	0
White	719	3,075	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Black / African American	330	810	0
Asian	19	180	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	179	585	0

Data Source: 2011-2015 CHAS

The racial composition of households in the City of Rockford, according to the 2011-2015 American Community Survey: the total number of White Households in the City of Rockford is 42,561 households (72.7%); its number of Black/African American Households is 11,212 households (19.1%); its number of Asian Households is 1,457 households (2.5%); and its number of Hispanic Households is 6,918 households (11.8%).

There is only one racial/ethnic group disproportionately affected by housing problems: among those earning 0-30% AMI, the Black/African American racial group.

J. Disproportionately Greater Need: Severe Housing Problems:

A household is considered to have a housing problem if it is cost overburdened by more than 30% of their income, experiencing overcrowding, or having incomplete kitchen or plumbing facilities. The four severe housing problems are: lacks complete kitchen facilities; lacks complete plumbing facilities; more than 1.5 persons per room; and cost overburdened over 50%.

In order for the City of Rockford to determine its goals and strategies, it must determine the extent to which any racial/ethnic group has a greater need in comparison to the City's overall population need. Data detailing information by racial group and Hispanic origin has been compiled from the CHAS data and the 2011-2015 American Community Survey. Disproportionate need is defined as a group having at least 10 percentage points higher than the percentage of persons in that group as a whole. The following tables illustrate the disproportionate needs of the City of Rockford.

Table II-30– 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,600	2,264	1,450
White	3,525	1,225	605
Black / African American	2,635	709	635
Asian	144	55	30
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	1,175	250	165

Data Source: 2011-2015 CHAS

Table II-31 – 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,740	5,730	0
White	1,485	3,425	0
Black / African American	685	1,385	0
Asian	55	80	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	494	685	0

Data Source: 2011-2015 CHAS

Table II-32 – 50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,275	9,755	0
White	784	6,305	0
Black / African American	155	1,645	0
Asian	34	109	0
American Indian, Alaska Native	0	30	0
Pacific Islander	0	0	0
Hispanic	295	1,480	0

Data Source: 2011-2015 CHAS

Table II-33 – 80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	465	5,475	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	265	3,525	0
Black / African American	90	1,045	0
Asian	8	190	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	100	670	0

Data Source: 2011-2015 CHAS

The racial composition of households in the City of Rockford, according to the 2011-2015 American Community Survey, the total number of White Households in the City of Rockford is 42,561 households (72.7%); its number of Black/African American Households is 11,212 households (19.1%); its number of Asian Households is 1,457 households (2.5%); and its number of Hispanic Households is 6,918 households (11.8%).

Racial/ethnic groups that are disproportionately affected by severe housing problems include Black/African American households earning 0-30% AMI and Hispanic households earning 50-80% AMI.

K. Disabled Households:

Table II-38 includes the 2013-2017 ACS data that shows the number of disabled individuals in the City of Rockford. The total population over the age of 5 is 134,935 and the disabled population is 22,563 or 15.5%. This is an indicator of the need for housing for the disabled which are mainly low- and moderate-income, and do not have housing resources that are accessible and/or affordable.

Table II-34 – Disability Status for Residents in Rockford, IL

Disability Status of the Civilian Non-Institutional Population	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total Civilian Population	150,049	-	145,806	-
Total Population with a disability	20,198	13.5%	22,563	15.5%
Population under 5 years	11,880	1.1%	10,871	0.7%
With a hearing difficulty	84	0.7%	23	0.2%
With a vision difficulty	69	0.6%	56	0.5%
Population 5 to 17 years	28,286	5.2%	26,654	7.0%
With a hearing difficulty	167	0.6%	369	1.4%
With a vision difficulty	98	0.3%	274	1.0%
With a cognitive difficulty	1,211	4.3%	1,343	5.0%
With an ambulatory difficulty	124	0.4%	176	0.7%
With a self-care difficulty	119	0.4%	154	0.6%
Population 18 to 64 years	90,310	12.5%	86,326	14.0%
With a hearing difficulty	1,770	2.0%	2,052	2.4%
With a vision difficulty	1,937	2.1%	2,275	2.6%
With a cognitive difficulty	5,091	5.6%	4,956	5.7%
With an ambulatory difficulty	6,028	6.7%	6,371	7.4%
With a self-care difficulty	2,542	2.8%	2,246	2.6%
With an independent living difficulty	4,547	5.0%	4,548	5.3%
Population 65 years and over	19,573	37.2%	21,955	38.9%
With a hearing difficulty	2,933	15.0%	3,336	15.2%
With a vision difficulty	1,485	7.6%	1,481	6.7%
With a cognitive difficulty	1,683	8.6%	2,256	10.3%
With an ambulatory difficulty	4,690	24.0%	5,124	23.3%
With a self-care difficulty	1,698	8.7%	1,988	9.1%
With an independent living difficulty	3,418	17.5%	3,848	17.5%
Sex				
Male with a disability	9,148	12.6%	10,573	14.9%

Female with a disability	11,050	14.3%	11,990	16.0%
Race with a disability				
White alone	14,456	13.9%	15,957	16.4%
Black or African American alone	4,651	14.8%	4,967	15.8%
American Indian and Alaska Native alone	120	26.8%	110	17.9%
Asian alone	195	4.6%	335	6.9%
Native Hawaiian and Other Pacific Islander alone	0	0.0%	0	0.0%
Some other race alone	300	5.6%	400	6.9%
Two or more races	476	9.6%	794	14.0%
White alone, not Hispanic or Latino	13,279	15.4%	14,502	18.5%
Hispanic or Latino (of any race)	1,650	6.7%	2,251	8.3%

Source: 2008-2012& 2013-2017 American Community Survey

Of the population age 65 and older, 38.9% have a disability. Women have a higher rate of disabilities than men (16.0% and 14.0%, respectively).

The disparities between individuals who “are” and who “are not” disabled can also be seen in the employment statistics. According to the 2017 American Community Survey, 20.3% of disabled persons ages 18 to 64 years old in the labor force are employed, whereas 64.2% of non-disabled persons ages 18 to 64 in the labor force are employed.

III. Review/Update to Original Plan

The previous “Analysis of Impediments to Fair Housing Choice” was prepared by the J-Quad Planning Group, LLC in 2015. The previous report was completed as a Regional Analysis for the Rockford Metropolitan Agency for Planning (RMAP) and included significant contributions from the City of Rockford and many other partners. The following were identified as impediments to fair housing choice and remedial actions to address the impediments.

The previous Analysis of Impediments to Fair Housing Choice was regionally focused, not all impediments identified necessarily applied to the City of Rockford. Accomplishments are identified as “not applicable” if they did not apply to the City of Rockford directly. Also, note that not all recommendations were able to be pursued due to resource constraints.

6.1 Real Estate and Housing Market Related Impediments

Impediment: Housing Affordability and Insufficient Income.

Housing Affordability

Affordability and Financing for Housing is Limited. Affordability is impeding housing choice in the region. The high cost of housing compared to the incomes of many households; the limited supply of affordable and subsidized housing in the region, much of which is in poor and deteriorated condition; subsidized housing that is largely concentrated in the City of Rockford in R-ECAP areas, particularly concentrated west of the river in Rockford; a lack of affordable housing in close proximity to minimum to low wage job centers outside of the City of Rockford; the lack of affordable housing for seniors and people with disabilities; and the lack of units for large and extended family households are some of the impediments that must be overcome.

The availability of financing presents a primary barrier to producing new subsidized housing. Although the cost of land and construction have declined in recent months, the tightened credit market, and decline in federal, state and local subsidies, have made it challenging for affordable housing developers to take advantage of lower costs.

Cost is increasing and subsidy for lower income wage earners is limited.

Rising costs of housing for purchase and a tight supply of affordable rental housing coupled with inadequate household incomes make it that much more difficult for many households to access housing that they can afford. In terms of barriers to home ownership, down payment requirements and property taxes pose big hurdles to many households in accessing homeownership. There is a lack of housing for population groups making less than 60%, 50% or even 30% of Area Median Income (AMI). Minimum wage is far below a 'living wage', and a

person could be working full-time and still not earn enough money to afford rental housing or to purchase a home in the region.

Access to Affordable Housing near Major Employment Centers is limited.

An often-cited concern is the issue of affordability and accessibility as a result of lower cost housing not being in close proximity to or accessible by public transportation to major employment centers in the region. Seniors and persons with disabilities were concerned that fair housing choice is limited outside the City of Rockford, due to their inability to access healthcare and social service centers if they are public transit dependent.

Housing for Seniors and People with Disabilities is limited. The increase in baby boomers and aging population requires affordable, accessible and senior friendly units, properties and neighborhoods. Currently, seniors and those persons with disabilities are experiencing limited choices in accessible and affordable housing units, and support services for seniors with mental and intellectual disabilities. There is an increasing demand for 'aging in place' modifications in existing housing and neighborhood infrastructure. An aging housing stock contributes to issues with retrofitting existing properties to accommodate seniors and people with disabilities.

Affordable Units for Large and Extended Families are limited. The region is impacted by a lack of affordable and available housing options for large families with 3 or more children. These families may face discrimination accessing housing through landlords or realtors, sometimes in response to public concern of perceived problems with large families. In the RMAP region, much of the limited supply of large units for rental are limited to Rockford City and offered primarily in public housing authorities and assisted housing properties.

Market rents are generally affordable to median-income households, but not for low, very low- and extremely-low income households. With a few exceptions, market rate rents are roughly comparable to the maximum affordable rents for households earning median income across the region. In contrast, the average market rate rent far exceeds the maximum affordable rent for most low, very low- and extremely low-income households. These households would need to spend substantially more than 30 percent of their gross income to afford market rate rental housing.

Supply of Available Land. In the RMAP region, the availability of land for affordable housing development constrains new housing production. As a result, new affordable residential production will largely occur as infill projects, often a more challenging and costly development type.

Land Costs. Due to the limited supply and high demand, land costs are high and not cost effective in some instances when developing affordable housing. Local

developers indicate that land prices are slowly adjusting during this economic downturn.

Construction Cost. Some cost associated with construction (materials and labor) have fallen nationally in conjunction with the declining residential real estate market according to the U.S. Department of Labor Bureau of Labor Statistics that measures the sales price and cost of materials for specific commodities and products. Thus, construction costs do not appear to be a development constraint in the current economy.

Remedial Actions:

Action #1: Support the increased production of affordable housing through public private partnerships with developers and capacity building for nonprofits. The City and Counties in the RMAP region will continue to work with local banks, developers and non-profit organizations to expand the stock of affordable housing. A continuation of these efforts should increase the production of new affordable housing units and assistance toward the purchase and renovation of housing in existing neighborhoods. Greater emphasis should also be placed on capacity building and technical assistance initiatives aimed at expanding non-profit, faith based organizations and private developers' production activities in the Region. Alternative resources for Entitlement funded housing programs and to leverage increased capacity among the public and private sector should be sought from Fannie Mae, U.S. Department of Treasury Community Development Funding Institution (CDFI) program, Federal Home Loan Bank and other state and federal sources.

Accomplishments:

The City administers housing rehabilitation, homebuyer, and Community Housing Development Organization (CHDO) programs on an annual basis. Specific results for the various housing programs can be found in the Consolidated Annual Performance and Evaluation Report (CAPER) produced each year. The annual CAPER also includes information on how the City leverages its funds with other resources. During 2018 alone, approximately \$874k of private funds leveraged the City's \$1.1 million of funds expended on 36 HOME activities. This 79% of leverage was generated through private first mortgage lender financing, other downpayment assistance (such as IHDA and Federal Home Loan Bank of Chicago), closing credits, owner contributions, and NW HomeStart's housing rehabilitation program.

During 2015, an Memorandum of Understanding was executed between NW HomeStart and the City to administer funds available through an Office of Attorney General grant that was received in a prior year. The housing rehabilitation program provided roofs and minor rehabilitation to homes located within a specified area in Rockford. Also, in 2015, the City's Illinois Housing

Development Authority Homebuyer Assistance grant expired. This grant provided both homebuyer assistance for the purchase of the property and some rehabilitation dollars. The City continued to offer a version of this program using federal dollars through 2018.

In 2016 and 2017, an Intergovernmental Agreement was executed to develop the Homebuyer Property Tax Refund Program, which refunded a portion of property taxes to homebuyers who purchased or built their homes during this time. Qualified homebuyers could receive refunds for up to 3 years.

In 2018, the City applied for a \$750,000 Affordable Housing Program grant through Federal Home Loan Bank to assist 50 residential units over the course of 3 years. The grant funding was extremely competitive, and the City was not awarded any funds.

The City continues to support the Rockford Area Habitat for Humanity, providing homebuyer assistance, as needed, for low/moderate income homebuyers who participate in the Habitat new home construction programs.

Overall, the City also continues to evaluate grant opportunities and either submits grant applications as they become available or ensures that other organizations apply if appropriate.

Action #2: Facilitate access to below-market-rate units. Jurisdictions in the RMAP region will assist affordable housing developers by advertising the availability of below-market-rate units via their jurisdictions' websites, referral phone service, and other media outlets. The Cities, Counties and RMAP will also facilitate communication between special needs service providers and affordable housing developers, to ensure that home seekers with special needs have fair access to available units. The Entitlements and RMAP will also work with the affordable housing developers and nonprofit agencies receiving entitlement funds to revise their housing applications to reduce the obstacles that persons with limited English proficiency, and those who are disabled, elderly or homeless may have in submitting completed paperwork within the allowable time.

Accomplishments:

Not applicable to the City of Rockford.

Action #3: Maintain a list of partner lenders. The Cities, Counties and RMAP will maintain a list of lenders that can help buyers' access below-market-rate loans and locally-sponsored down-payment and mortgage assistance programs.

Accomplishments:

The City continues to offer homebuyer assistance to low/moderate income individuals through its HOME program. The City collaborates with local lenders on this program and provides contact information for those lenders who work with the City programs.

The City also continues its partnership with NW HomeStart, a regional housing counseling agency. HomeStart provides homebuyer education classes, as well as foreclosure counseling to help individuals with finding appropriate homes, as well as address financial concerns related to housing.

Action #4: Identify and seek additional sources of funds for affordable housing. The Cities and Counties will seek State and other non-entitlement grant resources in an effort to increase funding for first time homebuyer mortgage assistance program. This would support eligible person in the market in acquiring affordable housing within the community and support those responsible for providing financing and engaged in affordable housing development.

Accomplishments:

The City continues to offer homebuyer assistance to low/moderate income individuals through its HOME entitlement grant program. Other local, non-entitlement organizations have applied for additional affordable housing grants through Illinois Housing Development Authority (IHDA). The City has supported these efforts either through providing Certificates of Consistency with the City's Consolidated Plan or through partnership on specific housing projects with the City's HOME programs.

Action #5: Encourage private sector support for affordable housing initiatives. The Cities and Counties, in coordination with the Chamber of Commerce, will encourage major employers and lenders to consider Employer Assisted Housing (EAH) programs, encouraging employers to work with employees in their efforts to purchase housing. In some instances, the Cities, Counties and the Chamber will have to help raise the awareness among local employers and increase their understanding that not all wage levels permit ready entry into homeownership, without some sort of subsidy.

Accomplishments:

The Northern Illinois Community Development Corporation (NICDC) was formed and owned by local banks in the Rockford area in the early 1990's with a purpose of supporting community lending needs and complementing lending already

being done by banks. Nearly 30 years later, all of the NICDC's funding has been allocated to local businesses and more money is needed in order to have a greater impact in the community. The City of Rockford and Winnebago County have identified the need to support our neighborhoods. Funding is needed to support home ownership through rehabilitation of troubled residential properties. The City has committed \$200,000 to support the homeowner rehabilitation program through the NICDC. Twelve (12) regional banks have jointly contributed an additional \$3.5 million of lending capital to the NICDC, \$1 million of which is dedicated to housing rehabilitation. Approximately ten (10) housing units have been completed, using these funds.

6.2 Public Policy and Fair Housing Infrastructure Impediments

Impediment: A Structure for Regional Governance must be created and for implementation of the Regional Analysis of Impediments and Fair Housing Equity Assessment.

Regional Governance is needed in order to implement the RAI and FHEA recommendations for removing impediments to fair housing choice and improving social equity. Consideration should include a regional Human Rights Commission for coordination and insuring measurable participation and implementation. Regional issues and solutions to social equity, housing and neighborhoods, fair housing, deconcentration of race, ethnicity, poverty and public and assisted housing must be elevated to the same level as transportation, infrastructure, cultural arts and entertainment, education and economic development.

Remedial Actions:

Regional Governance and Regional Policies, and Regulations

Action #6: Enact a Regional Governance Policy that requires local governments in the RMAP Region to adopt and implement the Regional AI and Social Equity recommendations and their participation in implementation of remedial actions; affirms each jurisdiction's support for the housing and poverty de-concentration plan and creation of a regional affordable housing share plan by all jurisdictions in the region; requires jurisdictions in the RMAP region to adopt and implement the Regional Governance Policy as a pre-requisite to their participation in regional programs and grants resulting from the HUD Sustainable Community Planning Grant. The Regional Governance Policy would include regional Incentives that tie local jurisdictions' benefits from regional transportation, economic development, infrastructure, housing and cultural arts funding to their participation in regional housing and fair housing policies and actions.

Accomplishments:

In 2018, a process was initiated to create a Regional Housing Initiative. Members included the cities of Rockford, Freeport, and Belvidere, Rockford Housing Authority, Winnebago/Boone County Housing Authorities, Winnebago County and Region 1 Planning Council. The project was managed by a HUD technical assistance consultant and was eventually discontinued.

Action #7: Enact a Regional Tax Credit Location Criteria and Local Support Policy that is adopted by each government in the region and guides demonstrations of local support to the State for Low Income Housing Tax Credit Applications. The region should lobby the State of Illinois for criteria changes in their developer selection and tax credit award process emphasizing development standards, amenities in developments and location in non minority / non poverty concentrated areas is included in the State LIHTC evaluation policy and scoring system.

Regional Low Income Housing Tax Credit (LIHTC) Project Support Criteria should be developed to guide the region and individual jurisdictions' evaluation and provision for a letter of support and or funding for Low Income Tax Credit Application to the State of Illinois. The criteria should include limitations or restrictions on supporting applications for developments in current R-ECAP census tracts, concentrations of LIHTC developments in any individual area or jurisdiction, design criteria that increase amenities to residents, limitations on income concentrations in individual developments similar to those imposed by HUD QHWRRA regulations, and CEPTED design standards. These standards should be formally adopted by individual jurisdictions in the region and used to model a state legislative agenda that move toward similar criteria adopted by the State to guide approval of LIHTC applications.

Accomplishments:

In 2019, Zion Development submitted a LIHTC application to rehabilitate and update their existing senior citizen apartment building. The City supported this LIHTC application through both a Certificate of Consistency and letter of support to the funder, Illinois Housing Development Authority. Zion's application was not approved, but they intend to re-apply in 2019/2020.

Action #8: Identify and seek additional local sources of funding for affordable housing. The region and its' jurisdictions will enact public policy creating local and regional resources for housing and neighborhood preservation i.e. dedicated sales tax, bond programs for infrastructure, housing trust funds, land bank. The City of Rockford, Boone and Winnebago Counties and the other jurisdictions will also support efforts to increase local funding for affordable housing development and mortgage assistance program. This would support

eligible person in the region in acquiring affordable housing within the community and support those responsible for providing financing and engaged in affordable housing development.

In an effort to expand local resources, we recommend that the City of Rockford, Boone and Winnebago Counties, and other jurisdictions initiate efforts to research and consider one particular policy change, inclusionary zoning, as one alternative means of promoting balanced housing development. Inclusionary zoning has been used in other communities to ensure that some portion of new housing development is affordable. As housing prices rise, low to moderate-income residents may be displaced or unable to afford new housing in mixed income areas of the region without the use of Inclusionary Zoning provisions. Mixed-income housing broaden access to services and jobs and provide opportunities for lower-wage earning families to buy homes in appreciating housing markets and, as a result, accumulate wealth.

Accomplishments:

In early 2019, an intergovernmental agreement was signed by Rockford, Belvidere, South Beloit, Machesney Park, Loves Park, Winnebago County and Boone County to establish the Northern Illinois Land Bank Authority. The land bank is managed through the Region 1 Planning Council, with the purpose of combating community deterioration by returning properties to productive use.

Local Policies and Regulations

Action #9: Design and Implementation of a Land Acquisition and Land Bank Program by the City of Rockford and Rockford Housing Authority - The Land Bank Concept involves acquiring unproductive, vacant and developable lots for affordable single-family and scattered site multifamily housing development. The Land Bank helps to both reduce unproductive expenditures and increase local government revenues. This approach is being implemented in a number of cities largely through a process of acquiring tax foreclosure property. Cities have established certain criteria for acquiring properties and for properties to be considered for Land Bank use. These criteria include: 1) the property must owe five years or more in back taxes; 2) the total taxes and liens must be greater than the value of the property; 3) the purchaser must demonstrate the financial ability to immediately develop the property for affordable housing. The Land Bank generally acquires the foreclosure properties from the Sheriff Sale, maintains the properties and assembles parcels for sale to for-profit and nonprofit developers. Land Bank properties are sometimes acquired as donations by property owners, purchases from owners willing to sale property at reduced prices, and as surplus City-owned land deemed no longer needed for any public purpose.

Accomplishments:

In early 2019, an intergovernmental agreement was signed by Rockford, Belvidere, South Beloit, Machesney Park, Loves Park, Winnebago County and Boone County to establish the Northern Illinois Land Bank Authority. The land bank is managed through the Region 1 Planning Council, with the purpose of combating community deterioration by returning properties to productive use.

Action #10: Create Neighborhood Revitalization Plans for existing concentrated areas as a means of elevating those areas to Opportunity Areas.

Neighborhood Revitalization plans and redevelopment initiatives are needed to transform R-ECAP concentrated and distressed neighborhoods and areas with concentrations of public and assisted housing developments into viable and sustainable mixed-income neighborhoods. The planning process will provide guidance for linking housing improvements, diversification of housing types, and reductions in public and assisted housing with appropriate services that improve the quality of life in neighborhoods including, schools, public assets, transportation, and access to jobs. Revitalization plans and reinvestment strategies should be created by the City of Rockford and Rockford Housing Authority for RCAP defined areas and areas experiencing disinvestment in an effort to transform these neighborhoods into "Opportunity Areas". Planning efforts should focus on both the de-concentration and improvement of public and assisted housing and the housing and neighborhoods surrounding such developments.

Accomplishments:

As part of the City's Five-Year Consolidated plan the City has been examining areas of the City to designate as a Neighborhood Revitalization Strategy Area.

Impediment: Increased public awareness of fair housing rights

The City of Rockford is the only jurisdiction in the region that has enacted local Fair Housing legislation that is substantially equivalent to federal fair housing law. Our analysis of applicable fair housing laws also included the State of Illinois Fair Housing Act. In the analysis, the state statutes were compared to the Federal Fair Housing Act. Our Analysis determined that state statute offered similar rights, remedies, and enforcement to the federal law and might be construed as substantially equivalent. The Cities and Counties of the RMAP region are part of the enforcement geography afforded enforcement coverage by the Chicago, xiv Illinois Regional HUD FHEO Office. While the current system of enforcement provides an acceptable process for filing and investigating fair housing complaints, increased regional fair housing outreach, education and training

would be an important step toward raising awareness and establishing more effective local Fair Housing Policy.

Fair housing complaint information was received from the Chicago, Illinois FHEO Division of the Regional Office of the U.S. Department of HUD. The data provides a breakdown of complaints filed for Boone and Winnebago Counties, and City of Rockford. While we were unable to determine if the number of complaints filed over the past 5 years is a sufficient indicator of the public's awareness relative to their fair housing rights, limited public awareness may be a major contributing factor. We believe that regional fair housing outreach, education and training must be increased, as an important step toward raising local awareness and establishing effective regional Fair Housing Policy.

Greater Public Awareness of Fair Housing is needed. Participants in the focus group sessions and key person interviews including representatives of fair housing organizations indicate that general public education and awareness of fair housing issues is limited. Of particular concern is that tenants often do not completely understand their fair housing rights. To address this issue, the City of Rockford, RMAP and fair housing organizations operating in this region should provide additional fair housing education and outreach programs to both housing providers and the general public. In addition, fair housing outreach to the general community through mass media such as newspaper columns, multi-lingual pamphlets, flyers, and radio advertisements have proved effective in increasing awareness. Fair housing organizations also indicate that outreach to immigrant and populations that are primarily Spanish speaking and other protected classes should be targeted for such outreach.

Increased Fair Housing Services Needed. The AI finds that fair housing is an ongoing concern in the RMAP region. In particular, interviews and focus group participants, and fair housing service providers indicate that many the general public, protected class members, home seekers and landlords all have limited awareness of federal and State fair housing laws. They also remain unfamiliar with protections offered to seniors, disabled, and other special needs populations, as well as families and protected classes.

Remedial Actions:

Action #11: Increase fair housing education and outreach. The City of Rockford and RMAP will increase fair housing education and outreach in an effort to raise awareness and increase the effectiveness of its local fair housing ordinances. The initiative will target funding to fair housing education and outreach to the rapidly growing Hispanic and other immigrant populations. The initiative will also continue organizing fair housing workshops or information sessions to increase awareness of fair housing rights among immigrant populations and low income persons who are more likely to be entering the

home-buying or rental markets at a disadvantage. Other alternatives for increasing awareness and effectiveness of fair housing include providing local enforcement. However, entitlement community development resources are limited and therefore local enforcement would necessitate additional funds for investigation and enforcement and expansion of outreach and education. We do not recommend this approach at the current time assuming HUD and nonprofit agencies continues its' enforcement services in the local jurisdiction. Future consideration should be given to a regional approach to local enforcement, perhaps through a partnership of local jurisdictions in the RMAP Region, and a submission of an application for FHAP and FHIP funding being submitted to HUD.

Accomplishments:

In late 2018, Prairie State Legal Services Inc. received a \$300,000 grant from HUD to continue to protect consumers from housing discrimination. Prairie State is one of six fair housing agencies in Illinois and the only agency outside the Chicago area to receive HUD funding. The grant supports Prairie State's Fair Housing Project, which is a three-year grant cycle. The initiative provides comprehensive fair housing enforcement services to affected residents in Lake, McHenry, Winnebago, Boone, and Stephenson Counties. Services include, but are not limited to: legal representation; fair housing testing in rental, sales, and lending markets; systemic investigations; and education and outreach presentations.

Action #12: Target outreach and training toward housing industry organizations and general public. The City of Rockford and RMAP will partner with fair housing service providers to conduct ongoing outreach and education regarding fair housing for the general public and focused toward protected class xvi members, renters, home seekers, landlords, and property managers. Outreach will include fair housing organizations providing training sessions, public events, city website and other media outlets, and multi-lingual fair housing flyers and pamphlets available in a variety of public locations.

Accomplishments:

The City of Rockford submits a Consolidated Annual Performance and Evaluation Report (CAPER) each year, which documents the fair housing efforts completed by the City of Rockford Community & Economic Development Department. Some of those efforts included, but are not limited to, the following:

As part of Money Smart Week in 2015, the City along with many other housing partners (including, but not limited to, Prairie State Legal) hosted a Home Fair for Renters, Homebuyers, and Homeowners. This fair provided informational booths

and also offered six (6) different classes/panels that were held throughout the event.

In 2016, the City entered into an agreement with Prairie State Legal Services (PSLS) to provide CDBG funds to support the creation, promotion and distribution of a video to educate Rockford-area residents and increase awareness of fair housing rights and laws. The purpose of the video was to educate the community on the impact of housing discrimination and how to spot discrimination on an individual basis. The video was completed in 2017 and was posted on PSLS social media accounts, as well as the both the PSLS and City websites. PSLS also showed the video at various fair housing trainings in 2017.

In 2018, the City partnered with NW HomeStart, Prairie State Legal Services, and the Health Department to host a Community in Housing educational event for housing professionals. The City of Rockford's Mayor spoke at the event, and each agency shared how resources are distributed throughout the community. In addition, in celebration of Fair Housing Month, the City of Rockford, Prairie State Legal Services, and HomeStart hosted an Art Contest for individuals K-5th grade in the City of Rockford. Students received an informational packet about Fair Housing law and history, and the importance of diversity in our community. An award ceremony was held at Rockford's City Hall in late April 2018. Contest winners received their awards and prizes, and the public heard a short speech about Fair Housing and was able to view the submitted artwork.

In celebration of Fair Housing Month in April 2019, the City of Rockford, Prairie State Legal Services, and HomeStart hosted another Art Contest for individuals K-5th grade and added a Video Contest for individuals in 6th-12th grade in the City of Rockford. Students received an informational packet about Fair Housing law and history, and the importance of diversity in our community. An award ceremony was held at Rockford's City Hall in late May 2019. Contest winners received their awards and prizes, and the public was able to view the submitted art work, all of which were kept on display for a week.

Action #13: Encourage Fair Housing Enforcement Agencies to target increase fair housing testing for multifamily properties. The City of Rockford and RMAP will encourage Fair Housing Agencies to provide increased fair housing testing in local apartment complexes. The testing program looks for evidence of differential treatment among a sample of local apartment complexes. Following the test, the Fair Housing Agency will be asked to submit findings to the City and RMAP and to conduct educational outreach to landlords that showed differential treatment during the test.

Accomplishments:

In 2016, the City entered into an agreement with Prairie State Legal Services (PSLS) to provide CDBG funds to support the creation, promotion and distribution of a video to educate Rockford-area residents and increase awareness of fair housing rights and laws. The purpose of the video was to educate the community on the impact of housing discrimination and how to spot discrimination on an individual basis. The video was posted on PSLS social media accounts, as well as the both the PSLS and City's websites. PSLS also showed the video at various fair housing trainings in 2017.

Impediment: Increased efficiency of Public Transportation and Mobility

The Rockford Mass Transit District (RMTD) provides fixed route and paratransit service to the residents of Rockford, Loves Park, and Machesney Park. RMTD operates 40 fixed route buses over 17 daytime routes Monday through Saturday, six night routes, and 5 Sunday routes. RMTD provides paratransit - origin to destination - service to persons with disabilities that prevent their use of fixed route services.

The public transportation system, for the most part, provides adequate routes to and from major employment centers and lower income neighborhoods in Rockford. Limitations include limited service after 6:00 pm to accommodate second and third shift workers, and direct routes to some existing and emerging employment centers and social services in the rural and suburban communities within the region. While the economics of public transit, particularly in smaller communities in the region, prevents complete coverage that would allow all worker a reliable and speedy commute to any job location within the region, the distribution of routes in the RMTD system focus on providing access to major xvii employment centers and neighborhoods where residents are more likely to utilize public transportation on their commutes to work.

With an eye towards sustainable communities, future housing development should emphasize transit-oriented development (TOD) principles, encouraging construction of new, higher density housing in locations that take advantage of existing community services and access to public transportation. With TOD focused planning, the RMTD system and extended night and weekend hours would work well in providing the best network possible given funding limitations.

Remedial Actions:

Action #14: Increased efficiency of Public Transportation and Mobility by focusing on Transit Oriented Development. Future housing development should emphasize transit-oriented development (TOD) principles, encouraging construction of new, higher density housing in locations that take advantage of

existing community services and access to public transportation. With TOD focused planning, the RMTD system and extended night and weekend hours would work well in providing the best network possible given funding limitations

Accomplishments:

Region 1 Planning Council (RPC) is responsible for developing the regional Metropolitan Transportation Plan (MTP). This plan addresses the transportation system in Boone County, Winnebago County, and northern Ogle County, and provides a framework for the region's transportation network over the next 20 – 30 years. The purpose of this plan is to identify the region's transportation vision, strategies, and priorities for the transportation system. The current 2040 MTP was adopted in 2015, and work has begun on developing a 2050 MTP.

6.3 Banking, Finance, Insurance, and other Industry related impediments

Impediment: Impacts of the Subprime Mortgage Lending Crises and increased Foreclosures.

The housing foreclosure rates across the country continue to soar and the impacts are being felt in Illinois as well. Numerous web sites are providing numerical counts and locations for homes with foreclosure filings across the country and for jurisdictions in the State of Illinois. RealtyTrac.com shows 36,948 foreclosure filings for the State of Illinois in June 2013. This represents 1 in every 121,276 houses in foreclosure, sixth highest among the states. The state of Illinois has an average foreclosure rate of 17%. The Illinois foreclosure rate is xviii higher than the national average of 1%. RealtyTrac.com revealed 1,231 and 192 filings for Winnebago and Boone Counties. The City of Rockford recorded 2,418 foreclosures, second highest among Illinois cities with only Chicago being higher.

Remedial Actions:

Action #15: Apply for competitive and non Entitlement State and Federal funding and assistance from nonprofit intermediaries. Eligible jurisdictions within the RMAP Region will pursue CDBG and State HOME and Neighborhood Stabilization Program (NSP) funding if it becomes available to provide home buyer assistance and subsidies to homebuyers to acquire foreclosure property and get it back into commerce. If successful in obtaining additional funding, jurisdictions should consider expanding its' program goals to consider initiatives that reduce mortgage defaults and foreclosure rates among low and moderate income home buyers.

Jurisdictions will work with the State, National Non-Profit Housing Intermediaries and HUD to identify funding that can help reduces the mortgage default rate and

foreclosure rates among low and moderate income home buyers and existing home owners. These programs offer initiatives such as loan default prevention programs based on providing counseling to affected borrowers, assistance with identifying alternative products that helps borrowers avoid subprime lending, and assistance with re-negotiation for more favorable terms for borrowers with subprime loans. These intermediaries offer assistance in identifying government assistance programs that serve to assist distressed borrowers and are currently evaluating the feasibility of creating a maintenance and replacement reserve account for affordable home buyers assisted with the entitlement and other federal funds to insure that funds are escrowed to help cover the cost of major repairs. Other alternatives being evaluated include the feasibility of creating a mortgage default and foreclosure prevention account for affordable home buyers assisted with federal funds to insure that funds are escrowed to help cover the cost of unexpected income/job loss and to write down interest rates.

Accomplishments:

NW HomeStart, a regional housing counseling agency, provides homebuyer education classes, as well as foreclosure counseling to help individuals with finding appropriate homes, as well as address financial concerns related to housing.

The City's HOME-funded homebuyer assistance program is available to eligible homebuyers who purchase a vacant home in the City of Rockford. The purpose of this program is not only to provide financial assistance to low/moderate income homebuyers, but also to bring new homeowners into vacant residential properties and increase property tax revenue for the City.

Impediment: Predatory lending and other industry practices.

Predatory lending is a concern in the RMAP region. Several incidents were cited, by person interviewed and those attending the focus group sessions, suggesting unfavorable lending practices. For some persons, traditional banking and lending relationships have been replaced or relegated to pay-day loan, check-cashing, and title-loan stores. Focus Group participants also complained of extremely high interest rates being charged by not only predatory lenders, but traditional banks and financial institutions for credit cards, auto loans, and other consumer loans. In some instances, the low-income population may be subject to predatory lending because they have a poor credit rating and limited credit history.

Remedial Actions:

Action #16: Encourage bank and traditional lenders to offer products addressing the needs of households currently utilizing predatory lenders. The City of Rockford and RMAP will encourage lending institutions to provide

greater outreach to the low income and minority households. Greater emphasis on establishing or reestablishing checking, saving, and credit accounts for residents that commonly utilize check-cashing services is desired. This may require traditional lenders and banks to establish “fresh start programs” for those with poor credit and previous non-compliant bank account practices. Lending institutions should therefore be encouraged to tailor products to better accommodate the past financial deficiencies of low income applicants with credit issues.

City and county officials should help raise awareness among the appraisal industry concerning limited comparability for affordable housing products. Industry representatives should be encouraged to perform comparability studies to identify real estate comparables that more realistically reflect the values of homes being built in low income areas.

Accomplishments:

In 2019, the City held a workshop with regional lenders and housing partners regarding a new program to help single-family low/moderate income homeowners located in specific areas of the City to address building code violations. The intent of the workshop is to encourage additional financial resources to the low/moderate income homeowners. Two local lenders have developed programs in 2019 that are specifically marketed towards housing rehabilitation needs of low/moderate income individuals.

6.4 Socio-Economic Impediments

Impediment: Barriers to Fair Housing Choice Impacts on Special Need Populations

Elderly Persons and Households. Seniors are living longer, lifestyles are changing and desire for a range of housing alternatives increasing. Issues such as aging in place, smaller units with lower maintenance cost, and rental accommodations that cater to those with live-in care givers are of major concern. For other seniors, they often need accessible units located in close proximity to services and public transportation. Many seniors live on fixed incomes, making affordability a particular concern. There is a limited supply of affordable senior housing in the region. In addition, local senior service providers and community workshop participants report that many subsidized senior housing projects serve individuals or couples only and do not accommodate caregivers. In other cases, the caregiver’s income may make the senior ineligible for the affordable unit.

Persons with Disabilities. Building codes and ADA regulations require a percentage of units in multifamily residential complexes be wheelchair accessible and accessible for individuals with hearing or vision impairments. Affordable

housing developers follow these requirements by providing accessible units in their buildings. Nonetheless, service providers report that demand exceeds the supply of accessible, subsidized units. In contrast to this concern, some affordable housing providers report that they have difficulty filling accessible units with disabled individuals. Persons with disabilities face other challenges that may make it more difficult to secure both affordable or market-rate housing, such as lower credit scores, the need for service animals (which must be accommodated as a reasonable accommodation under the Fair Housing Act), the limited number of accessible units, and the reliance on Social Security or welfare benefits as a major income source.

Homeless Individuals. The primary barrier to housing choice for homeless individuals is insufficient income. Service providers indicate that many homeless rely on Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI) for income, which are too low to qualify for most market rate and many affordable housing developments. In addition, property managers often screen out individuals with a criminal or drug history, history of evictions, or poor credit, which effectively excludes many homeless persons. There were antidotal comments by those interviewed that some persons have been denied housing based on their immediate rental history being a shelter or transitional housing facility.

Limited English Proficiency (LEP) Individuals. Local service providers state that as financial institutions institute more stringent lending practices and outreach to minority communities has declined with the economy, LEP and undocumented individuals face greater challenges in securing a mortgage. Furthermore, many households in the Spanish-speaking community and other LEP populations rely on a cash economy, and lack the record keeping and financial legitimacy that lenders require. Nationally, national origin is emerging as a one of the more common bases for fair housing complaints.

Female Headed, Female Headed with Children and large Family households. In many communities, female-headed households, female-headed households with children and large families face a high rate of housing discrimination. Higher percentages of female-headed households with children under the age of 18 sometimes correlate to increased incidents of reported rental property owners' refusal to rent to tenants with children. The percentage of families that were female-headed with children was 11 percent in Rockford and 9.1 percent in Belvidere according to the 2010 US Census. The percent of female-headed families with children in the other cities and villages in the regional planning area was relatively low, all below 7.5 percent. The percentage of female-headed households among White households in Boone County was 9.5 percent, compared to 29.9 percent in African-American households, and 13.4 percent in Hispanic households in the county. In Winnebago County, female headed households accounted for 10.6 percent of White households, 36.4

percent of African-American households, and 18.6 percent of Hispanic households.

Unemployed Persons. The unemployment rate in Rockford was eight percent and Belvidere recorded an unemployment rate of 10 percent between 2007 and 2011. Other jurisdictions in the two counties show unemployment rates at seven percent or below. These data were based on estimates from the American Communities Survey, 5-year average between 2007 and 2011. Unemployment was highest among minority populations. Approximately 6.8 percent of White persons age 16 and over reported being unemployed in Rockford and 9.7 percent of White persons were unemployed in Belvidere. African-Americans persons in the same age group reported a 13.4 percent unemployment rate in Rockford and an 18 percent rate in Belvidere. Hispanics reported an 8.5 percent rate in Rockford and 10.2 percent rate in Belvidere. In the other two largest cities in the two counties, Loves Park and Machesney Park, unemployment rates were not as high nor did it show the disparity between racial and ethnic groups.

The ACS data reveals an unemployment rate of 8 percent for White persons age 16 and over in Boone County and 6.3 percent in Winnebago County between 2007 and 2011. African-Americans persons in the same age group reported a 13.1 percent unemployment rate in Boone County and 13.2 percent rate in Winnebago County. Hispanics were reported at 8.5 percent rate in Boone County and 7.4 percent rate in Winnebago County. As a comparison, the countywide unemployment rate was 11.8 percent in Boone County during the period and 11 percent in Winnebago County.

Remedial Actions:

Action #17: Provide language assistance to persons with limited English proficiency. Many individuals living in RMAP region for who English is not their primary language may speak English with limited proficiency or, in some cases, not at all. As a result, persons who are limited English proficient (LEP) may not have the same access to important housing services as those who are proficient. The RMAP, its' entitlement jurisdictions and grant-funded agencies will implement and maintain a language access plan (LAP) consistent with federal guidelines to support fair access to housing for LEP persons.

Accomplishments:

Not applicable to the City of Rockford.

Action #18: Continue to Implement an Affirmative Fair Housing Marketing Plan (AFHMP} to create fair and open access to affordable housing. The City of Rockford, Boone and Winnebago Counties, and RMAP will include

provisions in Affirmative Fair Housing Marketing Plans insuring that individuals of similar economic levels in the same housing market areas have equal access to a like range of housing choices regardless of race, color, religion, sexual orientation, gender, familial status, disability, or national origin. The entitlement funded agencies in the region shall follow the plan and insure that it is consistent with federal guidelines to promote fair access to affordable housing for all persons. The Entitlement jurisdictions in the region will also provide outreach to private landlords not receiving entitlement funding encouraging landlords to facilitate and embrace the Entitlement's AFHMP provision of providing housing to persons protected under the Fair Housing Act and those with imperfect credit histories, limited rental histories or other issues in their backgrounds.

Accomplishments:

The Community and Economic Development department has a Affirmatively Further Fair Housing Marketing policy, which is followed by all City of Rockford staff, sub-recipients, developers, owners, and sponsors.

Action #19: Continue to encourage recruitment of industry and job creation. The City of Rockford, Boone and Winnebago Counties, other jurisdictions in the region and business interest will continue to work on expanding job opportunities through the recruitment of corporations, the provision of incentives for local corporations seeking expansion opportunities, assistance with the preparation of small business loan applications, and other activities whose aim is to reduce unemployment and expand the base of higher income jobs. A particular emphasis should be to recruit jobs that best mirror the job skills and education levels of those populations most in need of jobs. For RMAP as a region, this means jobs that support person with high school education, GED's and in some instances, community college or technical training. These persons are evident in the workforce demographics and in need of jobs paying minimum wage to moderate hourly wages. The jurisdictions within the region should also continue to support agencies that provide workforce development programs and continuing education courses to increase the educational level and job skills of residents. The goal should be to increase the GED, high school graduation, technical training, and college matriculation rates among residents. This will help in the recruitment of industry such as "call centers", clerical and manufacturing jobs. Call centers and customer service centers where employees are recruited to process sales or provide customer service support for various industries, have become more and more attracted to areas with similar demographics to that of RMAP region

Accomplishments:

Rock Valley College has unveiled plans to develop a 100,000 square foot Advanced Technology Center (ATC) in the downtown Rockford Register Star

building. The center will expand high-priority needs for the region, including programs like mechatronics, industrial welding, logistics and supply training. Courses offered at the ATC will be rolled out in different phases. Some courses will start as soon as fall 2020, but other programs will be rolled out based on demand in the manufacturing industry.

6.5 Neighborhood Conditions, Natural Barriers, Historical Events, Trends, and Development Pattern Related Impediments

Impediment: Limited resources to assist lower income, elderly and indigent homeowners maintain their homes and stability in neighborhoods.

The potential for neighborhood decline and increasing instability in RMAP' older neighborhoods are a growing concern. Neighborhoods relatively stable today with most of its housing stock in good condition will decline if routine and preventive maintenance does not occur in a timely manner. The population is aging, which means more households with decreasing incomes to pay for basic needs. This increase in elderly households coupled with the steady rise in the cost of housing and the cost of maintaining housing means that many residents xxv will not be able to limit their housing related cost to 30 percent of household income and still maintain their property. Rental property owners will be faced with increasing rents to pay for the cost of maintenance and updating units rendering rental units unaffordable to households as well.

The entitlement jurisdictions in the RMAP region receive CDBG entitlement annually and allocations of HOME HUD funding. These resources are used for housing, social service and infrastructure improvements but due to funding limitations do not directly impact large segments of the population in need of housing assistance. Increased support from volunteers and community resources will be needed to close the gap between those in need of housing related assistance and resources available.

Remedial Actions:

Action #20: Design and implement a centralized program of self-help initiatives. The RMAP region will evaluate the design and implementation of a Centralized Program of Self Help Initiatives based on volunteers providing housing assistance to designated elderly and indigent property owners and assisting them in complying with housing codes. This will require an organized recruiting effort to gain greater involvement from volunteers, community organizations, religious organizations/institutions and businesses as a means of supplementing available financial resources for housing repair and neighborhood cleanups.

While there have been successful initiatives of this nature in the City of Rockford and jurisdictions within the RMAP region and nonprofit agencies, a more comprehensive effort, perhaps coordinated by the City of Rockford or RMAP needs to be designed and implemented that fully utilizes the resources of the community and area businesses. The program will be based on a case management system where the select needs of area property owners are matched with volunteer resource teams capable of solving the various code violations and other needed exterior repairs for select properties. Requests for assistance would be received from code enforcement officials, housing program administrators, social service agencies, community institutions, and homeowners. Priority will be given to those owners immediately affected by an active code compliance case, a targeted block or area project, and those with life threatening or uninhabitable conditions.

Eligibility for assistance will require verification of income or status as elderly or disabled. Levels of assistance would be based on the specific needs to be addressed and the ability of the property owners and their family to assist in the effort. The region could possibly fund or seek funding from the private sector for a part-time program coordinator designated to conduct home visits of each program participant, evaluate the appropriateness for volunteers to perform the work, and determine and advise the homeowner of their responsibilities in support of the effort.

The Program Coordinator, upon securing a match between volunteers and property owner, will coordinate project dates, materials, supplies, and project support for the day of the project. Again, some of these activities may have been initiated in the past, so in some instances, our recommendations are that activities be continued, offer an enhanced level of programming, or that the region apply for funds as they become available. Activities that could be considered for the centralized self-help initiatives program include:

- **Increase self-help initiatives such as "fix-up," "paint-up," or "clean-up" campaigns and "corporate repair projects".** In order to increase resources available for these efforts, neighborhood residents, religious institutions, community organizations, individuals, and corporations would be recruited to participate in the repair to homes occupied by elderly, disabled, and indigent homeowners through organized volunteer efforts involving their members and employees.
- **Implement a Youth Build and Repair Program in conjunction with local school districts and or the Rockford and Winnebago Housing Authorities.** Youth Build is a U.S. Department of Housing and Urban Development (HUD) program that teaches young people how to build new homes and repair older ones. HUD offers competitive grants to cities and non-profit organizations to help high-risk youth, between the ages of 16 and 24, develop housing construction job skills and to complete their high school education.

- **Organize a “Compliance Store”** where home builders, building supply stores, merchants, and celebrities, such as radio and television personalities, are used to demonstrate simple, cost effective ways to make improvements to houses and donate building supplies for use in self-help projects. The supplies and storage facility for supplies could be provided to enrollees by building supply stores, contractors, and hardware stores.
- **Organize "adopt-a-block" and "adopt-an-intersection" campaigns** where neighborhood groups, residents, scout troops, and businesses adopt key vistas and intersections to maintain and implement beautification projects, such as flower and shrub plantings and maintenance.
- **Creating Community Gardens as interim uses on select vacant lots** provide an opportunity for neighborhood residents to work together to increase the attractiveness of their neighborhood. Formats for community gardens range from attaching simple window boxes to homes along a street reflecting a common theme, coordinating garden planting, or converting a vacant lot that may previously have been an eyesore in the neighborhood into a flower or vegetable garden tended by members of the community. Naturally, ownership of a vacant lot is an issue to be resolved before gardening begins. The City Assessor can provide information on the ownership of the property. If the lot is privately owned, permission to use the lot must be received from the owner. If the property is owned by the City or expropriated, ownership of xxviii the property might be transferred to a local non-profit organization or neighborhood association. While the costs of plant materials and supplies are an important consideration for community gardens, many nurseries and home improvement stores offer discounts for community improvement projects.

Accomplishments:

One Body Collaboratives is a non-profit, faith based 501c3 organization whose mission is to help mobilize and coordinate church and faith resources to rebuild lives transform communities. The organization operates a phone ministry and resource clearinghouse to match community needs with appropriate and available resources. In 2019, they launched an online Community Resource Directory, which is a searchable database to help individuals find available resources and programs in the area.

In 2015, the City of Rockford created a Mow to Own Program which allows adjacent property owners to acquire City vacant lots. Eligible homeowners or non-profits can submit an application to participate in the program and agree to maintain the City-owned vacant lot for two (2) years. If the lot is maintained per the agreement for two years, the City will transfer ownership of the property to the participant. This program improves neighborhoods while decreasing the City's maintenance burden. Twelve individuals have participated in the program.

Impediment: Historical and sustained patterns of segregation and concentration of racial/ethnic minority populations, poverty and low income population, and public and assisted housing.

Historical and sustained patterns of segregation and concentration of racial/ethnic minority populations, poverty and low income population, and public and assisted housing exist in Rockford City. The U. S. Department of HUD has defined “Areas of Concentration and Segregation (R/ECAP) – as areas or census tracts within a jurisdiction comprised of 50% or greater minority population and 3 times or more the poverty level of the MSA (35.1% for Rockford MSA) and generally lacking the basic amenities and failing to provide a quality of life expected and desired for any area within the MSA. The goal of de-concentration would be to achieve minority concentrations and poverty level less than defined above by R/ECAP and to transform these areas of concentration into “Opportunity Areas”. Opportunity Areas are defined as areas offering access to quality goods and services, exemplary schools, health care, range of housing, transportation to employment and service centers, adequate public infrastructure, utilities, and recreation.

The poverty rate in Rockford was 24.7 percent for all households, highest in the regional planning area. In Belvidere, the poverty rate was 14.4 percent. In Popular Grove the rate was 13.6 percent. In all other cities in the regional planning region, poverty rates were below 10 percent. The incidence of poverty among African-American households in Rockford was 49.4 percent of their total population between 2007 and 2011, and poverty among Hispanics was reported to be 36.5 percent. The White poverty rate was 17.5 percent. This high poverty rate among minorities in Rockford is largely concentrated in the R-ECAP Census Tracts.

Our analysis of the information provided during the study period documents that the City of Rockford Housing Authority has allowed a significant portion of their low income public housing units and Section 8 Voucher utilization to be concentrated into already predominately low income, poverty and minority concentrated parts of the city. In addition to RHA, the County of Winnebago Housing Authority, whose jurisdiction extends to Winnebago County has a large percentage of their Section 8 Voucher holders concentrated in the R/ECAP Census tracts of Rockford, further contributing to the problem of concentration of race and poverty within the City of Rockford. Approximately 62.5% of the public housing units in four developments are currently located in designated high poverty and minority concentrated census tracts. These R/ECAP census tracts are identified as having a poverty rate above 40% of the area, and with a minority concentration population of greater than 50%.

Our analysis also documented the concentration of other federally assisted and subsidized housing developments and State assisted Low Income Housing Tax Credit Assisted developments (LIHTC) in R/ECAP Census Tracts. Map 1.2 in the

Community Profile depicts the location of Public Housing Properties, LIHTC Properties, and other assisted properties (Sect. 202, 811, etc.) and Section 8 properties respectively. Based on our analysis, we have determined that a disproportionate concentration of public and assisted housing product and voucher utilization exist in minority concentrated and low income zip codes and census tracts within the Rockford City limit boundaries.

Remedial Actions:

Action #21: Create a voucher disbursement strategy which results in a 30 percent reduction of Section 8 voucher utilization in R-ECAP poverty and minority xxx impacted census tracts, in the City of Rockford, and no more than 30 percent utilization in any census tract in Boone and Winnebago Counties, or any census tract in any of the immediately adjacent counties and cities. Alternatives could include:

1. Voucher Program: Increase the Payment Standard in all bedroom sizes to allow voucher holders to move out of concentrated census tracts to nonconcentrated census tracts. Targeted non-concentrated census tracts are those in which 70 % or fewer units are currently accessible to voucher holders at the current FMR.

Accomplishments:

RHA has increased the Payment Standard to 110% of FMR.

2. Voucher Program: Offer landlords a one- time bonus fee, dependent upon bedroom size, for rental in a non-concentrated census tract to recruit more landlords into the program in non-concentrated areas of the city.

Accomplishments:

This has not been done. To date, RHA have not had any challenges recruiting landlords.

3. Voucher Program: Offer landlords in non-concentrated areas, a guarantee of rent subsidy for the initial or one full term of the lease, in the event of a tenant default on their initial lease agreement, as an incentive for landlords to stay in the Section 8 Program.

Accomplishments:

This has not been done, it is not within the RHA budget to implement at this time.

4. Voucher Program: Add a waiting list preference for voucher applicants who are willing to select a unit in a non-impacted concentrated census tract in the city, or county, for their housing choice voucher.

Accomplishments:

A separate waitlist was created for "Opportunity Area" PBV units.

5. Voucher Program: Implement a survey tracking system that will map/chart locations of units under contract and track how family patterns changes in connection with a voucher holder's move through annual surveys with family members.

Accomplishments:

Not Completed.

6. Public Housing: In accordance with recent regulatory changes, aggressively market public housing to families with 30% to 80% of median income, once the threshold of 40% of 30% or below of median income totals has been met in any development.

Accomplishments:

RHA Applications specialist, work directly with the DHS, IDES, Carpenters Place, Rockford Rescue, Crusader Clinic, and local community centers to ensure RHA information as well as, applications are available to those in the greatest of need.

Action #22: Create a Regional Housing Move to Opportunity Advisory Group as part of a Metropolitan Planning Organization, or the Rockford Metropolitan Planning Agency (RMAP).

This Move to Opportunity Advisory Group would be charged with mapping, tracking, and analyzing the locations of units under contract between both the Rockford Housing Authority and the Winnebago County Housing Authority's housing choice vouchers. This would enable a more regional approach to the strategy of managing housing choice vouchers for the entire region.

This group would track how the pattern changes, differentiating between new voucher families who have rented their preprogram unit and families who have use a voucher to move into a housing unit. When a large number of movers

choose housing in a certain neighborhood, it is important for the housing authorities, and counseling agencies working with voucher families, to analyze what is happening in the neighborhood. Can the neighborhood absorb a large number of assisted housing units that can be rented within the program's fair market rents ((FMRS)? Or is it a neighborhood that has been de-stabilized by rapid racial transition, or that is fragile in other ways?

This recommendation is also consistent with the smart growth/planning blueprint goals outlined in the Metropolitan's Planning Organization's blue print for affordable housing for the region.

Accomplishments:

Has not been undertaken.

Existing Public and Assisted Housing Redevelopment Alternatives

Action #23: Priority given to scattered sited development which focuses on non-impacted areas of the Cities, or Counties such as a land swapping.

Accomplishments:

Has not been undertaken.

Action #24: RHA will re-evaluate the redevelopment and replacement of subsidized public housing in location the Fairground Valley and other public and assisted housing developments and consider a combination of both market rate housing and economic development strategy in the redevelopment of the Fairgrounds Valley Choice Neighborhood (CN) Transformational Plan. The location of the Fairground Valley public housing development is in one of the city's poorest census tracts. It has a 61.9 % poverty rate, second only to the Orton Keyes development census tract. Although, a lot of planning has gone into this location, perhaps the authority would be better suited to find additional smaller scatter site locations within the city and counties to fulfill its replacement housing criteria with HUD. Many times in an effort to maximize the number of housing units, a retail economic component in not included in the transformation plan. The Fairground Valley Choice Neighborhood Plan did not show an economic development component for the area. A market research of possible retail opportunities should be included in Rockford's Choice Neighborhood (CN) Transformational Plan to prioritize possible retail development in the area with possible private and/or public partnerships. RHA should also pursue more private/public joint development ventures that focus on non-impacted areas of the City and Counties to replace units lost to demolition.

Accomplishments:

Has not been undertaken.

Action #25: Implement programs that improve safety and decrease perceptions of crime in concentrated areas including Crime Prevention, Law Enforcement community policing, Weed and Seed, and Crime Prevention through Environmental Design Standards (CPTED). Crime Prevention through Environmental Design (CPTED) – one of the major issues identified by both resident and participants in community outreach sessions was the need to address crime and the perception of crime in public housing developments and concentrated areas. We recommend a collaboration or commission involving representatives of the City officials, Police Department, RHA, and neighborhood leaders are designated to examine ways to improve crime prevention, safety and the perception of crime in the area. The CPTED concept could be explored by the City Police department as one means of implementing this recommendation. CPTED is based on the premise that "proper design and effective use of the built environment can lead to a reduction in the fear of crime and incidence of crime, and to an improvement in quality of life." CPTED strategies are ideal xxxiii for Law Enforcement Officers, City Planners, City Managers, City Council Members, Architects, Security Consultants, Educators or anyone involved in designing developments, neighborhoods, schools, downtowns, buildings, or revitalization efforts. It is an effective way of fighting crime and promoting business. Example of what types of activities or regulatory changes could be used or offered in the implementation of CPTED programs is listed below.

- Improved signage
- Providing education on Human Behavior and CPTED concepts
- Barriers – Real vs. Symbolic/Fencing, Landscaping, & Interior Walls
- Lighting For Safety
- Planning, Zoning, and CPTED
- Writing a CPTED Ordinance/Overlay Districts
- Traffic and signals
- Crosswalks and protected crossings

Accomplishments:

In 2017, the Rockford Police Department launched its first two (2) Resident Officer Community Keeper Houses. The houses are a part of the department's community policing initiatives aimed to cultivate and strengthen relationships within the community. Officers reside in the neighborhoods they are sworn to protect and serve.

The Strong Neighborhood houses program began in Rockford in 2015. These three (3) houses, which are a joint effort of the Rockford Police Department and

United Way of the Rock River Valley, are located in areas where crime rates and access to social services are both problematic. The houses are meant to address both issues. Police staff each house, and community organizations host various classes there, as well as provide access to social service-related information

Action #26: Evaluate opportunities for land swaps and joint development between RHA and the ISD Education Bond Program, and City/County Bond Program Infrastructure to address de-concentration concerns.

Accomplishments:

Has not been undertaken.

Action #27: Develop focus group sessions with Public Housing resident, Residents Councils, and Voucher holders as to de-concentration, loss of housing units, gentrification, and housing in areas outside of already identified concentrated areas.

Accomplishments:

Has not been completed.

Public Housing De-Concentration Plan – The final section of this report, Section 07, details the results of the De-Concentration Plan analysis of the City of Rockford Housing Authority's (RHA) public and assisted housing programs administered under federal government statutes. The Public Housing Authority De-Concentration of Poverty and Fair Housing in Program Admission Plan requirements are details in HUD Regulations C.F.R. Subpart A. Sec 903. The purpose of this section is to specify the process which a Public Housing Authority, as part of its Annual Planning Process and development of Admissions Policies, must follow in order to develop and apply a policy that provides for de-concentration of minority populations, poverty and encourage income mixing in certain areas of the jurisdiction and in public housing developments and to Affirmatively Further Fair Housing. The plan also should specifically address de-concentration of PHA developments and saturation of Section 8 Rental Vouchers in minority ethnic and racial and poverty concentrated census tracts and geographies.

The U. S. Department of HUD has defined "Areas of Racial and Ethnic Concentration and Segregation (R/ECAP) – as areas or census tracts within a jurisdiction comprised of 50% or greater minority population and 3 times or more the poverty level of the MSA (35.1% for Rockford MSA) and generally lacking the basic amenities and failing to provide a quality of life expected and desired for any area within the MSA.

The plan provides an analysis and documentation of existing conditions and concentrations of poverty, minorities, and incomes in geographies and PHA owned and operated developments across the City. Corrective actions and strategies are recommended for redevelopment, policy, regulatory, legislative, admissions, operations, and fiscal aspects of the Rockford Housing Authority programs. These tasks include identification of development opportunities, programs, joint development opportunities, demolition and replace strategies, and funding opportunities.

The analysis documents that the City of Rockford Housing Authority has allowed a significant portion of their low income public housing units and Section 8 Voucher utilization to be concentrated into already predominately low income, poverty and minority concentrated parts of the city. In addition to RHA, the County of Winnebago Housing Authority, whose jurisdiction extends to Winnebago County has a large percentage of their Section 8 Voucher holders concentrated in the R/ECAP Census tracts of Rockford, further contributing to the problem of concentration of race and poverty within the City of Rockford.

Our analysis also documented the concentration of other federally assisted and subsidized housing developments and State assisted Low Income Housing Tax Credit Assisted developments (LIHTC) in R/ECAP Census Tracts.

The goal of de-concentration would be to achieve minority concentrations and poverty level less than defined above by R/ECAP and to transform these areas of concentration into "Opportunity Areas". Opportunity Areas – areas offering access to quality goods and services, exemplary schools, health care, range of housing, transportation to employment and service centers, adequate public infrastructure, utilities, and recreation.

The City's previous Consolidated Annual Performance and Evaluation Reports (CAPERs):

The Consolidated Annual Performance and Evaluation Report (CAPER) details the status and accomplishments of the City of Rockford's activities under the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME), Emergency Solutions Grants (ESG) federal dollars from the Department of Housing and Urban Development (HUD).

In Rockford's FY 2015-2019 Five-Year Consolidated Plan, the City of Rockford prioritized activities according to the following HUD objectives: to provide a suitable living environment, to provide decent housing, and to expand economic opportunities. All programs and projects were identified as high or medium need in the Consolidated Plan. All funded activities served primarily low/moderate income persons by supporting housing needs, providing needed services,

improving the quality of life for individuals and households in Rockford, and continuing to attempt to meet the needs of underserved populations.

2018 CDBG funds expended in 2018 totaled \$1,068,840.81. The total of all CDBG expenditures, regardless of funding year, was \$1,364,970.90. These totals include Section 108 debt service expenditures of \$68,323.50.

CDBG Activities: During the 2018 program year, the CDBG activities included the following:

- 49 residential structures demolitions
- 175 youth served through an after-school program.
- 5,671 code violations
- 5 Economic Development agreements were awarded

HOME Activities: FY 2018 HOME funds expended in 2018 totaled \$107,371.75. The total of all HOME expenditures, regardless of funding year, was \$941,344.16.

In 2018 the HOME activities included the following:

- 12 homebuyer activities
- 24 homeowner rehabilitation activities.

ESG Activities:

The Rockford community continues to be part of both the Mayor's Challenge to End Homelessness and Built for Zero to end veteran and chronic homelessness. The City was recognized for ending veteran homelessness in 2015 and chronic homelessness in 2017. Since accomplishing those goals, the City established new goals of ending youth homelessness by March 31, 2019 and family homelessness by December 31, 2019. This required continued outreach and in-reach and Rapid-Rehousing generally prioritized for veterans and chronically homeless shifted to homeless youth and more families.

IV. Impediments to Fair Housing 2019

In order to determine if impediments to fair housing choice exist, interviews and meetings were conducted, and an analysis of the fair housing complaints in Rockford was undertaken.

A. Fair Housing Complaints:

1. Community Relations Commission of the City of Rockford

The City of Rockford's Community Relations Commission was newly created by the City of Rockford City Council. The ordinance was approved December 19, 2018 and the initial 11

**City of Rockford Community
Relations Commission
Mayor's Office
425 East State Street
Rockford, IL 61104**

members were appointed on July 30, 2019. According to the Ordinance, 2018-281-O, "It is the public policy of the City of Rockford to provide all of its citizens equal opportunity for education, employment, access to public conveniences and accommodations, and acquisition, through purchase or rental, of real property, including but not limited to housing, and to eliminate segregation and discrimination based on race, color, national origin, religion, sex (including pregnancy, childbirth, and related medical conditions, and harassment based upon sex), disability, age, genetic information, marital status, sexual orientation, citizenship status, military status, unfavorable military discharge, gender identity, or status as a survivor of domestic violence or human trafficking. It is further the policy of the City of Rockford to promote the full realization of equal opportunity through a positive and continuing approach with each department, division, agency, or internal component of the City, every contractor, subcontractor or bidder seeking contracts with the City, and every employer, property owner, and business owner in the community. It is further the policy of the City of Rockford to foster, encourage, and stimulate the improvement of relations among and between all citizens, and to provide all individuals with an equal opportunity to grow and participate to the best of their ability in the economic, educational, social, and cultural activities available in the community".

The primary functions of the Commission are as follows:

- Identify for the City Council programs or projects that will enhance relationships between city government and its residents;
- Study the nature and causes of prejudices in the City, its ordinances and policies and to make recommendations for improvements;
- Study the nature and extent of discriminatory housing, employment, and public accommodation practices in the City;
- Publish and disseminate reports, recommendations, and information derived from such studies;
- Conduct and promote such educational and other programs and may be necessary to carry out the functions of the Commission;
- Assist City departments in establishing and maintaining good community relations and to serve all segments of the community in an equitable and professional manner;
- Advise and consult with the Mayor and City Council on all matters involving racial, religious, sex, ethnic, disability or sexual orientation prejudice or discrimination and recommend such legislative action as it may deem appropriate;
- Periodically review, with the Human Resources Director and the Mayor or his designee, the City's diversity programs, as well as City contractors' compliance with all HUD requirements, and report the results of the review to the City Council;
- Provide education programs on community relations issues or practices of unlawful discrimination; conduct public meetings to aid in alleviating discrimination and bias, and as a means of fostering positive community relations within the City; and issuing such publications as may assist it in the performance of its functions
- Review the hiring, promoting, and contracting processes of the City and all its departments in furtherance of the policies and goals of this chapter;
- Request the Legal Director or his/her designee investigate possible discrimination which might come to the attention of the Commission with or without an individual complaint.

Resulting class based investigations, after the Legal Director's fact-finding, may be issued as reports and be distributed throughout the community. The Commission may recommend informal mediation and recommendations to the Council for formal action, to end any discrimination is may find as a result of these investigations.

- The Commission will submit an annual report to the Mayor and Council concerning its activities and enforcement.

Individuals may submit a written statement that an unlawful act in the City of Rockford has been committed. The charge must be filed to the Department of Law within 180 days after the occurrence of the alleged violation.

2. **Prairie State Legal**

Prairie State Legal Services is an organization that offers free legal services for low income persons and those age 60 and over who have serious civil legal problems and need legal help to solve them. There are 12 office locations serving 36 counties in northern Illinois.

**Prairie State Legal
Winnebago Office
303 North Main Street
Suite 600
Rockford, IL 61101
Phone: (815) 965-2902**

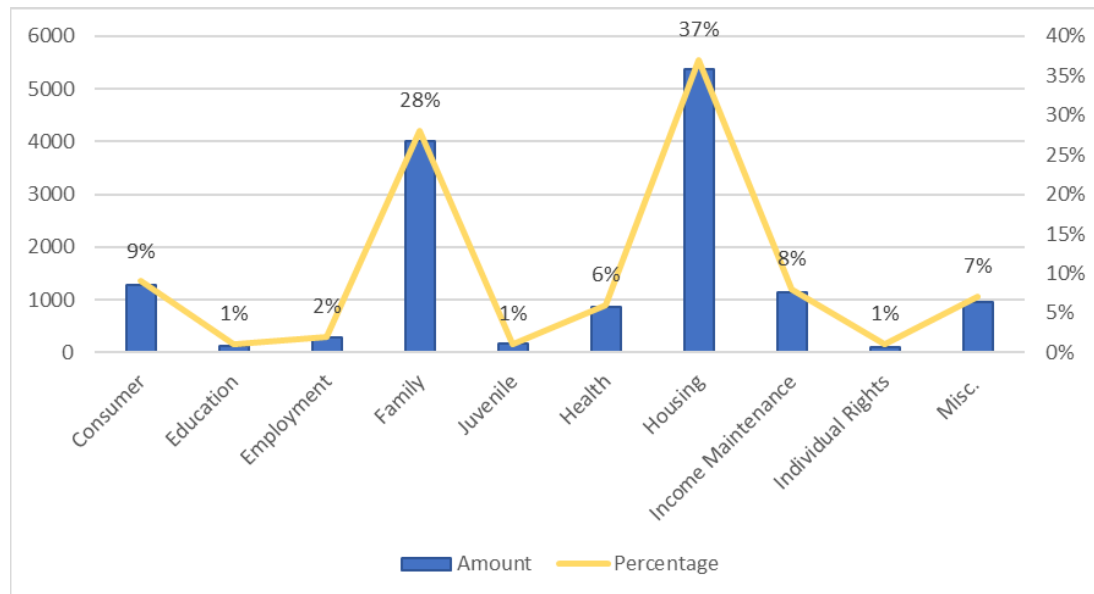
Prairie State Legal takes on special projects in Legal Help for Homeowners Facing Foreclosure, Tax Law, Fair Housing, Older Adults, Department of Children and Family Services Education, HIV/AIDS Services, Vocational Rehab and Home Services, and Services to the Homeless.



PRAIRIE STATE LEGAL SERVICES
Equal Access to Justice

Of the 14,301 cases handled in 2016 (the most recent Annual Report with data available), 37% were related to housing. More than three quarters of Prairie State Legal's clients are women living in poverty. The Majority of Prairie State Legal's clients are adults between the ages of 26 and 59. Of the clients with families, 12,639 children received services. (www.pslegal.org).

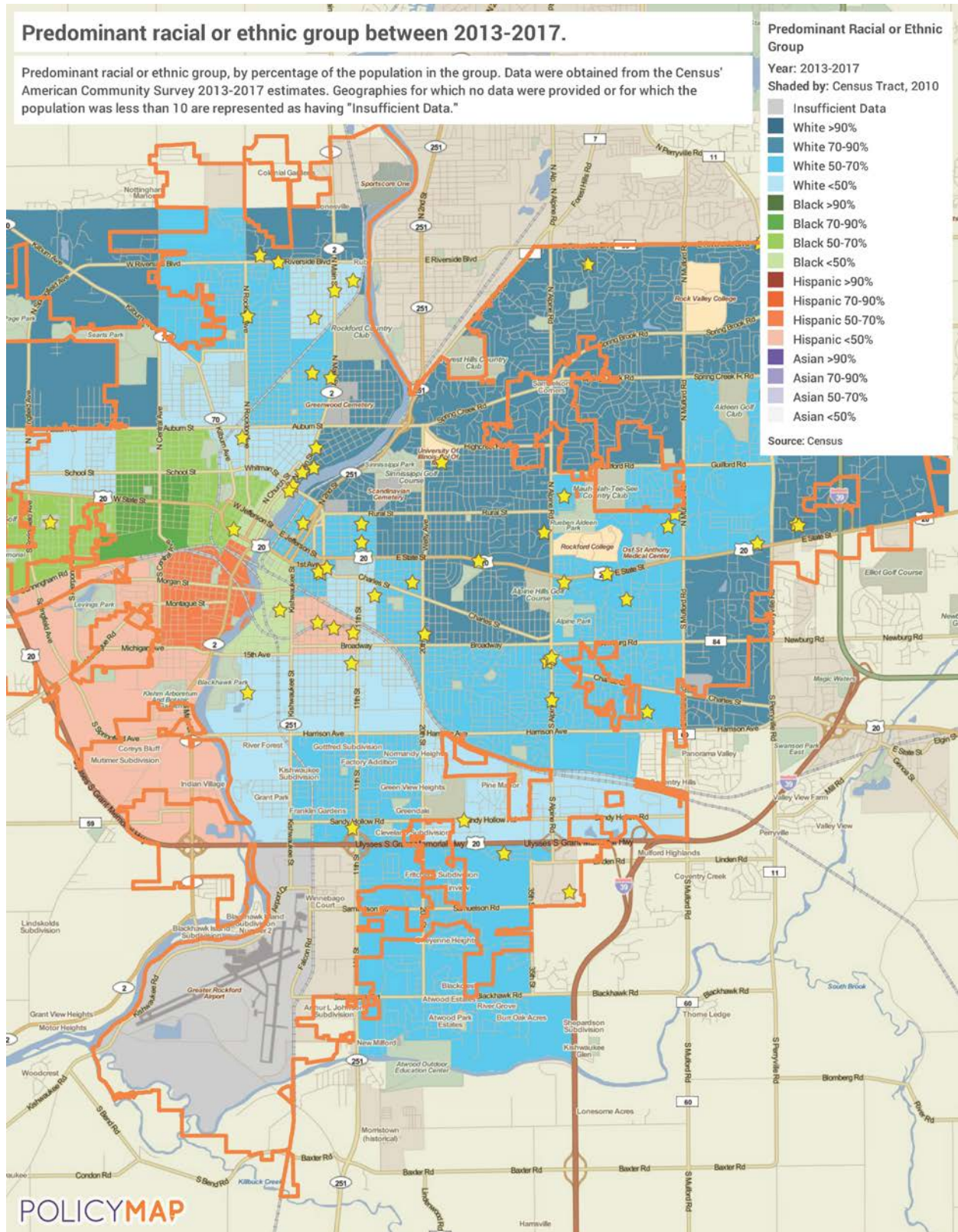
Chart IV-1 – Prairie State Legal Cases Handled in 2016



Source: Prairie State Legal 2016 Annual Report

In 1991 the Civil Rights Division established the Fair Housing Testing Program within the Housing and Civil Enforcement Section and began testing the following year. Testing refers to the use of individuals who, without an bona fide intent to rent or purchase a home, apartment, or other dwelling, pose as prospective buyers or renters for real estate for the purpose of gathering information. This information may indicate whether a housing provider is complying with fair housing laws and to identify discrimination based on race, national origin, disability, or familial status. Testing has demonstrated to be a useful tool to investigate housing market practices and to document illegal housing discrimination.

Between the years 2015-2019 Prairie State Legal completed 87 tests in the City of Rockford Area of those, 67% of the tests supported the allegations tested. The map below illustrates the locations of testing completed between 2015-2019:



Source: AJ Young, Prairie State Legal

3. Illinois Human Rights Commission

The Illinois Human Rights Commission is dedicated to promoting freedom from unlawful discrimination as defined by the Illinois Human Rights Act. The Act forbids discrimination based on: sex, age, race, color, religion, arrest record, marital status, sexual orientation, physical and mental disability, citizenship status (with regard to employment), national origin, ancestry, unfavorable military discharge, familial status (with respect to real estate transactions), military status, sexual harassment, and orders of protection.

**The Illinois Human Rights
Commission
James R. Thompson Center
100 W. Randolph Street
Suite 5-100
Chicago, IL 60601
Phone (312) 814-6269**

The mission statements of the ILHRC is as follows: “Our mission is to provide a neutral forum for resolving complaints of discrimination filed pursuant to the Illinois Human Rights Act. The Act forbids discrimination in employment, real estate transactions, education, public accommodations, and access to financial credit. Our primary responsibility is to make impartial determinations of whether there has been unlawful discrimination as defined by the Illinois Human Rights Act. We are also responsible for furnishing information to the public about the Act and the Commission. To fulfill our mission, we strive to provide professional, competent, and considerate service to everyone who seeks information from us or who has a case before the Commission.”

On December 6, 1979, the then Governor James R. Thompson signed into law the Illinois Human Rights Act, 775 ILCS 5/1-101 etseq. The Act created the broadest civil rights coverage for the people of Illinois in the history of the state. The Commission consists of thirteen Commissioners and a staff which includes an Executive Director, a General Counsel and Assistant General Counsel, a Chief Administrative Law Judge, Hearings and Motion Judges and administrative operations staff. The Department of Human Rights investigates filed charges and refers to the Human Rights Commission which conducts hearings, makes decisions, and approves settlements.

The Department of Human Rights publishes an annual summary of docketed cases filed during the Fiscal Year (July 1 – June 30). **Table IV-1** below illustrates the trends for new complaints that were docketed and conciliated for the State of Illinois from 2015 to 2018.

The reports are published by the Illinois Department of Human Rights. In FY 2018, employment related complaints accounted for 84% of the total complaints. Since 2015, employment related complaints accounted for over 80% of the total amount of complaints filed. While overall complaints have decreased since 2015, there was an 11% increase in housing complaints docketed between 2107 and 2018.

Table IV-1 – ILHRC New Complaints Docketed

Category	2015	2016	2017	2018	Total
Employment	3,163	2,909	2,748	2,442	11,262
Housing	353	289	282	313	1,237
Public Accommodations	197	214	165	153	729
TOTALS	3,713	3,412	3,195	2,908	13,228

Source: Illinois Department of Human Rights Annual Reports, 2015-2018

Table IV-2 – ILHRC Complaints Closed

Category	2015	2016	2017	2018	Total
Housing	372	282	309	302	1,265
Non-Housing*	3,325	3,050	3,069	3,017	12,461
TOTALS	3,697	3,332	3,378	3,319	13,726
* Includes employment, public accommodation, financial credit, and sexual harassment in education					

Source: Illinois Department of Human Rights Annual Reports, 2015-2018

4. Fair Housing & Equal Opportunity (HUD)

The U.S. Department of Housing and Urban Development's (HUD) Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Fair Housing Act.

Chicago HUD Regional Office
Ralph Metcalfe Federal Building
77 West Jackson Boulevard
Chicago, IL 60604
Phone: (312) 913-8429



The complaints received for the City of Rockford and Winnebago County are shown in the following **Table IV-3** and **Table IV-4**, respectively, to illustrate the most common basis for complaints over the five-year span from January 1, 2014 through June 26, 2019.

City of Rockford:

The most common basis for complaints in Rockford were “Disability” and “Race”, garnering 59.4% and 25.0%, respectively. Of the claims in Rockford, fifteen (15) were closed for “no cause”, four (4) were “withdrawn after conclusion”, and one (1) was conciliated/settled.

Table IV-3 – Basis for Complaint by Percent in Rockford

Basis	Number	Percentage
Race	8	25.0%
Color	1	3.1%
Disability	19	59.4%
National Origin	2	6.3%
Family Status	5	15.6%
Sex	6	18.8%
Retaliation	6	18.8%

Winnebago County:

The most common basis for complaints in the County were “Disability” and “Race”, each making up 58.5% and 26.8% of total complaints, respectively. ‘Retaliation’ was third with 14.0%, and “sex” and “family status” each garnered 12.3% and 10.5%, respectively. Of the cases, 21 of the cases (36.8%) were closed for no cause. Five cases (8.7%) were withdrawn after resolution and one case (1.7%) was conciliated/settled.

Table IV-4 – Basis for Complaint by Percent in Winnebago

Basis	Number	Percentage
Race	11	26.8%
Color	1	2.4%
Disability	24	58.5%
National Origin	1	2.4%
Family Status	6	14.6%
Sex	7	17.1%

Retaliation	8	19.5%
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The following **Tables IV-5** and **Table IV-6** “HUD-FHEO Complaints” summarize all of the complaints filed with the Office of Fair Housing & Equal Opportunity between January 1, 2014 and June 26, 2019 in the City of Rockford and Winnebago County, respectively.

Table IV-5 – HUD-FHEO Five Year Complaints for the City of Rockford

HUD File Number	HUD Filed Date	Issue Code Description	Basis	City	How Closed
05-14-0415-8	01/17/14	Discrimination in terms/conditions/privileges relating to rental	Disability	Rockford	Administrative Closure
05-14-0634-8	03/11/14	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Race, Color	Rockford	No Cause
05-14-0661-8	03/21/14	Discriminatory refusal to rent	Familial Status	Rockford	Withdrawn after Resolution
05-14-0920-8	04/16/14	Discrimination in terms/conditions/privileges relating to rental	Race	Rockford	No Cause
05-14-0991-8	05/30/14	Discrimination in terms/conditions/privileges relating to rental	Race	Rockford	No Cause
05-14-1526-8	09/12/14	Failure to make reasonable accommodation	Disability	Rockford	Charged or FHAP Caused
05-15-0572-8	02/19/15	Discriminatory terms, conditions, privileges, or services and facilities	Race, Sex, Retaliation	Rockford	No Cause

05-15-0743-8	04/10/15	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Sex, Retaliation	Rockford	No Cause
05-15-1187-8	06/24/15	Discriminatory terms, conditions, privileges, or services and facilities	Disability	Rockford	Administrative Closure
05-15-1341-8	07/17/15	Discrimination in terms/conditions/privileges relating to rental	Sex	Rockford	No Cause
05-16-4313-8	02/10/16	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Disability, Retaliation	Rockford	Withdrawn after Resolution
05-16-4357-8	02/19/16	Failure to make reasonable accommodation	Disability	Rockford	No Cause
05-16-4541-8	04/14/16	Discriminatory refusal to rent	Race, Disability	Rockford	Conciliation/ Settlement
05-16-5092-8	08/24/16	Discrimination in terms/conditions/privileges relating to rental	Disability	Rockford	No Cause
05-17-5680-8	10/11/16	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Disability	Rockford	No Cause

05-17-9332-8	09/15/17	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Sex, Retaliation	Rockford	Charged or FHAP Caused
05-17-9381-8	09/18/17	Discriminatory refusal to rent	Familial Status	Rockford	Withdrawn after Resolution
05-17-9458-8	09/22/17	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Disability, Familial Status, Retaliation	Rockford	Charged or FHAP Caused
05-18-0068-8	12/11/17	Discriminatory refusal to rent; Failure to make reasonable accommodation	Disability	Rockford	Administrative Closure
05-18-1202-8	04/10/18	Discrimination in terms/conditions/privileges relating to rental	Disability	Rockford	No Cause
05-18-1610-8	05/25/18	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Race	Rockford	No Cause
05-18-2416-8	07/31/18	Failure to make reasonable accommodation	Disability	Rockford	No Cause
05-18-2598-8	08/17/18	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Familial Status	Rockford	No Cause

05-18-2636-8	08/16/18	Failure to make reasonable accommodation	Disability	Rockford	No Cause
05-18-2759-8	08/22/18	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	National Origin, Familial Status	Rockford	No Cause
05-19-3236-8	10/19/18	Discriminatory refusal to rent	Disability	Rockford	Administrative Closure
05-19-3337-8	10/26/18	Discrimination in terms/conditions/privileges relating to sale	Disability	Rockford	Open
05-19-3475-8	11/15/18	Discrimination in terms/conditions/privileges relating to rental	Disability	Rockford	Withdrawn after Resolution
05-19-4894-8	04/23/19	Discriminatory terms, conditions, privileges, or services and facilities	Race, Sex, Disability, Retaliation	Rockford	Open
05-19-5114-8	04/08/19	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Sex	Rockford	Open
05-19-5230-8	05/21/19	Discrimination in terms/conditions/privileges relating to rental	Race, Disability	Rockford	Open
05-19-5654-8	06/26/19	Discriminatory refusal to rent	Disability	Rockford	Open

Source: U.S. Dept. of HUD-FHEO, Chicago Regional Office

Table IV-6 – HUD-FHEO Five Year Complaints for Winnebago County

HUD File Number	HUD Date Filed	Issue Code Description	Basis	City	How Closed
05-14-0415-8	01/17/14	Discrimination in terms/conditions/privileges relating to rental	Disability	Rockford	Administrative Closure
05-14-0634-8	03/11/14	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Race, Color	Rockford	No Cause
05-14-0661-8	03/21/14	Discriminatory refusal to rent	Familial Status	Rockford	Withdrawn after Resolution
05-14-0920-8	04/16/14	Discrimination in terms/conditions/privileges relating to rental	Race	Rockford	No Cause
05-14-0991-8	05/30/14	Discrimination in terms/conditions/privileges relating to rental	Race	Rockford	No Cause
05-14-1526-8	09/12/14	Failure to make reasonable accommodation	Disability	Rockford	Charged or FHAP Caused
05-14-0667-8	03/21/14	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Disability, Retaliation	Rockton	No Cause
05-15-0647-8	03/11/15	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under	Race, Sex	Loves Park	Withdrawn after Resolution

		Section 818 (coercion, Etc.)			
05-15-0572-8	02/19/15	Discriminatory terms, conditions, privileges, or services and facilities	Race, Sex, Retaliation	Rockford	No Cause
05-15-0743-8	04/10/15	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Sex, Retaliation	Rockford	No Cause
05-15-1187-8	06/24/15	Discriminatory terms, conditions, privileges, or services and facilities	Disability	Rockford	Administrative Closure
05-15-1341-8	07/17/15	Discrimination in terms/conditions/privileges relating to rental	Sex	Rockford	No Cause
05-16-4428-8	03/21/16	Discriminatory advertising, statements and notices	Disability	Cherry Valley	Administrative Closure
05-16-4313-8	02/10/16	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Disability, Retaliation	Rockford	Withdrawn after Resolution
05-16-4357-8	02/19/16	Failure to make reasonable accommodation	Disability	Rockford	No Cause
05-16-4541-8	04/14/16	Discriminatory refusal to rent	Race, Disability	Rockford	Conciliation/Settlement
05-16-5092-8	08/24/16	Discrimination in terms/conditions/privileges relating to rental	Disability	Rockford	No Cause
05-17-5680-8	10/11/16	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Disability	Rockford	No Cause
05-16-4285-8	02/01/16	Discriminatory terms, conditions, privileges, or services and facilities;	Disability, Retaliation	Roscoe	No Cause

		Discriminatory acts under Section 818 (coercion, Etc.)			
05-17-6811-8	01/18/17	Discriminatory refusal to negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities	Familial Status	DeKalb	No Cause
05-17-9332-8	09/15/17	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Sex, Retaliation	Rockford	Charged or FHAP Caused
05-17-9381-8	09/18/17	Discriminatory refusal to rent	Familial Status	Rockford	Withdrawn after Resolution
05-17-9458-8	09/22/17	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Disability, Familial Status, Retaliation	Rockford	Charged or FHAP Caused
05-18-0068-8	12/11/17	Discriminatory refusal to rent; Failure to make reasonable accommodation	Disability	Rockford	Administrative Closure
05-18-2579-8	08/17/18	Discriminatory terms, conditions, privileges, or services and facilities	Race	Gurnee	No Cause
05-18-0825-8	02/23/18	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Disability	Loves Park	No Cause
05-18-1202-8	04/10/18	Discrimination in terms/conditions/privileges relating to rental	Disability	Rockford	No Cause
05-18-1610-8	05/25/18	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Race	Rockford	No Cause

05-18-2416-8	07/31/18	Failure to make reasonable accommodation	Disability	Rockford	No Cause
05-18-2598-8	08/17/18	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Familial Status	Rockford	No Cause
05-18-2636-8	08/16/18	Failure to make reasonable accommodation	Disability	Rockford	No Cause
05-18-2759-8	08/22/18	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	National Origin, Familial Status	Rockford	No Cause
05-19-3236-8	10/19/18	Discriminatory refusal to rent	Disability	Rockford	Administrative Closure
05-19-3337-8	10/26/18	Discrimination in terms/conditions/privileges relating to sale	Disability	Rockford	Open
05-19-3475-8	11/15/18	Discrimination in terms/conditions/privileges relating to rental	Disability	Rockford	Withdrawn after Resolution
05-18-2356-8	07/31/18	Failure to make reasonable accommodation	Disability	Roscoe	Charged or FHAP Caused
05-19-4540-8	03/26/19	Discrimination in terms/conditions/privileges relating to rental	Race	Rock Island	No Cause
05-19-4894-8	04/23/19	Discriminatory terms, conditions, privileges, or services and facilities	Race, Sex, Disability, Retaliation	Rockford	Open
05-19-5114-8	04/08/19	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing	Sex	Rockford	Open

		unavailable			
05-19-5230-8	05/21/19	Discrimination in terms/conditions/privileges relating to rental	Race, Disability	Rockford	Open
05-19-5654-8	06/26/19	Discriminatory refusal to rent	Disability	Rockford	Open

5. Human Services, Housing, and Community and Economic Development Agencies

The City of Rockford interviewed agencies offering housing, human services, and community and economic development within the City in order to obtain their input and gain insight into potential impediments to fair housing. The following agencies were engaged in roundtable discussions or individual meetings:

- Jeremiah Development, NFP
- The Workforce Connection
- Winnebago County Health Department
- Center for Sight and Hearing
- United Way of Rock River Valley
- Rosecrance Ware
- Rockford Center Public Library
- The ARC of Winnebago
- NW HomeStart
- Remedies Renewing Lives
- Prairie State Legal Services
- Rockford Apartment Association
- Rockford Area Habitat for Humanity
- Winnebago County Housing Authority
- Rockford Housing Authority
- Zion Development Corporation
- Construction Business Development Center
- Gorman and Company
- Midland States Bank
- Salvation Army Rockford/Winnebago
- Crusader Community Health
- American Red Cross
- RAMP, Center for Independent Living
- Rockford Rescue Mission
- Members of Rock River Homeless Coalition

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- Rockford Chamber of Commerce
 - SCORE: Service Corps of Retired Executives
 - Muslim Association of Greater Rockford
 - Lifescape Community Services
 - Transform Rockford
 - YouthBuild Rockford
 - Rockford Area Association of Realtors
 - Shelter Care Ministries
 - Satori Pathway LLC
 - Rock Valley College
 - Small Business Development Center
 - Rockford Local Development Corporation

Each of these agencies provided feedback on housing-related issues in the City of Rockford. Complete meeting notes can be found in Part VI, Appendix D. The following is a summary of some of the comments that were received during the roundtable discussions:

Housing Agencies:

The City needs to focus on:

- Increasing the amount of affordable homes available; it is estimated the City is lacking in about 4,900-5,000 affordable homes.
- Decentralizing low-income housing in predominantly low-income areas.
- Expanding housing options for people with disabilities.
- Improve unsafe living conditions, especially for seniors.
- Addressing absentee landlords and poor property maintenance and management.
- Increasing incentives for investment in low and middle income areas.
- Home rehabilitation assistance for low and moderate income persons.
- Education for landlords and the public on fair housing issues.

The City needs to reduce:

- The number of absentee/slum landlords.
- Disinvestment from landlords in communities.
- The fear in residents, as it relates to reporting landlords and code violations, because they fear retaliation and/or eviction.
- Slum and blight, and the deterioration of housing conditions.

Rockford Housing Authority:

Resident Programs:

- **Community Policing** - The Rockford Housing Authority pays a lump sum to the local Rockford police department to hire 6 Officers and 1 Sergeant to provide community policing, at Housing Authority properties to help build relationships between teenagers and the police
- **Family Self Sufficiency** - (FSS) program-FSS is a HUD-initiated program that encourages communities to develop local strategies to assist families receiving any type of government subsidy with the tools to increase job opportunities, obtain, and maintain employment and provide life skills enhancements designed to promote economic independence and self-sufficiency.
 - **Homeownership program** - an escrow (savings) account. As the family rent increases due to increased earned income (30% of adjusted gross income), the increase of rent is deposited in an escrow account that they may access once their goals are completed. FSS makes it possible for participants to accumulate substantial sums of money; therefore, giving the family a down payment on a home of their own if they choose that option. To date the housing authority has 92 homeowners.
- **Connect Home** - Public Housing Authorities and The U.S. Department of Housing and Urban Development (HUD) have collaborated to connect children and families in HUD-assisted housing with access to high-speed Internet through an initiative called "Connect Home". As a Connect Home pilot community, the Connect Home Project Initiative of the Rockford Housing Authority is working to build a bridge over the digital divide by partnering with internet service providers to bring low-cost, high-speed internet access to RHA

residents in their homes. They are also working to help their residents complete free digital literacy training, and opportunities to provide them with a free desktop computer and other devices

- **New Resident Orientations** - In November of 2016, Rockford Housing Authority produced a comprehensive orientation for new move-in residents of housing. Since its start, 62 residents have attended through 7 on-site New Resident Orientation monthly seminars. The program is designed to educate new RHA residents on their tenant and community responsibilities as well as share resources and available opportunities.
- **Blackhawk Boys and Girls Club** - The Blackhawk Unit was founded in 1988 and is located within Blackhawk Courts community, which consists of over 300 low-income subsidized units. Blackhawk serves 650 members annually and nearly 100 members 6-18 daily. The Club's members are primarily from the Blackhawk neighborhood and Beyer School. The Blackhawk Unit collaborates with the Rockford Housing Authority and runs an after-school program that offers recreational activities, life skills, homework assistance, digital literacy training and computer access.
- **Etsy/Creative Craft Entrepreneurship** - For many adults, the idea of returning to a classroom setting, especially after some time away, can be an intimidating and stressful experience. Many Creative Craft Entrepreneurship graduates have shared that they experienced fear before class even started, when deciding whether to enroll. They were filled with worry and doubt about their products, technical abilities and capacity for learning new skills through opportunities.

Social Services Agencies:

Issues and needs:

- Poor quality of housing in low income areas; areas of blight, raising health concerns.
- People living in unsafe housing conditions due to fear of retaliation and having nowhere else to live.
- Poor sidewalk and lighting conditions in neighborhoods; especially detrimental for wheelchair users and elderly.
- Mold in low-income households.

- Inefficient public transportation.
- Lack of resources for seniors of all income levels.
- Food deserts in low-income areas
- No shelter/housing for sex offenders and felons
- Lack of programming/resources to teach soft skills
- Immigrant tenants fear retaliation from landlords and forego reporting violations
- Difficulties in finding housing for clients with prior evictions

Other Comments:

- Lack of accessible sidewalks and cross walks
- Need for detox programming and wrap around services
- Lack of education on reporting fair housing violations
- Resources and education for tenants and landlords
- Bed bug issues-costs falling on tenant
- Public transportation is unreliable
- Landlords violating laws about service animals

B. Public Sector:

Part of the Analysis of Impediments is to examine the public policies of the jurisdiction and the impact on fair housing choice. The local government controls land use and development through the comprehensive plan, zoning regulations, subdivision regulations, and other laws and ordinances passed by the local governing body. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and the various residential uses in a community. Local officials determine the community's commitment to housing goals and objectives. The local policies therefore determine if fair housing is to be promoted or passively tolerated.

This section of the Analysis of Impediments evaluates the City's policies to determine if there is a commitment to affirmatively further fair housing.

1. CDBG, HOME, and ESG Programs

The “Vision” of the Five Year Consolidated Plan is to serve as a consolidated planning document, an application, and a strategic plan for the City of Rockford, IL. The following goals and objectives have been identified for the period of FY 2020 through FY 2024:

**Table IV-7 – Five Year Strategies and Objectives
for the City of Rockford**

Housing Strategy – HS (High Priority)	
<i>Objective</i>	
HS-1 Housing Development	– Increase the number of affordable housing units in the City for owners and renters by assisting with acquisition, development fees, and construction.
HS-2 Housing Rehabilitation	– Continue to assist with rehabilitating existing affordable housing units occupied by owners and renters in the City by addressing code violations, emergency repairs, energy efficiency improvements, and handicap accessibility.
HS-3 Homeownership	– Continue to assist low- and moderate-income homebuyers to purchase homes by providing direct subsidies which include but are not limited to down payment and closing cost assistance including housing counseling fees, interest subsidies, etc.
HS-4 Fair Housing	– Promote fair housing choice through education, training, and outreach in the City of Rockford.
HS-5 Project Delivery	– Provide eligible program delivery and oversight for the CDBG and HOME funded housing projects/activities.
Homeless Strategy – HMS (High Priority)	
<i>Objective</i>	
HMS-1 Housing	– Support the Continuum of Care's efforts and applicants to provide emergency shelter, transitional housing, permanent supportive housing, and other permanent housing opportunities.
HMS-2 Operation/Support	– Assist providers who operate housing or provide support services for the homeless and persons or families at-risk of becoming homeless.
HMS-3 Prevention and Re-Housing	– Assist the Continuum of Care's efforts in prevention of homelessness through anti-eviction activities and program for rapid re-housing.
Other Special Needs Strategy – SNS (Low Priority)	
<i>Objective</i>	
SNS-1 Housing	- Increase the supply of affordable, accessible, decent, safe, and

sanitary housing for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs through rehabilitation of existing buildings and new construction.
SNS-2 Social Services - Support social service programs and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs.
SNS-3 Accessibility - Promote and assist in making accessibility improvements for homeowners, making reasonable accommodations, and bring public facilities and infrastructure into compliance with Federal and State Laws.
Community Development Strategy – CDS (High Priority)
<i>Objective</i>
CDS-1 Community Facilities - Improve parks, bikeways and trails, recreational facilities, and all public and community facilities including accessibility improvements to public buildings and all community facilities in the City.
CDS-2 Infrastructure - Improve the public infrastructure through rehabilitation, reconstruction, and new construction, of streets, sidewalks, bridges, curbs, walkways, water, storm water, sanitary sewer, handicap accessibility improvements/removal of architectural barriers, etc.
CDS-3 Public Services - Improve and enhance public services, programs for youth, the elderly, disabled, and general public service programs for low- and moderate-income persons.
CDS-4 Code Enforcement - Undertake code enforcement activities to maintain the existing housing stock in the City.
CDS-5 Public Safety - Improve public safety facilities, equipment, crime prevention, community policing, and ability to respond to emergency situations in the City.
CDS-6 Clearance/Demolition - Remove and eliminate slum and blighting conditions through demolition of vacant, abandoned, and dilapidated structures.
CDS-7 Accessibility Improvements - Improve handicap accessibility improvements and removal of architectural barriers to public and community facilities
CDS-8 Transportation - Support the expansion of transportation options to assist low- and moderate-income residents in the City.
Economic Development Strategy – EDS (High Priority)
<i>Objective</i>
EDS-1 Employment - Support and encourage job creation, job retention, and job training opportunities.
EDS-2 Development - Support business and commercial growth through

rehabilitation of store fronts and retail space, expansion of businesses, and the development of new businesses.
EDS-3 Redevelopment - Plan and promote the development, redevelopment, and revitalization of vacant and underutilized commercial and industrial sites.
EDS-4 Access to Transportation - Support the expansion of public transportation and access to bus and automobile service to assist residents to get to work or training opportunities.
Administration, Planning & Management Strategy – AMS (High Priority)
<i>Objective</i>
AMS-1 Overall Coordination - Provide program management and oversight for the successful administration of Federal, State, and locally funded programs, including planning services for special studies, annual action plans, five year consolidated plans, substantial amendments, consolidated annual performance and evaluation reports (CAPER), environmental reviews and clearances, fair housing, and compliance with all Federal, State, and local laws and regulations.

The City of Rockford receives CDBG, HOME, and ESG funds from HUD as an entitlement city under the program. In FY 2020 the City anticipates receiving \$2,171,919, in CDBG; \$982,552 in HOME; and \$186,641 in ESG funding. The City will allocate its funds to residential rehabilitation, homebuyer assistance, demolition, and economic development. Nearly all of the CDBG funds directed towards directly benefit low- and moderate-income persons, with the remaining funds dedicated to addressing slums and blight.

The City in its FY 2020 CDBG, HOME, and ESG Programs allocated the funds as follows:

Table IV-8 – FY 2020 CDBG, HOME, and ESG Budgets for the City of Rockford

Community Development Block Grant Funds		
Number	Activity	Amount
CDBG-20-01	CDBG Administration	\$ 377,261
CDBG-20-02	Housing Services (HOME Activity Delivery Costs)	\$ 177,003
CDBG-20-03	Rehab Services	\$ 225,345

CDBG-20-04	CDBG Housing Rehabilitation	\$ 690,000
CDBG-20-05	Fair Housing	\$ 20,000
CDBG-20-06	Clearance/Demolition	\$ 413,541
CDBG-20-07	Economic Development	\$ 195,571
CDBG-20-08	Section 108 Stand-by Loan Debt Service	\$ 83,198
	Program Income	\$ 8,000
Total		\$ 2,179,919
HOME Investment Partnership (HOME)		
Number	Activity	Amount
HOME-20-09	HOME Administration	\$ 98,255
HOME-20-10	HOME Housing Rehabilitation	\$ 550,884
HOME-20-11	Homeownership	\$ 76,635
HOME-20-12	Housing Development	\$ 207,651
HOME-20-13	CHDO Operating	\$ 49,127
	Program Income	\$ 5,440
Total		\$ 987,992
Emergency Solutions Grants Funds		
Number	Activity	Amount
ESG-20-14	Essential Services	\$ 15,000
ESG-20-15	Administration	\$ 13,663
ESG-20-16	Operating	\$ 68,000
ESG-20-17	HMIS	\$ 30,000
ESG-20-18	Prevention	\$ 57,978
Total		\$ 184,641

2. Other Funds

In addition to its CDBG funds, the following other public resources have been received by agencies in the City of Rockford:

- Emergency Solutions Grants
- HOME Investment Partnerships Program (HOME)
- Illinois Housing Development Authority (IHDA)
- United States Environmental Protection Agency-Brownfields Assessment Grants
- United States Environmental Protection Agency- Clean Up Grant
- United States Environmental Protection Agency- Supplemental Revolving Loans Fund
- Community Service Block Grant
- IL Home Weatherization Assistance Program

3. Low Income Housing Tax Credits

The Low-Income Housing Tax Credit (LIHTC) Program was created under the Tax Reform Act of 1986 and is intended to attract private investment to develop affordable rental housing for low- and moderate-income households.

There have not been any approved LIHTC projects in the last few years. The City is supportive of the use of LIHTC projects to provide affordable housing to low-income households, and had twenty-seven previously developed LIHTC projects, between 1987 and 2017, totaling 1,734 housing units.

The following is a list of LIHTC projects which were built in the City of Rockford from 1987 through 2017:

Table IV-9 – LIHTC in the City of Rockford

HUD ID Number:	Project Name:	Project Address:	Project City:	Project State:	Project ZIP Code:	Total Number of Units:
ILA19960010	528 SEVENTH STREET	528 SEVENTH ST	Rockford	IL	61104	8
ILA19910186	ANCHOR HOUSING I	504 S THIRD ST	Rockford	IL	61104	15
ILA19910187	ANCHOR HOUSING II	304 N INDEPENDENCE AVE	Rockford	IL	61101	4
ILA19930040	ANCHOR HOUSING III	517 OAKLEY AVE	Rockford	IL	61101	8
ILA20110983	BETHPHAGE OF ROCKFORD	1831 APPLE TREE LN	Rockford	IL	61108	25
ILA20010020	CORONADO VILLAGE APTS	417 N ROCKTON AVE	Rockford	IL	61103	43
ILA20060015	CHAMPION PARK REVITALIZATION PHASE II	3822 DELAWARE ST	Rockford	IL	61102	52
ILA19980025	CHATHAM COURT APTS	1905 W RIVERSIDE BLVD	Rockford	IL	61103	120
ILA19940205	COURT STREET APTS	410 N CT ST	Rockford	IL	61103	15
ILA20090904	COLLIER GARDEN APTS	2901 SEARLES AVE	Rockford	IL	61101	150
ILA20110923	FAUST LANDMARK APTS	630 E ST ST	Rockford	IL		200
ILA19960090	FOREST GLEN APT	7010 FOREST GLEN DR	Rockford	IL	61114	140
ILA20000040	HARBOR HOUSE	413 N WINNEBAGO ST	Rockford	IL	61103	30
ILA19980070	HEATHER GLEN APTS	2723 SILENT WOOD TRAIL	Rockford	IL	61109	40

ILA19980095	LONGWOOD PLAZA	1055 E STATE ST	Rockford	IL	61104	65
ILA19960280	KEMPER APTS	2310 KILBURN AVE	Rockford	IL	61101	40
ILA19960275	HERSHEY APTS	1832 N MAIN ST	Rockford	IL	61103	38
ILA20120809	JANE ADDAMS PARK APTS	502 SEMINARY ST	Rockford	IL	61104	38
ILA19940245	MELD MANOR	414 N CT ST	Rockford	IL	61103	12
ILA20070095	PINEVIEW OF ROCKFORD SLF	202 N SHOW PL DR	Rockford	IL	61107	99
ILA19990055	RIVER'S EDGE APTS	3541 NORMANDY AVE	Rockford	IL	61103	103
ILA19990135	RIVERWEST HOUSING PHASE I	421 N WINNEBAGO ST	Rockford	IL	61103	46
ILA19950260	OLD CITY HALL APTS	126 S FIRST ST	Rockford	IL	61104	31
ILA20050130	VALLEY VIEW APTS	3303 E STATE ST	Rockford	IL	61108	167
ILA20040115	TERRACE APTS	2321 HALSTED RD	Rockford	IL	61103	128
ILA20010050	THE GRAND APTS	1146 BRDWAY	Rockford	IL	61104	45
ILA00000123	WILDBERRY VILLAGE APTS	5725 FOREST HILLS RD	Rockford	IL	61114	72

4. Planning, Zoning, and Building Codes

City of Rockford

Zoning for the City of Rockford is codified in Part 2 of the Zoning Ordinance of the City of Rockford, Illinois. The ordinance was put into effect by City Council on March 24, 2008, effective April 3, 2008 and has been amended through March 31, 2017.

The Zoning Ordinance of the City of Rockford divides the City into four (4) base zoning districts. Each zoning district contains permitted and conditional land uses, along with associated

development standards. These development standards establish minimum lot sizes, maximum lot coverage, parking requirements, minimum yard setbacks and related requirements. The City of Rockford has refined these broad categories into seventeen (17) use districts:

- RE Rural Estate
- R-1 Single-Family Residential
- R-1U Single-Family Residential, Urban
- R-2 Two-Family Residential
- R-3 Multifamily Residential
- R-4 Multifamily Residential
- C-1 Limited Office District
- C-2 Limited Commercial
- C-3 General Commercial
- C-4 Urban Mixed Use District
- I-1 Light Industrial
- I-2 General Industrial
- I-3 Airport Industrial
- PUD-Planned Unit Development
- HDO-Historic District and National Register Overlay
- RRO-Rock River Overlay
- Wellhead Setback Overlay Districts

The Rockford Zoning Ordinance was approved by City Council on March 24, 2008 and became effective as of April 3, 2008. The Zoning Ordinance underwent amendments through March 31, 2017. The City's ordinance was reviewed for conformance with the Fair Housing Act of 1968, as amended, the American's with Disabilities Act, as amended and HUD Regulations and Guidelines.

Recommendations:

Review the following and consider minor additions and clarifications.

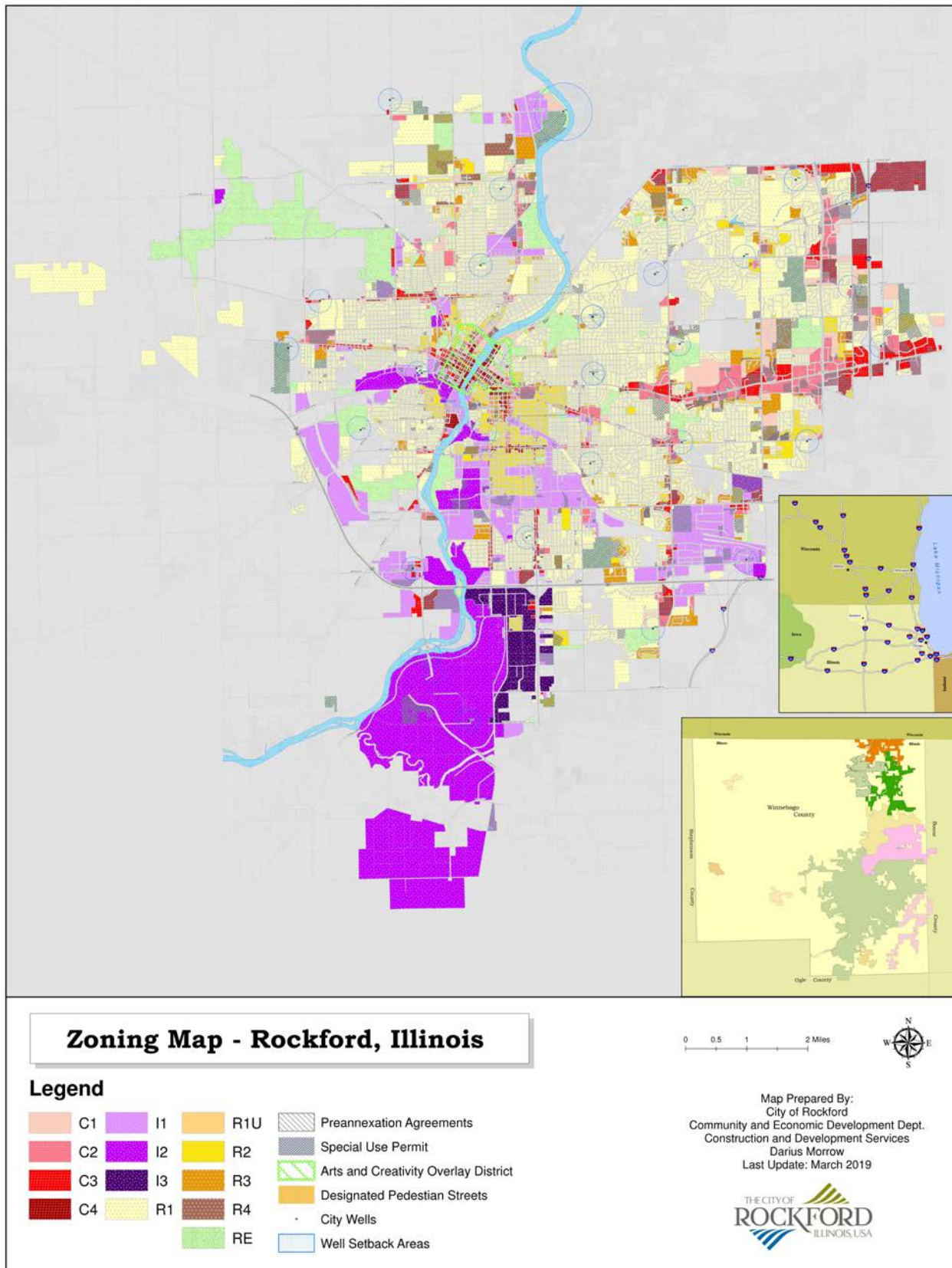
- Article 20-001 Purpose: Add the following: "The City of Rockford's Zoning Ordinance will be in conformance with

Federal and State laws and the City will affirmatively further fair housing.

- Table 20-1 Use Classification Table: Elderly Housing Units are not listed in the table. Since these are single dwelling units they should be permitted in each Residential District by right
- Article 91 General Terms: Add the Federal definition of “disabled” or “handicapped”

The following is a copy of the City of Rockford’s Zoning District Map:

City of Rockford's Zoning District Map



U.S. Department of Housing and Urban Development (HUD)

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

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

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

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

The Fair Housing Act was amended in 1988 to include persons with disabilities as a protected class, as well as to include design and construction requirements for housing developed with private or public funds. Specifically, this law requires property owners to make reasonable modifications to units and/or public areas in order to allow the disabled tenant to make full use of the unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant full use of the unit. As it relates to local zoning ordinances, the Fair Housing Act prohibits local government from making zoning or land use decisions, or implementing land use policies that exclude or discriminate against persons of a protected class.

5. Taxes

Real estate property taxes also impact housing affordability. This may not be an impediment to fair housing choice but it does impact the affordability of owner and renter housing.

The general residential real estate tax receipts in the City of Rockford are divided among Winnebago County, and Rockford Public School District 205. There is also a Redevelopment Fund (Metro) Tax and Tourism (Hotel/Motel) tax. Depending on the location, a property could be subject to many taxing bodies. The three largest are listed below, based on data from the Winnebago County Clerk:

- Winnebago County..... 0.1073 Total Extended rate
- Rockford City..... 3.1194 Total Extended rate
- Rockford PSD 205..... 7.3508 Total Extended rate

The estimated median value of a taxable residential property within the City of Rockford was \$89,500 in 2017, according to the 2013-2017 American Community Survey.

Table IV-10 illustrates the taxes assessed for property valued at \$100,000 and the City's median value of \$89,500. Real Estate taxes have been identified as a significant cause of housing cost overburden.

Table IV-10 – Real Estate Property Taxes

Taxes for Owner Occupied Property Assessed at \$100,000 in City of Rockford	
School District Excess	\$ 7,350.00
Rockford Current	\$ 14,270.80
Total Owner Occupied	\$ 2,162.08
Taxes for Non-owner Occupied Property Assessed at \$100,000 In City of Rockford	
School District Excess	\$ 7,350.00
Rockford Current	\$ 14,270.80

Total Non-Owner Occupied	\$ 2,162.08
Taxes for Owner Occupied Median Property Value (\$89,500) In City of Rockford	
School District Excess	\$ 6,578.97
Rockford Current	\$ 12,771.65
Total Owner Occupied	\$ 1,935.06
Taxes for Non-owner Occupied Median Property Value (\$89,500) In City of Rockford	
School Excess/Fire Excess	\$ 6,578.97
Rockford Current	\$ 12,771.65
Total Non-owner Occupied	\$ 1,935.06

6. Public Housing

The Rockford Housing Authority is the public housing agency that serves the City of Rockford. The mission of the Rockford Housing Authority is to provide decent, safe, and sanitary housing to the residents receiving assistance through the Public Housing and Section 8 Housing Choice Programs in an efficient and professional manner.

The Housing Authority owns and manages 1,923 units of public housing, of which 11.2% of units are accessible. In addition, the Housing Authority administers 1,862 Vouchers Housing Choice Vouchers.

There are currently 4,773 people on the Section 8 waiting list. There are 4,736 applicants on the Public Housing waiting list, with an approximate waiting period of 1-6 months depending on family size. Of these applicants, 1,164 are waiting for one-bedroom units; 771 are waiting for two-bedroom units; 340 are waiting for three-bedroom units; 144 are waiting for four-bedroom units; 33 are waiting for 5 bedroom units; and 9 are waiting for 5+ bedrooms. There are 1,886 applicants on the Public Housing waiting list that identified as elderly, and 50 that identified as near elderly.

The following are identified in the Rockford Housing Authority's FY 2018 Annual PHA Plan as the goals to address the needs of families, seniors, and persons with disabilities in Public Housing and Section 8 housing; these goals are designed to identify gaps in services tenants face and close these gaps by providing and coordinating the delivery of quality services and resources to residents.

Goal 1: Reduce Dependency on HUD Grant Funds

Objective A: Identify other sources of tax credit and grant funding including state and local dollars, and public and private foundation funds. *Diversify.*

Objective B: Create business opportunities including consulting and training activities

Goal 2: Bring in Sufficient Funds from Grants, Consulting, Training and/or Other Activities Each Year to Fully Support Operations – includes Fee for Service with RHA.

Objective A: Develop a full cost of operation

Objective B: Establish budget and funding targets annually

Objective C: Internally track and monitor the flow of funds

Goal 3: Streamline and Improve the Process of Identifying and Applying for Funds

Objective A: Create internal tracking and monitoring systems

Objective B: Develop boilerplate proposals for PHAs and non-HUD funders

Goal 4: Streamline and Improve the Process of Reporting Progress to Funders

Objective A: Automate case management information

Objective B: Automate the Logic Model for each HUD grant award

Objective C: Automate and track goals and objectives for all other awards

Goal 5: Increase the Percentage of Bridge and RHA Residents That Are Served by RSD

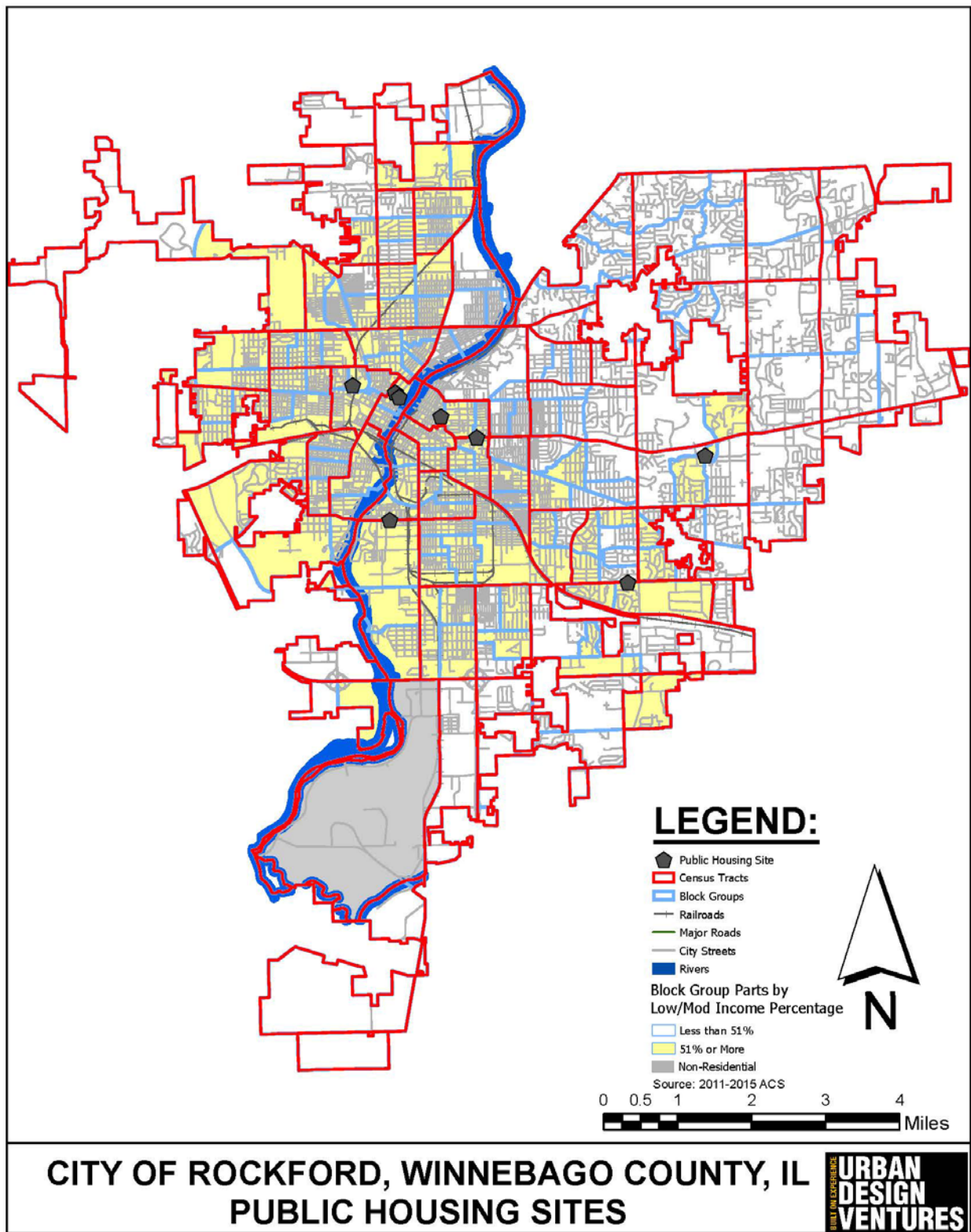
Objective A: Establish an RSD presence on-site, funds allowing

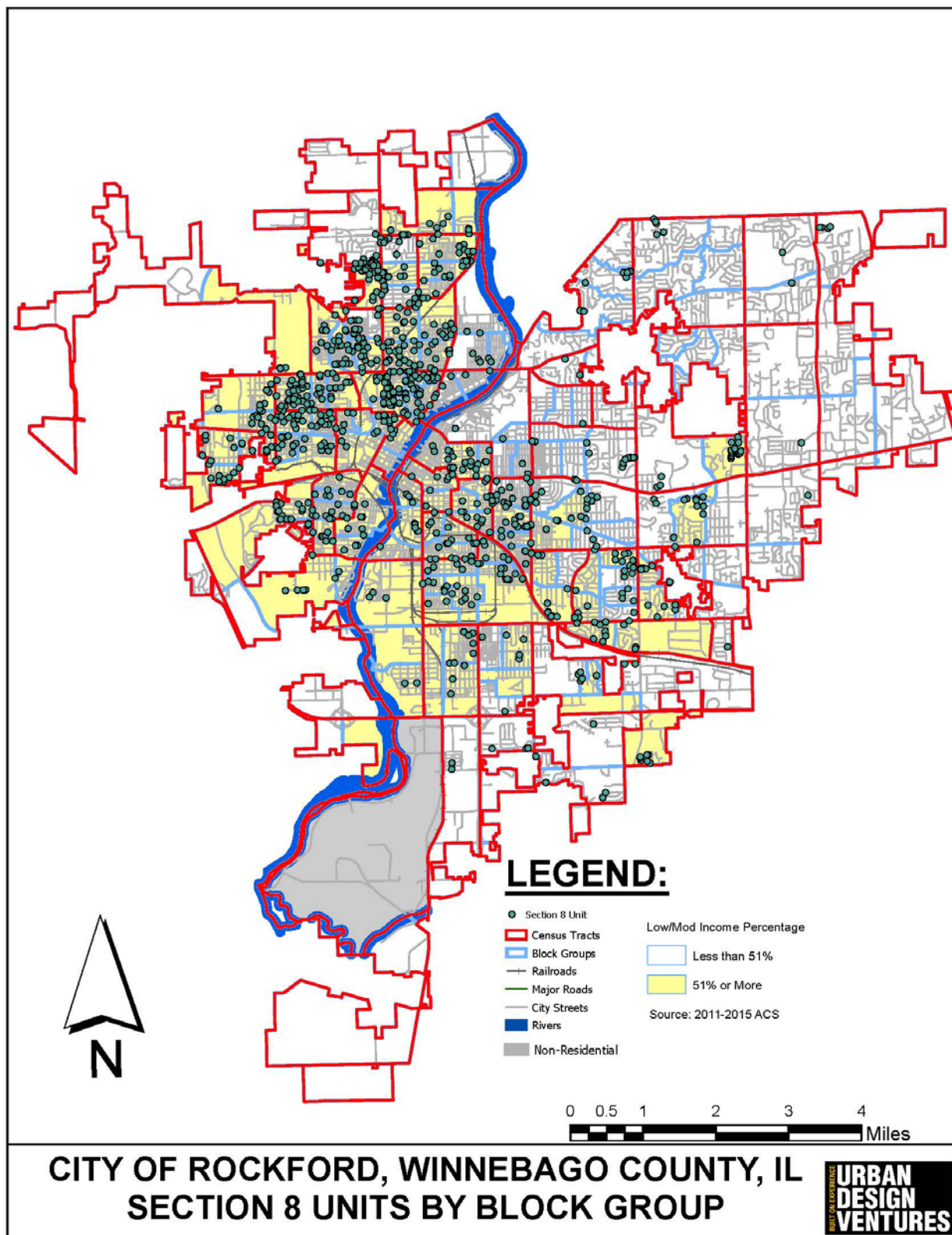
Objective B: Increase the number of successful partnerships with local service provider organizations, and encourage them to provide services in RHA communities

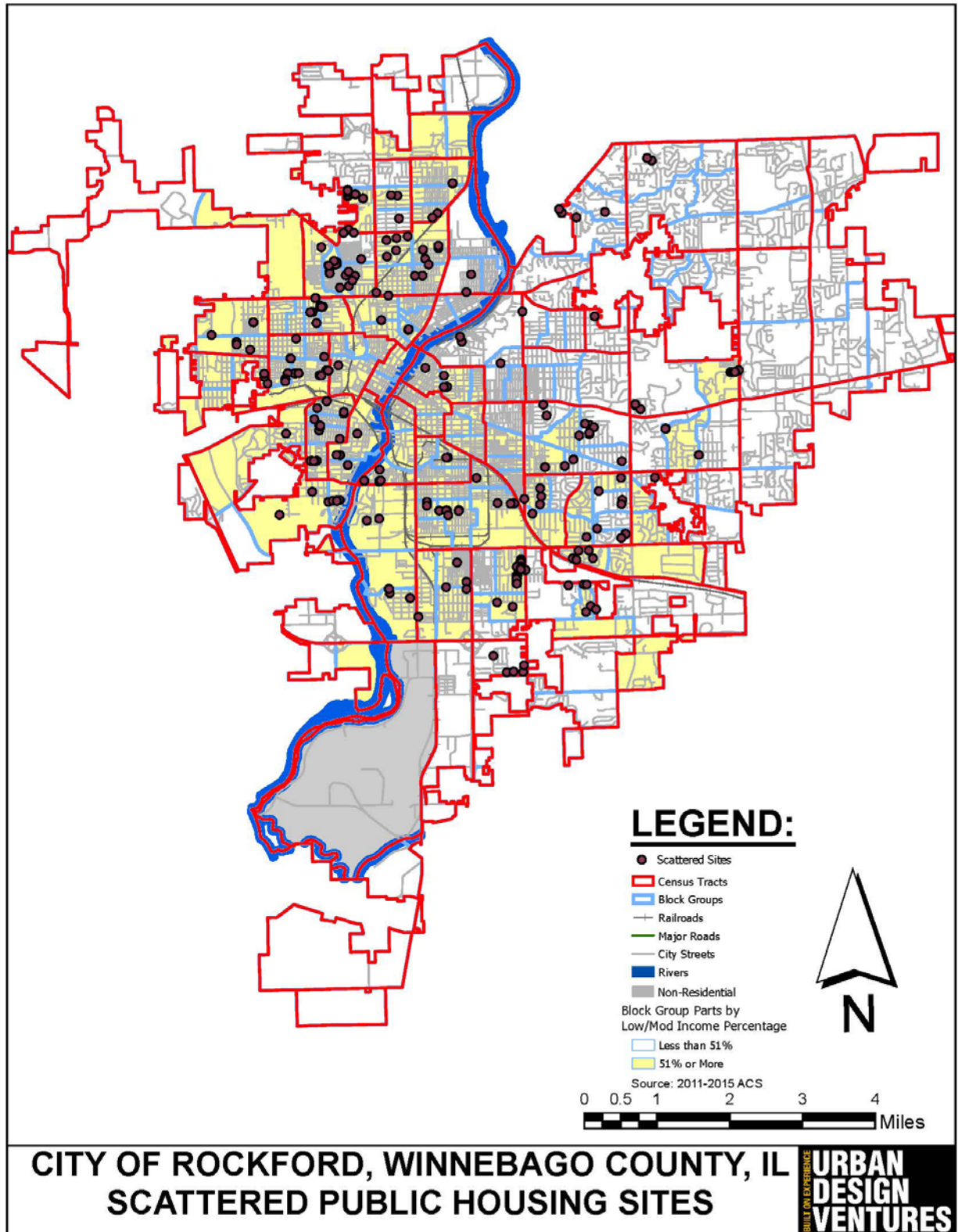
Rockford Housing Authority has identified the following items as their Keys to Success which indicate that they are making progress in meeting their mission and goals:

- Successfully transition the team and internal functions from a unit within the Rockford Housing Authority to the nonprofit spin-off
- Aggressively seek cash flow producing housing and human service opportunities
- Aggressively pursue alternative sources of funding
- Expand activities to reach more people
- Implement program management controls and accountability

The map below illustrates the Section 8 Housing units and Scattered Site Public Housing by Block Group in the City of Rockford and surrounding County area:







The Rockford Housing Authority is not rated as a “troubled” agency by HUD. The Housing Authority’s continues to work with the City to create and provide a more streamlined application process for chronically homeless individuals. Additionally, the housing authority is working to address the gaps in service for residents and promote self-sufficiency. Rockford Housing Authority plans to move several Resident Services operations to a non-profit organization Bridge Rockford Alliance by 2020 to meet the needs of the growing demand for comprehensive services.

There is a need for accessible housing accommodations for the elderly applicants on the Section 8 waiting list. The Housing Authority reported that 10.0% of the persons on the waiting list (256 persons) are in need of accessibility accommodations. The Housing Authority has been working in collaboration with the City and other agencies to create programming and activities that will encourage self-sufficiency and participation in homeownership opportunities for residents.

The Rockford Housing Authority is improving self-sufficiency programming especially for training and employment. Residents state they feel disengaged and opportunities for educational training and employment resources would improve their drive to self-sufficiency greatly. The Housing Authority is in the process of relaunching the newly enhanced ReBuild platform to bring training resources, employment opportunities and focus back to residents and the Rockford Community.

The Housing Authority’s current operating budget provides funds for routine maintenance and operating costs. The Rockford Housing Authority obtains an annual grant from HUD through the Capital Fund Program (CFP) for capital improvements and renovation costs. The CFP funds include the construction of capital maintenance initiatives identified in the Housing Authority’s Five Year Plan, and implementation of the agency’s Section 504 handicap accessibility improvements.

The Housing Authority’s FY 2019 Capital Fund Program Budget is as follows:

- **Operations** = \$644,024.80
- **Management Improvement** = \$386,414.88
- **Administration** = \$322,012.40
- **Fees & Costs** = \$208,000.00

- **Site Improvement** = \$353,000.00
- **Dwelling Structures** = \$347,008.56
- **Dwelling Equipment** = \$120,000.00
- **Non-Dwelling Structures** = \$81,000.00
- **Non-Dwelling Equipment** = \$31,500.00
- **Relocation Costs** = \$10,000.00
- **Development Activity** = \$261,085.00
- **Collater Exp / Debt Srvc** = \$7,109.00
- **Contingency** = \$257,609.92
- **RAD-CFP** = \$77,741.00
- **Debt Reserves** = \$0.00
- **Loan Debt Obligation** = \$ 113,618.44

Total = \$ 3,220,124.00

7. Comprehensive Plan

The City of Rockford is looking to update their comprehensive plan which is likely to begin in 2020, when a planner is selected and hired on to City staff.

The City of Rockford designed a 2020 Comprehensive Plan that was approved by City Council in 2004, amended in 2009 and 2011, and provides an update to the previous 2000 Comprehensive Plan which was approved in 1984. The vision of the plan is “to strengthen and focus this community’s commitment to improve the lives of all its people”. The 2020 Plan serves as a guide for all of the City’s planning endeavors and ensures that all City programs, strategies, and activities, are working in the same direction through interdepartmental involvement, round table discussions, and community input. Smart growth principles are embedded within the plan to provide a framework for achieving long-term land-use, transportation, economic development and related planning through the year 2020. A review process began in 2013 and upon completion in 2014, the City staff recommended updating strategies to align with the then current conditions in the City of Rockford and

continue alignment with other regional plans developed since the adoption of the plan and most recent amendments

The plan identifies twelve (12) different Community Goals and Principles outlining objectives in the following identified key areas:

1. **Land Use** - Guide Rockford's development through the 2020 Plan, Zoning Ordinance, Subdivision Ordinance and Building Code, following the principles of Smart Growth.
2. **Transportation** - Improve transportation infrastructure, services and networks (Airport, transit, roadways and pathways) to provide efficient and accessible movement of all Rockford residents and goods throughout the community.
3. **Community Facilities and Services** - Develop and provide easy access for all Rockford residents to the quality and types of resources and services people need to improve their quality of life, and to develop to their fullest potential.
4. **Telecommunications** - Ensure that all Rockford citizens and businesses have access to the latest telecommunications services.
5. **Housing** - Ensure that all Rockford residents have a decent and affordable home and suitable living environment.
6. **Economic Development Strategy** - Bring businesses, the community, and other resources together for the entire community of Rockford to attain a robust and diverse economic environment.
7. **Neighborhoods** - Ensure that all Rockford residents have a decent and affordable home and a suitable living environment.
8. **Natural Resources** - Safeguard and improve environmental features as a means of promoting sustainable urban development, revitalization, and a good quality of life in Rockford.
9. **Historic Preservation** - Identify, protect, and preserve Rockford's historic resources in order to enhance the quality of life and economic wellbeing of current and future generations.

10. Initiating Community Design – Improve the aesthetics and enhance the identity of Rockford as a whole as well as constituent neighborhoods, major road corridors and gateways and the riverfront.

11. Public Participation - Engage the public through community outreach, consensus building, and public education.

12. Monitoring, Evaluating, and Amending the 2020 Plan - Ensure that the 2020 plan remains viable while still consistent with its original principles through regular review and amendment process.

The City of Rockford has adopted several plans to coordinate community revitalization efforts.

- Rockford Historic Preservation Plan, adopted in 1985;
- Bullseye! An Action Plan for Downtown, adopted in 1986;
- City Shores Riverfront Plan Report, adopted in 1988;
- Strategic Plan for industrial development, adopted in 1992;
- Destination River Center, adopted in 1993;
- Blueprint: A Plan for Rockford's Future, adopted in 1995;
- Consolidated Strategy and Plan for 2000-2004, adopted in 1999;
- RATS Long-Range Plan, adopted in 2000;
- Mid-Town North Neighborhood Plan, 2004;
- River District Framework Plan, 2004;
- Mid-Town District Framework Plan, 2004; and
- On-going planning efforts for everything from bicycle trails to housing.

In addition to the plans mentioned above the Steering Committee and Work Groups reviewed the following planning documents in 2014:

Organization Name	Planning Document
City of Rockford	<ul style="list-style-type: none"> - 2020 Comprehensive Plan - 2020 Comprehensive Plan Amendments (neighborhood and corridor plans & technical amendments since 2004) - 2010-2014 Consolidated Plan/Annual Action Plan - 2014-2019 Capital Improvement Program
Rockford Park District	- RPD Strategic Development Framework Plan

Winnebago County	- 2030 Land Resource Management Plan
Rockford Area Economic Development Council	- Rockford Regions Strategic Diversification Plan
Rockford Metropolitan Agency for Planning	- 2040 Long Range Transportation Plan - Regional Plan for Sustainable Development
Rockford Region Economic Development District (RREDD)	- 2010-2015 Comprehensive Economic Development Strategy

The City utilized a 5-year Implementation Plan Development Process to update and implement their comprehensive plan for 2015-2019. The outline is as follows:

Phase 1 (Oct. 2013-Mar. 2014)	Phase 2 (March-June 2014)	Phase 3 (July-Nov. 2014)	Phase 4 (Nov.-Jan. 2015)	Phase 5 (Jan.-April 2015)
City Council P&D Committee Review & Analysis of Comprehensive Plan	COR Steering Committee formed	Strategy Review and Alignment by Work Groups	Plan Draft writing by COR staff	Final Steering Committee Review
	Current Conditions Analysis	Community Input Sessions & Online Feedback		Review by Work Groups
	Vision, Goals, and Strategy Matrix			30-Day Public Comment Period
				Council review and approval

The framework for the 2015-2019 implementation plan consists of three (3) strategy themes: social, environmental, and economic, and identifies sixteen (16) strategic outcomes and sets of recommended tactics for ongoing improvements and plan implementation. The framework is outlined below:

Social

Housing and Neighborhoods

- Continue to create opportunities for rehabilitation.
 - Promote and expand housing preservation and rehabilitation incentive programs.
 - Develop a vacant housing online database and market incentives available for property repurposing to young adult professionals.

- Provide housing options that support aging-in-place and accessory housing units.
 - Align resources for residential property landscaping beautification.
 - Maintain a housing inspection program that can identify housing trending toward decline or identifiable substandard housing issues.
- Continue demolition of abandoned properties
 - Identify demolished properties suitable for public art projects and urban agriculture/community gardens.
- Enable a range of housing affordability within existing and new neighborhoods.
 - Target new senior housing development with high connectivity and access to essential services.
 - Consider existing poverty levels with planning areas and vital sign districts when reviewing/siting affordable housing developments.
 - Encourage transit-oriented development near train stations and along major transit routes.
 - Prioritize new affordable and accessible housing in areas that offer good access to transportation, employment, and public amenities.
 - Prioritize new mixed use and mixed income housing development along corridors with major infrastructure improvements is occurring.
- Reduce number of absentee ownership properties.
 - Identify Community Development Organizations to acquire tax foreclosed properties.
 - Integrate enforcement with other abandonment prevention strategies through housing infill and rehabilitation.
 - Establish a direct marketing campaign for the City's housing tax incentive programs.
- Develop parks and open space within existing and new neighborhood developments.
 - Identify vacant land or soon-to-be demolished properties to expand parks and recreation opportunities.
- Improve access and availability of essential services within neighborhood commercial corridors and centers.
 - Identify obsolete industrial sites suitable for neighborhood-oriented development.
 - Promote a compatible mix of land uses that create a diversified environment for living, shopping, and recreation and employment.

- Increase community engagement opportunities in neighborhood and focus area planning.
 - Incorporate online social media tools to community in phases of planning phases.
 - Use evaluation tools for collective feedback on established community involvement processes both from the City and participant's perspective.

Safety

- Develop and implement programs to decrease crime and improve actual and perceived public safety.
 - Inventory and analyze existing public safety programs and communication platforms for improved real time information.
 - Continue implementation and operation of community policing strategy.
 - Continue refining community metrics dashboards for neighborhood based crime reporting and mapping.
 - Partner with local agencies and neighborhood associations to implement additional safe-routes-to-school.
- Provide and support community dialogue on safety concerns and preventative solutions.
 - Involve business and property owners in crime-preventative measures.
 - Support and expand neighborhood watch associations in neighborhoods and business districts.
 - Expand neighborhood safety summits for neighborhood organizations.
- Develop and implement technology platforms to improve crime reporting by residents and business owners.
 - Host tech-innovation weekends to design and develop solutions to complement existing means of communication.
 - Align public and private funding sources.
- Continue engaging youth in the development and implementation of youth oriented educational programming supporting the reduction of crime.
 - Increase youth outreach efforts through existing Police Department programming.
 - Facilitate dialogue within the Mayor's Youth Advisory Council for addressing issues concerning crime among the youth population.
 - Support School District initiatives that decrease expulsion, truancy and dropout rates.

- Develop and implement life coaching and counseling opportunities for youth in supporting the reduction of crime occurrence.
 - Support active programming provided by the District at major indoor/outdoor facilities and community centers.

Civic Vitality

- Support and strengthen active involvement of residents in neighborhood organizations, associations, and events.
 - Improve and increase collaboration with community members.
 - Connect residents with volunteer programs and opportunities.
 - Continue open communication through Social media platforms.
 - Involve neighborhood organizations and associations in neighborhood planning activities.
 - Engage our local colleges and universities to serve as community information hubs.
- Establish a youth and young adult leadership development program to encourage active civic engagement.
 - Partner with voter leagues and neighborhood associations to increase the number of registered voters and participation rates.
 - Align the Mayor's Youth Council with community service projects.
- Align public, private, and non-profit resources to support socio-economic stability among residents.
 - Work with neighborhood organizations to promote programming and financial capital assistance to grow the number of small business, craft, and trade startups.

Culture

- Increase participation among all residents in cultural, art and recreational events and programs.
 - Identify vacant storefronts and buildings mobile pop-up arts and cultural facilities.
 - Partner with visual and performing arts agencies to increase membership rates for Rockford residents.
 - Link cultural events with tours of historic districts and neighborhoods.

- Preserve cultural and ethnic traditions, places, and resources.
 - Promote major events celebrating diversity.
 - Identify potential additions for wayfinding signage for cultural venues.
 - Incorporate cultural and linguistic diversity within branding and wayfinding projects.
- Create new and enhance existing local events based on various cultural experiences unique to Rockford.
 - Upgrade flagship parks to support diverse cultural events, arts and recreation.
 - Support and expand event offerings and activities reflective of the cultural diversity in Rockford.

Health

- Align with healthcare providers and institutions to mitigate barriers of access to health and wellness among low-income and aging populations.
 - Coordinate with Rockford Health Council to increase the number of individuals utilizing regular health care resources.
 - Improve access to oral healthcare.
 - Collaborate with healthcare providers and institutions to improve awareness of benefits for the regular use of healthcare.
- Improve healthcare resources and services in currently underserved Planning Areas.
 - Support the expansion of clinic programs at Rockford High Schools.
- Collaborate with healthcare providers and institutions to improve public health outcomes.
 - Improve awareness of preventative health care resources.
 - Increase access and availability of prenatal care resources.
 - Decrease the percent of low-birth weight children.
 - Support and expand awareness of addiction programs.

Food

- Provide convenient access to healthy food for all residents.
 - Facilitate the creation of more healthy good retail options in targeted underserved neighborhoods.

- Support and expand the location of weekday and weekend farmer's markets.
 - Identify City-owned properties for urban agriculture and community gardens.
 - Partner with non-profit agencies to plant new community gardens on city owned properties identified as suitable for urban agriculture.
 - Integrate a food-systems analysis in all major land use decisions such as zoning, transportation planning, and the comprehensive plan.
- Support Local Foods Network
 - Establish a commercial community kitchen to offer interactive learning on food preparation, safety, and entrepreneurial start-up opportunities.
 - Expand opportunities for local growers.
 - Evaluate impediments to urban agriculture.
 - Create a new land use category for urban agriculture.
 - Market suitable sites for indoor urban agriculture.
 - Support infrastructure for local and regional food processing and distribution.

Environmental

Land

- Reduce surplus City-owned land and structures and return publicly owned vacant parcels to taxable status.
 - Develop a web-based public database for all vacant land and structures available for purchase.
 - Assemble and consolidated parcels for redevelopment.
 - Partner with residents, businesses, and non-profits to expand vacant land management strategies.
- Promote targeted infill development in each Planning Area.
 - Identify current barriers associated with each Infill Areas identified in the existing Comprehensive Plan.
 - Market incentive packages reduce the cost burden and encourage development in the identified Infill Areas.
 - Include market residential tax incentives and housing rehabilitation programs in outreach to existing and new employers.
 - Encourage a range of housing types and price points within infill and new development.

- Encourage compact and sustainable development to maximize walkability and access within neighborhood centers and commercial corridors.
- Preserve and enhance natural and environmentally sensitive areas.
 - Update codes and regulations to regulate development and encourage development outside of environmentally sensitive areas.
 - Use topography to direct land development.
 - Establish a “green infrastructure” program to link, manage and expand existing parks, preserves, and greenways.
- Identify high risk areas for mitigation.
 - Identify natural-hazard areas.
 - Prepare and Implement Local Hazard Mitigation Plan.
- Support regulations to improve on site stormwater management and reduce flooding damage.
 - Encourage Low Impact Development designs.
 - Promote integration of green roofs and related sustainable building elements to reduce stormwater runoff.
 - Conduct regular inspections of the drainage system for proper maintenance.
 - Develop an open space acquisition reuse and preservation plan targeting hazard areas.

Water

- Protect the groundwater supply and enhance drinking water quality.
 - Implement Source Water Protection Program (SWPP).
 - Optimize existing and add new water treatment facilities as needed to meet drinking water regulations.
 - Conduct annual water main flushing program.
 - Provide a program to inspect industrial and commercial properties to reduce illicit discharges into the ground and streams.
- Maintain and enhance infrastructure that delivers water to the City.
 - Conduct performance tests and perform maintenance as needed.
 - Repair water main infrastructure as needed.
 - Implement city-wide valve exercising program.
 - Perform fire-hydrant testing (10-year rotation).

- Identify and upgrade aging water main infrastructure.
 - Assign risk score to all water mains based on condition and consequence failure.
 - Develop water main renewal forecast along with estimated annual costs.
 - Develop and implement water main replacement funding.
- Protect the aesthetic quality of waterways for recreational use.
 - Complete next phase of River Rock waterfront pathway system.
 - Evaluate water transportation services to connect Riverfront activity centers.
 - Partner with private and non-profit organizations to implement pedestrian friendly streetscapes connecting neighborhoods to waterways within city boundaries.
- Maintain and enhance local watershed protection
 - Identify wetland sites for restoration projects.
 - Complete waterway planning for Kent and Keith creeks.
- Protect floodways and floodplains
 - Develop an inventory of best practices to support neighborhoods impacted by flood map changes.
 - Complete watershed studies and plans.

Biodiversity

- Protect mature trees and maintain required landscaping
 - Evaluate street tree policy and responsibilities to encourage more tree planting.
 - Include tree planting as part of stormwater management.
 - Evaluate tree protection ordinance.
- Maintain and enhance the tree planting program with a variety of native species and locations.
 - Continue partnering with public agencies, non-profit and private sector entities related to tree-planting and educational programming.
- Identify linear corridors along waterways and abandoned railroads to serve as habitat connections for wildlife between open spaces.
 - Provide safe wildlife crossings.

Built Environment

- Maintain and expand open space along the Rock River corridor for recreational use.
 - Support further implementation of the Riverfront walkway plan.
 - Implement appropriate phases of the Whitewater Rafting plan.
- Enhance and expand pathways, trails and linear parks for recreational and commuter uses.
 - Continue reducing all existing gaps along major bike and trail pathways within city boundaries.
 - Connect city-wide parks to the existing protected natural areas of the regional green-space network.
 - Increase the number of participants in annual cycling events by 30%.
- Preserve and enhance walkability within all Planning Areas.
 - Extend the street network in areas with low pedestrian connectivity.
- Ensure all Rockford residents live within a 10- minute walk of a neighborhood park or a recreation center.
 - Identify opportunity sites available for parks, open space and related public facilities.
 - Work with the Park District to prioritize and develop neighborhood parks in areas identified with service gaps.
- Ensure proper maintenance and vibrancy of parks, public green space, and public facilities.
 - Assist the Rockford Public Library with near and long-term planning for facilities in all Planning Areas.
 - Assist the Rockford Park District with near and long-term land acquisition for the development of indoor and outdoor public facilities.
- Continue assessment, remediation and redevelopment of brownfield sites.
 - Establish training and other community engagement programs to build capacity within community-based organizations in brownfield redevelopment planning and implementation.
 - Create a green remediation guide for site remediation and improvements.
 - Establish green remediation approaches for redevelopment of City-owned land.
 - Study the economic value of brownfield redevelopment within the city boundary.

- Incentivize development in Planning Areas where investment is stagnant or declining.
 - Leverage public sector infrastructure development for private investment in stable and declining Planning Areas.
 - Evaluate and advance strategies with existing TIF District redevelopment plans.

Waste

- Improve the convenience and ease of recycling.
 - Continue installing recycling receptacles in areas with high pedestrian use.
 - Partner with the Rockford Public Schools to develop programming to maintain and expand awareness of recycling for grades K-12.
 - Implement redesigned drinking fountains in public spaces to encourage adoption of reusable water bottles.
- Reduce the City's solid waste footprint.
 - Increase recycling within households, public, private, and non-profit sectors by 50%.
 - Incentivize city vendors to recover and reuse materials.
 - Collaborate with regional partners to develop a shared E-waste recycling program.
- Establish a public-private partnership to pilot waste conversion technologies.
 - Solicit proposals to develop conversion technology facilities to disposal of waste.

Economic

Transportation

- Upgrade and modernize streets, bridges and traffic control infrastructure to ensure high level of service and safety.
 - Bury overhead utilities underground with planned infrastructure improvements.
 - Develop streetscape lighting standards and invest in street furniture (i.e., benches, bus shelters, street signs) within business districts and along major commercial corridors.
- Improve road, freight and air network to enhance the airports movement of people and goods.

- Reduce the number of load weight restriction roads by 50%.
 - Implement improvements to key entrances into Global Trade Park.
 - Work with the Illinois Tollway Authority to advance I-90/Perry Creek Interchange project.
 - Implement remaining improvements to U.S. Bypass 20 for interstate level of service.
 - Improve freight transfer and intermodal capacity by relocating the near Downtown railyard to Global Trade Park area.
- Coordinate land-use decisions with existing and planned transportation assets to increase transportation choices, access to jobs, goods and services.
 - Promote mixed use development and walkability near major local and regional transit centers.
- Improve and expand transportation connectivity between neighborhoods and major employment centers.
 - Develop and expand express bus routes to reduce travel times and attract riders.
 - Promote and attract riders for the Amtrak service line to increase the number of interregional trips.
 - Implement real-time transit information systems and applications.
 - Support regional efforts to grow commuter rail access and daily trips between Rockford and the Chicago metropolitan area.
- Implement a complete streets policy.
 - Prepare a complete streets design manual.
 - Ensure adequate space for multiple users (i.e., pedestrians, bikes, cars, buses) of the street network
- Improve pedestrian connections and safety across major right-of ways.
 - Continue filling in key gaps in sidewalk network.
 - Implement mid-block marked crosswalks where possible.
 - Partner with local non-profit design organizations to develop creative solutions for improving pedestrian experience.
- Maintain and expand on and off-street networks servicing pedestrians and bicyclists.
 - Continue filling in key gaps in sidewalk network.
 - Identify key locations to implement bike racks and bike stations.
 - Improve pedestrian access between schools and neighborhoods.

- Initiate a city-wide bike sharing program feasibility study.

Education

- Increase education attainment rate.
 - Align and support programs designed to improve the quality and availability of early childhood learning and family support.
 - Promote Rock Valley College aviation and maintenance technology certification program.
 - Market support services to increase GED class enrollment and completion.
 - Provide support for implementing Rockford Promise.
- Align and support regional efforts for retaining and attracting certificate, associates, undergraduate and graduate students.
 - Develop and implement ACT Work Keys, manufacturing skills standards and certification credentials for students.
- Expand post-high school learning programming and facilities.
 - Identify opportunities to physically connect college and university campuses to the Central Planning Area.
 - Identify craft manufacturing and design locations.
 - Complete a market feasibility and strategy plan to develop or attract a craft manufacturing & design school.

Economic Development

- Reposition former industrial sites and areas for new users.
 - Continue environmental assessment and remediation on sites constructed prior to 1950.
 - Develop ranking system for pre-1950 industrials sites to determine eligibility for repurposing or demolition for site readiness.
 - Develop qualified site program to assist property owners in advancing their land for site development readiness.

- Promote and encourage the use of New Market Tax Credits and other funding programs designed for repurposing industrial sites.
 - Develop partnerships with developers experienced in repurposing industrial sites.
- Ensure adequate supply of development ready land zoned for industrial and commercial uses.
 - Pursue voluntary annexation of property in adjoining unincorporated areas.
 - Develop qualified site program to assist property owners in advancing their land for site development readiness.
 - Create tangible offerings to attract private developers.
- Identify, develop, and expand emerging economic clusters.
 - Target craft manufacturers to locate within designated Enterprise and River Edge Redevelopment Zones.
 - Continue to seek and host national and international visitor events.
 - Develop and encourage businesses to utilize apprenticeship programs in growth industries.
 - Identify, create and promote programs, activities and policies fostering innovation in emerging and existing businesses, aiding them in the creation of viable business operation and economic development practices.
 - Develop and align training programs to support job growth demands in emerging industries.
- Encourage the growth and development of existing and new primary employment centers.
 - Encourage airport-related development and supportive services to support the growth of Chicago-Rockford International Airport.
 - Encourage development of hotel rooms and retail services to support primary employment clusters and corridors.
 - Improve branding, wayfinding and signage within industrial and commercial business parks.
 - Improve infrastructure and transportation networks within and access to industrial parks.
 - Identify alternative funding programs to expand public infrastructure improvements.
- Encourage the growth of existing and emerging commerce retail corridors.
 - Identify and prioritize land use, economic incentives to continue implementation of council approved corridor plans.

- Support live-work redevelopment within new and existing developments.
 - Support new pop-up retail.
 - Target destination retail uses.
- Attract more essential services to currently underserved Planning Areas.
 - Target public investment that encourages private development within neighborhood centers and commercial corridors.
 - Work with the private sector to locate groceries, laundry/dry cleaning facilities and pharmacies within neighborhood center and commercial corridors.
 - Establish business incentive programs in neighborhood corridor areas.
- Grow Rockford's strong institutional job sectors
 - Support Rockford's colleges, universities, medical institutions and providers through enhanced living and working environments near institution locations.
 - Encourage mixed-use development near colleges and universities.
- Align local startup and expansion capital to encourage and accelerate entrepreneurial growth.
 - Encourage participation in self-employment training classes with RVC and SBDC.
 - Promote the use of start-up business funding platforms.
 - Develop and or link entrepreneur networks with existing micro financing programs.
 - Develop the underpinning community support system for entrepreneur development.
- Improve awareness among all residents of existing small business and entrepreneur support programs.
 - Promote and reward a culture of entrepreneurial and innovative business development.
- Collaborate with local businesses to minimize barriers to employment opportunities for formerly incarcerated citizens.
 - Partner with non-profit and private sector entities to expand prison reentry workforce training through local entrepreneurship programs.
- Support regional efforts facilitating retention and attraction of young professionals.
 - Facilitate an annual city tour for residents, business owners and prospective community members to showcase planned and currently underway projects.

- Target positive promotions of Rockford to non-Rockford area markets.
- Preserve culturally, historically, and architecturally significant sites, buildings and districts.
 - Incentivize the rehabilitation and reuse of locally designated resources within neighborhoods and commercial corridors.
 - Ensure new development is compatible with historic districts.
 - Encourage new mixed-use developments on underutilized sites.
- Align resources to support cultural and recreational institutions for increased economic development opportunities.
 - Formalize a new culinary tourism program highlighting food and beverage market destinations throughout the city.
 - Support the expansion of neighborhood-based public art programming.

Technology

- Locate telecommunication facilities in areas other than the airport, historic districts or in residential areas
 - Review existing code requirements and provide recommended modifications.
- Expand affordable access to broadband to all residents and businesses.
 - Support Wi-Fi hotspot initiatives targeting areas with low service coverage.
- Expand access to broadband infrastructure to encourage technical innovation and recruitment of high-tech businesses.
 - Continue support for iFiber implementation and service expansion.
 - Evaluate the installation of Wi-Fi infrastructure on city-owned assets.
- Support education and training opportunities for tech-related business startups and occupations.
 - Collaborate with EigerLab and other technology cluster incubators to create advanced digital infrastructure for attracting and growing tech-related businesses.

Energy

- Increase the use of renewable energy sources to reduce financial and environmental costs.
 - Increase planning and coordination to promote clean, reliable and affordable energy.
 - Work with providers to increase amount of energy produced by cogeneration and waste capture.
 - Ensure the reliability of power delivery to our residents and businesses.
- Improve energy efficiency through the modernization of energy delivery.
 - Work with ComEd (Exelon) to implement the SmartGrid for Rockford.
 - Integrate energy utility improvements with capital improvement projects.
- Continue improving our codes and regulations to facilitate cost effective sustainable development.
 - Work with historic preservation entities and code officials to reconcile the energy codes and preservation requirements.

8. Transportation

The Rockford Mass Transit District (RMTD) operates a number of transportation programs for all of Winnebago County. The RMTD offers a transit system for residents in Boone County who wish to go to Rockford and vice versa. Riders must call to schedule a ride with the Boone County Council of Aging and are dropped off at the nearest RMTD stop.

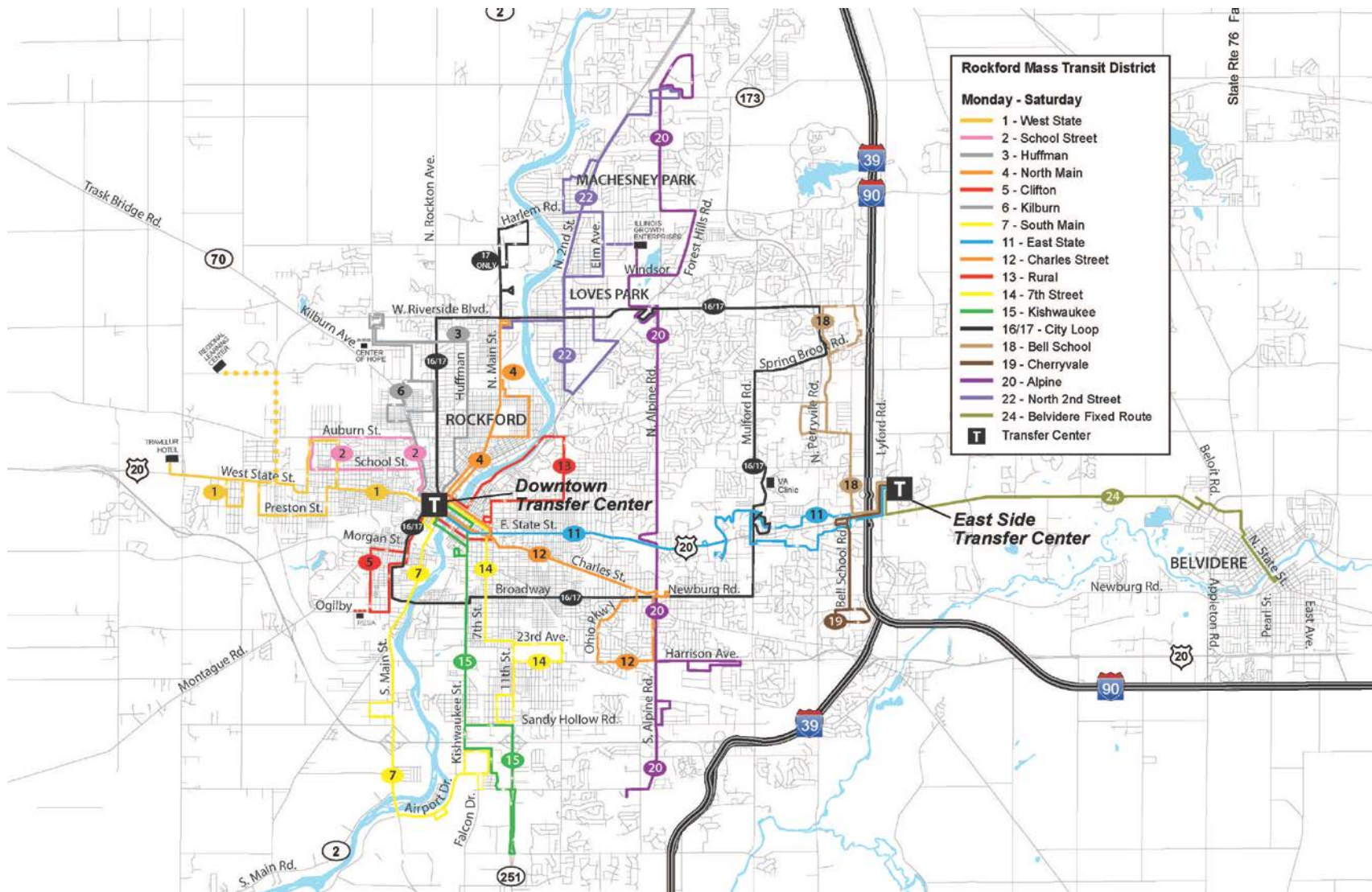
Those living in the Stateline areas have the option to call for transportation as well for those living in the communities of Roscoe, Rockton, South Beloit and the Townships of Roscoe and Rockton. On demand rides are also available for Medicaid recipients and must call 24 hours in advance to utilize the services.

Rockford Paratransit also offers on demand rides for riders with disabilities in the Loves Park, Machesney Park, and Belvidere areas; riders must first be deemed eligible by Rockford Paratransit and must call 2 weeks in advance to schedule for service. Interstate travel is available and provided by Burlington Trailways, Greyhound, and Coach USA.

The fares for regular bus services are \$1.50 for a one-way trip; students and children between the ages of 5 and 11 can ride for \$0.75; children under the age of 5 ride for free. Senior citizens and those with disabilities who are enrolled in the Benefits Access

Program ride for free; those not enrolled in the program ride for \$0.75. The fare for paratransit services is \$3.00 per ride, ticket books are made available for \$30.00 and allow for ten trips.

The **map below** indicates the service lines that run through and around the City of Rockford and Winnebago County:



The need for a local transit system in Rockford has been studied in the past. The Rockford Mass Transit District (RMTD) completed a comprehensive transit analysis in 2013 and is currently undertaking a comprehensive study of services currently offered. The study is funded through the Illinois Department of Transportation and funded using Statewide Planning and Research funds. Concurrent to comparing the strengths and weaknesses of the current public transportation system to identified resident, employment, and service centers within the Rockford Region, the analysis has emphasized the importance of obtaining direct feedback from the public and stakeholder organizations on their day-to-day needs. The report is anticipated to be completed and available to the public by the end of the 2019 year.

The Region 1 Planning Council (RPC) is responsible for planning and addressing needs of the metropolitan planning area, which consists of urbanized parts of Winnebago, Boone, and Ogle Counties and has also completed comprehensive studies to identify the gaps in services particularly for seniors, individuals with disabilities, individuals with low incomes, and other transit dependent populations. The RPC Mobility Subcommittee currently consists of human services and transportation on agencies, governmental entities, workforce investment organizations, public and private transit providers, assisted living facilities, and ambulance providers.

In addition to the RMTD comprehensive mobility analysis, and RPC coordinated transportation plan, updates are being made to the Transportation for Tomorrow (2040) long range plan for the Rockford region and the 2019-2022 Transportation Improvement Program. Both documents are Federally mandated to be completed. The Transportation for Tomorrow (2040) provides a coordinated regional vision for transportation improvements and the delivery of public transportation services. Planning involved intense government, stakeholder, and public outreach efforts. The 2019-2022 Transportation Improvement Program identifies the policies and procedures used to develop the program of projects and works in conjunction with the long-range vision identified in the Long-Range Transportation Plan.

9. Education

Education is often an important factor influencing where people choose to live. According to the 2013-2017 American Community Survey, 83.1% of the population age 25 years and over have at least a high school education or higher in the City of Rockford, and

21.4% have a bachelor's degree or higher. However, almost one third (30.0%) of the population age 25 years and over in the City have only a high school education, or less.

The schools serving Rockford are part of the Rockford Public Schools District 205. There are 42 public schools that serve the District, including 4 early childhood education centers, 21 Elementary schools, 6 Middle schools, 5 High schools, as well as additional special program schools and adult education centers. The district has a student population of 28,144 and a workforce of 4,890 employees. In addition to the public schools, there are 18 private schools that serve both City and County residents.

In the Rockford School District, 53.5% of students are considered low income and eligible for the free or reduced lunch program through the National School Lunch Program, compared to 49.4% of students in the State of Illinois. The City has seen a decrease of low income students over the past years, from 83.0% of students to 53.5% for the school year ending in 2018.

The Illinois Achieves Report Card for 2018-2019 measures school performance of individual schools and districts across the state. Since 2015, Rockford School District 205 test scores have decreased in English Language Arts (reading) and math; whereas state scores have remained stable. Of the District's 42 schools, twelve (12) are underperforming and fifteen (15) are considered 'Commendable'.

6.8% of the students in the district are considered homeless compared to just 2% of students at the State level; this has been the trend over the last five years.

According to the Illinois Report Card, 65% of graduating students graduated in 4 years; the dropout rate is 6% in the Rockford School District, compared to 2% for the State of Illinois.

Table IV-11 below compares student performance in the areas of reading, math, and science between the Rockford School District and the State of Illinois using data available over the past four years (Illinois Report Card). The data illustrates the percentage of student's scores at or above mastery level.

**Table IV-11 – Trend Data of Student Performance
(percentage of student's scores at or above mastery level)**

	Year	Rockford Public School District	State of Illinois
Reading	2015	29.0%	38.0%
	2016	23.0%	36.0%
	2017	20.0%	37.0%
	2018	17.0%	37.0%
Math	2015	29.0%	38.0%
	2016	23.0%	36.0%
	2017	20.0%	37.0%
	2018	17.0%	37.0%
Science	2017	31.0%	51.0%
	2018	34.0%	51.0%
	X	X	X
	X	X	X

The Rockford School District's 2015-2020 Strategic Focus uses indicators to measure District progress in strategic and long term goals. These measures fall into three levels of work: System Measures, Setting Measures, and Individual Measures.

- **System Measures** - assess the overall performance of the district.
- **Setting Measures** - assess the performance of departments and schools.
- **Individual Measures** - assess the performance of individuals.

These measures are used to track the progress of the District's goals for the 2015-2020 Strategic Focus years.

Under **Goal 1 – Growth and Achievement**: The focus of Goal 1 is to ensure students are college and career ready. The goal contains measures on the academic achievement of students, the value the district adds to children through education, and the social emotional learning of students. The District mentions the following strategies:

- **Curriculum Alignment** - We will align curriculum with unit/course assessments across grade levels and schools to guarantee a rigorous, consistent set of learning expectations.

- Common Core or other Standards
- College and Career Readiness
- Common Unit Plans
- Essential Learning Outcomes for Each Unit of Instruction
- Common Formative and Summative Assessments (Pre- and Post- Unit) Assessments at the Elementary Level;
- Course Unit, Mid-Term and Final Exam Assessments at the Secondary Level)
- Vertical and Horizontal Alignment of Curriculum
- Clarity on Early Learning Expectations
- **Differentiated Instruction** - We will differentiate instruction and provide additional time and support for students who are struggling and students who need to be challenged.
 - Tier I, Tier II, Tier III Supports
 - Use Unit or Course Assessment Data to Drive Instructional Decision-making
 - Specialists (ELL, Reading, Math, Social Worker, Psychologist, Nurse, Counselors, etc.)
 - Provide Additional Time and Support for Those Students who have not Learned Essential Learning Outcomes for Each Unit or Course.
 - Provide Additional Time and Support for Those Students who have Mastered Essential Learning Outcomes and Need More Challenge.
 - Flexible Grouping
 - Co-Teaching, Push-in collaboration, Researched-based Interventions, Advanced Placement, Dual Credit, etc.
 - Problem Solving Team
 - Entrance and Exit Learning Outcomes for All Interventions

Under **Goal 2 – Engaging Partnerships**: The focus of Goal 2 is to engage families and the community as vital partners in the education process. This goal contains measures on family engagement and satisfaction, community contributions, and

community satisfaction. The District mentions the following strategies:

- **Customer Service** - We will improve customer service between the District and its families and its community to foster confidence, respect, and continuous improvement for the system.
 - Customer Service Focus from the district and schools to families and the extended communities.
 - Inclusion of families in appropriate decision making structures and processes.
 - Continued Support for Alignment Rockford.
 - Improved Use of Electronic Communication Tools to ensure clarity, Networking, and Sharing of Work
 - Samples.
 - Increasing Numbers of Families Engaged in Assisting Students Learn and Grow
 - Increased Respect for Public Schools.
 - More Families Choosing Public Schools as their First Choice.
 - Expanded Learning Opportunities, Community Service, and Civic Participation for Students.
 - Expanded Partnership with Community Organizations to Provide Support for Students beyond the School Day.

Under **Goal 3 – Optimal Climate**: The focus of Goal 3 is to ensure a productive and satisfying climate for learning and teaching. This goal contains measures on family student behavior and satisfaction, staff engagement and satisfaction, and collaboration. The District mentions the following items:

- **Social Emotional Health and Skills-** We will ensure students develop socially and emotionally, feel safe and secure, make healthy choices, and develop skills to be productive citizens.
 - Student Behaviors
 - Student Engagement and Effort
 - Student Attendance
 - Guidance and Counseling

- Social Emotional Curriculum
- Behavior Interventions
- Family Education for the Development of Social, Emotional, and Health Expectations
- **Facilities and Technology-** We will maintain facilities and integrate technology into our academic and operations systems to create a high-quality and innovative teaching, learning, and working environment.
 - Universal Access
 - Dependable Infrastructure
 - Clarity in Replacement Cycles; Upgrading
 - Equity in Resources
 - Responsive Help Desk and Other Tech Services
 - Technology Plan Communication
 - Professional Learning for Staff
 - Learning for Families
 - Exploration of STEM
 - Facilities Plan
 - Maintenance/Capital Refreshment Plan

Under **Goal 4 – Quality Staff:** The focus of Goal 4 is to attract, develop, and retain a high quality, diverse, and accountable workforce. This goal contains measures on staff performance, engagement, and retention. The District mentions the following items:

- **Internal Trust and Relationships** - We will build trust and improve relationships between the district office and its schools to foster a climate conducive to continuous improvement.
 - Customer Service Focus from the District Office to the Schools.
 - Two-way Decision-making Structures: Grade Level, Departments, Teams, Schools, and District
 - Two-way Decision Making processes: Grade Level, Department, Teams, Schools, and District
 - Improved Use of Electronic Communication Tools to Ensure Clarity, Networking, and Sharing of Work Samples.

- Clarity of Collaboration Expectations at both the Elementary and Secondary Levels.
 - Increase in Collaboration Time at the Elementary School Level.
 - Training and Support for PLC grade/department Collaboration.
 - Improved Trust and Respect among District and the Schools.
 - Improved Relationships: Board, Management and Union.
- **Recruit and Develop** - We will recruit, on-board, mentor, develop, evaluate, and retain employees who comprise a high-quality and diverse workforce.
 - Recruitment of high quality staff
 - Recruitment of diverse staff
 - Onboarding process for all employees
 - Mentoring process for all employees
 - Succession planning
 - Leadership development at all levels
 - Staff evaluation
- **Monitor Track and Report** - We will use key data indicators and measures with all employees that promote a culture of inquiry, reflection and action to assist individuals, teams, departments, schools and the district set goals and monitor, track, and report performance.
 - Student Ownership for Their Learning.
 - Employee Evaluation Professional Practice/Student Growth Goals
 - Strategic Plan
 - School Improvement Plans
 - SMART Goals and Action Plans
 - Progress Monitoring and Reporting
 - District Department Improvement Plans
 - Key Indicators of Success/Assessment System
 - Transparency
 - Data Management System

- Data Culture and Dialogue
- Data Driven Instruction
- Data Progress Monitoring and Reporting
- Trend, Cohort, Comparative, and Subgroup Data
- Professional Learning for Analysis and Reporting
- Continuous Improvement

Under **Goal 5 – Fiscal and Operational Stewardship**: The focus of Goal 5 is to demonstrate effective and efficient business operations and ensure excellent stewardship of public money. The District mentions the following items:

- **Resource Allocation** - We will proactively forecast and allocate resources that balance the needs of taxpayers and the community with the critical needs of fulfilling our mission and vision.
 - Balanced budget
 - Increased efficiencies
 - Fiscal responsibility

10. Section 3

HUD's definition of Section 3 is:

Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low- and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.

The following is the City of Rockford's guidelines that it uses to accomplish Section 3 compliance:

- When a contract or project is put out for bid, as part of the bid-package, the advertisement contains the Section 3 information describing the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701U (Section 3). The first pages of this

document are the actual wording of Section 3, including 25 CFR Part 135. These pages are to be read by and signed by all contractors bidding on City projects and contracts, stating that the contractor “will abide by and include in all subcontracts the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended.” The “Estimated Work Force Breakdown” sheet requires the following: total estimated positions needed; number of positions occupied by permanent employees; number of positions not occupied; and number of positions to be filled with Section 3 residents. The “Section 3 Business Utilization” sheet is also included. This form asks for general contract information and requests the following: name of subcontractor; Section 3 business; address; trade/service or supply; contract amount; award date; and competitive or negotiated bid. It then asks for the total dollar amount awarded to Section 3 businesses. This form is then checked by the City’s Contract & Grant Compliance to ensure that it was indeed filled out and signed by those contractors submitting bids.

- Once the contract is awarded to a contractor, a Pre-Construction Conference is then scheduled. At this conference the Labor Compliance Officer spends time going over all of the U.S. Department of Labor, U.S. Department of Housing and Urban Development, and State and local regulations and requirements with the contractor. The above stated Section 3 document is given to the contractor during the conference for a second time, and must be filled out, signed and sent to the Contract & Grant Compliance Officer with all the other documents/paperwork involved in the Pre-Construction Conference.
- Two other areas of concern are addressed during the Pre-Construction Conference: the requirement that contractors inform the Contract & Grant Compliance Officer as to locations and times, once the work on a project begins, and a second piece that relates specifically to Section 3. Contractors are given a form with two sections to complete. The first requires the contractor to submit in writing where Section 3 “new hires” will be located and the source they were recruited from for the contract. The second section requires the contractor to confirm in writing if the crew-size for all work done on a project is sufficient and no new-hires of any kind will be needed. This is the case for a number of City construction contracts, as contractors have crews as small as two to four long time employees. This form is

signed and returned to the Contract & Grant Compliance Officer with all other requested written information for Section 3. The contractor is made aware that failure to submit all of the above will be considered non-compliance.

- Finally, in reference to the submission in writing that a sufficient crew exists and no new hires will be necessary, it is requested that contingent plans regarding the recruiting and hiring of Section 3 residents be considered.

During this Analysis of Impediments study, no impediments or complaints were mentioned or filed based on Section 3 Requirements.

C. Private Sector:

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

1. Real Estate Practices

The Rockford Area Association of Realtors is a regionally based professional association, whose Members are governed by the National Association of Realtors (NAR) Code of Ethics, dedicated to fulfilling the member needs by providing public advocacy, technology, education and knowledge to enhance performance. Members of the Association are obligated to conduct themselves and their businesses in accordance with the Association's rules and regulations, Constitution and Bylaws, as well as the MLS rules and the Bylaws and Constitutions of Rockford Area Association of Realtors and NAR. This Code of Ethics obligates its members to maintain professional standards including efforts to affirmatively further fair housing.



Each year, the Illinois Association of Realtors recognizes the significance of the anniversary of the 1968 Fair Housing Act and reconfirms their commitment to uphold fair housing laws as well as

the commitment to offer equal professional service to all Illinois citizens in their search for real property. The Local, State and National Association of REALTORS® have dedicated pages on their websites to Fair Housing. The Rockford Area Realtors Association has brochures, videos, policy studies, infographics, and other educational materials for members.

This year Illinois finalized a rewrite of the Real Estate Licensing Act requiring continuing education requirements for pre-licensed and post licensed Realtors. Brokers and Designated Managing Brokers must renew their licenses every two years in order to maintain compliance with the Industry. The Rockford Area Realtor Association continuously offers educational and training opportunities in order for individuals to maintain their licenses.

2. Newspaper Advertising

Under Federal Law, no advertising with respect to the sale or rental of a dwelling unit may indicate any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin. Under the Fair Housing Act Amendments, descriptions are listed in regard to the use of words, photographs, symbols or other approaches that are considered discriminatory.

Real estate advertisements were reviewed for several real estate publications, including the *Rockford Register Star* Sunday October 20, 2019 and Tuesday October 22, 2019 publications. The real estate and lender's advertisements in each of these publications include the equal housing opportunity logo. Private landlord advertisements did not contain discriminatory language however, they did not include the equal housing opportunity logo. None of the sample advertisements from real estate companies or lenders that were reviewed contained language that prohibited occupancy by any group.

The *Rockford Register Star* also publishes its paper online at <https://www.rrstar.com/> and posts real estate listings in the classifieds section. Of the five rental listings available online on October 30, 2019, none of the advertisements contained discriminatory language.

3. Private Financing

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that

makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The HMDA data was obtained and is included in the following pages of this Analysis of Impediments. The data that was available does not indicate any discriminatory lending patterns.

The table on the following page outlines the disposition of conventional loans and Federal Housing Administration (FHA), Farm Service Agency (FSA)/Rural Housing Services (RHS), and Veterans Affairs (VA) Home-Purchase Loans in the United States by income level and race.

Loan applications from households at an income level less than 50% National median income have a denial rate of 25.6%, or 25.6% of applications from these households are rejected. Comparatively, the denial rate for families earning 120% of National median income 22.7% of those whose income is more than 120% of the National median are denied. Upper-income households have higher origination rates than other income groups.

Table IV-12 – Disposition of Conventional Loans by Census Tract (2018)

Census Tract	Loans Originated		Applications Approved, Not Accepted		Applications Denied by Financial Institution		Applications Withdrawn by Applicant		Filed Closed for Incompleteness		Total Applications Received	
	Count	% of Total	Count	% of Income Level Applications	Count	% of Income Level Applications	Count	% of Income Level Applications	Count	% of Income Level Applications	Count	% of Income Level Applications
000300	47	1.79%	2	2.38%	0	0.00%	2	0.66%	1	4.35%	52	1.60%
000401	36	1.37%	1	1.19%	1	0.47%	7	2.30%	0	0.00%	45	1.39%
000402	52	1.98%	3	3.57%	2	0.93%	7	2.30%	0	0.00%	64	1.97%
000403	53	2.02%	3	3.57%	4	1.87%	6	1.97%	0	0.00%	66	2.03%
000501	61	2.33%	2	2.38%	3	1.40%	6	1.97%	1	4.35%	73	2.25%
000502	39	1.49%	0	0.00%	2	0.93%	5	1.64%	1	4.35%	47	1.45%
000504	82	3.13%	1	1.19%	5	2.34%	17	5.57%	0	0.00%	105	3.23%
000506	54	2.06%	1	1.19%	2	0.93%	5	1.64%	1	4.35%	63	1.94%
000507	27	1.03%	0	0.00%	2	0.93%	3	0.98%	0	0.00%	32	0.99%

000510	40	1.53%	0	0.00%	2	0.93%	7	2.30%	0	0.00%	49	1.51%
000511	25	0.95%	2	2.38%	0	0.00%	6	1.97%	0	0.00%	33	1.02%
000512	86	3.28%	5	5.95%	2	0.93%	8	2.62%	0	0.00%	101	3.11%
000513	48	1.83%	2	2.38%	3	1.40%	7	2.30%	0	0.00%	60	1.85%
000514	41	1.56%	0	0.00%	2	0.93%	4	1.31%	1	4.35%	48	1.48%
000600	72	2.75%	2	2.38%	2	0.93%	8	2.62%	2	8.70%	86	2.65%
000700	53	2.02%	2	2.38%	7	3.27%	6	1.97%	0	0.00%	68	2.09%
000800	20	0.76%	1	1.19%	2	0.93%	1	0.33%	1	4.35%	25	0.77%
001000	8	0.31%	0	0.00%	2	0.93%	0	0.00%	0	0.00%	10	0.31%
001100	2	0.08%	0	0.00%	1	0.47%	1	0.33%	0	0.00%	4	0.12%
001200	3	0.11%	0	0.00%	0	0.00%	2	0.66%	0	0.00%	5	0.15%
001300	7	0.27%	0	0.00%	1	0.47%	1	0.33%	1	4.35%	10	0.31%
001400	26	0.99%	1	1.19%	5	2.34%	6	1.97%	0	0.00%	38	1.17%
001500	62	2.37%	3	3.57%	5	2.34%	6	1.97%	2	8.70%	78	2.40%
001600	38	1.45%	1	1.19%	5	2.34%	6	1.97%	0	0.00%	50	1.54%

001700	42	1.60%	0	0.00%	2	0.93%	2	0.66%	2	8.70%	48	1.48%
001800	9	0.34%	0	0.00%	1	0.47%	1	0.33%	1	4.35%	12	0.37%
001900	14	0.53%	0	0.00%	2	0.93%	0	0.00%	0	0.00%	16	0.49%
002000	3	0.11%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	3	0.09%
002100	5	0.19%	0	0.00%	2	0.93%	2	0.66%	0	0.00%	9	0.28%
002200	10	0.38%	0	0.00%	1	0.47%	1	0.33%	1	4.35%	13	0.40%
002301	11	0.42%	0	0.00%	7	3.27%	2	0.66%	0	0.00%	20	0.62%
002302	7	0.27%	0	0.00%	2	0.93%	2	0.66%	1	4.35%	12	0.37%
002400	4	0.15%	1	1.19%	1	0.47%	0	0.00%	0	0.00%	6	0.18%
002500	4	0.15%	0	0.00%	3	1.40%	0	0.00%	0	0.00%	7	0.22%
002600	4	0.15%	0	0.00%	0	0.00%	1	0.33%	0	0.00%	5	0.15%
002700	3	0.11%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	3	0.09%
002800	1	0.04%	0	0.00%	1	0.47%	1	0.33%	0	0.00%	3	0.09%
002900	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
003000	19	0.72%	3	3.57%	4	1.87%	8	2.62%	0	0.00%	34	1.05%

003100	20	0.76%	1	1.19%	3	1.40%	3	0.98%	0	0.00%	27	0.83%
003200	10	0.38%	1	1.19%	1	0.47%	1	0.33%	0	0.00%	13	0.40%
003300	15	0.57%	0	0.00%	2	0.93%	2	0.66%	0	0.00%	19	0.59%
003400	44	1.68%	3	3.57%	3	1.40%	1	0.33%	0	0.00%	51	1.57%
003500	34	1.30%	0	0.00%	1	0.47%	3	0.98%	1	4.35%	39	1.20%
003601	13	0.50%	2	2.38%	2	0.93%	1	0.33%	0	0.00%	18	0.55%
003602	18	0.69%	2	2.38%	6	2.80%	5	1.64%	0	0.00%	31	0.95%
003604	22	0.84%	0	0.00%	6	2.80%	2	0.66%	0	0.00%	30	0.92%
003605	7	0.27%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	7	0.22%
003606	17	0.65%	2	2.38%	0	0.00%	1	0.33%	0	0.00%	20	0.62%
003705	38	1.45%	0	0.00%	1	0.47%	0	0.00%	0	0.00%	39	1.20%
003706	60	2.29%	0	0.00%	7	3.27%	5	1.64%	0	0.00%	72	2.22%
003707	14	0.53%	2	2.38%	1	0.47%	3	0.98%	0	0.00%	20	0.62%
003708	15	0.57%	1	1.19%	2	0.93%	3	0.98%	0	0.00%	21	0.65%
003709	16	0.61%	1	1.19%	0	0.00%	1	0.33%	0	0.00%	18	0.55%

003710	18	0.69%	0	0.00%	4	1.87%	3	0.98%	0	0.00%	25	0.77%
003711	41	1.56%	2	2.38%	4	1.87%	7	2.30%	0	0.00%	54	1.66%
003801	108	4.12%	2	2.38%	2	0.93%	4	1.31%	0	0.00%	116	3.57%
003805	83	3.17%	3	3.57%	11	5.14%	3	0.98%	3	13.04%	103	3.17%
003806	64	2.44%	0	0.00%	1	0.47%	8	2.62%	1	4.35%	74	2.28%
003807	117	4.46%	5	5.95%	7	3.27%	18	5.90%	0	0.00%	147	4.53%
003808	35	1.34%	1	1.19%	3	1.40%	1	0.33%	0	0.00%	40	1.23%
003809	53	2.02%	2	2.38%	10	4.67%	13	4.26%	0	0.00%	78	2.40%
003901	91	3.47%	3	3.57%	12	5.61%	12	3.93%	0	0.00%	118	3.63%
003903	80	3.05%	4	4.76%	6	2.80%	13	4.26%	0	0.00%	103	3.17%
003904	59	2.25%	1	1.19%	5	2.34%	7	2.30%	0	0.00%	72	2.22%
004001	106	4.04%	1	1.19%	8	3.74%	10	3.28%	0	0.00%	125	3.85%
004002	83	3.17%	1	1.19%	3	1.40%	7	2.30%	0	0.00%	94	2.89%
004003	20	0.76%	0	0.00%	2	0.93%	1	0.33%	0	0.00%	23	0.71%
004100	63	2.40%	0	0.00%	9	4.21%	5	1.64%	1	4.35%	78	2.40%

004200	73	2.79%	4	4.76%	3	1.40%	8	2.62%	0	0.00%	88	2.71%
004300	66	2.52%	4	4.76%	3	1.40%	7	2.30%	1	4.35%	81	2.49%
Total	2,621	80.7%	84	2.6%	214	6.6%	305	9.4%	23	.71%	3,247	--

Source: <http://www.ffiec.gov/hmda>

Table IV-13 – Disposition of FHA, FSA/RHS & VA Loans by Census Tract (2018)

Census Tract	Loans Originated		Applications Approved, Not Accepted		Applications Denied by Financial Institution		Applications Withdrawn by Applicant		Filed Closed for Incompleteness		Total Applications Received	
	Count	% of Total	Count	% of Income Level Applications	Count	% of Income Level Applications	Count	% of Income Level Applications	Count	% of Income Level Applications	Count	% of Income Level Applications
000300	13	1.3%	0	0.0%	0	0.0%	1	0.8%	0	0.0%	14	1.1%
000401	13	1.3%	0	0.0%	4	3.0%	1	0.8%	0	0.0%	18	1.4%
000402	17	1.7%	2	5.1%	5	3.7%	4	3.1%	1	9.1%	29	2.2%
000403	22	2.2%	0	0.0%	0	0.0%	4	3.1%	1	9.1%	27	2.1%

000501	22	2.2%	1	2.6%	9	6.7%	6	4.7%	0	0.0%	38	2.9%
000502	16	1.6%	0	0.0%	2	1.5%	3	2.3%	0	0.0%	21	1.6%
000504	36	3.7%	2	5.1%	6	4.5%	5	3.9%	1	9.1%	50	3.9%
000506	28	2.8%	0	0.0%	3	2.2%	7	5.4%	0	0.0%	38	2.9%
000507	8	0.8%	1	2.6%	0	0.0%	1	0.8%	0	0.0%	10	0.8%
000510	6	0.6%	1	2.6%	3	2.2%	1	0.8%	0	0.0%	11	0.8%
000511	9	0.9%	0	0.0%	0	0.0%	1	0.8%	0	0.0%	10	0.8%
000512	15	1.5%	2	5.1%	5	3.7%	2	1.6%	1	9.1%	25	1.9%
000513	20	2.0%	0	0.0%	2	1.5%	2	1.6%	0	0.0%	24	1.9%
000514	12	1.2%	0	0.0%	1	0.7%	1	0.8%	0	0.0%	14	1.1%
000600	28	2.8%	1	2.6%	2	1.5%	5	3.9%	0	0.0%	36	2.8%
000700	22	2.2%	1	2.6%	4	3.0%	1	0.8%	0	0.0%	28	2.2%
000800	3	0.3%	0	0.0%	2	1.5%	0	0.0%	0	0.0%	5	0.4%
001000	1	0.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	0.1%
001100	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

001200	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
001300	5	0.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	5	0.4%
001400	7	0.7%	0	0.0%	1	0.7%	1	0.8%	0	0.0%	9	0.7%
001500	31	3.2%	3	7.7%	3	2.2%	4	3.1%	1	9.1%	42	3.2%
001600	32	3.3%	3	7.7%	1	0.7%	2	1.6%	0	0.0%	38	2.9%
001700	24	2.4%	1	2.6%	3	2.2%	0	0.0%	0	0.0%	28	2.2%
001800	6	0.6%	0	0.0%	2	1.5%	1	0.8%	0	0.0%	9	0.7%
001900	4	0.4%	0	0.0%	1	0.7%	2	1.6%	0	0.0%	7	0.5%
002000	1	0.1%	0	0.0%	2	1.5%	0	0.0%	0	0.0%	3	0.2%
002100	3	0.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	3	0.2%
002200	2	0.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	2	0.2%
002301	1	0.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	0.1%
002302	2	0.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	2	0.2%
002400	0	0.0%	0	0.0%	1	0.7%	1	0.8%	0	0.0%	2	0.2%
002500	1	0.1%	0	0.0%	1	0.7%	0	0.0%	0	0.0%	2	0.2%

002600	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
002700	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
002800	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
002900	0	0.0%	0	0.0%	1	0.7%	0	0.0%	0	0.0%	1	0.1%
003000	7	0.7%	0	0.0%	2	1.5%	4	3.1%	0	0.0%	13	1.0%
003100	3	0.3%	0	0.0%	2	1.5%	0	0.0%	0	0.0%	5	0.4%
003200	2	0.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	2	0.2%
003300	11	1.1%	0	0.0%	2	1.5%	1	0.8%	0	0.0%	14	1.1%
003400	21	2.1%	1	2.6%	4	3.0%	0	0.0%	0	0.0%	26	2.0%
003500	9	0.9%	0	0.0%	2	1.5%	0	0.0%	0	0.0%	11	0.8%
003601	6	0.6%	2	5.1%	0	0.0%	0	0.0%	0	0.0%	8	0.6%
003602	11	1.1%	0	0.0%	2	1.5%	1	0.8%	1	9.1%	15	1.2%
003604	20	2.0%	1	2.6%	5	3.7%	4	3.1%	1	9.1%	31	2.4%
003605	5	0.5%	1	2.6%	0	0.0%	0	0.0%	0	0.0%	6	0.5%
003606	18	1.8%	1	2.6%	2	1.5%	4	3.1%	0	0.0%	25	1.9%

003705	19	1.9%	1	2.6%	2	1.5%	6	4.7%	0	0.0%	28	2.2%
003706	41	4.2%	4	10.3%	1	0.7%	8	6.2%	1	9.1%	55	4.2%
003707	5	0.5%	0	0.0%	1	0.7%	2	1.6%	0	0.0%	8	0.6%
003708	16	1.6%	2	5.1%	0	0.0%	2	1.6%	0	0.0%	20	1.5%
003709	5	0.5%	1	2.6%	0	0.0%	2	1.6%	0	0.0%	8	0.6%
003710	5	0.5%	0	0.0%	2	1.5%	3	2.3%	0	0.0%	10	0.8%
003711	17	1.7%	0	0.0%	3	2.2%	2	1.6%	0	0.0%	22	1.7%
003801	27	2.7%	1	2.6%	4	3.0%	8	6.2%	2	18.2%	42	3.2%
003805	32	3.3%	0	0.0%	7	5.2%	2	1.6%	0	0.0%	41	3.2%
003806	31	3.2%	0	0.0%	3	2.2%	4	3.1%	0	0.0%	38	2.9%
003807	32	3.3%	0	0.0%	2	1.5%	1	0.8%	1	9.1%	36	2.8%
003808	13	1.3%	2	5.1%	0	0.0%	1	0.8%	0	0.0%	16	1.2%
003809	12	1.2%	0	0.0%	3	2.2%	1	0.8%	0	0.0%	16	1.2%
003901	24	2.4%	1	2.6%	2	1.5%	3	2.3%	0	0.0%	30	2.3%
003903	13	1.3%	0	0.0%	1	0.7%	2	1.6%	0	0.0%	16	1.2%

003904	26	2.6%	0	0.0%	2	1.5%	0	0.0%	0	0.0%	28	2.2%
004001	42	4.3%	1	2.6%	9	6.7%	6	4.7%	0	0.0%	58	4.5%
004002	28	2.8%	0	0.0%	2	1.5%	0	0.0%	0	0.0%	30	2.3%
004003	5	0.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	5	0.4%
004100	27	2.7%	2	5.1%	1	0.7%	2	1.6%	0	0.0%	32	2.5%
004200	15	1.5%	0	0.0%	2	1.5%	3	2.3%	0	0.0%	20	1.5%
004300	25	2.5%	0	0.0%	2	1.5%	1	0.8%	0	0.0%	28	2.2%
Total	983	75.8%	39	3.0%	134	10.3%	129	10.0%	11	0.9%	1296	100.0%

Source: <http://www.ffiec.gov/hmda>

The following tables show the dispositions of conventional loans disaggregated by minority status and income level for the United States. The number of applications for conventional loans submitted by White, non-Hispanic applicants significantly outnumbers minority applicants in each income level analyzed. Denial rate differences are considered to be disproportionate if the difference is 10% or greater between two groups of applicants. The percentages are based on the number of applicants in each minority status category, and since the White, non-Hispanic applicants far outnumber the minority applicants in each category, the results may be slightly misleading.

Table IV-14 below indicates that White applicants outnumber minority applicants and Non-Hispanic or Latino/a applicants outnumber Hispanic or Latino/a applicants. White applicant origination rates are 11.8% higher, and slightly disproportionate than minority group origination rates. Denial rates are higher among minority applicants by 6.6%, this is not considered to be disproportionate.

**Table IV-12 – Disposition of Applications by Minority Status,
Less than 50% of National Median Income (2018)**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Applications Received by Minority Status	Applications Approved but Not Accepted	% of Applications Received by Minority Status	Applications Denied	% of Applications Received by Minority Status	Applications Withdrawn	% of Applications Received by Minority Status	Applications Closed for Incompleteness	% of Applications Received by Minority Status	Purchased Loans	% of Applications Received by Minority Status
White, Non-Hispanic	1,339	80.50%	762	56.9%	39	2.9%	341	25.5%	136	10.2%	61	4.5%	39	2.9%
Minority, not including Hispanic or Latino/a	324	19.50%	146	45.1%	7	2.2%	104	32.1%	51	15.7%	16	4.9%	12	3.7%
Total	1,663	100%	908	54.6%	46	2.8%	445	26.7%	187	11.2%	77	4.6%	51	3.1%
Hispanic or Latino/a	312	20.41%	172	55.1%	21	6.7%	87	27.9%	23	7.4%	9	2.9%	4	1.3%
Not Hispanic or Latino/a	1,217	79.59%	677	55.6%	24	1.9%	310	25.5%	144	11.8%	62	5.1%	34	2.8%
Total	1,529	100%	849	55.5%	45	2.9%	397	25.9%	167	10.9%	71	4.6%	38	2.5%

Source: <http://www.ffiec.gov/hmda/>

Table IV-15 below indicates that White applicants outnumber minority applicants and Non-Hispanic or Latino/a applicants outnumber Hispanic or Latino/a applicants. White applicant origination rates are higher than minority group origination rates, and denial rates are higher among minority applicants by 6.0%, this is not considered to be disproportionate.

**Table IV-15 – Disposition of Applications by Minority Status,
50-79% of National Median Income (2018)**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Applications Received by Minority Status	Applications Approved but Not Accepted	% of Applications Received by Minority Status	Applications Denied	% of Applications Received by Minority Status	Applications Withdrawn	% of Applications Received by Minority Status	Applications Closed for Incompleteness	% of Applications Received by Minority Status	Purchased Loans	% of Applications Received by Minority Status
White, Non-Hispanic	2,091	88.60%	1,422	68.0%	63	3.0%	340	16.3%	214	10.2%	52	2.5%	108	5.2%
Minority, not-including Hispanic or Latino/a	269	11.40%	152	56.5%	11	4.1%	60	22.3%	40	14.9%	6	2.2%	13	4.8%
Total	2,360	100	1,574	66.7%	74	3.1%	400	16.9%	254	10.8%	58	2.4%	121	5.1%
Hispanic or Latino/a	381	16.1%	253	66.4%	16	4.1%	74	19.4%	30	7.9%	8	2.1%	18	4.7%
Not Hispanic or Latino/a	1,987	83.9%	1,324	66.6%	57	2.9%	333	16.7%	225	11.3%	48	2.4%	101	5.1%
Total	2,368	100	1,577	66.6%	73	3.1%	407	17.2%	255	10.8%	56	2.4%	119	5.0%

Source: <http://www.ffiec.gov/hmda/>

Table IV-16 below indicates that White applicants outnumber minority applicants and Non-Hispanic or Latino/a applicants outnumber Hispanic or Latino/a applicants. White origination approval rates are higher than minority group origination rates by 7.2%, and denial rates are higher among minority applicants by 1.4%, this is not considered to be disproportionate.

**Table IV-16 – Disposition of Applications by Minority Status,
80-99% of National Median Income (2018)**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Applications Received by Minority Status	Applications Approved but Not Accepted	% of Applications Received by Minority Status	Applications Denied	% of Applications Received by Minority Status	Applications Withdrawn	% of Applications Received by Minority Status	Applications Closed for Incompleteness	% of Applications Received by Minority Status	Purchased Loans	% of Applications Received by Minority Status
White, Non-Hispanic	658	81.60%	443	67.3%	12	1.8%	106	16.1%	82	12.5%	15	2.3%	26	3.9%
Minority, not-including Hispanic or Latino/a	148	18.30%	90	60.1%	6	4.1%	26	17.5%	19	12.8%	7	4.7%	8	5.4%
Total	806	100	533	66.1%	18	2.2%	132	16.4%	101	12.5%	22	2.7%	34	4.2%
Hispanic or Latino/a	103	13.90%	65	63.1%	2	1.9%	18	17.5%	15	14.6%	3	2.9%	1	0.9%
Not Hispanic or Latino/a	634	86.00%	431	67.9%	15	2.4%	100	15.7%	71	11.2%	17	2.9%	27	4.3%
Total	737	100	496	67.3%	17	2.3%	118	16.0%	86	11.7%	20	2.7%	28	3.8%

Source: <http://www.ffiec.gov/hmda/>

Table IV-17 below indicates that White applicants outnumber minority applicants and Non-Hispanic or Latino/a applicants outnumber Hispanic or Latino/a applicants. White applicant origination rates are higher than minority group origination rates by 10.5%, and denial rates are higher among minority applicants by 8.9%, origination rates between Whites and minority groups are slightly disproportionate.

**Table IV-17 – Disposition of Applications by Minority Status,
100-119% of National Median Income (2018)**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Applications Received by Minority Status	Applications Approved but Not Accepted	% of Applications Received by Minority Status	Applications Denied	% of Applications Received by Minority Status	Applications Withdrawn	% of Applications Received by Minority Status	Applications Closed for Incompleteness	% of Applications Received by Minority Status	Purchased Loans	% of Applications Received by Minority Status
White, Non-Hispanic	1,557	83.3%	1,118	71.8%	34	2.2%	199	12.8%	172	11.0%	34	2.2%	119	7.6%
Minority, not-including Hispanic or Latino/a	313	16.7%	192	61.3%	11	3.5%	68	21.7%	35	11.2%	7	2.2%	26	8.3%
Total	1,870	100	1,310	70.1%	45	2.4%	267	14.3%	207	11.1%	41	2.2%	145	7.8%
Hispanic or Latino/a	148	8.7%	101	68.2%	4	2.7%	23	15.5%	19	12.8%	1	0.7%	9	6.1%
Not Hispanic or Latino/a	1,542	91.2%	1,101	71.4%	37	2.4%	199	12.9%	171	11.1%	34	2.2%	121	7.8%
Total	1,690	100	1,202	71.1%	41	2.4%	222	13.1%	190	11.2%	35	2.1%	130	7.7%

Source: <http://www.ffiec.gov/hmda/>

Table IV-18 below indicates that White applicants outnumber minority applicants and Non-Hispanic or Latino/a applicants outnumber Hispanic or Latino/a applicants. White applicant origination rates are higher than minority group origination rates by 16.3%, and denial rates are higher among minority applicants by 19.1%, origination rates and denial rate between White and minority group applicants are disproportionate for this income group.

**Table IV-18 – Disposition of Applications by Minority Status,
120% or More of National Median Income (2018)**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Applications Received by Minority Status	Applications Approved but Not Accepted	% of Applications Received by Minority Status	Applications Denied	% of Applications Received by Minority Status	Applications Withdrawn	% of Applications Received by Minority Status	Applications Closed for Incompleteness	% of Applications Received by Minority Status	Purchased Loans	% of Applications Received by Minority Status
White, Non-Hispanic	2,755	79.3%	1,932	70.1%	82	2.9%	341	12.4%	325	11.8%	75	2.7%	220	7.9%
Minority, not-including Hispanic or Latino/a	721	20.7%	388	53.8%	22	3.1%	155	21.5%	118	16.4%	38	5.3%	43	5.9%
Total	3,476	100%	2,320	67.7%	104	3.0%	496	14.3%	443	12.7%	113	3.3%	263	7.6%
Hispanic or Latino/a	166	5.62%	100	60.2%	4	2.4%	33	19.9%	25	15.1%	4	2.4%	10	6.0%
Not Hispanic or Latino/a	2,790	94.38%	1,922	68.9%	90	3.2%	357	12.8%	341	12.2%	80	2.9%	221	7.9%
Total	2,956	100%	2,022	68.4%	94	3.2%	390	13.2%	366	12.4%	84	2.8%	231	7.8%

Source: <http://www.ffiec.gov/hmd>

The number of White, non-Hispanic high-income applicants significantly outnumbers the number of minority applicants. Compared to white applicants, minority applicants have a lower origination rate and a higher denial rate as a whole, regardless of income.

The following table below offers a closer look at the denial rates of conventional loans by denial reason and income level. For those earning less than 50% of median income, Debt-to-Income Ratio and Credit History are the most and second-most reasons, respectively. For those earning 50-79% of median income, Credit History and Debt-to-Income Ratio are the most common reasons for denial. For applicants earning 80-119% median income the most common reasons for denial are Credit History and Debt-to-Income Ratio. Credit history is the most common reason for denial for applicants earning 120% of median income or more. Overall, Credit History and Debt-to-Income Ratio account for just over 50% of reason for denial in City of Rockford.

Table IV-19 – Conventional Loan Denial Rates by Denial Reason and Income Level (2017)

	Less than 50% Low		50-79%		80-99%		100-119%		120% or More		Income Not Available		Total Denials	
	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Total
Debt to Income Ratio	25	43.8%	15	21.7%	9	29.0%	3	17.6%	5	10.0%	2	100%	59	26.1%
Employment History	4	7.0%	4	5.8%	2	6.4%	0	0.0%	1	2.0%	0	0.0%	11	4.9%
Credit History	8	14.0%	17	24.6%	8	25.8%	6	35.3%	16	32.0%	0	0.0%	55	24.3%
Collateral	4	7.0%	14	20.3%	6	19.3%	3	17.6%	14	28.0%	0	0.0%	41	18.1%
Insufficient Cash	3	5.3%	5	7.2%	2	6.4%	3	17.6%	2	4.0%	0	0.0%	15	6.6%
Unverifiable Information	5	8.8%	2	2.3%	1	3.2%	1	5.9%	1	2.0%	0	0.0%	10	4.4%
Credit Application Incomplete	3	5.3%	6	8.7%	1	3.2%	1	5.9%	7	14.0%	0	0.0%	18	7.9%
Mortgage Insurance Denied	0	0.0%	1	1.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	0.44%
Other	5	8.8%	5	7.2%	2	6.4%	0	0.0%	4	8.0%	0	0.0%	16	7.1%
Total Denials/ % of Total	57	25.2%	69	30.5%	31	13.7%	17	7.5%	50	22.1%	2	.88%	226	100%

Source: <http://www.ffiec.gov/hmda/>

In summary, the HMDA Data indicates that low income households have a higher rate of denial than higher income households do. Overall, in the United States, the origination rate of conventional loans is approximately 67%. In every income category, White, non-minority applicants for a conventional home purchase loan substantially outnumber minority applicants. The percentage of total applications by Whites accounts for 83.9% of the total number of applications, regardless of income. Loan origination rates are higher for White applicants than for minority applicants and minority denial rates are higher than White denial rates.

Table IV-20 – Home Purchase Loan Applications by Race (2018)

	Applications Received		Loans Originated		Applications Approved, Not Accepted		Applications Denied		Applications Withdrawn		Applications Withdrawn or Closed for Incompleteness	
Race	Count	% of Total	Count	% of Income Level Applications	Count	% of Income Level Applications	Count	% of Income Level Applications	Count	% of Income Level Applications	Count	% of Income Level Applications
American Indian/Alaska Native	76	0.4%	36	0.3%	0	0.0%	24	0.7%	14	0.6%	2	0.3%
Asian	464	2.3%	268	2.0%	30	5.2%	76	2.2%	72	3.0%	18	2.9%
Black or African/American	1226	6.0%	702	5.3%	44	7.7%	284	8.1%	146	6.1%	50	8.0%
Native Hawaiian or Other Pacific Islander	32	0.2%	4	0.0%	2	0.3%	20	0.6%	6	0.3%	0	0.0%
White	16,800	82.4%	11,354	85.4%	460	80.1%	2,654	75.4%	1,858	78.2%	474	76.0%
2 or More Minority Races	16	0.1%	6	0.0%	0	0.0%	8	0.2%	2	0.1%	0	0.0%
Joint (White/Minority Race)	244	1.2%	144	1.1%	4	0.7%	44	1.2%	50	2.1%	2	0.3%
Race not Available	1526	7.5%	774	5.8%	34	5.9%	412	11.7%	228	9.6%	78	12.5%
Total	20,384	--	13,288	65.2%	574	2.85%	3,522	17.3%	2,376	11.7%	624	3.1%

Source: <http://www.ffiec.gov/hmda/>

D. Citizen Participation:

The City of Rockford's FY 2020 Analysis of Impediments to Fair Housing Choice was made available for public comment on the City's website (www.rockfordil.gov), and copies were on display at the following locations:

- City of Rockford, Dept. of Community & Economic Development - 425 E. State Street
- City of Rockford, Human Services Office - 612 N. Church Street
- Rockford Housing Authority - 223 S. Winnebago Street
- Hart Interim Library - 214 N. Church Street
- East Branch - 6685 E. State Street
- Montague Branch - 1238 S. Winnebago Street
- Rock River Branch - 3128 11th Street
- Rockton Centre Branch - 3112 N. Rockton Avenue

The document was available beginning on December 10, 2019, until January 8, 2020. Citizens were encouraged to submit written or oral feedback on the Analysis of Impediments by January 8, 2020.

As a part of the consolidated planning process, the City of Rockford distributed a Citizen Questionnaire. Questionnaires were made available in the City Hall Lobby, 2nd Floor Lobby of City Hall, along with a link on the City's Website. Additionally, the survey was shared through mass e-mails to community and housing groups, handed out in public, electronically through NextDoor, Facebook, and other social media platforms, shared with non-profits to share directly with residents, and community events such as National Night Out and Public Hearings.

There was a total of five hundred five (505) questionnaires completed and returned.

Some of the notable characteristics of respondents included (as a percentage of those that answered each question):

- The majority of respondents are female at 66.05% and 89.05% of respondents are White.
- Over two-thirds (68.44%) of respondents are over the age of 50.
- Of those that answered the question, 32.3% are low- to moderate-income for their family size.
- Over two-thirds (73.85%), come from one or two-person households.

- 85.92% indicated they are homeowners.

Some of the notable needs identified by respondents included problems with the following (as a percentage of those that answered each question):

- Streets – 48.21%
- Curbs/Sidewalks – 46.17%
- Property Maintenance – 43.37%
- Public Safety – 42.86%
- Litter – 29.85%
- Traffic – 27.58%
- Storm Sewers – 19.59%
- Parking – 13.92%
- Handicap Access – 8.51%
- Sanitary Sewers – 5.41%

Additional Comments or Concerns:

- Sidewalks are nonexistent or in total disrepair.
- Inability to feel safe in the neighborhood due to lack of street lights.
- Poor housing conditions and landlords/tenants who do not care about their property/home.
- Speeding and STOP sign running in the neighborhoods; lack of traffic enforcement.
- Overgrowth in abandoned lots, litter, and dumping in storm drains.

The following is a list of needs/issues associated with different areas of community and economic development. Values were calculated as a percentage of those that answered each question. *Note that not all participants answered every question.*

Recreation:

- 45.40% mentioned the need for improvements to playground equipment.
- 45.09% mentioned the need for improvements to benches and picnic tables.
- 34.36% and 32.82% mentioned the need for improvements to pools and splash pads, respectively.

- The following issues each received 25.0% or less of the responses:
 - Improvements to basketball courts.
 - ADA equipment and surfacing.
 - Baseball fields.
 - Tennis courts.

Social Services:

- The City of Rockford has a vast array of social services available to residents. Of the 500 residents who completed the survey 126 completed the section on Social Services. Medical services accounted for over 40% of services utilized by residents.
 - Medical - 40.94%
 - Aging -19.69%
 - Disability -17.32%
 - Mental Health -13.39%
 - Employment - 9.45%
 - Childhood Development - 8.66%
 - Legal - 5.51%
 - Homeless - 2.36%
 - Addictions - 2.36%

Additional Comments or Concerns:

Some residents indicated they are in need of services but are not eligible due to income guidelines.

Programs that are Missing or Under-funded:

- Respondents were provided with an open-ended question for the opportunity to share their thoughts on programs missing or under-funded in the City. The following were most commonly mentioned:
 - Street/curb/sidewalk repair
 - Drug rehabilitation programs
 - Youth programming; after school and Summer
 - Blight removal
 - Public transit services
 - Homelessness services - including domestic violence and mental health

- Mental Health for children and teens
- Public safety and law enforcement

Employment:

- 52.22% identified the lack of jobs that pay a living wage over low pay, part-time jobs.
- 43.70% identified a lack of job training opportunities.
- 37.78% indicated a lack of transportation services to get to/from work on time.

The following issues received 25% or less of the responses:

- Discriminatory practices- 22.22%
- Disabled-15.19%
- Childhood Development/Child Care-14.81%
- Legal-5.56%

Additional Comments or Concerns:

Respondents were provided with an open-ended question for the opportunity to share their thoughts on employment problems in the City. The following were most commonly mentioned:

- Lack of job Opportunities for those with criminal records.
- Changing job market and lack of education appropriate jobs.
- Lack of job training for jobs available.
- Lack of programs to prepare young people for the workforce.
- Lack of job opportunities for older adults.
- Not enough pay to attract someone to the job market; people do not want to lose their public benefits when the wages they earn cannot get them out of poverty.

Transportation:

- 47.41% mention a lack of service hours during the day/week
- 30.68% mention a lack of parking
- 23.90% mention a lack of reliable public transit services

Additional Comments or Concerns:

Respondents were provided with an open-ended question for the opportunity to share their thoughts on transportation problems in the City. The following were most commonly mentioned:

- Difficulty in traveling through town East to West and North to South.
- Limited scheduling and routes.
- Lack of bus shelters, benches, and lighting at bus stops.
- Too much time is spent between transferring buses.
- Lack of pedestrian infrastructure such as sidewalks, walking paths, and bike lanes.

Crime:

- 84.89% mention community problems with drugs
- 78.09% mention theft as a problem
- 74.31% mention violent crime as a problem
- 70.03% mention gangs as a problem
- 26.45% mention a lack of interaction between police and residents

Additional Comments or Concerns:

Respondents were provided with an open-ended question for the opportunity to share their thoughts on crime issues in the City. The following were most commonly mentioned:

- Fear of once safe neighborhood becoming unsafe.
- Domestic violence.
- Vehicle and home break-ins.
- Hearing gunshots on a daily basis.
- Delays in response from 911 calls.
- Excessive speeding in neighborhoods and no traffic enforcement by police.

Blight/Clearance:

- 86.62% mention vacant residential structures
- 79.68% mention vacant commercial structures

- 63.10% mention uncut lawns
- 42.51% mention vacant lots
- 25.40% mention open dumping grounds
- 21.12% mention squatting

Additional Comments or Concerns:

Respondents were provided with an open-ended question for the opportunity to share their thoughts on blight/clearance issues in the City. The following were most commonly mentioned:

- Properties not kept up to code.
- Absentee landlords not maintaining properties.
- The high volume of blighted/abandoned homes.
- Lack of opportunities for residents to buy abandoned properties.

Housing:

- 65.17% mention needs for major rehabilitation
- 60.11% mention needs for minor rehabilitation
- 59.27% mention needs for decent, safe, and affordable rental units
- 48.03% mention needs for affordable housing

Additional Comments or Concerns:

Respondents were provided with an open-ended question for the opportunity to share their thoughts on housing issues in the City. The following were most commonly mentioned:

- Properties not kept up to code.
- Absentee landlords not maintaining properties.
- The high volume of blighted/abandoned homes.
- Lack of opportunities for residents to buy abandoned properties.
- Overall appearance of blighted properties influences the attitude of the neighborhood.
- High property taxes make homeownership and maintenance difficult for middle and low-income people.
- Rents too high for the conditions homes are in.
- High eviction rates leaving people with nowhere to go and limited options for future housing.

Fair Housing:

- Responses to whether or not residents are aware of how to report fair housing violations or concerns:
 - 13.1% Yes
 - 40.91% No
 - 47.33% Unsure

Reasons Fair Housing Complaints Are Not Reported:

- Respondents were provided with an open-ended question for the opportunity to share their thoughts on fair housing issues and primary reasons why fair housing complaints are not reported in the City. The following were most commonly mentioned:
 - Fear of retaliation by landlords.
 - Intimidation.
 - Lack of education on what constitutes a fair housing violation; how to report and where to find resources.
 - Believe that reporting won't make a difference in their situation.
 - Agencies are backlogged and underfunded and cannot get to complaints quickly enough.

The following situations result in further discriminations and/or barriers to fair housing in the City of Rockford:

	Strongly Agree	Agree	Neutral/Unsure	Disagree	Strongly Disagree
Concentration of subsidized housing in certain neighborhoods	31.34%	27.35%	27.35%	7.41%	6.55%
Lack of affordable housing in certain areas	22.19%	38.04%	23.05%	8.93%	7.78%
Lack of accessible housing for persons with disabilities	15.45%	31.49%	44.31%	5.25%	3.50%
Lack of accessibility in neighborhoods (i.e. curb cuts)	12.13%	28.11%	42.60%	10.95%	6.21%
Lack of fair housing education	21.41%	32.26%	34.90%	5.57%	5.87%
Lack of fair housing organizations in the City	11.24%	22.49%	44.67%	13.91%	7.69%

State or Local laws and policies that limit housing choice	11.31%	14.88%	53.57%	12.50%	7.74%
Lack of knowledge among residents regarding fair housing	22.74%	38.19%	28.57%	5.54%	4.96%
Lack of knowledge among landlords and property managers regarding fair housing	18.18%	28.15%	31.96%	14.08%	7.62%
Lack of knowledge among real estate agents regarding fair housing	9.49%	22.15%	48.10%	10.76%	9.49%
Lack of knowledge among bankers/lenders regarding fair housing	11.73%	19.06%	44.87%	13.49%	10.85%
Other barriers	9.36%	14.04%	66.81%	5.53%	4.26%

Additional Comments or Concerns:

- Property taxes are too high for home owners and landlords to make improvements to their properties.
- There are several areas that are missing sidewalks, street lights, have overgrown grass and trees, making mobility in neighborhood difficult.
- Concerns of daily incidents of violence and feeling unsafe in the City.
- There is a lack of property care and maintenance from both tenants and landlords; a need for more education on tenant/landlord responsibilities.
- Concerns of ice and snow affecting driving safety on the roads during winter.
- More opportunities for job training and professional growth to help attract young people back into the area.
- Want to see vacant commercial areas repurposed.

Citizen Comments

The Citizen Participation is included in the Exhibit section of the Five Year Consolidated Plan.

V. Actions and Recommendations

The City of Rockford's FY 2020-2024 Analysis of Impediments to Fair Housing Choice has identified the following impediments, along with goals and strategies to address those impediments and affirmatively further fair housing in the City:

- **Impediment 1: Fair Housing Education and Outreach**

There is a need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities and the disabled population who fear retaliation if they lodge a complaint.

Goal: The public in general and local officials will become knowledgeable and aware of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing in the city.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **1-A:** Continue to promote Fair Housing awareness through the media, seminars, testing, and training to provide educational opportunities for all persons to learn more about their rights under the Fair Housing Act and Americans With Disabilities Act.
- **1-B:** Continue to distribute literature and informational material concerning fair housing issues, an individual's housing rights, and landlord's responsibilities to affirmatively further fair housing.
- **1-C:** Promote housing choice so residents with the same financial means may choose to live anywhere in the City.

- **Impediment 2: Need for Decent, Safe, and Affordable Rental Housing**

The City of Rockford does not have a sufficient supply of rental housing that is decent, safe, and sound. In many cases, landlords don't maintain their property to code standard which results in unsafe living conditions for tenants. However, the monthly cost of rent for apartments has steadily increased due to the limited supply of rental housing, despite the condition of the rental unit.

Goal: The supply of affordable rental housing that is decent, safe, and sound will meet the needs of all renter households throughout the City of Rockford, through

new construction and in-fill housing, the rehabilitation of existing occupied structures and vacant buildings, and the development of mixed-income buildings.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **2-A:** Support and encourage both private developers and non-profit housing providers to develop and construct new affordable mixed and middle income rental housing that would be located throughout the City of Rockford.
- **2-B:** Support and encourage the rehabilitation of existing housing units in the City to create decent, safe, and sound rental housing that is affordable to lower income households.
- **2-C:** Continue to provide funding for Code Enforcement to identify buildings and units that need to be maintained and rehabilitated in accordance with local codes.

- **Impediment 3: Lack of Affordable Homeownership Opportunities**

The population of Rockford has decreased since the 2010 U.S. Census and the percentage of share of renters has increased from 39%-46%. In some areas the share of renters is as high as 70% or more.

Home values and access to traditional mortgage financing have decreased since the recession, partly due to significantly higher credit standards and the age of Rockford's housing stock. Homes within an affordable price range require rehabilitation, which limits the availability of mortgage financing programs for lower income households.

Goal: For-sale single family homes for lower income households will be developed through new construction, in-fill housing, and rehabilitation of substandard houses.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **3-A:** Support homebuyer education and training programs to improve homebuyer awareness and increase the opportunities for lower-income households to become homebuyers.
- **3-B:** Support and provide funds for downpayment assistance to lower-income households to become homeowners.

- **3-C:** Support and encourage plans from both private developers and non-profit housing providers to develop and construct new affordable housing that is for-sale.
 - **3-D:** Support and encourage the acquisition, rehabilitation and resale of existing housing units to become decent, safe, and sound.
 - **3-E:** Partner with private and non-profit developers to increase opportunities for 'lease purchase' housing
- **Impediment 4: Need for Accessible Housing Units That Are For-Sale or Rent**

There is a lack of accessible housing units in the City of Rockford. Most of the existing housing units do not have accessible features. The City's disabled population has grown to 15.5% of the total population.

Goal: Increase the number of accessible housing units through new construction and rehabilitation of existing housing units for the physically disabled and developmentally delayed.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **4-A:** Support home rehabilitation programs that financially assist seniors and people with disabilities to provide a safe and accessible home in order to continue to age in place.
 - **4-B:** Support and encourage the development of accessible housing units in the City.
 - **4-C:** Provide fair housing education and outreach to seniors and people with disabilities to address fear of reporting housing and code violations.
 - **4-D:** Enforce the ADA and Fair Housing requirements for landlords to make "reasonable accommodations" to their rental properties so they become accessible to tenants with disabilities.
- **Impediment 5: Economic Issues that affect Fair Housing Choice**

There is a lack of economic opportunities in the City which prevent low-income households from improving their income and ability to live outside areas with concentrations of low-income households, which makes this a fair housing concern.

Goal: The local economy will provide new job opportunities, which will increase household income, and will promote fair housing choice.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken.

- **5-A:** Continue to provide support, education, and technical assistance opportunities to minority, women owned and small businesses
- **5-B:** Support and enhance workforce development and skills training that result in a “livable wage” and increases job opportunities.
- **5-C:** Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities.
- **5-D:** Support and encourage efforts for improvements in public transportation options in the City to allow for second and third shift workers.
- **5-E:** Support and encourage private and non-profit developers and businesses to provide assets (grocery stores, services, etc.) in low to moderate income neighborhoods

VI. Approval

The City of Rockford approved the FY 2020-2024 Analysis of Impediments to Fair Housing Choice at its regular City Council meeting on February 3, 2020.