

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

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EXECUTIVE SUMMARY

PURPOSE OF THE STUDY

This Analysis of Impediments to Fair Housing Choice (AIFHC) examines policies, practices, and local socioeconomic and housing market conditions and trends that may affect the ability of Chicago residents to choose housing in the city. The U.S. Department of Housing and Urban Development (HUD) requires that jurisdictions that receive Community Development Block Grant funds Affirmatively Further Fair Housing (AFFH) and promote integration by producing a comprehensive analysis of impediments to fair housing affecting their communities, developing a plan to address those impediments, and documenting progress in achieving goals to remove impediments.

In recent months, HUD has changed the rules regulating efforts to further fair housing and has established new reporting requirements for what the agency now calls Assessments of Fair Housing. This AIFHC document addresses most of the issues and requirements of the new guidelines; however, it is part of the City of Chicago's 2015 to 2019 Consolidated Planning process, which requires an AIFHC as defined prior to the new AFFH rule established in 2015. The Chicago Department of Budget and Management retained Applied Real Estate Analysis (AREA), Inc., to assist with preparation of the AIFHC.

INCREASED EMPHASIS ON AFFIRMATIVELY FURTHERING FAIR HOUSING

In addition to changing rules, HUD has placed increased focus on efforts to further fair housing as part of an overall effort to ensure that opportunity is not limited by where a person lives and that all households can find decent and affordable housing in neighborhoods that offer safety, stability, and opportunity. Unfortunately, the location of affordable housing and patterns of residential segregation in most major cities have created a situation in which where people live depends largely on their income, race, and ethnicity. Furthermore, contrary to past findings, recent research by economist Raj Chetty and his colleagues indicates that how adults in the U.S. fare economically depends, to a large extent, on the quality of the neighborhoods in which they grew up.¹

¹ Raj Chetty, Nathaniel Hendren, Patrick Kline, and Emmanuel Saez, "Where is the Land of Opportunity? The Geography of Intergenerational Mobility in the United States," *The Quarterly Journal of Economics*,

The Geography of Intergenerational Mobility in the United States," *The Quarterly Journal of Economics*, (129) (4) 2014, available at http://www.rajchetty.com/chettyfiles/mobility_geo.pdf; and Raj Chetty and Nathaniel Hendren, The Impacts of Neighborhoods on Intergenerational Mobility: Childhood Exposure Effects and County-Level Estimates (Cambridge: Equality of Opportunity Project, 2015), available at http://www.equality-of-opportunity.org/images/nbhds paper.pdf.

Growing recognition of the impacts of segregation as well as the effects that place of residence have on individuals' lives has led HUD as well as community and economic development activists across the country to encourage a two-pronged approach to ensuring that all people have equal access to housing and opportunity. Policies increasingly focus on promoting residential mobility and the deconcentration of poverty while at the same time facilitating economic development and reinvestment in impoverished neighborhoods. These two goals are key to improving fair housing choice in Chicago as well as other cities.

ISSUES OF FAIR HOUSING IN CHICAGO

The issue of fair housing choice and its opposite — segregation — are not new to the city of Chicago. The city has long been a collection of neighborhoods that initially offered support to many residents but soon became a hindrance to others. As Ed Marciniak stated in his 1977 book *Reviving an Inner City Community*:

"In the nineteenth and early twentieth centuries, Chicago thrived as a city of neighborhoods. They gave support to families moving up the economic and social ladder and supplied the political and social cement which held the city together. They took the hodgepodge of nationalities, races, languages, and cultures, the rich and poor, the skilled and the poorly educated and blended them into a lively, livable Chicago.

Beginning in the 1940's, however, city neighborhoods began to vanish one by one: dissolved by racial change, ripped apart by newly-built expressways, nibbled away by parking lots and gasoline stations, gobbled up by land-starved hospitals and universities, abandoned by the flight to the suburbs."²

Private housing market mechanisms, such as restrictive covenants on the sale of housing to African Americans, resulted in market dynamics that directed some racial and ethnic groups to particular neighborhoods in the city in the early 1910s. In the 1930s, the federally sponsored Home Owner's Loan Corporation drafted maps of the city that ranked neighborhoods worthy of mortgage lending versus those that were shunned, mainly because of the racial composition of their populations.

In addition, over the years publicly funded affordable housing programs have aggravated the problem of racial isolation and concentration. It has long been recognized that many federal housing programs, in particular, permitted if not encouraged segregation in most of the nation's cities. Federally subsidized housing, including public housing, was developed in neighborhoods that already suffered

² Marciniak, Ed, *Reviving an Inner City Community*, Loyola University of Chicago, 1977, page 9.

because of residents' low incomes. More recently, the Low-Income Housing Tax Credit program encouraged the concentration of assisted housing in high-poverty areas known as "qualified census tracts," where developers received a competitive advantage in obtaining tax credits over developers of housing in other geographic areas.

Clearly, numerous public and private sector forces have defined housing markets and affected fair housing choice in Chicago as in other cities. As a result, many of the impediments identified in this report are beyond the control of the City of Chicago. However, the City has the responsibility to identify issues and develop a strategy to address impediments to fair housing, including those that originate in the private sector. Affirmatively furthering fair housing is an important process that requires the leadership of the City's officials and preparation of a viable plan to increase fair housing choice in the city.

ELEMENTS OF THE FAIR HOUSING PLAN

The current AIFHC is a blueprint for affirmatively furthering fair housing in Chicago. The analysis examines the dynamics of the local housing market as well as current programs and policies affecting housing opportunities in the city. Factors affecting fair housing choice that were reviewed include:

- Demographic and socioeconomic conditions and trends in the city and its neighborhoods
- Housing market conditions and trends
- Current laws, policies, and practices that affect fair housing
- Housing programs, activities, and outreach that encourage fair housing
- Complaints and residents' attitudes toward housing opportunities in Chicago, based on surveys and roundtable discussions

Based on findings from this research, the AIFHC identifies key impediments to fair housing choice in Chicago and recommends administrative and programmatic actions to address barriers in private housing as well as government-assisted housing.

KEY IDENTIFIED IMPEDIMENTS

Over the approximately one-year period of the investigation of fair housing in Chicago, 11 key impediments and additional related issues were identified and 33 actions were recommended to address these impediments. For many impediments, the City of Chicago already has activities and programs underway on which the City can build to address the barriers that were identified

The following is a brief summary of the impediments and some recommended actions.

Impediment 1: Lack of Awareness of Fair Housing Laws. Perhaps the primary impediment to fair housing in the City of Chicago is a lack of awareness and/or full understanding of city, state, and federal housing laws by residents and some real estate industry professionals.

Based on research, a number of issues come into focus:

- Affected individuals and families are frequently unaware that their fair housing rights have been violated and unaware of options for redress.
- Private sector individuals are frequently unaware that they are violating fair housing laws.
- There is widespread confusion between "affordable housing" and "fair housing," and many individuals and organizations — including real estate industry professionals — associate providing affordable housing with affirmatively furthering fair housing.
- Widespread assumptions exist that fair housing laws apply only to lower-income individuals, African Americans, and persons with a disability.

To address these issues, recommended actions include:

- Conduct fair housing training sessions for City staff, delegate agencies, and community-based service providers.
- Increase the capacity of the Chicago Commission on Human Relations (CCHR) to offer fair housing roadshows and training sessions for various community and government agencies.
- Create a City fair housing website or webpage.
- Coordinate outreach activities in partnership with fair housing advocacy organizations such as the Lawyers' Committee for Better Housing, Chicago Area Fair Housing Allowance, and other fair housing advocacy organizations.
- Convene fair housing stakeholders from nonprofit housing advocacy organizations and real estate industry professionals to foster cross-sector dialogue and understanding.
- Develop a marketing and media awareness campaign and promotional materials that delegate agencies can distribute in their neighborhoods that demonstrate how their community areas welcome diversity.
- Participate in events held by organizations such as the Metropolitan Planning Council, Chicago Metropolitan Agency on Planning, and Urban Land Institute, where housing professionals learn about best practices.

Impediment 2: A Prevalent "Fear of Others" Exists Among Residents, Including NIMBYism, and Discrimination Persists. Housing choice is limited for protected classes in part because racism and prejudice still exist, individuals are stereotyped based upon various socioeconomic characteristics, and there is a fear of people who are dissimilar in some way living in areas that have been largely homogenous. The consequence is that individuals and households often self-segregate by locating in community areas with others who are of the same racial or ethnic background. Upon seeing communities with concentrations of a particular race, ethnicity, or income group, those who are not a member of the predominant racial, ethnic, or income group often develop ideas of that neighborhood that prevent them from considering living there.

To address this self-perpetuating problem, the City will continue its outreach and training efforts to increase the public's understanding of fair housing and interaction with diverse groups of individuals.

Impediment 3: An Insufficient Supply of Affordable Housing in the City. Although fair housing laws apply to all income groups — not just those who require affordable housing — minority households often have greater difficulty becoming homeowners and during the most recent recession suffered disproportionately in the loss of owner-occupied homes due to foreclosures. In addition, affordable rental housing is in short supply, especially in strong housing market areas, many of which have limited racial and ethnic diversity.

Recommended actions to address this impediment include:

- Review the City's zoning and land-use plan to identify any amendments needed to support the preservation and expansion of affordable housing in highopportunity areas. The City recently modified its Affordable Requirements Ordinance (ARO), which is anticipated to increase development of affordable housing units and generate additional revenue from fees that can be used to finance more affordable housing.
- Revise the transit-oriented development (TOD) ordinance to reduce housing costs and facilitate additional less costly housing in strong market areas with transit options. In 2015 the City updated its TOD ordinance to increase opportunities for affordable housing near transit.
- The Chicago Department of Planning and Development should continue to coordinate with the Chicago Housing Authority (CHA) to facilitate affordable housing development and support CHA's efforts to provide more housing options for residents, especially in the CHA's designated opportunity neighborhoods.
- Expand the availability of accessible housing, including affordable housing, and encourage removal of barriers to accessibility.

Impediment 4: Limited and/or Inconsistent Coordination among Some City Departments. Although the City departments we interviewed during the course of this research have a solid understanding of fair housing laws, communication and coordination among some departments is limited and/or inconsistent.

As an extension of fair housing training sessions, CCHR should conduct training sessions with appropriate City agencies over the next 12 months to educate staff about the Chicago Fair Housing Ordinance and encourage interdepartmental coordination and communication regarding housing policies and programs.

Impediment 5: Certain City Policies and Procedures Do Not Encourage Fair Housing. Concerns that arose during the course of this research include:

- CCHR has limited staff who focus on fair housing complaints.
- CCHR's section of the City's website focuses primarily on explaining how to file discrimination complaints and its efforts to promote societal harmony and understanding, not the City's overall approach to furthering fair housing.
- The Department of Planning and Development focuses heavily on ensuring that all regulatory and redevelopment agreements, such as those with housing developers, include mandated compliance with the Fair Housing Ordinance. Local fair housing advocates expressed concern that DPD's housing and neighborhood revitalization and development programs do not explicitly address fair housing objectives.
- Subsidized housing and project-based vouchers tend to be concentrated in high-poverty areas of the city. Because of negative perceptions of individuals and families who live in subsidized housing, the City faces challenges when trying to work with developers to undertake subsidized housing projects in opportunity neighborhoods.
- The CHA's efforts to further fair housing continue to be negatively impacted by the nature of Chicago's housing market and perceptions of the agency. Although the agency is moving forward with building new mixed-income developments to meet its housing production goals, CHA continues to face challenges as it attempts to balance rebuilding units on previous public housing sites with building and/or rehabilitating units in off-site locations and in a wider variety of neighborhoods to reduce concentrated poverty in the city.

Planned actions to address these impediments include:

• Increase staff dedicated to fair housing. Adding a full-time staff person to CCHR to focus on enforcement of the Fair Housing Ordinance would help address this impediment Unfortunately, given Chicago's limited resources, increases to personnel cannot be made at this time.

- Leverage existing relationships and other funding sources. CCHR will increase
 its efforts to work with fair housing advocacy groups and planning organizations,
 many of which may have access to funding for some partnership activities.
- Conduct additional analyses related to fair housing and more effectively integrate fair housing into the housing planning process. CCHR and DPD will endeavor to explore resources in this area and to conduct more neighborhood-level analyses for the next five-year affordable housing plan.
- Expand CHA's mobility program for Housing Choice Voucher recipients and implement comparable efforts citywide.
- Focus CHA's new construction efforts in its designated "opportunity neighborhoods," which have among other positive attributes low percentages of poverty-level households, low crime, and easy access to employment, shopping, and other services and amenities. To facilitate this effort, the City will use its updated ARO, which went into effect in October 2015, to provide housing developers with fee reductions if they lease units to the CHA in strong market areas.
- Promote and catalyze economic investments in low-income neighborhoods. The City will continue to promote economic investment in communities with significant poverty concentrations, using housing programs such as the Micro-Market Recovery Program, Chicago Neighborhoods Now, and business development efforts such as the Method factory development and new grocery store projects.

Impediment 6: The Lack of a Systematic Approach to Fair Housing Planning. Several fair housing advocacy organizations believe that the City tends to develop multiple assessment and planning efforts that address housing in a way that is perceived as disjointed and not fully inclusive of all stakeholders' perspectives. Recently, the City attempted to engage community representatives in the analysis and policy planning of the five-year housing plan; however, some fair housing advocacy groups indicated that they felt excluded from that process.

The City plans to do the following to overcome this perception:

- In developing the next five-year affordable housing plan, DPD will incorporate a fair housing component while working with CCHR and other fair housing partners.
- Provide annual fair housing training for City delegate agencies. As a first step in this process, the City will release a request for proposals for various federal, state, and locally funded housing and community development programs in May 2016. The City will hold three technical assistance sessions citywide for all current and new delegate agencies, which will include a mandatory fair housing training session.

Impediment 7: Members of the Protected Classes Are Denied Mortgages at a Higher Rate. In addition to being denied mortgages at a higher rate, members of the protected classes tend to be offered subprime loans more often than others. These limited financing options reduce the chance of homeownership, and when homeownership is achieved, it may be unaffordable. Real estate professionals indicated that despite some improvement in the general availability of mortgage credit, funds are still limited for households located in low- and moderate-income neighborhoods.

Recommended City actions include funding housing counseling agencies with a focus not only on those at risk for foreclosure but also those interested in obtaining a mortgage, providing incentives that encourage banks and other financial institutions to develop more equitable underwriting guidelines, and providing information to the public about lending discrimination. To begin addressing this impediment, the City has maintained level funding for housing counseling agencies in its 2016 annual budget.

Impediment 8: The Perpetuation of Discriminatory Practices That Are Not Addressed by the Fair Housing Ordinance. Some housing organizations and real estate professionals that participated in the roundtable discussions cited barriers to furthering fair housing that are not currently addressed by the Fair Housing Ordinance.

- Rental housing eviction filings are used to deny access to housing. Many tenants are the victims of foreclosures over which they had no control and end up with eviction filings on their records without their knowledge. Consequently, these renters often have a difficult time finding landlords that will rent to them.
- Media outlets are not held accountable for posting housing advertisements placed by landlords and property managers with wording such as "no Section 8 allowed" or that include discriminatory language that is clearly illegal. Roundtable participants expressed concern that nothing in the Fair Housing Ordinance holds media outlets accountable for promoting such a discriminatory practice.

Local housing advocates encourage the City to amend the Fair Housing Ordinance to include provisions to address the aforementioned discriminatory practices. CCHR has already presented the City Council with a proposed ordinance amendment that would add retaliation as a basis for complaints. CCHR has no jurisdiction over media outlets.

Impediment 9: The Housing Crisis and Recession Have Disproportionately Impacted Members of the Protected Classes. The recent housing market crash and most recent recession impacted every group in the U.S. However, research has shown that members of the protected classes as well as lower-income households have been impacted more by these crises and that the negative impacts have been reversed more slowly. Specifically:

The foreclosure crisis has impacted minority and immigrant communities at a disproportionate rate.

- "Mom and pop" one- to five-unit buildings had a higher foreclosure rate. These units were a substantial supply of affordable housing in the city.
- "Mom and pop" landlords have also encountered difficulty obtaining financing for property acquisition and rehabilitation, as shown in research by DePaul University's Institute for Housing Studies.
- Areas with concentrations of minorities have had higher foreclosure rates. Consequently, Chicago has experienced a mixed housing market recovery as several majority-minority neighborhoods continue to experience depressed housing prices and properties with negative equity.

Recommended actions to address this impediment include:

- Allocate funding to neighborhoods with high foreclosure rates to improve infrastructure and encourage economic development. Although these neighborhoods may not need additional housing, funding can be used to improve other aspects of the community to maintain or increase the appeal of the neighborhoods. DPD will continue several existing programs that address this problem, including the Micro-Market Recovery Program.
- Encourage housing developers (nonprofit and for-profit) to purchase and rehab foreclosed properties.

Impediment 10: Real Estate Professionals Have No Explicit Role in Furthering Fair Housing. Although this impediment could be considered a subset of Impediment 1, the role of the real estate industry is such that it warrants separate treatment.

Changes in real estate professional standards in the last few years have resulted in real estate agents and brokers refraining from making any comments or assessment of a neighborhood's quality, socioeconomic characteristics, schools, and crime rates, among other factors. As a result, some brokers are apprehensive to consider issues related to fair housing. Although some associations of real estate industry professionals discuss fair housing as a topic in training sessions, others do not.

During the course of research, some real estate professionals expressed reluctance to work with Housing Choice Voucher holders and/or low-income individuals that have low credit scores. Real estate professionals and brokers who search for and place renters in housing units are compensated by receiving the renter's first month's rent via the landlord; thus compensation can be delayed if a renter pays the security deposit but not the first month's rent.

Further, appraisals in some low-income neighborhoods are difficult to obtain. Few appraisers are familiar with Chicago's low-income neighborhoods and they often have difficulty obtaining reliable comparable units for their appraisals, which results in underestimates of property values that do not reflect true market conditions.

To overcome this impediment, CCHR will partner with the CHA to deliver presentations to real estate professionals. As those presentations will likely focus on source of income discrimination, CCHR will also develop presentations that will include other protected classes. CCHR will also discuss the issue of discriminatory appraisal practices with real estate professionals, such as the Chicago Association of Realtors and the Dearborn Realtist Board, who may then share this information with appraisers.

Impediment 11: There Are Highly Segregated Communities in the City of Chicago.

There are many neighborhoods in the city, primarily on the South Side and West Side, which have high concentrations of minorities. Some neighborhoods also include high concentrations of lower-income populations. These same neighborhoods have also been subject to intentional economic disinvestment that then fosters further racial segregation and/or poverty concentration. Although fair housing laws are designed to prevent illegal discrimination, fair housing laws alone are not sufficient to meet the larger goal of creating integrated communities with equal access to neighborhood amenities that make them desirable places to live.

Most participants in the citizens' and community representatives' roundtable were insistent that segregation is at the heart of the problem in furthering fair housing in Chicago. Barriers to accessing housing in certain neighborhoods across the city based on income and race restrictions continue to exist, and the housing market mirrors and perpetuates long-standing institutional racism. An example is the fact that Housing Choice Voucher participants continue to be concentrated on the South Side and West Side.

Recommended actions for the City to address this impediment include:

- Conduct trainings on the value of diversity to address some commonly held myths.
- Engage community groups and nonprofit organizations that focus on ending discrimination and addressing stereotypes.
- Encourage City agencies and housing delegate agencies to engage in more affirmative marketing strategies.
- Encourage the CHA to more aggressively market the Housing Choice Voucher and project-based voucher programs to landlords on the North Side and other low-poverty neighborhoods.
- Consider providing incentives for more landlords to participate in the Chicago Low-Income Housing Trust Fund, which provides rental housing to very-lowincome residents that earn up to 30 percent of area median income.

NEXT STEPS

Given the complexity of AIFHC implementation and outside factors influencing the City staff's workload, the City has identified several key recommended actions that will help establish a framework for full implementation, with an emphasis on key activities to be undertaken during the next one to two years. These recommendations include:

- Develop benchmarks for outreach and training
- Increase the public's understanding of fair housing and interaction with diverse groups
- Continue to preserve the stock of affordable and accessible housing
- Pursue City policies and procedures that encourage fair housing
- Continue to address the negative impacts that the housing crisis and recent recession have disproportionately had on members of protected classes

Section IX of the AIFHC discusses the priorities and proposed phasing for implementation of these recommendations.

SECTION I. INTRODUCTION

PURPOSE OF THE STUDY

As a recipient of federal funds from the U.S. Department of Housing and Urban Development (HUD), the City of Chicago is required to "affirmatively further fair housing." In recent months, HUD has placed increasing emphasis on this obligation and established a new format for what are now called Assessments of Fair Housing that provide a plan to achieve specific goals. This new reporting format will be required for the City of Chicago's next consolidated planning process. For the current 2015 to 2019 Consolidated Plan, the new rule does not yet apply. At the time that research was performed for this report, the definition of "affirmatively furthering fair housing" had not been codified; however, HUD had defined it through obligations of the funding recipients:

- 1. "Conduct an analysis to identify impediments to fair housing choice within the jurisdiction."
- 2. "Take appropriate actions to overcome the effects of any impediments identified through the analysis."
- 3. "Maintain records reflecting the analysis and actions taken in this regard."3

The City conducted a full written analysis of impediments to fair housing choice (AIFHC) in 2010 in conjunction with its Consolidated Plan. Although HUD requires the AIFHC, it is important to note that the City procured this analysis because it recognizes and appreciates the value of a diverse population. This diversity can only be maintained and expanded if all individuals have equal access to a broad range of housing in thriving communities. The City desires that through this analysis and implementation of its recommendations, individual residents, families, businesses, and all Chicago neighborhoods recognize the intrinsic value of diversity and that it makes the city more effective and competitive.

As is normal practice with AIFHC reports, this report focuses on providing City officials with an overview of the population and some trends affecting housing availability in Chicago. It also provides information that will help City officials to understand existing impediments to fair housing choice and provides recommendations for overcoming the identified impediments.

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³ "Fair Housing Planning Guide," HUD.

WHO CONDUCTED THE STUDY

The City selected Applied Real Estate Analysis (AREA), Inc., to conduct an analysis of impediments to fair housing choice. AREA is a real estate research and public policy consulting firm located in Chicago, Illinois. The firm regularly conducts studies for local agencies as an independent third party. The project director and manager is Maxine V. Mitchell, CRE®, President of AREA, and the project associate is Heather D. Parish, Senior Consultant for AREA. Ms. Mitchell and Ms. Parish are the authors of the study. As a subcontractor to AREA, Valerie S. Kretchmer, President of Valerie S. Kretchmer Associates, Inc., assisted with some demographic and housing supply data collection.

METHODOLOGY

The primary data sources for demographics for this study were the 1990, 2000, and 2010 U.S. Decennial Census and American Community Survey (ACS) 2008–2012 five-year estimates. These are the most consistent data sources that provide information at a census-tract level. In some cases, the ACS 2013 one-year estimates were used if city-level data were acceptable. Consequently, the data may not match in all cases.

The researchers also relied on several reports and studies on fair housing and related topics, all of which are cited throughout the report. Finally, online surveys, conversations, and roundtables with residents, local fair housing advocates, and real estate professionals assisted in identifying challenges and potential solutions. AREA also interviewed staff in City agencies whose work influences the City's efforts to affirmatively further fair housing.

ORGANIZATION OF THE STUDY

The study is organized into nine sections:

- I. Introduction.
- **II. Overview of the City of Chicago** provides contextual information on the city's community areas and the Fair Housing Ordinance.
- III. Demographic, Socioeconomic, and Market Conditions provides a detailed discussion of the population of each of the protected classes as well as discussions on the rental and for-sale housing markets in the city, employment, and transportation.
- **IV. Fair Housing Policies and Procedures** highlights the City's current policies related to fair housing, including the enforcement of the Fair Housing Ordinance by the Chicago Commission on Human Relations, along with roles and responsibilities of key stakeholders involved in furthering fair housing.
- V. Fair Housing Programs, Activities, and Outreach describes steps currently being taken by the City and other organizations to further the goals of fair housing.
- **VI. Fair Housing Complaints** analyzes data on housing discrimination complaints submitted to the City, Chicago Housing Authority, State of Illinois, and HUD.
- VII. Fair Housing Surveys and Roundtables analyzes the results of web-based fair housing surveys and roundtables with residents and housing organizations as well as real estate professionals conducted by the research team.
- VIII. Findings/Identified Impediments and Recommended Actions lists and describes the identified impediments to fair housing choice as well as the recommended actions the City should take to overcome the impediments.
- **IX. Implementation** provides narrative on the timeline for implementing the various actions recommended for overcoming identified impediments. (Will provide after City review.)
- **Appendices** contain additional information and maps, detailed summaries of the fair housing survey responses, and responses from the public comment period.

ACKNOWLEDGEMENTS

The authors would like to thank the City of Chicago Office of Budget Management and the Chicago Commission on Human Relations for the data and assistance in developing this AIFHC. Additionally, discussions with the Chicago Department of Planning and Development, Chicago Department of Family and Support Services, Mayor's Office for People with Disabilities, Chicago Housing Authority, Chicago Area Fair Housing Alliance, Chicago Lawyers' Committee for Civil Rights Under Law, Lawyers' Committee for Better Housing, and representatives of the real estate industry were invaluable in developing the report. Reference to an organization within this study does not constitute an endorsement of the analysis or recommendations.

SECTION II. OVERVIEW OF THE CITY OF CHICAGO

Chicago, Illinois is located on the shore of Lake Michigan and surrounded by Cook County to the north, south, and west. According to the American Community Survey 1-year 2013 estimate, the city is home to approximately 2.7 million people, a slight increase from the approximately 2.6 million counted in the Decennial Census in 2010. The city is the most populous in the state and covers approximately 237 square miles.

As shown on the following map, the city is divided into 77 community areas, which were initially defined by the University of Chicago's Social Science Research Committee in the 1920s and continue to reflect important communities in the city. In addition, the city has more than one hundred neighborhoods. For purposes of this report, most analysis is provided for the city overall and its community areas.

The City of Chicago's first Fair Housing Ordinance was passed on September 11, 1963 and "declared it unlawful for real-estate brokers to discriminate on account of race, color, religion, national origin or ancestry in the sale, rental or financing of residential property. ..." Since that time, the ordinance has been revised multiple times. As part of the Chicago Human Rights Ordinance, the Fair Housing Ordinance was most recently updated on July 9, 2015. The ordinance's protected classes now include race, color, sex, gender identity, age, religion, disability, national origin, ancestry, sexual orientation, marital status, parental status, military discharge status, and source of income.

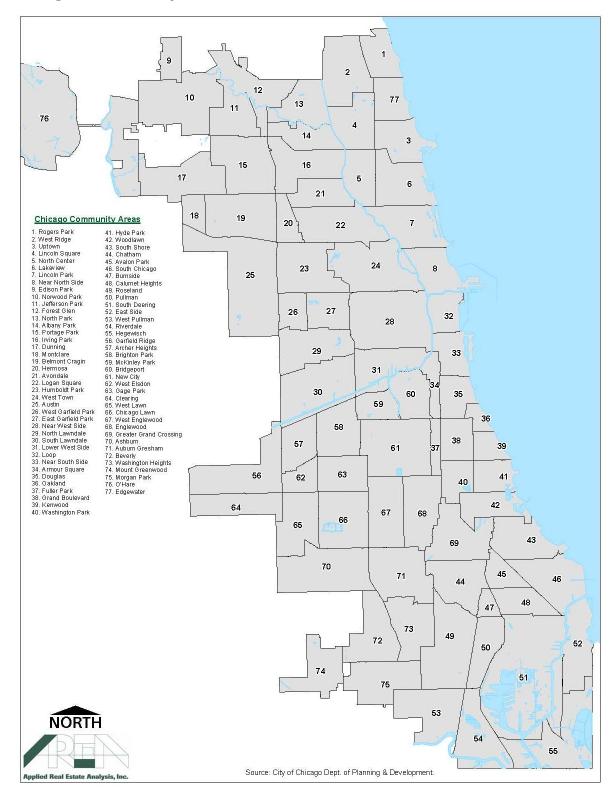
The City of Chicago Fair Housing Ordinance covers a larger number of protected classes than the Federal Fair Housing Act (42 USC § 3601), which only includes race, color, religion, national origin, sex, disability, and familial status. The Illinois Human Rights Act (775 ILCS 5/3-101) includes the protected classes of the Federal Fair Housing Act with the additional protected classes of ancestry, age, marital status, unfavorable military discharge, and sexual orientation.

http://www.leagle.com/decision/196756636III2d530_1509.xml/CHI.%20REAL%20ESTATE%20BD.%20v. %20CITY%20OF%20CHICAGO

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⁴ The Chicago Real Estate Board et al., Appellants, v. The City of Chicago et al., Appellees. Supreme Court of Illinois. Rehearing denied March 27, 1967.

Exhibit II-1.
Chicago's Community Areas



SECTION III. DEMOGRAPHIC, SOCIOECONOMIC, AND MARKET CONDITIONS

This section provides an overview of the demographic characteristics of Chicago and changes over time. The primary purposes of this section are to provide an understanding of the size and location of the protected classes in the city as well as trends in the size and location of the protected classes over time.

RESIDENT POPULATION

Chicago is the third-most-populous city in the United States. Located in northeastern Illinois, the city's 2010 population was 2,695,598 individuals. This is a 6.9 percent decrease in population from 2000, compared to a 4.0 percent increase that occurred between 1990 and 2000.

Exhibit III-	1.	
Chicago F	Population Since	1980
Year	Population	% Change
1980	3,005,072	NA
1990	2,783,726	-7.4%
2000	2,896,016	4.0%
2010	2,695,598	-6.9%
Sources: 1980,	1990, 2000 and 2010 Dec	ennial Census

POPULATION OF PROTECTED CLASSES

Using the 2010 U.S. Census, AREA identified the population of the protected classes within the city. This was compared with data from the 2000 U.S. Census to identify any changes in population.

Race and Color

The U.S. Census currently provides seven options for individuals to identify their race:

- White alone
- Black or African American alone
- American Indian and Alaska Native alone
- Asian alone
- Native Hawaiian and Other Pacific Islander alone
- Some other race alone
- Two or more races

These categories are separate from the Hispanic ethnic category. Individuals who identify themselves as Hispanic must also identify a race. In the remainder of this document, we have combined the "American Indian and Alaska Native alone" category with "Native Hawaiian and Other Pacific Islander alone" category, as they represent 0.5 percent of the population in the city.

Maps showing the concentrations of the various racial and ethnic groups are presented on the following pages.

Exhibit III-2.
Chicago White Population

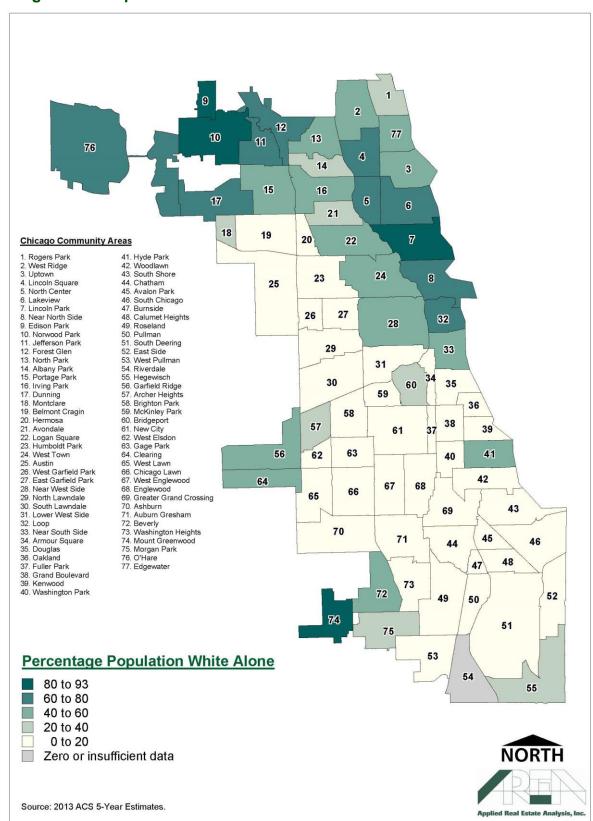


Exhibit III-3.
Chicago Black Population

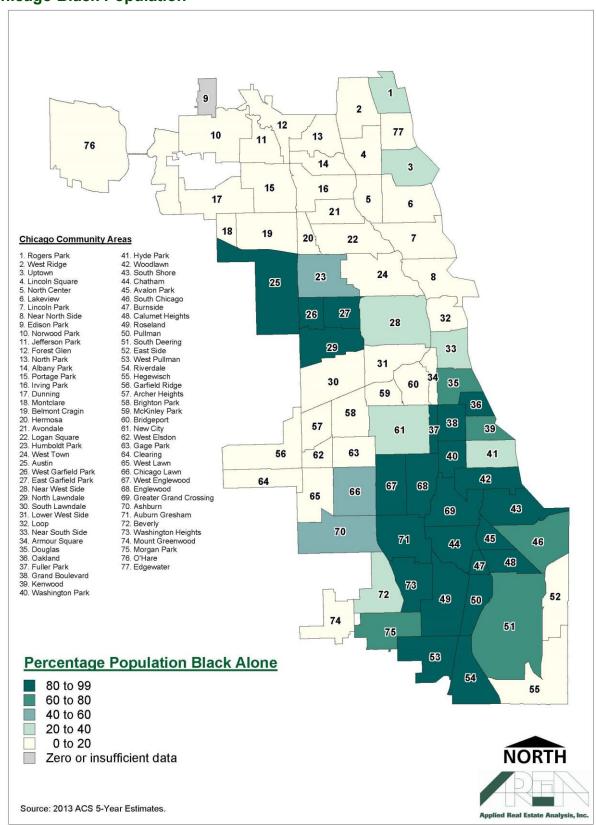


Exhibit III-4.
Chicago Hispanic Population

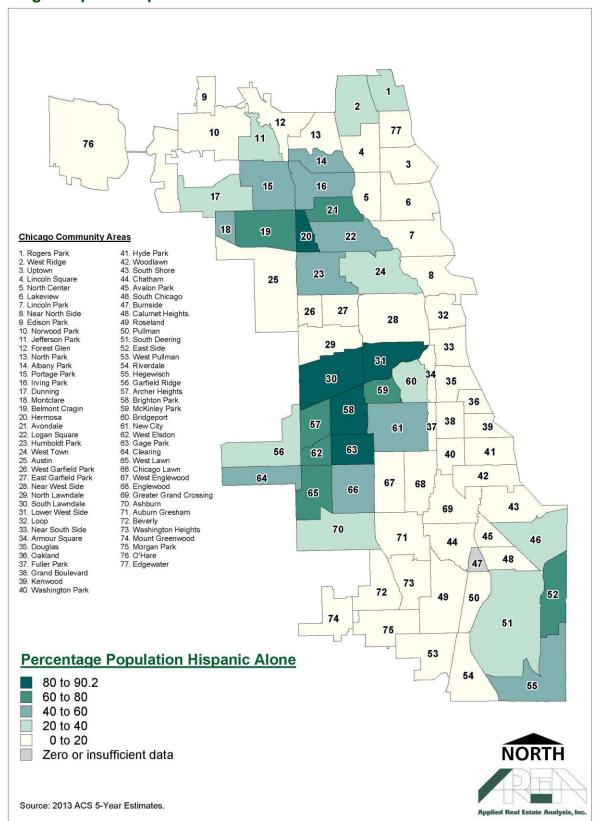


Exhibit III-5.
Chicago Asian Population

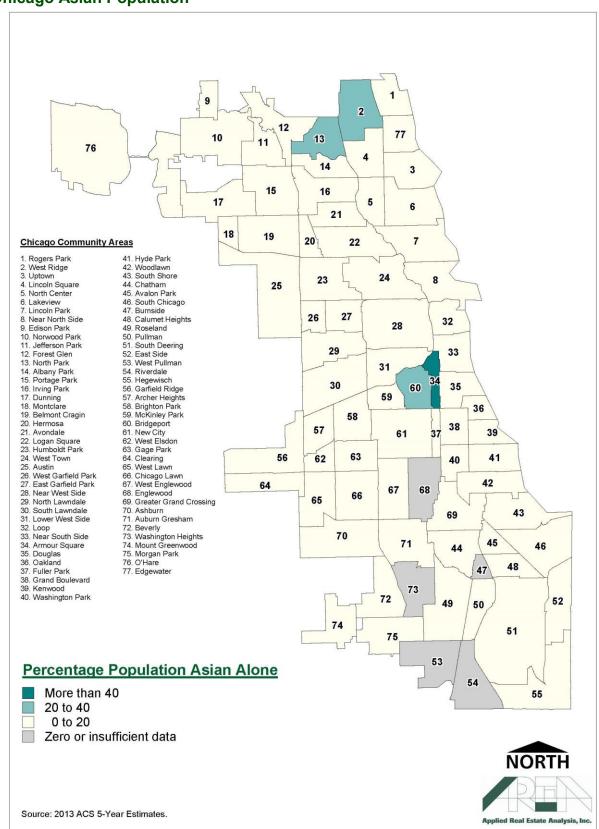


Exhibit III-6. Chicago American Indian, Alaska Native, Native Hawaiian, and Other Pacific Islander Population

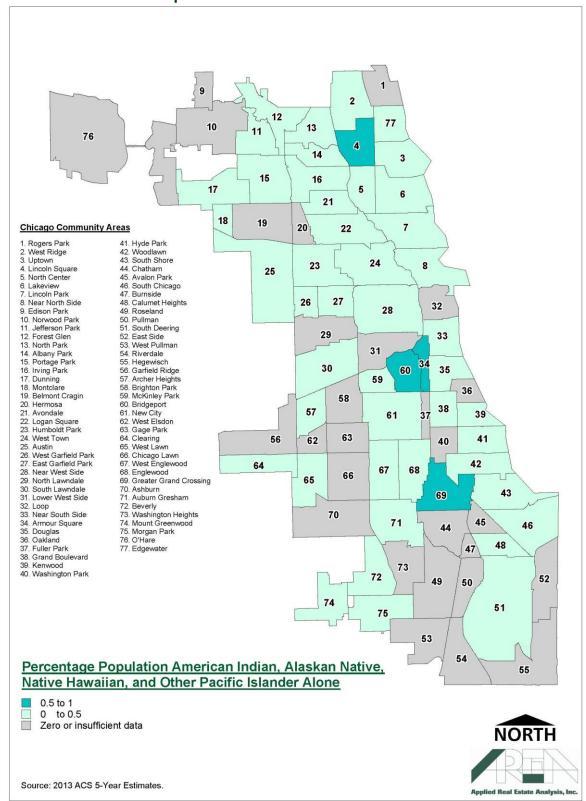


Exhibit III-7.
Race and Ethnicity of Individuals in Chicago

		1990		2000		2010
Race	Number	Percentage	Number	Percentage	Number	Percentage
White	1,263,524	45.4%	1,215,315	42.0%	1,212,835	45.0%
Black/African American	1,087,711	39.1%	1,065,009	36.8%	887,608	32.9%
Asian	102,938	3.7%	125,974	4.3%	147,164	5.5%
American Indian, Alaska Native, Native Hawaiian and Other Pacific Islander	8,244	0.3%	12,078	0.4%	14,350	0.5%
Some other race	321.309	11.5%	393.203	13.6%	360.493	13.4%
Two or more races	NA	NA	84,437	2.9%	73,148	2.7%
Total	2,783,726	100.0%	2,896,016	100.0%	2,695,598	100.0%
		1990		2000		2010
Ethnicity	Number	Percentage	Number	Percentage	Number	Percentage
Hispanic/Latino	545,852	19.6%	753,644	26.0%	778,862	28.9%
Not Hispanic/Latino	2,237,874	80.4%	2,142,372	74.0%	1,916,736	71.1%

 $\ensuremath{\mathsf{NA}}\xspace$: Category w as not available at the time.

Sources: 1990, 2000 and 2010 Decennial Census

As shown in Exhibit III-7, over the past two decades Chicago has seen increases in the population shares of Hispanics and Asians, a decrease in the share of African Americans, and stable White share. From 1990 to 2010, the number of White and Black/African Americans declined, while the number of individuals who are Hispanic, Asian, and American Indian, Alaska Native, Native Hawaiian, or Other Pacific Islander increased across the city.

The most significant increase occurred among those who self-identified as Hispanic. In 1990, Hispanics represented 19.6 percent of the city's population. By 2010, Hispanics represented 28.9 percent, due to a 43 percent increase in population. During this same time period, the number of White individuals decreased by 4 percent, and the number of Black/African Americans decreased by 18 percent.

Sex

As of 2010, 48.5 percent of the city population was male and 51.5 percent of the population was female. This ratio is similar to the national and state of Illinois ratio of males to females.

Age

Chicago residents are predominantly aged 54 and younger (80 percent). This percentage has remained the same since 1990. Near senior individuals (55 to 61 years of age) represent 7 percent of the population, and seniors (62 years of age and above) represent 13 percent.

An initial examination of the data appears to indicate that the age cohorts as a percentage of the population have remained relatively steady since 1990, with a 3 percentage point decline in the share under 18, a 3 percentage point increase in the share of those aged 18 to 54 years, a 1 percentage point increase in the share of those aged 55 to 61, and 1 percentage point decline in the share of those aged 62 to 74. The share of those over age 75 remained the same.

However, when the number of individuals within each of the age cohorts is examined, we see that the number of individuals increased in two cohorts and declined in the other three since 1990. Specifically:

- The number of residents aged 55 to 61 increased by 24 percent, the greatest of any age group.
- The number of residents aged 18 to 54 increased by 2 percent.
- The number of residents aged 17 and younger decreased by 14 percent.
- The number of residents aged 62 to 74 decreased by 16 percent.
- The number of residents aged 75 and above decreased by 8 percent.

In contrast, the total population of the city decreased by 3 percent since 1990. The largest percentage increase is among the "baby boom" — those born from 1946 to 1964. The number of people aged 75 and older is a smaller population group, as birth rates were lower during the Depression and World War II.

	bit III-8. of Individ	luals in Chi	cago									
•	0-1	17 years old	18-	54 years old	55	-61 years old	62-	74 years old	75 y	ears old and		Total
Year	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage
1990	722,704	26%	1,504,922	54%	157,843	6%	260,277	9%	137,980	5%	2,783,726	100%
2000	759,840	26%	1,620,684	56%	158,851	5%	217,753	8%	138,888	5%	2,896,016	100%
2010	621,630	23%	1,533,187	57%	196,165	7%	217,779	8%	126,837	5%	2,695,598	100%
Source	s: 1990, 2000	and 2010 Decenr	nial Census									

As the postwar "baby boom" generation ages, their housing preferences will shift. In 2011, the first members of this generation reached retirement age, and by 2029, all members will be at or above retirement age. As these seniors continue to age, they will begin to consider alternatives to their current housing options. The housing options available to seniors fall into two broad categories. Seniors can choose to remain in their existing homes or live in age-restricted housing. Many seniors choose to "age in place" — to remain in their existing single-family homes, apartments, or condominiums. For these seniors, in particular, it is important that their homes have accessibility features that enable them to safely live in their homes. To meet the needs of both those seniors who choose to age in place and those who select age-restricted housing, there will be an increased demand for accessible housing units.

Religion

Available data on the religious affiliation of individuals below the state level are limited. Though various organizations collect information on religion, the methodology varies widely, and many cannot be considered independent researchers. One source used in the 2012 Statistical Abstract of the United States is the American Religious Identification Survey (ARIS). ARIS 2008 provides the religious affiliation of residents at a state level. One drawback of the data is that non-Christian religions are combined into one category, "Other Religion."

Nonetheless, the data indicate that the religious makeup of Illinois is shifting from Catholicism and other Christian religions to no religious affiliation. This is consistent with a 2012 Gallup survey of the U.S., which shows that 77 percent of U.S. residents identify themselves as Christian, 1.7 percent as Jewish, 0.6 percent Muslim, 2.6 percent other non-Christian, and 15.6 percent no religious identity.

Disability

Nearly 11 percent of the Chicago population are persons with a disability and non-institutionalized. Of these individuals, 38 percent are aged 65 years and older, and 55 percent are aged 18 to 64. The population of persons with a disability as a percentage of the entire population has not changed significantly over the last three years. The U.S. Census Bureau changed the questions related to disability in 2008; therefore, comparison with prior years is not possible.

Exhibit III-9.									
Population with a Disability									
		2011		2012		2013			
	Number	Percent	Number	Percent	Number	Percent			
With a disability	297,279	11.1%	299,570	11.1%	292,332	10.9%			
Without a disability	2,387,603	88.9%	2,393,412	88.9%	2,401,164	89.1%			
Total	2,684,882	100.0%	2,692,982	100.0%	2,693,496	100.0%			
Sources: 2011, 2012, and 2013 American Community 1-year estimates									

The majority of the population of persons with a disability has difficulty walking or climbing stairs (ambulatory difficulty). The second-most-frequent disability is related to the ability to conduct independent activities of daily living (IADLs). IADLs include activities such as grocery shopping and housekeeping. Individuals may have more than one disability and are included in multiple categories in Exhibit III-10.

Exhibit III-10. Characteristics of the Disabled Population

	Number*	Percent
Total	292,332	100%
With an ambulatory difficulty	172,192	59%
With an independent living difficulty	115,787	40%
With a cognitive difficulty	108,657	37%
With a vision difficulty	63,306	22%
With a self-care difficulty	62,318	21%
With a hearing difficulty	58,996	20%

^{*} Individuals may have more than one disability, so they may be included in multiple categories.

Source: 2013 American Community Survey 1-year estimates

National Origin and Ancestry

The majority (79 percent) of Chicago residents were born in the United States or U.S. territories, according to the 1-year 2013 American Community Survey. Of the 21 percent of the population that is foreign born (572,928), the largest group was born in Latin American (55.5 percent), followed by Asia (22.7 percent), Europe (16.6 percent), Africa (4.2 percent), and Canada (0.8 percent).

The estimate of the non-U.S.-born residents is most likely low as undocumented individuals tend to not respond to Census surveys. A map showing concentrations of foreign-born populations is provided in Exhibit III-10.

Language

Sixty-two percent of the Chicago population five years of age and older speaks only English at home. The remaining 33 percent either do not speak English at all or speak it less than "very well," as defined by the U.S. Census. As noted in the following exhibit, the most commonly spoken non-English languages are Spanish (11 percent), Polish (1 percent) and Chinese (1 percent).

Exhibit III-11.

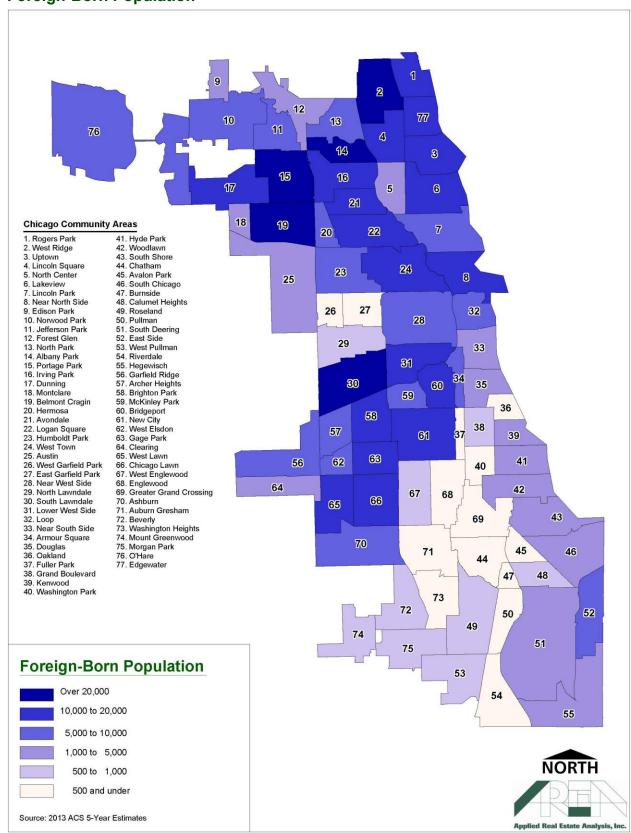
Language Spoken at Home (Population Age 5+)

		Number of Persons*
Total		2,524,106
Speaks only E	nglish	1,596,238
Speaks Anoth	er Language**	
	Spanish or Spanish Creole	272,780
	Polish	32,991
	Korean	4,241
	Russian	5,156
	Arabic	3,902
	Tagalog	6,970
	Gujarati	1,374
	Other Indo-European Languages	4,140
	Other Slavic Languages	4,337
	Other Asian Languages	4,991
	Italian	2,444
	Chinese	32,163
	Urdu	2,484
	Greek	2,068
	Serbo-Croatian	6,609
	Other Languages	3,421

^{*}Five Years of Age and Older

^{**} This includes households who speak English less then "very well." Source: 2012 American Community Survey 1-Year Estimates

Exhibit III-12. Foreign-Born Population



The U. S. Census provides 72 options to identify ancestry. The first ancestry reported by 1.9 million residents was "Other Groups" (not listed by the Census). This group was followed by Polish, German, and Irish.

Exhibit III.13									
Reported Ancestry of Chicago Residents									
First Ancestry Reported Number P									
Other groups (not listed)	1,929,407	71.4%							
Polish	134,032	5.0%							
German	120,328	4.5%							
Irish	137,799	5.1%							
Italian	77,967	2.9%							
Unclassified or not reported	152,901	5.7%							
English	36,145	1.3%							
American	37,118	1.4%							
Greek	15,129	0.6%							
Russian	19,771	0.7%							
Swedish	15,151	0.6%							
Arab	17,598	0.7%							
Dutch	9,125	0.3%							
Source: 2008-2012 American Communit	ty Survey 5-year estima	ates							

Sexual Orientation

Reliable data are limited on the sexual orientation of individuals. One method to assist in identifying the population of lesbian, gay, bisexual, and transgendered (LGBT) individuals is reviewing the issuance of civil union licenses. In June 2011, Cook County began issuing civil union licenses to same-sex and heterosexual couples. In 2012, the most recent year for which data are available, the County issued 2,099 licenses for civil unions. Data on licenses for the City of Chicago are not available. The County estimates that 95 percent of civil union licenses were issued to same-sex couples.

The 2010 Census was the first to ask whether a same-sex household was living together as unmarried partners or spouses. During data processing, same-sex unmarried partners or spouses were combined. As of 2010, an estimated 11,715 same-sex couples live in Chicago, representing 1 percent of all households.

Exhibit III-14.			
Same Sex Couples			
Gender of Couple	Total	With Children	Without Children
Female	4,424	1,373	3,051
Male	7,291	816	6,475
Total	11,715	2,189	9,526
Source: 2010 Decennial Census			

In 2012, the Williams Institute in association with Gallup began collecting survey data for adults regarding whether they identify themselves as lesbian, gay, bisexual, or transgender. This information is available by state and for large metropolitan areas, including the Chicago metropolitan area. According to the survey, for the 2012 to 2014 Gallup daily survey period, 3.8 percent of the metro area's population identified themselves as LGBT.⁵ According to the Williams Institute analysis of that survey, the Chicago area ranks 32 among the 47 large Metropolitan Statistical Areas. Data are not available for the city of Chicago.6

Marital Status

Fifty-two percent of city residents are or have been married at some point. This includes those who are currently married (38 percent), widowed (6 percent), and divorced (9 percent). A review of the data on household type shows a few interesting facts. African American households are disproportionately composed of female-headed families. Although this household type represents 17 percent of all households independent of race, it represents 33 percent of African American households. In contrast, Hispanic and Asian households are disproportionately composed of married-couple families at 47 percent and 43 percent, respectively, compared to 33 percent of all households regardless of race and ethnicity.

Exhibit III-15.					
Familial Status					
Household Type	All Households	White	Black	Asian	Hispanic
Married-Couple Family	33%	37%	19%	43%	47%
Male Householder, No Wife Present	5%	4%	6%	4%	11%
Female Householder, No Husband Present	17%	8%	33%	8%	18%
Householder Living Alone	36%	39%	37%	35%	18%
Householder Not Living Alone	9%	11%	4%	10%	6%
All Households	100%	100%	100%	100%	100%
Source: 2008-2012 American Community Survey 5-y	ear estimates				

percentage.aspx?utm_source=Social%20Issues&utm_medium=newsfeed&utm_campaign=tiles

⁵ Newport, Frank and Gates, Gary J., "San Francisco Metro Area Ranks Highest in LGBT Percentage," Social Issues, March 20, 2015.

http://www.gallup.com/poll/182051/san-francisco-metro-area-ranks-highest-lgbt-

The Williams Institute omitted three metropolitan areas included in the U.S. Census definition of the 50 largest Metropolitan Statistical Areas and were included in the 2012 to 2014 Gallup survey: San Jose and Riverside, California; and Baltimore, Maryland. These MSAs were omitted because data for them were not available for a comparison of similar data for 1990. Gates, Gary J., "Comparing LGBT Rankings by Metro Area: 1990 to 2014," March 2015.

http://williamsinstitute.law.ucla.edu/wp-content/uploads/Comparing-LGBT-Rankings-by-Metro-Area-1990-2014.pdf

Military Discharge Status

According to the 1-year 2013 American Community Survey, there are an estimated 83,354 veterans in Chicago. Almost 13 percent of these veterans have a service-related disability.

Income

As shown in the exhibits on the following pages, minorities tend to make up a higher percentage of households at the lower end (\$19,999 or less) of the income range and lower percentage of households at the higher end of the income range. Despite the fact that non-Whites are 48 percent of all households, they make up 74 percent of the households at the lower end of the income range. Hispanics of any race make up 20 percent of the city's households but account for 18 percent of the households with incomes under \$20,000. The percentage gap among White and non-White households increases for all income groups over \$20,000.

Whereas 48 percent of all households in the city have incomes over \$50,000, 59 percent of Whites have incomes at this level. In comparison, 32 percent of Black and 41 percent of Hispanic households have incomes over \$50,000.

Exhibit III-16. Number of Households in Income Range

		Less than	\$10,000 to	\$15,000 to	\$20,000 to	\$25,000 to	\$30,000 to	\$35,000 to	\$40,000 to
Race/Ethnicity	Total	\$10,000	\$14,999	\$19,999	\$24,999	\$29,999	\$34,999	\$39,999	\$44,999
White	536,990	37,012	23,964	24,979	25,129	24,390	23,928	22,318	23,587
Black/African American	329,756	61,361	29,579	27,001	23,877	20,672	18,121	16,411	14,057
Asian	58,827	7,247	2,979	2,350	2,752	2,489	2,327	2,043	2,234
Native Hawaiian or Other	312	10	-	8	24	-	-	-	-
Pacific Islander									
American Indian/Alaskan	3,023	461	177	204	73	268	92	178	119
Native									
Other	86,419	6,676	5,240	5,802	5,776	6,167	5,836	5,670	5,713
Two or More	14,749	1,913	882	1,167	546	777	718	569	723
Total	1,030,076	114,680	62,821	61,511	58,177	54,763	51,022	47,189	46,433
Ethnicity									
Hispanic/Latino	206,150	16,755	12,490	14,372	13,862	14,394	14,061	13,195	12,254
Source: 2008-2012 American Co	ommunity Survey	/ 5-year estimat	es						

Exhibit III-16.
Number of Households in Income Range (Continued)

		\$45,000 to	\$50,000 to	\$60,000 to	\$75,000 to	\$100,000 to	\$125,000 to	\$150,000 to	\$200,000 or
Race/Ethnicity	Total	\$49,999	\$59,999	\$74,999	\$99,999	\$124,999	\$149,999	\$199,999	more
White	536,990	18,530	40,786	52,478	66,076	46,804	28,374	35,162	43,473
Black/African American	329,756	12,694	22,804	24,905	26,996	14,194	7,039	6,177	3,868
Asian	58,827	2,198	3,590	6,118	7,272	5,239	2,975	3,362	3,652
Native Hawaiian or Other	312	-	53	30	57	94	-	22	14
Pacific Islander									
American Indian/Alaskan	3,023	170	173	370	347	112	101	129	49
Native									
Other	86,419	4,912	7,309	9,459	9,472	4,289	2,207	1,438	453
Two or More	14,749	550	1,412	1,128	1,523	1,163	647	699	332
Total	1,030,076	39,054	76,127	94,488	111,743	71,895	41,343	46,989	51,841
Ethnicity									
Hispanic/Latino	206,150	10,353	18,217	20,890	21,804	10,936	5,883	4,501	2,183
Source: 2008-2012 American C	ommunity Surve	/ 5-year estimat	es						

Exhibit III-17. Percentage of Households in Income Range as Percentage of All Households Less than \$10,000 to \$15,000 to \$20,000 to \$25,000 to \$30,000 to \$35,000 to \$40,000 to Race/Ethnicity Total \$10,000 \$14,999 \$19,999 \$24,999 \$29,999 \$34,999 \$39,999 \$44,999 52% White 32% 38% 41% 43% 45% 47% 47% 51% 47% 44% 38% Black/African American 32% 54% 41% 36% 35% 30% Asian 6% 6% 5% 4% 5% 5% 5% 4% 5% Native Hawaiian or Other 0% 0% 0% 0% 0% 0% 0% 0% 0% Pacific Islander American Indian/Alaskan 0% 0% 0% 0% 0% 0% 0% 0% 0% Native Other 8% 6% 8% 9% 10% 11% 11% 12% 12% Two or More 2% 1% 2% 1% 1% 1% 1% 1% 2% Total 100% 100% 100% 100% 100% 100% 100% 100% 100% Ethnicity 26% 20% 15% 20% 23% 24% 26% 28% 28% Hispanic/Latino

Source: 2008-2012 American Community Survey 5-year estimates

		\$45,000 to	\$50,000 to	\$60,000 to	\$75,000 to	\$100,000 to	\$125,000 to	\$150,000 to	\$200,000 o
Race/Ethnicity	Total	\$49,999	\$59,999	\$74,999	\$99,999	\$124,999	\$149,999	\$199,999	more
White	52%	47%	54%	56%	59%	65%	69%	75%	84%
Black/African American	32%	33%	30%	26%	24%	20%	17%	13%	7%
Asian	6%	6%	5%	6%	7%	7%	7%	7%	7%
Native Hawaiian or Other Pacific Islander	0%	0%	0%	0%	0%	0%	0%	0%	0%
American Indian/Alaskan Native	0%	0%	0%	0%	0%	0%	0%	0%	0%
Other	8%	13%	10%	10%	8%	6%	5%	3%	19
Two or More	1%	1%	2%	1%	1%	2%	2%	1%	19
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%
Ethnicity									
Hispanic/Latino	20%	27%	24%	22%	20%	15%	14%	10%	4%

		Less than	\$10,000 to	\$15,000 to	\$20,000 to	\$25,000 to	\$30,000 to	\$35,000 to	\$40,000 to
Race/Ethnicity	Total	\$10,000	\$14,999	\$19,999	\$24,999	\$29,999	\$34,999	\$39,999	\$44,999
White	100%	7%	4%	5%	5%	5%	4%	4%	4%
Black/African American	100%	19%	9%	8%	7%	6%	5%	5%	4%
Asian	100%	12%	5%	4%	5%	4%	4%	3%	4%
Native Hawaiian or Other	100%	3%	0%	3%	8%	0%	0%	0%	0%
Pacific Islander									
American Indian/Alaskan	100%	15%	6%	7%	2%	9%	3%	6%	4%
Native									
Other	100%	8%	6%	7%	7%	7%	7%	7%	7%
Two or More	100%	13%	6%	8%	4%	5%	5%	4%	5%
Total	100%	11%	6%	6%	6%	5%	5%	5%	5%
Ethnicity									
Hispanic/Latino	100%	8%	6%	7%	7%	7%	7%	6%	6%

Exhibit III-18.									
Percentage of Househ	olds in In	come Ran	ge as Pero	centage of	Househol	ds within F	Race/Ethnic	city (Conti	nued)
		\$45,000 to	\$50,000 to	\$60,000 to	\$75,000 to	\$100,000 to	\$125,000 to	\$150,000 to	\$200,000 or
Race/Ethnicity	Total	\$49,999	\$59,999	\$74,999	\$99,999	\$124,999	\$149,999	\$199,999	more
White	100%	3%	8%	10%	12%	9%	5%	7%	8%
Black/African American	100%	4%	7%	8%	8%	4%	2%	2%	1%
Asian	100%	4%	6%	10%	12%	9%	5%	6%	6%
Native Hawaiian or Other	100%	0%	17%	10%	18%	30%	0%	7%	4%
Pacific Islander									
American Indian/Alaskan	100%	6%	6%	12%	11%	4%	3%	4%	2%
Native									
Other	100%	6%	8%	11%	11%	5%	3%	2%	1%
Two or More	100%	4%	10%	8%	10%	8%	4%	5%	2%
Total	100%	4%	7%	9%	11%	7%	4%	5%	5%
Ethnicity									
Hispanic/Latino	100%	5%	9%	10%	11%	5%	3%	2%	1%
Source: 2008-2012 American Comr	nunity Survey	5-year estimates	3						

The recent economic recession, crash of the housing market, and high levels of unemployment have resulted in a significant decrease in the economic status of all households, in particular minority households. Although minority households have had a higher rate of poverty for several decades, this rate has increased with the weak economy. In Chicago, 22 percent of all households are below the poverty level. The rate for White and Asian households is 15 and 18 percent, respectively. However, the rate for Hispanic households is 23 percent, and the rate for African American households is even higher at 33 percent — more than double that of White households.

Exhibit III-19. Poverty Status									
	All	White	Black	Asian	Hispanic/Latino				
At or above poverty level	78%	85%	67%	82%	77%				
Below poverty level	22%	15%	33%	18%	23%				
Total	100%	100%	100%	100%	100%				
Source: 2008-2012 American	Source: 2008-2012 American Community Survey 5-year estimates								

Of equal concern is that independent of race or ethnicity, most of the households below the poverty level are not dispersed across the city. As shown on the following map, the concentrations of poverty (defined here as a census tract where 30 percent or more of the households have incomes below the poverty line⁷) are located primarily in the south and west sides of the city. Though there are concentrations in the northern portion of the city, it is not at the same rate as the other two areas. A pattern begins to emerge that shows:

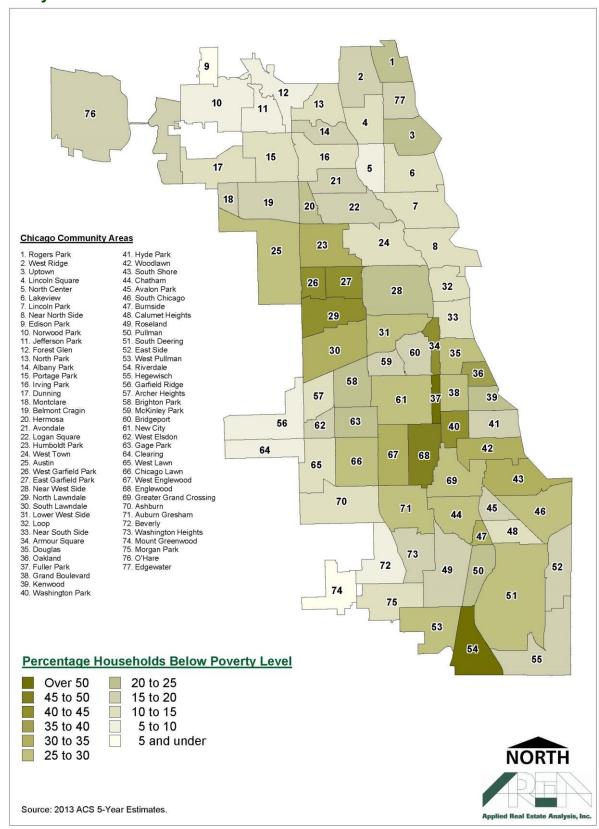
- Minority households below the poverty line are concentrated in small geographic areas that tend to have a higher rate of poverty and lower rate of diversity.
- Primarily minority communities tend to have higher rates of poverty.

below the poverty level.

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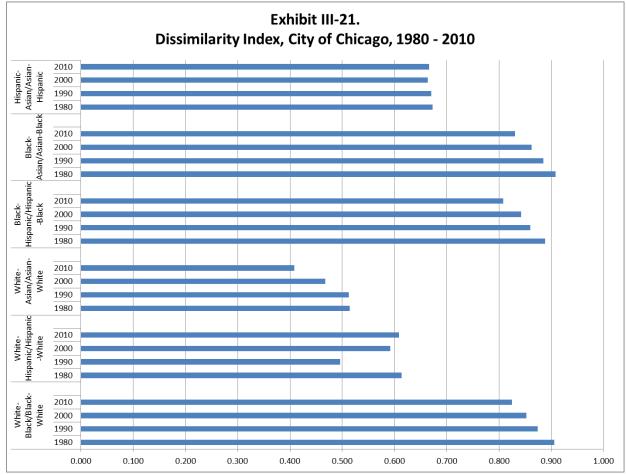
⁷ The definition of what constitutes concentrated poverty in specific geographic areas varies in the literature for fair housing–related research but is often related to the average poverty rate for a broad geographic area. In contrast, public agencies, including the Chicago Housing Authority, often define "opportunity areas," which are considered to have low concentrations of poverty, as areas with less than 20 percent of all households or residents with incomes below the poverty level. Definitions of concentrated poverty usually start at 25 percent to 30 percent of all households or residents with incomes

Exhibit III-20. Poverty Concentration



DISSIMILARITY ANALYSIS OF SEGREGATION

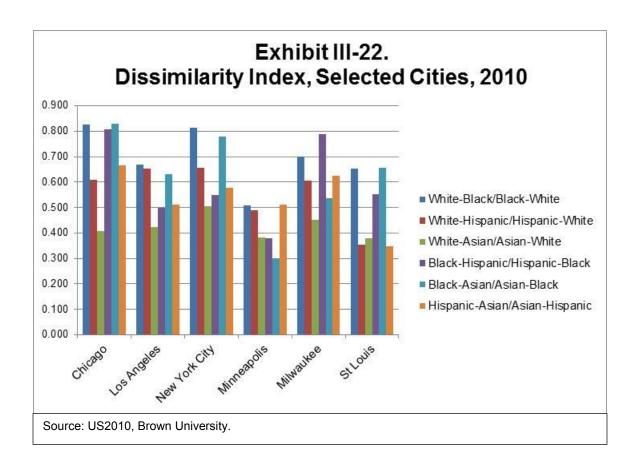
As discussed in the executive summary, racial segregation is not a new phenomenon in Chicago but is the result of many factors, including housing policies and programs at the federal level as well as demographic, socioeconomic, and housing market conditions and trends at the local level. One measure of the extent of separation or integration of groups is known as the dissimilarity index. According to analysis funded by the Russell Sage Foundation and compiled by Brown University, in 2010 the city of Chicago's dissimilarity index for the White and African American population groups was 87.4, which means that 87.4 percent of Whites in the city would need to move to another neighborhood to make Whites and African Americans evenly distributed across all neighborhoods. Chicago's dissimilarity index for White versus Asian populations was only 40.8, indicating that a much smaller percentage of the White population would have to move to achieve even distribution of White versus Asian population groups across all neighborhoods. Generally, a value of 60 or higher is considered very high, 40 to 50 is considered a moderate level of segregation, and 30 or lower is considered fairly low.



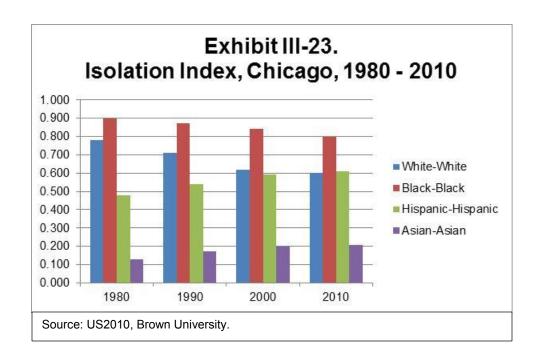
Source: US2010, Brown University.

8US2010, Brown University http://www.s4.brown.edu/us2010/segregation2010/?msa=16974

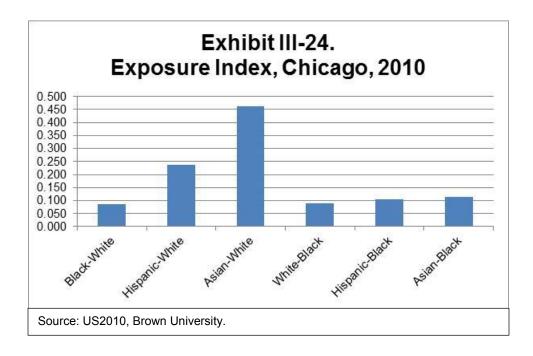
As shown in the following chart, other Midwest cities, including Minneapolis, Milwaukee, and St. Louis, appear to be somewhat less segregated than Chicago in terms of White/African American segregation. Among selected major cities, New York City is similar to Chicago in terms of White/African American segregation; however, Los Angeles has lower segregation indexes than Chicago for most population group comparisons except White/Asian.



Another measure of segregation is the isolation index, which is the percentage of same-group population in a geographic area. The isolation index for the African American population in Chicago in 2010 was 89.9 and 77.8 for the White population. The isolation index for both the White and African American populations in Chicago has been declining over time. In contrast, the isolation index for Asians was 20.9 in 2010; however, the index has been increasing slightly for this group as well as for Hispanics.



The index that measures exposure to other groups has a higher value for groups that live in a geographic area with a higher percentage of persons from the comparison group. In Chicago in 2010, the Asian population had the greatest exposure to the city's White population (46.2), while the White population had the lowest index when compared to the city's African American population (9.0).



Housing Status

Hispanic/Latino

The city has a homeownership rate that is much lower than that of Cook County and the national average. The data show that the homeownership rate is 46 percent citywide.

Exhibit III-25.											
Occupancy by Tenure: 2012											
		Total		Owner		Renter					
	Number	Percent	Number	Percent	Number	Percent					
All Housing Units	1,030,076	100.0%	474,602	46.1%	555,474	53.9%					
White	536,990	100.0%	286,571	53.4%	250,419	46.6%					
Black/African American	329,756	100.0%	117,820	35.7%	211,936	64.3%					
Asian	58,827	100.0%	25,934	44.1%	32,893	55.9%					

91,075

44.2%

115,075

55.8%

206,150 100.0%

Sources: 2008-2012 American Community Survey 5-year estimates

What is important to keep in mind in reviewing the exhibit above is that the data cover a five-year period, the majority of which included the downturn in the housing market. Prior to the period covered by the 2008–2012 American Community Survey, home purchase lending requirements were looser, resulting in more homeowners. The recession resulted in a 3 percent decline in the number of occupied housing units as people moved in with roommates or family to make ends meet. The decline affected renters (who have greater mobility) more than owners. The for-sale market started to improve in 2013, so it is likely that the homeownership rate will start to increase in 2014.

The rate of homeownership in the city increased by 1.1 percentage points between 2000 and 2010 for all households. However, while the rate among Whites, Asians, and Hispanics increased between 1.9 and 7.7 percentage points, the rate for African Americans declined by 1.5 percentage points. As discussed in subsequent sections of this chapter, the foreclosure crisis has affected almost every community, in particular those with lower incomes and higher percentages of minorities.

Exhibit III-26.
Change in Occupancy by Tenure

			Total			Owner			Renter
	2000	2012	Change	2000	2012	Change	2000	2012	Change
All Housing Units	1,061,928	1,030,076	-3.0%	464,865	474,602	2.1%	597,063	555,474	-7.0%
White	526,171	536,990	2.1%	265,550	286,571	7.9%	260,621	250,419	-3.9%
Black/African	363,480	329,756	-9.3%	134,378	117,820	-12.3%	229,102	211,936	-7.5%
American									
Asian	44,787	58,827	31.3%	16,392	25,934	58.2%	28,395	32,893	15.8%
Hispanic/Latino	190,886	206,150	8.0%	75,780	91,075	20.2%	115,106	115,075	0.0%
Sources: 2000 Decennia	l Census, 2012 A	merican Comm	unity Survey	5-year estim	ates				

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LAND USE, ZONING, AND OTHER REGULATIONS

Zoning and land use regulations that affect fair housing issues include the range of permitted housing types and densities. As shown in the following exhibit, the City of Chicago's Zoning Ordinance for Residential Districts allows for a variety of housing types, ranging from single-family homes to high-rise multifamily developments.

We have focused on residential districts as opposed to downtown, commercial, and other districts that permit residential uses, because in some communities located across the country residential districts restrict uses that are important for providing fair housing choice to some protected classes, especially persons with disabilities.

The following table shows key residential zoning categories and residence types. Appendix I, Exhibit 1, provides more detailed information about zoning requirements.

Exhibit III-27. City of Chicago Zoning Ordinance, Residential Districts							
DISTRICT RESIDENCE TYPE	ZONING CATEGORY						
Single Family	RS1 RS2 RS3						
Two-Flat, Townhouse, Multi-Unit	RT3.5 RT4 RT4A						
Multi-Unit	RMS RM5 RM5.5 RM6 RM6.5						
Source: City of Chicago Zoning Ordinance.	1						

Group living facilities, which include elderly custodial care, skilled nursing care, transitional residences and shelters, temporary overnight shelters, and facilities for persons with mental illness and/or drug and alcohol addictions, are permitted in residential districts. Some facilities, however, are not permitted by right and require special approval. As shown in Exhibit III-28, additional notification to the public and administrative procedures as well as additional fees are required for some uses. The City's zoning requirements do not unduly restrict various types of group living and transitional facilities.

Exhibit III-28 Chicago Zoning Ordinance: Allowed Uses-Residential Districts Use Category RS RS RS RT RT RM RMRMSpecific Use Type 1 2 3.5 4 6-6.5 3 4.5 5-5.5 P= permitted by-right S = special use approval required - = Not allowed **Group Living** 1 Assist. Living (Elderly Ρ Ρ Ρ Р Custodial Care) 2 Convents and Ρ Ρ Ρ Ρ Ρ Ρ Ρ Monasteries 3 Community Home, Ρ Р Р Р Ρ Family Community Home, Р Р Р S S Р S S Group 5 Domestic Violence Р S S Ρ Ρ Р Ρ S Residence, Family Domestic Violence S S Ρ Ρ Residence, Group 7 Domestic Violence S S S S Shelter 8 Nursing Home (Skilled S S S S Nursing Care) Temporary Overnight S S S S S S Shelter 11 Transitional Residences S S S S S S S S 12 Transitional Shelters S S S S S S Group Living Not S S S S

Source: City of Chicago Zoning Ordinance.

Otherwise Classified

In recent years, the City of Chicago has also passed ordinances to encourage residential development, especially affordable housing and transit-oriented development (TOD). In 2015 the City revised the Affordable Requirements Ordinance (ARO), which was created in 2003 and revised in 2007 to create affordable units in private market-rate residential developments. The ARO requires that residential developments that receive City financial assistance or involve City-owned land provide a percentage of units at affordable prices. The ARO applies to developments of 10 or more units and requires that at least 10 percent of the units are affordable by households within specific income limits. The ordinance also applies if a zoning change is granted, which increases a

development's density or allows a residential use not previously permitted, or if a development is a "planned development" within the downtown area.

The definition of affordable for-sale units specifies that units must be affordable by households with incomes at or below 100 percent of the Area Median Income (AMI) as defined by HUD. Rental units must be affordable by households with incomes up to 60 percent of AMI. The units designated as affordable also have restrictions, which require that they remain affordable over time.

Developers can also pay a fee instead of including affordable units. In March 2015, the City Council passed a change that will be phased in over time. The new requirements will increase the fees required that developers must pay in lieu of providing affordable units if they develop units in high-income census tracts and will lower the required fee payments for developments in low- to moderate-income tracts. The changes are expected to increase the number of affordable units in the city.

The ARO, however, only addresses developments that receive City financial assistance, involve City-owned land, or receive a zoning increase. According to *Planning Chicago* by D. Bradford Hunt and Jon B. DeVries, when the City's zoning code was updated in 2004, local affordable housing advocates encouraged the use of "inclusionary zoning," which generally requires affordable housing in all new developments. However, the effort to establish an inclusionary zoning ordinance was not successful.⁹

In 2013, the City also increased incentives for transit-oriented development near transit stations. TOD housing can increase affordable housing options by reducing transportation costs for households living in TOD developments. Chicago's ordinance also reduces housing development costs in the form of reduced parking requirements, which can result in lower housing costs. When the changes were approved, affordable housing advocates in the city applauded the changes as a way to reduce housing development costs in low- and moderate-income communities, for example. However, advocates recommended additional changes, which resulted in further proposed revisions to the TOD ordinance that were introduced in July 2015, including expansion of the size of TOD zones, elimination of parking requirements in these areas, and additional affordable housing incentives.

The City of Chicago has also passed ordinances to preserve market-rate as well as federally assisted rental housing that offers affordable housing options. For federally assisted housing, the City requires that owners notify the City at least 12 months prior to any changes in the ownership or financial structure of the property that might affect affordable use restrictions on the property.

Similarly, because market-rate, single room occupancy (SRO) housing provides an affordable option for many individuals, the City is concerned about their conversion to

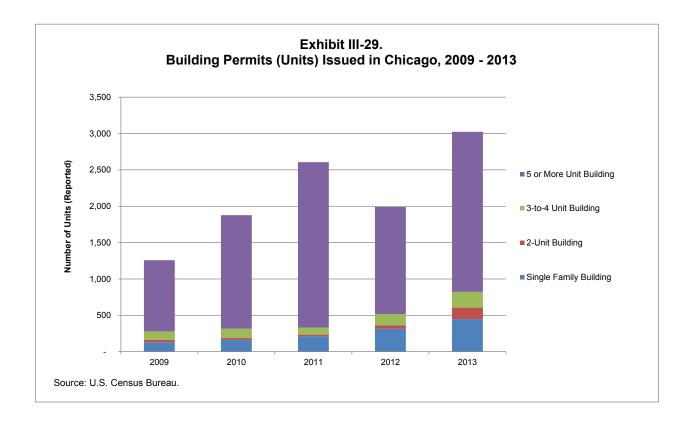
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⁹ Hunt, Bradford D., and DeVries, Jon B., *Planning Chicago*, American Planning Association, 2013, page 258.

other uses. SRO properties are defined as buildings containing five or more single-room occupancy units and in which at least 90 percent of the units are SRO units. In December 2014 the City passed the SRO Preservation Ordinance, which requires notification to current residents of an SRO property that is being listed for sale, requires notification to the Chicago Department of Law and Department of Planning and Development, and provides information to affordable housing development organizations to give them an opportunity to consider a preservation investment.

BUILDING PERMITS

From 2009 through 2013, building permits were issued for 10,755 units in Chicago. As shown in Exhibit III-29, the number of units for which permits were issued increased between 2009 and 2011, decreased in 2012, and increased again in 2013. The decline between 2011 and 2012 is most likely due to more cautious lending to developers of large multifamily buildings (primarily rental apartments). Fearful of a short-term glut of downtown apartments, lenders held back. As the new apartments leased up, large apartment projects moved forward in 2013. As such, the one-year decline between 2011 and 2012 is viewed as a temporary market correction rather than a trend.



Between 2009 and 2013, the number of permits for all residential building types increased by 141 percent. The largest increase occurred in the larger multifamily

buildings. Permits issued for five-or-more-unit buildings increased by 125 percent, and permits issued for single-family units increased by 247 percent. The significant increase in construction of large multifamily apartments was concentrated downtown and the adjoining neighborhoods and was primarily luxury buildings.

As shown in Exhibit III-30, 26 percent of all households in Chicago live in single-family detached homes. African American and Hispanic households have a slightly higher single-family share than White households. Hispanic households are far more likely to live in two- to four-unit buildings than any other ethnic group. Higher percentages of Asian and White households live in larger buildings with 20 or more units than African American and Hispanic households.

		Total		White	•	Black		Asian	Hispan	ic/Latino
Units in Structure	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percen
1 Detached	306,706	25.6%	146,436	27.3%	98,077	29.7%	9,410	16.0%	61,185	29.7%
1 Attached	42,714	3.6%	17,868	3.3%	15,076	4.6%	3,059	5.2%	4,465	2.2%
2 to 4 Units	378,107	31.6%	142,922	26.6%	101,573	30.8%	12,607	21.4%	97,823	47.5%
5 to 9 Units	129,446	10.8%	57,549	10.7%	35,965	10.9%	5,752	9.8%	17,726	8.6%
10 to 19 Units	53,588	4.5%	26,698	5.0%	13,744	4.2%	2,613	4.4%	6,937	3.4%
20 to 49 Units	73,365	6.1%	37,588	7.0%	18,956	5.7%	4,625	7.9%	6,456	3.1%
50 or More	210,456	17.6%	106,434	19.8%	45,755	13.9%	20,708	35.2%	10,794	5.2%
Mobile Home	2,287	0.2%	1,201	0.2%	347	0.1%	31	0.1%	664	0.3%
Boat, RV, Van, Etc.	579	0.0%	294	0.1%	263	0.1%	22	0.0%	100	0.0%
Total	1,197,248	100.0%	536,990	100.0%	329,756	100.0%	58,827	100.0%	206,150	100.0%

Subsidized Housing Stock

As shown in the following map, the city of Chicago has a substantial supply of assisted housing. Unfortunately, much of this housing is located in a small number of neighborhoods on the South Side and West Side of the city and in a few community areas on the North Side, especially Uptown. In part because of this concentration of assisted housing units, the community areas in which the properties are located have substantial numbers of households below the poverty level.

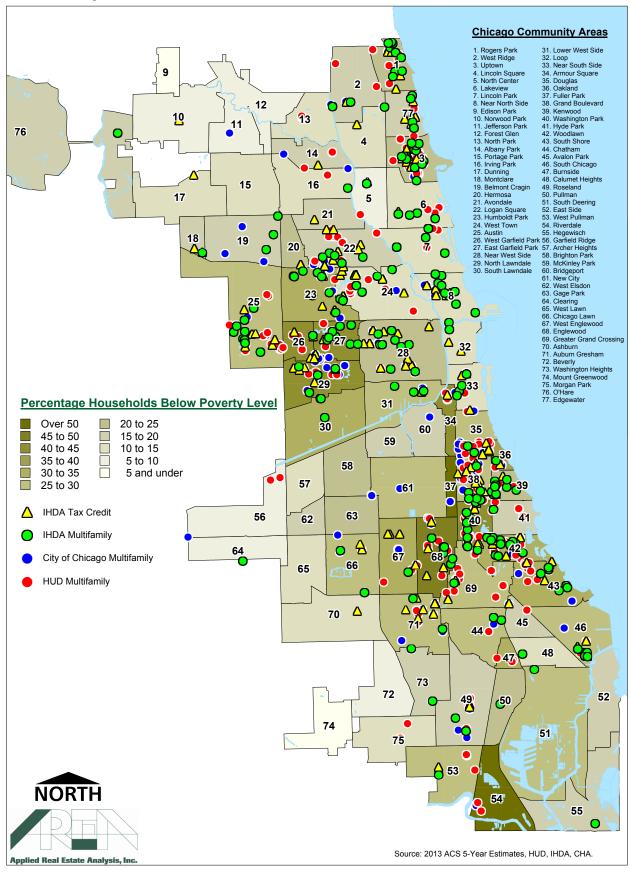
For many years, some new affordable housing development programs focused mainly on low-income neighborhoods that had suffered from disinvestment with the hope that new residential construction would not only provide attractive housing options for low-and moderate-income households but also spur other neighborhood investment. For example, over the years the Low-Income Housing Tax Credit (LIHTC) program has encouraged development in difficult development areas, which are defined as census tracts with high poverty levels. The program offers enhanced tax credits for projects in these areas. As a result, in Chicago, as in many cities, many LIHTC developments are located in high-poverty community areas on the South Side and West Side.

Recently, however, the Illinois Housing Development Agency (IHDA) has designated "opportunity areas." These areas are defined in part as census tracts having a percentage of people in poverty that is below the average for all Illinois jurisdictions, which is 13.3 percent. Other criteria for opportunity areas include the availability of jobs, the unemployment rate, the market share of IHDA-financed units versus all rental units, and the market share of all assisted housing units versus all rental units. The objective of the revised program guidelines is to encourage new LIHTC developments in a wider variety of communities with lower poverty levels and greater economic opportunities.

Appendix I provides additional maps showing the location of assisted housing based on key financing sources. Section V of this report discusses the location of public housing and affordable Housing Choice Voucher recipients in the city, which are also concentrated in high-poverty neighborhoods.

Exhibit III-31.

Location of Subsidized Housing by Community Area with Poverty Levels

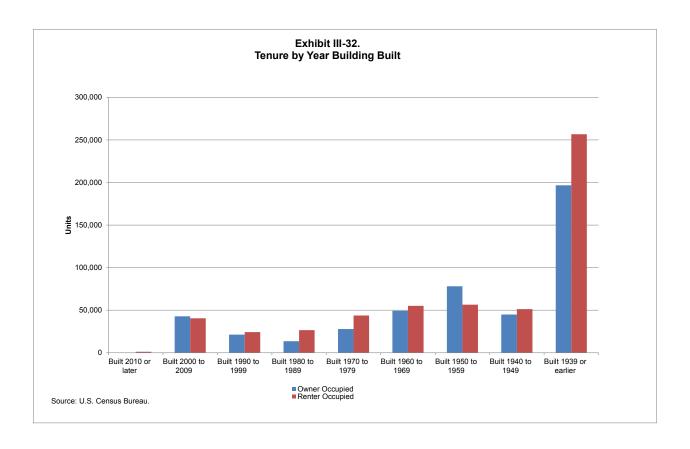


OVERALL HOUSING STOCK

The city's housing market varies greatly depending up on the neighborhood. Although rental and owner-occupied housing are located across the city, the affordability and availability of each type varies substantially. In addition, although the foreclosure crisis had an impact across the city, the South Side and West Side were affected substantially more than other parts of the city.

As of 2010, there were 1,030,076 occupied housing units in Chicago. Forty-six percent of these units were owner occupied, and 54 percent were renter occupied. In 2000, when the total number of occupied units was 1,061,928, the owner and rental rates were 44 and 56 percent, respectively.

Forty-four percent of all housing units in Chicago were built before 1940, with a slightly higher rental share of those more than 75 years old. A slightly higher share of owner-occupied versus rental housing was built since 2000. Because a substantial percentage of the city's housing stock was built in 1939 or earlier (that is, long before the Americans with Disabilities Act provided guidelines for the accessibility of structures), and because approximately 31 percent of the units are located in structures with two or more units (most of which are multistory), many units are not easily accessible by persons with disabilities.



Housing Affordability

The median household income for Chicago was \$47,408 in 2012, according to the American Community Survey. The data also show that African Americans and Hispanics have median incomes that are significantly lower than the citywide median, while White and Asian households have significantly higher incomes. African American households have the lowest median income, which is half that of Whites.

We calculated the maximum monthly housing payment a household could afford without being cost burdened, based upon median income. The standard definition of "housing burden" is when one applies more than 30 percent of household income toward housing payment (rent or mortgage). It is important to note that the following analysis does not include the cost of tenant-paid utilities or take into account the size or condition of the units.

Exhibit III-33.		
Median Household Inco		
Race/Ethnicity of	Median Household	Maximum Monthly
Householder	Income	Housing Payment
All Households	\$47,408	\$1,185
White	61,111	1,528
Black/African American	30,592	765
American Indian and Alaska	42,956	1,074
Native		
Asian	56,657	1,416
Hispanic/Latino	41,712	1,043

Note: Maximum monthly housing payment based on 30% of income affordability standard. Source: 2008-2012 American Community Survey 5-year estimates

Rental Affordability. The U.S. Census provides the most readily available and consistent data on rental rates. However, the Census does not provide the most accurate estimate of current market rents; this is because the survey asks current renters their rent, which is not reflective of the market. Rents for households that have lived in one place for extended periods of time — often with below-market rent increases — are not distinguished from households that recently moved. However, conducting a full market assessment is outside the scope of this study; therefore, U.S. Census data were used as a proxy for market rent.

"Asking rent" indicated in Exhibit III-34 applies only to units that are vacant for rent or rented but not occupied. As such, the asking rent responses cover only 8 percent of the total number of rental units. Thirteen percent of existing renters paid less than \$500 in

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¹⁰ Data for 2012 are based on the 2012 ACS 5-year estimates, which averages information collected over a five-year period.

rent, while 8 percent of the vacant or rented but not occupied units had asking rents of less than \$500. Fifty-two percent of existing renters paid between \$500 and \$1,000 in contract rent, while 63 percent of the vacant or rented but not occupied units had asking rents in that range in 2013.

2013 Contract Re	ent		2013 Asking Rent				
Contract Rent	Number	Percent	Asking rent	Number	Percent		
Less than \$100	6,703	1.1%	Less than \$100	249	0.5%		
\$100 to \$149	5,435	0.9%	\$100 to \$149	345	0.7%		
\$150 to \$199	14,611	2.5%	\$150 to \$199	973	2.0%		
\$200 to \$249	10,332	1.8%	\$200 to \$249	327	0.7%		
\$250 to \$299	5,674	1.0%	\$250 to \$299	145	0.3%		
\$300 to \$349	7,334	1.2%	\$300 to \$349	110	0.2%		
\$350 to \$399	6,765	1.2%	\$350 to \$399	563	1.2%		
\$400 to \$449	9,656	1.6%	\$400 to \$449	624	1.3%		
\$450 to \$499	9,978	1.7%	\$450 to \$499	671	1.4%		
\$500 to \$549	23,090	3.9%	\$500 to \$549	808	1.7%		
\$550 to \$599	18,335	3.1%	\$550 to \$599	2,015	4.1%		
\$600 to \$649	36,423	6.2%	\$600 to \$649	2,791	5.7%		
\$650 to \$699	30,470	5.2%	\$650 to \$699	3,816	7.9%		
\$700 to \$749	40,144	6.8%	\$700 to \$749	5,393	11.1%		
\$750 to \$799	36,604	6.2%	\$750 to \$799	4,460	9.2%		
\$800 to \$899	69,657	11.8%	\$800 to \$899	6,962	14.3%		
\$900 to \$999	50,980	8.7%	\$900 to \$999	4,525	9.3%		
\$1,000 to \$1,249	71,644	12.2%	\$1,000 to \$1,249	4,545	9.4%		
\$1,250 to \$1,499	39,111	6.6%	\$1,250 to \$1,499	2,980	6.1%		
\$1,500 to \$1,999	48,120	8.2%	\$1,500 to \$1,999	3,448	7.1%		
\$2,000 or more	32,053	5.4%	\$2,000 or more	2,817	5.8%		
No Cash Rent	15,080	2.6%					
Total	588,199	100.0%	Total	48,567	100.0%		

Based upon the data above, we determined that White and Asian households have the highest number of units among which to select for housing that is affordable. Based upon the median income, White and Asian households could afford 86 percent of rental units. Hispanic households could afford 68 percent of rental units, followed by African Americans, who could afford only 37 percent. This is well below the rate of other races and ethnic groups as well as the overall affordability rate, which is 77 percent.

Owner-Occupied Housing. We also calculated the affordability of homes available for purchase. Using the local Multiple Listing Service (MLS), we identified the number of units sold within a given price range in 2013. MLS provides one of the most accurate sources of information on home sales. Optimistically assuming a 4.5 percent interest (the current average rate), a 30-year fixed mortgage, and a 15 percent down payment,

we determined the percentage of units that each race/ethnic category could afford without being cost burdened.

We find that, similar to the rental market, Whites and Asians are able to afford the largest percentage of homes, at 79 and 73 percent, respectively. Hispanic households are able to afford 59 percent of homes, and African American households are able to afford 50 percent of homes.

However, several important caveats need to be made:

- Interest rates are currently at historic lows, with the local average at 4 percent. However, based on a recent study, African American and Hispanic borrowers have a 7.7 and 6.2 percentage point higher likelihood of a high-cost loan, respectively, compared to all home mortgage borrowers.¹¹ Therefore, the monthly costs would be higher.
- Many banks have tightened their lending requirements, including increasing the down payment required for a purchase. According to Federal Housing Finance Agency data, in 2010, 82 percent of single-family home purchasers were required to provide a down payment of at least 20 percent. This is an increase from 62 percent in 2007. Given the low level of asset accumulation among minorities, the number of minority households who would be able to provide a substantial down payment is extremely low.
- The estimated mortgage payment used in the analysis only includes principal and interest and does not include insurance and property taxes.
- Information is not available on the condition of the units sold. Units sold at the lower end of the price range are quite likely of a substandard quality and may have been purchased for demolition.

Property Taxes. The affordability analysis does not take into account property taxes, which can have a substantial impact on housing costs. A common critique levied against the Cook County taxation system is that residential properties are assessed at a lower percentage than other properties, including commercial and industrial properties.

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¹¹ Bayer, Patrick, Duke University; Ferreira, Fernando, The Wharton School, University of Pennsylvania; Ross, Stephen L., University of Connecticut; "Race, Ethnicity and High Cost Mortgage Lending," University of Connecticut, Department of Economics Working Paper Series, Working Paper 2014-36, December 2014.

Exhibit III-35.
Units Sold in Chicago, 2013

	All Units		Convention	al Units	Cash of foreclosure sale, and approv		
Sale Price	Number of Units Sold	% of Units Sold	Number of Units Sold	% of Units Sold	Number of Units Sold	% of Units Sold	Estimated Monthly Mortgage Payment
Less than \$49,999	4296	14%	649	3%	3647	34%	\$215 or less
\$50,000 - \$99,999	4007	13%	1189	6%	2818	26%	\$215-\$431
\$100,000 - \$149,999	3399	11%	1783	9%	1616	15%	\$431-\$646
\$150,000 - \$199,999	3755	12%	2576	12%	1179	11%	\$646-\$861
\$200,000 - \$249,999	3015	9%	2380	11%	635	6%	\$861-\$1,077
\$250,000 - \$299,999	2570	8%	2209	11%	361	3%	\$1,077-\$1,292
\$300,000 - \$349,999	2026	6%	1845	9%	181	2%	\$1,292-\$1,507
\$350,000 - \$399,999	1845	6%	1730	8%	115	1%	\$1,507-\$1,723
\$400,000 - \$449,999	1413	4%	1332	6%	81	1%	\$1,723-\$1,938
\$450,000 - \$499,999	1041	3%	999	5%	42	0%	\$1,938-\$2,153
\$500,000 - \$549,999	812	3%	781	4%	31	0%	\$2,153-\$2,369
\$550,000 - \$599,999	602	2%	592	3%	10	0%	\$2,369-\$2,584
\$600,000 - \$699,999	880	3%	851	4%	29	0%	\$2,584-\$3,015
\$700,000 - \$799,999	546	2%	524	3%	22	0%	\$3,015-\$3,445
\$800,000 - \$899,999	384	1%	375	2%	9	0%	\$3,445-\$3,876
\$900,000 - \$999,999	231	1%	219	1%	12	0%	\$3,876-\$4,307
\$1,000,000 and greater	938	3%	920	4%	18	0%	\$4,307 and above
Total	31,760	100%	20,954	100%	10,806	100%	

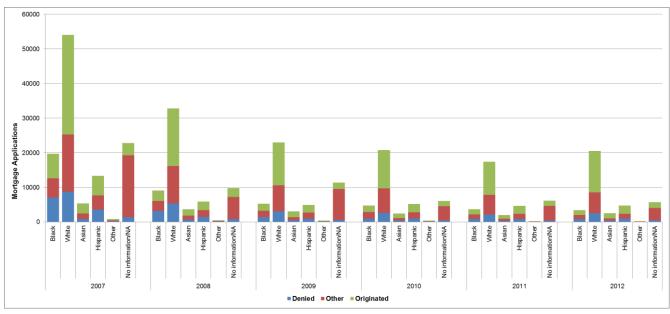
Source: Midwest Real Estate Data, LLC.; Applied Real Estate Analysis, Inc.

MORTGAGE LENDING ACTIVITY

The Chicago Fair Housing Ordinance, like the federal Fair Housing Act, prohibits lenders from discriminating against members of protected classes in connection with borrowing or lending money for purchase, construction, rehabilitation, or maintenance of any residential unit. Access to financial resources is key to fair housing choice and equal access to housing. The Home Mortgage Disclosure Act (HMDA) requires financial institutions to maintain records on the characteristics of mortgage borrowers, including gender, race, and ethnicity. The following exhibit shows recently available HMDA data for the city of Chicago for 2007 through 2012.

As the chart indicates, overall loan application activity was much lower in 2012 than in 2007, prior to the recession. White households' applications decreased from over 54,000 in 2007 to just over 20,000 in 2012. Similarly, African American loan applications decreased from 19,722 in 2007 to only 3,381 in 2012, Hispanic applications decreased from 13,309 to 4,704, and Asian loan applications declined from 5,369 to 2,544.

Exhibit III-36.
Mortgage Lending Activity in the City of Chicago



Source: Home Mortgage Disclosure Act.

In 2012, White loan applications were an even higher percentage of total loan applications (55 percent) than they were five years earlier (47 percent). African American households' loan applications were a smaller percentage of loan applications in 2012 (9 percent) than they were in 2007 (17 percent), while the percentage of loan applications by Hispanic households increased slightly during that time period from 11 percent to 13 percent.

Asians had the highest percentage of loan applications (61 percent) that resulted in loans in 2012, although the absolute number of loan originations for Asians was small—only 1,551 loans. In contrast, 58 percent of the applications by White applicants resulted in 11,985 loans. Only 42 percent of the loan applications by African Americans and 51 percent of those by Hispanics became originated loans. Similarly, the highest loan denial rates were for African American loan applications (24 percent), and the lowest denial rates were for White applicants (12 percent.)

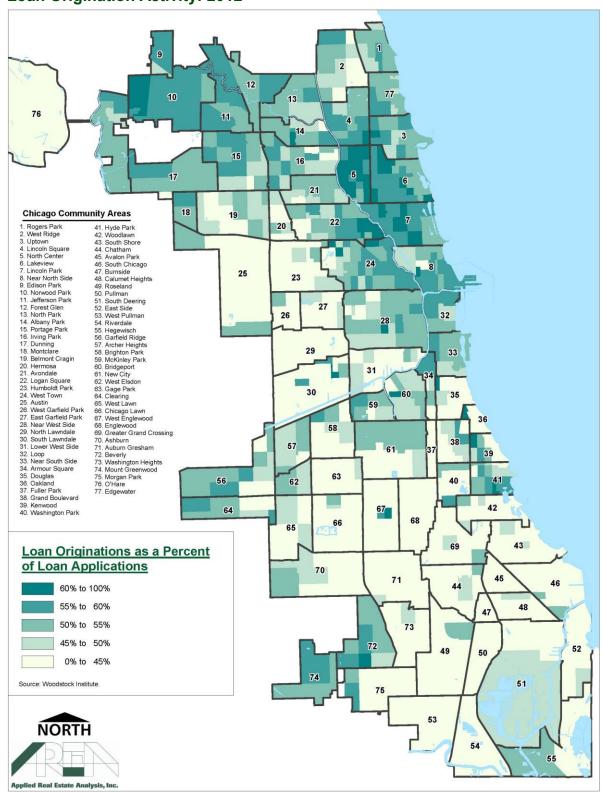
As shown on the following map, the percentage of loan applications that resulted in loan originations varied substantially for community areas within the city. The highest percentages of applications that became loans occurred in community areas on the city's North Side, especially parts of North Center, Lakeview, and Lincoln Park. In contrast, in many community areas on the city's South Side and West Side, less than 45 percent of the loan applications resulted in loan originations.

Exhibit III-37.
Annual Trends in Mortgage Lending: City of Chicago

	2007		2008		2009		2010		2011		2012	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Total Loan Application	116,054	100%	61,607	100%	47,836	100%	39,418	100%	33,991	100%	37,006	100%
Black	19,722	17%	9,083	15%	5,210	11%	4,696	12%	3,686	11%	3,381	9%
White	54,050	47%	32,786	53%	22,965	48%	20,712	53%	17,370	51%	20,529	55%
Asian	5,369	5%	3,660	6%	3,052	6%	2,441	6%	2,006	6%	2,544	7%
Hispanic	13,309	11%	5,850	9%	4,909	10%	5,154	13%	4,598	14%	4,704	13%
Other	857	1%	432	1%	368	1%	349	1%	219	1%	154	0%
Missing Data/NA	22,747	20%	9,796	16%	11,332	24%	6,066	15%	6,112	18%	5,694	15%
Loans Originated	48,369	42%	26,855	44%	20,324	42%	18,344	47%	16,059	47%	19,102	52%
Black	7,091	36%	3,078	34%	1,986	38%	1,855	40%	1,540	42%	1,409	42%
White	28,745	53%	16,670	51%	12,411	54%	11,055	53%	9,561	55%	11,985	58%
Asian	2,922	54%	1,899	52%	1,694	56%	1,326	54%	1,115	56%	1,551	61%
Hispanic	5,688	43%	2,423	41%	2,272	46%	2,389	46%	2,249	49%	2,408	51%
Other	429	50%	184	43%	168	46%	150	43%	108	49%	80	52%
Missing Data/NA	3,494	15%	2,601	27%	1,793	16%	1,569	26%	1,486	24%	1,669	29%
Loans Denied	21,641	19%	11,478	19%	6,478	14%	5,468	14%	4,557	13%	4,978	13%
Black	7,015	36%	3,124	34%	1,334	26%	943	20%	820	22%	820	24%
White	8,667	16%	5,302	16%	3,074	13%	2,620	13%	2,183	13%	2,462	12%
Asian	810	15%	649	18%	451	15%	338	14%	297	15%	347	14%
Hispanic	3,595	27%	1,469	25%	953	19%	996	19%	850	18%	875	19%
Other	209	24%	115	27%	97	26%	73	21%	49	22%	32	21%
Missing Data/NA	1,345	6%	819	8%	569	5%	498	8%	358	6%	442	8%
Other	46,044	40%	23,274	38%	21,034	44%	15,606	40%	13,375	39%	12,926	35%
Black	5,616	28%	2,881	32%	1,890	36%	1,898	40%	1,326	36%	1,152	34%
White	16,638	31%	10,814	33%	7,480	33%	7,037	34%	5,626	32%	6,082	30%
Asian	1,637	30%	1,112	30%	907	30%	777	32%	594	30%	646	25%
Hispanic	4,026	30%	1,958	33%	1,684	34%	1,769	34%	1,499	33%	1,421	30%
Other	219	26%	133	31%	103	28%	126	36%	62	28%	42	27%
Missing Data/NA	17,908	79%	6,376	65%	8,970	79%	3,999	66%	4,268	70%	3,583	63%

Source: The Woodstock Institute.

Exhibit III-38. Loan Origination Activity: 2012



FORECLOSURE ACTIVITY

Foreclosure activity has declined in Chicago in recent years from its peak of 22,903 filings in 2009. As of 2013, the most recent year for which data are available, there were 10,689 foreclosure filings for all types of residential units. Of these foreclosures, over half were single-family homes, approximately 22 percent were condominiums, 23 percent were two- to four-unit structures, and the remainder (2 percent) were five-plus—unit buildings. The percentage of foreclosure filings for single-family homes and condominiums was about the same at the peak of filings activity in 2009.

Exhibit III-39.

Total Foreclosures by Year: City of Chicago

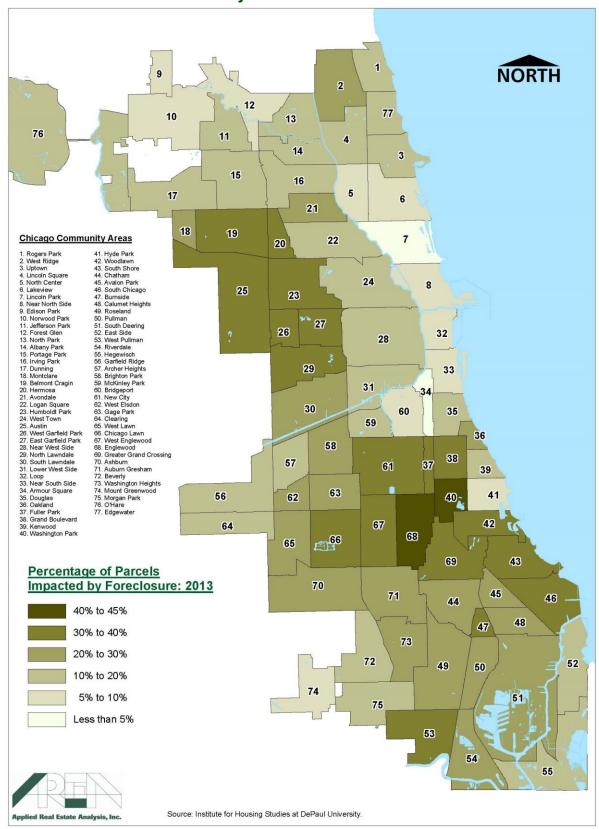
	All	Single-		Two- to	Five Plus
	Residential	Family		Four-Unit	Unit
City of Chicago Total	Properties	Dwellings	Condominiums	Buildings	Buildings
2005	8,107	4,796	845	2,346	120
2006	10,970	6,027	1,291	3,452	200
2007	16,184	8,259	2,170	5,423	332
2008	21,512	10,430	3,824	6,758	500
2009	22,917	10,700	5,384	6,281	552
2010	22,903	10,798	5,995	5,663	447
2011	17,919	8,596	4,798	4,153	372
2012	17,879	9,095	4,359	4,075	350
2013	10,698	5,659	2,312	2,476	251

Source: The Institute for Housing Studies at DePaul University.

As shown on the following map, the community areas with the greatest percentages of parcels affected by foreclosures are Washington Park and Englewood. Community areas that are predominately African American or Hispanic on the city's South Side and West Side have high percentages of parcels in foreclosure. For example, in 2013, 36 percent of the parcels were in foreclosure in Humboldt Park, which has a substantial Hispanic population, and 39 percent of the parcels were in foreclosure in West Englewood, which is predominately African American.

There are many causes for high foreclosure rates in minority communities. One factor is the high rate of predatory loans in these areas. Loans with unfavorable terms and conditions place borrowers at greater risk of foreclosure. In addition, the unemployment rate among African Americans and Hispanics is higher than that of the White population, making it difficult for these households to meet financial obligations unless they have substantial savings. Another factor is the spiraling negative impact on property values of foreclosed properties. High percentages of real estate owned by financial institutions can exacerbate negative perspectives of a neighborhood and further reduce property values, especially if the properties are not well maintained.

Exhibit III-40.
Cumulative Foreclosure Activity: 2013

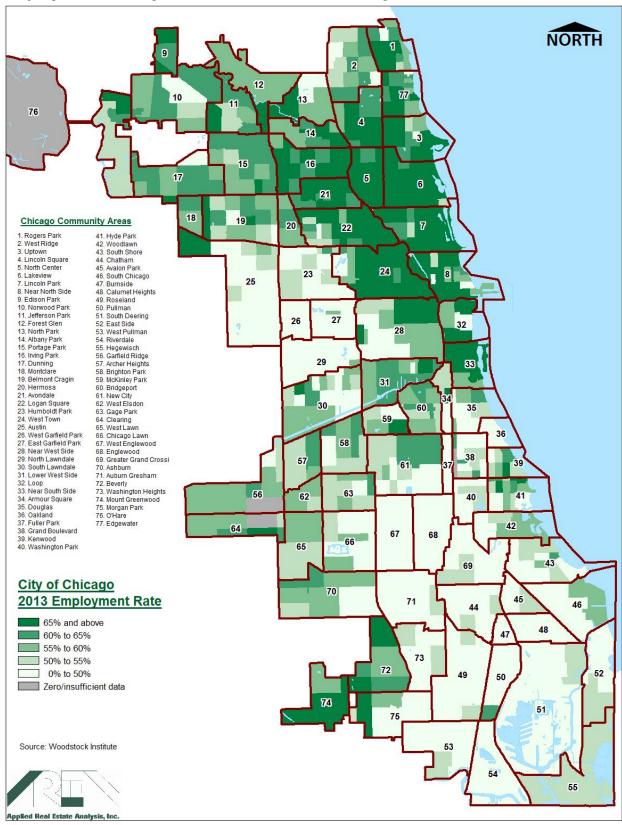


EMPLOYMENT

As of April 2015, the unemployment rate for the city of Chicago was 6.5 percent, which was down from 7.7 percent in April 2014, according to the Illinois Department of Employment Security. Unemployed residents dropped from 104,157 in April 2014 to 88,487 in 2015.

Unfortunately, not all community areas within the city have traditionally benefited from Chicago's employment opportunities, and currently many are not benefiting as the city's overall employment picture improves. As shown in the following map, the percentage of employed persons living on the city's North Side is significantly higher than the percentage living on the South Side and West Side.

Exhibit III-41.
Employment Rate by Census Tract and Community Area: 2013



PUBLIC TRANSPORTATION

Access to public transportation provides a benefit to households who can use it to access jobs, services, recreation, and other activities. It is especially important for low-and moderate-income households who often do not own a vehicle. The lack of public transportation for low- and moderate-income households can greatly reduce employment options as well as limit housing choices.

Fortunately, the city of Chicago has an extensive public transportation system used by many residents for their trips to work. According to the American Community Survey for 2013, approximately 27 percent of workers aged 16 and over in Chicago used public transportation to reach their employment location, and only 50 percent commuted by private vehicle. In contrast, in Milwaukee, 70 percent of workers drive to work, and in Minneapolis, 62 percent.

According to analyses by the Metropolitan Planning Council (MPC), "the extensive rail transit system provided by the Chicago Transit Authority and Metra puts more than half of Chicago's residents within a half-mile, or about a 10-minute walk, from a station. Employment is even more tightly concentrated near transit; about 80 percent of the city's jobs are within a half-mile of a rail station." In addition, approximately 63 percent of the city's subsidized affordable housing units are within a half-mile of rail transit stations (based on MPC's analysis of data from the City), which is a higher percentage than the city's overall population.

Usage of public transportation in Chicago does vary somewhat by race, ethnicity, and sex. Approximately 55 percent of White workers used public transportation in 2013 according to the ACS, compared to only 28 percent of African Americans, 7 percent of Asians, and 20 percent of Hispanics. Fifty-four percent of women used public transit, versus only 46 percent of men.

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¹² Freemark, Yonah, "Talking Transit: Why Should Chicago Focus Growth New Transit?" Metropolitan Planning Council, April 22, 2015, page 5. http://www.metroplanning.org/news/article/7125.

SECTION IV. FAIR HOUSING POLICIES AND PROCEDURES

CHICAGO HUMAN RIGHTS AND FAIR HOUSING ORDINANCES

As introduced in Section II, Chicago's Human Rights Ordinance (HRO) and Fair Housing Ordinance (FHO) provide protection from discrimination within the City of Chicago in housing, employment, credit transactions, bonding, and public accommodations. Both ordinances prohibit discrimination based upon 14 groups (known as "protected classes") — more protected classes than are found in either the state or federal housing laws. ¹³ These groups are based upon:

- Race
- Color
- Sex
- Gender Identity
- Age
- Religion
- Disability
- National Origin
- Ancestry
- Sexual Orientation
- Marital Status
- Parental Status
- Military Discharge Status
- Source of Income

The HRO also prohibits discrimination based on credit history (as pertains to employment only).

Specifically, the Fair Housing Ordinance prohibits:

Discrimination in the terms and conditions of a sale or lease of residential property. The price, terms, and conditions of the sale, rental, lease, or occupancy of a residential property in the city of Chicago cannot be altered based on the protected class of a prospective buyer or lessee. This provision also applies to the furnishing of, or access to, any facilities, privileges, furnishings, or services rendered in connection to a sale, rental, lease, or

¹³ The above narrative is a summary of the Commission on Human Relations Enabling Ordinance (2-120-480 as amended through December 31, 2013) and is intended for informational purposes only. It is not meant to serve as legal counsel. The full ordinance is available from the City of Chicago Commission on Human Relations and can be found at www.cityofchicago.org/humanrelations.

occupancy; however, this is provided that the access provision does not mandate modifications, accommodations, or other actions not also required by the federal Fair Housing Amendments Act and its regulations.

- Communications that are discriminatory. This includes publishing, circulating, issuing, or displaying any communication that indicates discrimination against one of the protected classes.
- Refusal to sell, lease, or rent residential property within the City of Chicago because of the protected class to which the prospective buyer or renter belongs.
- **Discrimination in the financing of residential property.** Financing includes "borrowing or lending money, guaranteeing loans, accepting mortgages" as well as any other financial assistance to purchase, acquire, construct, rehabilitate, repair, or maintain any residential housing unit or housing accommodation.
- Soliciting sale or lease of residential real estate based on perceived loss of value. Soliciting the sale, lease, or listing of a property because of a belief that the property will lose value as a result of the actual or prospective entrance of a member (or members) of a protected class into a neighborhood is prohibited.
- Inducing sale of residential real estate through distribution of materials. This applies to oral or written communication that is intended to encourage someone to sell or lease residential property because of the actual or prospective entrance of a member (or members) of a protected class into a neighborhood.
- Not showing a listing of a residential unit because an individual is a member of a protected class. This includes indicating that the residential property is not available for inspection, sale, rental, or lease in the city of Chicago when in fact it is available, not bringing the listing to the attention of the individual, and refusing to allow someone to inspect a listing based upon their status as a member of a protected class.
- Interference with the religious observances and practices of any lease or owner of a condominium or cooperative unit. Persons are allowed to place or affix a religious sign, symbol, or relic on the door, door post, or entrance of one's individual unit, provided that imposing reasonable rules necessary to avoid substantial damage to property or an undue hardship to other unit owners or lessees shall not be deemed a violation of this provision of the ordinance.

There are exceptions allowed to the discriminatory acts to allow for senior-restricted housing; property owned, operated, or supervised by a religious organization that limits occupants to members of the same religion or provides preferences to members; rooms to be rented to a single sex; and owners of private rooms that are rented in a private home if the owner or owner's family lives in the home.

CITY OF CHICAGO ADMINISTRATIVE POLICIES AND PROCEDURES

Chicago Commission on Human Relations

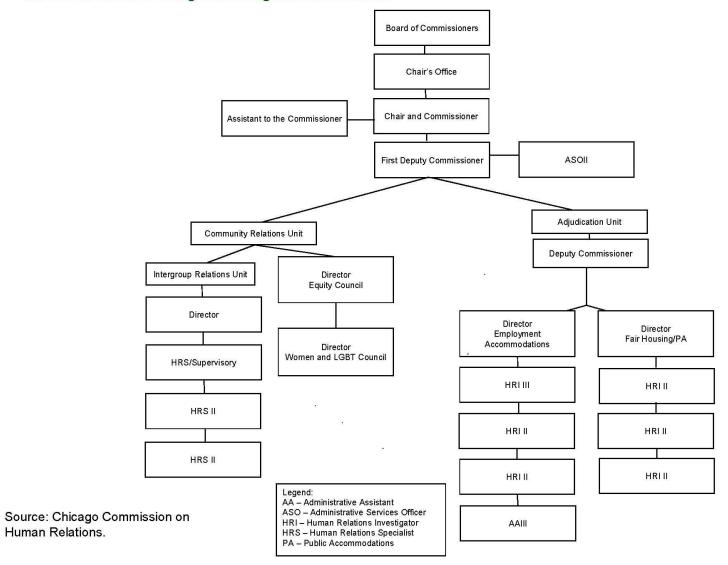
The Chicago Human Rights Ordinance and Fair Housing Ordinance indicate that the Chicago Commission on Human Relations (CCHR) is responsible for their enforcement. The Commission includes a total of 19 members, who are appointed by the mayor with approval of the Chicago City Council. Three of the 19 members also serve as the chairpersons of the CCHR advisory councils, which represent their respective constituencies at the Office of the Mayor — Equity, Women and LGBT Issues, Veterans, and New Americans (the latter is now housed in the Mayor's Office) — and are considered ex-officio members of the Commission. Members are appointed for three-year terms and, with the exception of the chairperson, are not compensated for their services (other than expenses). The chairperson of the Commission serves at the pleasure of the mayor and is compensated, as this person is responsible for the day-to-day operations of the Commission and its staff.

In addition to the enforcement of the City's human rights and fair housing laws, the Chicago Commission on Human Relations advises and consults the mayor and city council on all matters involving prejudice and discrimination as pertains to the protected classes. The agency also has the power to require the assistance of the various departments and agencies of the city government in identifying and eliminating discriminatory activities. The agency has a budget for 18 full-time staff persons, currently six of which include investigators. Four of the six investigators focus primarily on fair housing and are supported with Community Development Block Grant (CDBG) funding, while the other two investigators focus on employment. All six investigators also handle public accommodations complaints.

The enforcement responsibilities of CCHR are to initiate, receive, investigate, and rule on discrimination complaints filed under the HRO and FHO. Non-enforcement responsibilities include employing proactive programs of education, intervention, and constituency building to discourage bigotry and bring people from different groups together. CCHR offers a variety of human relations workshops and presentations to schools, religious institutions, youth agencies, and community groups on such topics as the Chicago Human Rights Ordinance and Fair Housing Ordinance, prejudice reduction, hate crimes, bullying, and access to public places for people with disabilities. CCHR also aids victims of hate crimes in accordance with the City's hate crimes law.

Exhibit IV-1. **Chicago Commission on Human Relations** 2016 Position and Assignment Organizational Chart

Human Relations.



FAIR HOUSING ORDINANCE COMPLAINT PROCESS¹⁴

Complainants — those who are alleging violations of the FHO — are required to file their complaints with CCHR within 180 days after the violation is alleged to have occurred. If the violation is ongoing, the complainant has 180 days from the first time they became aware of the violation. Any prior violations that exceed 180 days would be considered as background.

Complaint forms are available online at the CCHR website and can also be accessed at the Commission's office. Complainants are encouraged to telephone CCHR first to discuss the complaint they wish to file to determine whether the Commission has jurisdiction over the claim. Although they cannot provide legal advice, CCHR intake staff can also answer questions related to whether the FHO covers the claim they want to file, other laws and agencies that may cover the type of claim they wish to file, and complaint filing and other CCHR procedures. Those who need in-person assistance in completing the complaint form can go to the Commission's office at least two hours prior to closing and receive help drafting their complaint with CCHR intake staff. If a complainant needs an interpreter, they must notify the Commission at least one week prior to coming to the office.

Complainants also have the option to prepare their own complaints or have an attorney complete the complaint on their behalf. In either case, they must use the CCHR Complaint Form or something substantially equivalent that contains all the required information; it cannot exceed five pages without CCHR permission. Complainants may also elect to file a claim with Cook County, the State of Illinois, or the U.S. Department of Housing and Urban Development (HUD), or seek civil action in court, except in certain instances where one or more intergovernmental agreements may specify before which governmental agency or court a person may pursue his or her complaint. ¹⁵

On the complaint form, the complainant is required to provide sufficient detail for the Commission to determine a prima facie violation. A prima facie violation is defined as one in which someone from a protected class believes that an adverse action has been taken against them that someone who is not a member of a protected class would not have experienced. Namely, the formal complaint must include: 1) a description of the conduct, policy, or practice that the complainant claims to be discriminatory, along with timing, locations, and facts that set the scope for the complaint; 2) the date(s) of each discriminatory act being alleged; and 3) the type(s) of discrimination being claimed for

http://www.cityofchicago.org/city/en/depts/cchr/provdrs/discrim/svcs/file a discriminationcomplaint.html; Interview with JoAnn Newsome, Director of Human Rights Compliance/Fair Housing, Chicago Commission on Human Relations.

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¹⁴ Reference sources for this section include Chicago's Discrimination Ordinances Fact Sheet, http://www.cityofchicago.org/content/dam/city/depts/cchr/AsianCouncilFlyers/English.pdf; City of Chicago – File a Discrimination Complaint,

¹⁵ CCHR Enabling Ordinance as amended through December 31, 2013, page 3, http://www.cityofchicago.org/content/dam/city/depts/cchr/AdjSupportingInfo/AdjFORMS/2014%20Adjudic ation%20Forms/OrdinanceBooklet2014.pdf

each alleged discriminatory action along with the complainant's protected status with regard to each action. In the case of self-filed complaints, CCHR staff will review the information provided to ensure accuracy, and as long as the allegations are enough to substantially apprise the respondent and the Commission as to the nature of the complaint, the complaint will be accepted. Complaints filed are rejected only in instances where the complaint is unsigned, not filed in a timely manner, or otherwise deemed defective.

Per the CCHR Enabling Ordinance, the Commission is to provide a copy of the complaint to the alleged violator (respondent) within 10 days. If the Commission does not deliver the copy on time, it is not held against the complainant. Each respondent is given a deadline of 28 days to submit a written response to the Commission and also to the complainant.

Investigations and Hearings¹⁶

Once a discrimination complaint has been filed, CCHR must then conduct an investigation within 180 days (unless impractical) to determine whether there is "substantial evidence" that the violation occurred. It may interview witnesses and obtain documents or other information. CCHR may also order a complainant or respondent to submit more information, and it may assist the parties who wish to try to settle the case. Within 30 days of completion of the investigation, CCHR shall issue a written determination stating whether there is substantial evidence that a violation has occurred. If the Commission determines that there is not substantial evidence, it shall give written notification of the determination to the complainant and the person(s) against whom the complaint was made. At this point, the case ends.

If the Commission finds that there is substantial evidence of a violation or an "order of default" (if the case does not settle), an administrative hearing is held with a hearing officer that is hired by contract for this specific purpose. The ordinance indicates that the administrative hearing will commence within 90 days after the determination that substantial evidence of a violation exists. The hearing is like a court trial and is open to the public. The complainant must prove the case and prove what remedies should be ordered, while the respondent may present defenses. After the administrative hearing, the hearing officer writes a recommended decision and mails it to the parties. The recommended decision will state which party should win the case, the reasons for the recommendation, and proposed remedies if the hearing officer recommends that the complainant should win. The complainant and the respondent may submit written objections to the hearing officer's recommended decision. The CCHR Board of Commissioners reviews the recommended decision, any objections, and the evidence received at the hearing. The Board of Commissioners then mails its written final decision, which can be appealed and enforced in state court.

¹⁶ Ibid, pp. 3–4; Chicago's Discrimination Ordinances Fact Sheet.

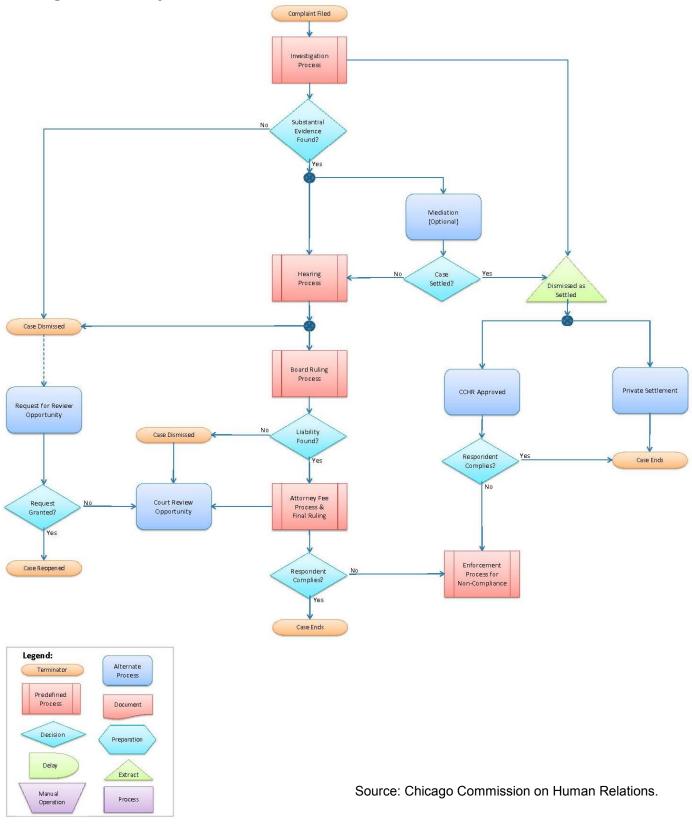
If the Board rules, after a hearing, that a respondent violated the City's discrimination ordinances, the Board can order the respondent to do one or more things:

- Out-of-pocket damages: Pay the complainant any money lost because of the discrimination.
- **Emotional distress damages:** Pay the complainant for the personal stress caused by the discrimination.
- Punitive damages: Pay the complainant money to punish and deter the discrimination if it was proved to be willful, wanton, or in reckless disregard of the complainant's rights.
- Attorney fees and costs: Pay for the work the complainant's attorney performed on the case.
- Fines: Pay to the City of Chicago a fine up to \$1,000 for each violation of the discrimination ordinances.
- Injunctive relief: Order the respondent to take specific actions to end the discrimination.

Normally, the CCHR Board of Commissioners adopts the findings of the hearing officer, assuming that the findings are not contrary to the evidence presented at the hearing. The Board of Commissioners also has the authority to modify the hearing officer's recommendations and/or remand the case for additional hearings. All decisions must be approved by the majority of commissioners, who can only vote at meetings with a quorum.

A flow chart illustrating the investigation and adjudication process can be found on the next page.

Exhibit IV-2. Investigation and Adjudication Process



FAIR HOUSING STAKEHOLDERS

In addition to the Chicago Commission on Human Relations, several other key stakeholders are involved in affirmatively furthering fair housing in Chicago.

There are four key elements to affirmatively further fair housing: outreach, advocacy, compliance, and housing development and management. Exhibits IV-3 and IV-4 on the following pages list the key fair housing stakeholders in the city of Chicago along with their respective roles and responsibilities as they relate to fair housing.

Exhibit IV-3. Fair Housing Stakeholders

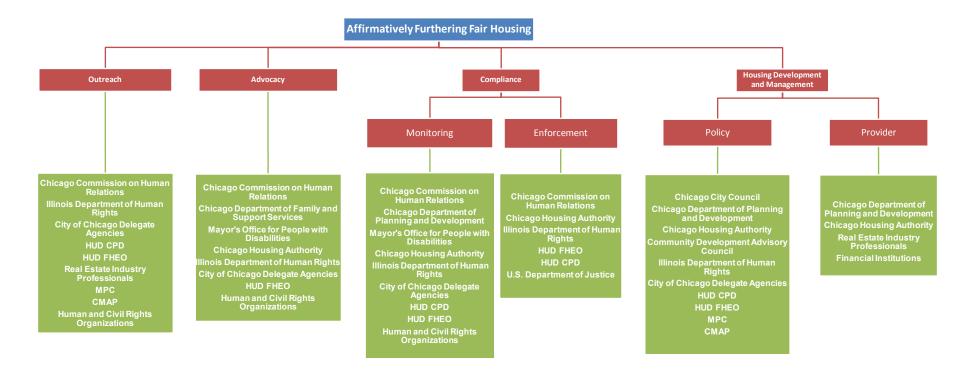


Exhibit IV-4. Key Fair Housing Stakeholders' Roles and Responsibilities

Entity Name	Fair Housing Roles and Responsibilities
Federal Government	
HUD Office of Fair Housing and Equal Opportunity (FHEO)	 Administers and enforces federal laws related to fair housing, including the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and executive orders, among others.
	 Administers the Fair Housing Assistance Program and Fair Housing Initiatives Program, which includes the Private Enforcement Initiative Grant, Fair Housing Organization Initiative Grant, and the Education and Outreach Initiative Grant.
	 Reviews and provides comments on the AIFHC to HUD CPD.
HUD Office of Community Planning and Development (CPD)	 Allocates CDBG grants to entitlement states, counties, and cities, including Cook County and select municipalities within the county.
	Reviews Consolidated Plan.
	Reviews and approves AIFHC.
U.S. Department of Justice, Civil Rights Division–Housing and Civil Rights Section	Responsible for the enforcement of federal laws related to housing.
State Government	
Illinois Department of Human Rights	Administers the Illinois Human Rights Act.
	Provides outreach and training on the Human Rights Act.

Exhibit IV-4. Key Fair Housing Stakeholders' Roles and Responsibilities (continued)

City of Chicago Government	
Chicago Council on Human Relations (CCHR)	 Responsible for enforcing the Human Rights Ordinance and Fair Housing Ordinance, including initiating, receiving, and investigating violations of the ordinances.
	 Responsible for enhancing human rights by providing education and outreach.
	 Provides support to victims of hate crimes.
Chicago Department of Family and Support Services (DFSS)	 Supports and coordinates a comprehensive network of support services programs to prevent and end homelessness, such as outreach and engagement, community-based case management, permanent supportive housing, employment training and placement, assistance with public benefits, and substance use treatment.
	 Administers programs for homeless individuals and families, including nearly 3,000 beds of overnight shelter and interim housing.
	 Manages more than 1,300 units of Shelter Plus Care, a rental housing subsidy program for homeless persons with disabilities, such as HIV/AIDS, substance use disorders, or mental illness.
	 Ensures DFSS- and HUD-funded homeless shelters are in compliance with Section 504 of the Rehabilitation Act of 1973.

Exhibit IV-4. Key Fair Housing Stakeholders' Roles and Responsibilities (continued)		
Chicago Department of Planning and Development (DPD)	 Promotes the comprehensive growth and well-being of the city and its neighborhoods. 	
	 Oversees planning, zoning, and land use policies. 	
	 Employs a variety of resources to encourage business and real estate development as well as a diverse and stable housing stock throughout the city. 	
	 Oversees multifamily rental housing development, monitoring, and compliance with regulatory agreements. 	
Mayor's Office for People with Disabilities (MOPD)	 Works to make Chicago the most accessible city in the nation on behalf of residents and visitors with disabilities through a wide range of services, advocacy, compliance monitoring, and trainings offered to public and private agencies. 	
	 Examines and permits plans for compliance with the accessibility provisions of the Chicago Building Code and Illinois Accessibility Code. 	
	 Provides pre-permit plan review guidance for architects and developers for a nominal fee. 	
	Provides home accessibility modifications.	
	 Links people with disabilities to affordable and accessible housing units and information on housing programs and resources. 	

Exhibit IV-4.
Key Fair Housing Stakeholders' Roles and Responsibilities (continued)

Chicago Area Fair Housing Alliance (CAFHA) ¹⁷		
Access Living	 Advocacy organization that focuses on increasing housing options for people with disabilities and their families by ensuring "compliance with disability rights laws in the design and construction of housing" and encouraging the development of more housing suitable for people with disabilities. 	
Chicago Lawyers' Committee for Civil Rights Under Law, Inc.	 Consortium of Chicago-area law firms that focuses on promoting and protecting the civil rights of "poor, minority, and disadvantaged people." 	
	 Under the Fair Housing Project, provides education and outreach on rights related to fair housing, including investigating fair housing complaints and providing pro bono legal services. 	
Housing Choice Partners of Chicago	 Housing advocacy organization that focuses on expanding housing options for low-income households, including those with housing subsidies. Activities also include promotion of diversity and the value of neighborhood inclusion. 	
John Marshall Fair Housing Legal Clinic	 Provides fair housing enforcement by providing legal services to those who have experienced housing discrimination and are unable to otherwise have legal representation. Provides fair housing law education to the public. 	

¹⁷ Source: Organizations' respective websites.

Exhibit IV-4. Key Fair Housing Stakeholders' Roles and Responsibilities (continued)		
Lawyers' Committee for Better Housing	 Advocacy organization that supports housing for low- and moderate-income households. 	
	 Activities include legal representation, support for tenants in poorly maintained housing, social services, and education. 	
Sargent Shriver National Center on Poverty Law	 Advocacy organization that advances laws to improve the "lives and opportunities of people living in poverty." 	
	 Activities focus on protecting the rights of low-income individuals, including those in subsidized housing, as well as providing litigation support and initiation and advancing innovative state and local housing policies. 	
Woodstock Institute	 Research and policy organization that focuses on creating an equitable financial system. 	
Planning Organizations		
Metropolitan Planning Council (MPC)	 Regional organization that focuses on making the Chicago region more sustainable, competitive, and equitable. 	
Chicago Metropolitan Agency for Planning (CMAP)	Official regional planning organization for northeastern Illinois.	
	 Develops the comprehensive regional plan, which provides strategies to address a variety of topics, including housing and quality-of-life issues. 	
Housing Providers		
Chicago Housing Authority	 Local public housing agency responsible for managing public housing and the Housing Choice Voucher program in the city of Chicago. 	

SECTION V. FAIR HOUSING PROGRAMS, ACTIVITIES, AND OUTREACH

This section of the report describes the various programs, activities, and outreach activities conducted by the City of Chicago, its delegate agencies, and housing advocacy organizations to affirmatively further fair housing in Chicago. AREA also interviewed key staff from each of the various entities listed, and where appropriate, impediments to fair housing and recommendations offered by these key staff are also discussed.

CITY OF CHICAGO ACTIVITIES

Chicago Commission on Human Relations (CCHR)

The Enabling Ordinance for the Commission on Human Relations calls for the CCHR to help improve human relations within Chicago by conducting research, public forums, and educational programs on practices of discrimination based on the protected classes as well as tensions between various groups within society. The Commission can also conduct public hearings to ascertain the societal status and treatment of various racial, ethnic, religious, cultural, and social groups.

In 2014, CCHR participated in approximately 100 community trainings, presentations, and events throughout the city. All these events addressed fair housing; however, 10 of the events focused mainly on fair housing laws and discrimination, with one event specific to disability discrimination training. In general, CCHR presentations about its work (usually done by the Intergroup Relations staff) covers all the Commission's responsibilities, including fair housing enforcement and handling of discrimination cases. It should also be noted that in 2013 and 2014, the Commission wrote a housing rights proclamation, enlarged it to poster size, translated it into four languages, and then posted the proclamation at the offices of various organizations. According to CCHR staff, 2014 represents a typical year of outreach activities completed by the Commission.

The CCHR Director of Human Rights Compliance/Fair Housing also indicated that typically the adjudication staff conducts fair housing and disability access trainings on request. Staff members use PowerPoint presentations tailored to the audience that requests the trainings. Organizations that request trainings are usually community-based organizations that focus on housing advocacy. The CCHR adjudication staff will also partner with organizations such as the Latino Policy Forum, Consulate General of Mexico, and Access Living to provide trainings during Fair Housing Month every April. The Commission has also conducted fair housing trainings with Chicago Housing Authority staff, and vice versa, so that all staff are aware of how to educate

constituents about fair housing and address discrimination complaints that may be presented to either entity. The CCHR Director of Human Rights Compliance/Fair Housing acknowledged that more trainings should be done, particularly with real estate professionals; however, the Commission has limited resources and staff to devote to fair housing outreach and education.

CCHR and City of Chicago Websites

The CCHR website lists a significant amount of information on the City's Human Rights Ordinance and Fair Housing Ordinance. The site provides links to the full ordinances, contact information for CCHR staff, a narrative description of the complaint process, and an online database of decisions of the Commission. Because CCHR's activities are enabled by the Fair Housing Ordinance, which focuses on enforcement — not affirmatively furthering fair housing — the Commission's site does not provide a broad range of information about the City's efforts, policies, and programs to affirmatively further fair housing. Unfortunately, the City of Chicago website also lacks one location where fair housing law and efforts to further fair housing are listed.

A recent Internet search on "Chicago furthering fair housing" identified multiple links to the Chicago Area Fair Housing Alliance (CAFHA) and its members on the first page along with links to other housing advocacy groups, fair housing reports, and the Illinois Department of Human Rights as a resource for filing complaints. Reference to the CCHR website appeared on the second page, including a CCHR document listing local organizations that provide fair housing training. The CCHR website does not, however, currently have direct links to the websites of local housing advocacy organizations that could be used to educate those who are searching for information on efforts to affirmatively further fair housing. The City of Chicago may want to consider creating a website specifically dedicated to fair housing that describes all the resources and organizations working on this issue.

Mayor's Office for People with Disabilities (MOPD)¹⁸

MOPD works to meet the diverse needs of the more than 600,000 individuals with disabilities who live, work, and visit Chicago, with the overarching goal of making Chicago the most accessible city in the country. The department employs a multifaceted approach that includes systems change, education and training, advocacy, and direct services through the following initiatives, some of which are offered under multiple MOPD units:

 Information and Referral: Assistance with identifying and accessing resources in the community.

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¹⁸ This section is based upon information provided through MOPD brochures and fliers, MOPD staff interviewed for the AI report, and http://www.cityofchicago.org/city/en/depts/mopd.html/.

- Independent Living: Homemaker services, home-delivered meals, needs assessments, simple in-home adaptive devices, and monthly independent living workshops.
- Employment: Employment readiness support, referrals to job training and placement agencies, and benefits counseling for SSI/SSDI recipients who are seeking employment.
- Training: Provided to City departments, sister agencies, and public and private sector employers on disability awareness and etiquette, independent living skills, communication access, and disability rights laws and codes.
- Architectural Services: Accessibility plan reviews, technical assistance, and information about federal, state, and local accessibility codes and laws.
- HomeMod Program: Modifications that make living environments accessible for individuals with mobility disabilities under the age of 60, such as lowered kitchen counters and cabinets, roll-in showers, exterior ramps, vertical platform lifts, and interior lifts.
- Youth Programs: Substance abuse prevention program for deaf and hard of hearing; various employment readiness programs for students with disabilities including youth mentoring, job shadowing, internships, and referrals to transition services.

Although all of MOPD's programs and services are critical to support efforts to further fair housing for individuals with disabilities, the programs that apply most directly in this regard are those offered under the following units: accessibility compliance, accessible housing, and training.

The Accessibility Compliance Unit (ACU) works to ensure that the City of Chicago is accessible to people with all types of disabilities. Specifically, the ACU a) advises City departments and sister agencies to ensure compliance with federal, state, and local disability rights laws and regulations; b) examines and permits plans for compliance with the accessibility provisions of the Chicago Building Code and Illinois Accessibility Code; c) provides pre-permit plan review guidance for architects and developers for a nominal fee; and d) provides technical assistance to individuals and businesses regarding federal, state, and local disability rights and accessibility requirements. The ACU works closely with the Chicago Department of Buildings to provide guidance during the inspection process, utilizing a 10-point inspection checklist segmented by discipline, such as entry, egress, doorways; electrical; zoning/landscaping; plumbing; and heating and ventilation. In 2013, the ACU completed 1,815 permit plan reviews and 185 pre-permit plan reviews.

The Accessible Housing Unit provides the aforementioned home modification services for people less than 60 years of age. This unit also links people with disabilities to affordable and accessible housing units and information on housing programs and resources, and advocates for accessible housing. In 2014, the Accessible Housing Unit responded to over 2,100 phone inquiries related to housing for people with disabilities.

Approximately 1,800 were requests for home modifications, 333 were related to advocacy and direct service, and 1,191 involved short-term counseling. MOPD is able to complete only 70 to 80 home modifications for every 400 requests annually. In addition, 1,284 people called for assistance in finding affordable housing, 964 people called for assistance in finding accessible housing, and 133 people called for assistance finding housing in both categories.

At one time, MOPD hosted housing and information fairs, but it discontinued them because people often attended with the expectation of direct access to available housing. Although the MOPD keeps lists of available units, they are usually dated. MOPD focuses on providing resources and information and will refer constituents who are searching for housing to Access Living.

Impediments to Fair Housing/Recommendations. When asked about impediments to fair housing for people with disabilities that still exist and that the City of Chicago needs to address, MOPD leadership interviewed indicated the following:

- Limited number of accessible and usable units within subsidized housing.
- Developers that fail to comply with HUD's new construction provisions to ensure accessibility for people with disabilities.
- Failure of landlords to provide reasonable accommodations to make units accessible.
- Lack of accessible parking linked to residential housing, particularly in condominiums.
- Discrimination experienced by people with disabilities when searching for rental housing, such as¹⁹:
 - Landlords refusing service to people who are deaf and use the teletypewriter (TTY) system to inquire about an advertised rental unit.
 - TTY users receiving significantly less information about the application process and fewer opportunities for follow-up contact.
 - Wheelchair users receiving less information about the application process, learning about fewer available units than nondisabled customers, and denied the opportunity to inspect units.
 - Landlords denying requests from persons with disabilities for reasonable modification and/or accommodation needed to make available rental units fully accessible.
 - Landlords refusing to make the reasonable accommodation of providing a designated accessible parking space for a wheelchair user.

¹⁹ Examples are listed in the report "Discrimination Against Persons with Disabilities: Barriers at Every Step," Prepared for Office of Policy Development and Research, U.S. Department of Housing and Urban Development, June 2005.

- Barriers to filing complaints with CCHR and/or other referral agencies because people need immediate relief and do not want to go through the adjudication process.
- Definition of affordable housing does not always meet the needs of those who rely on SSI/SSDI income and are disabled.

Recommended actions put forth by MOPD leadership for the City's consideration include:

- Educate landlords about home modification requirements.
- Consider enacting a "visitability" ordinance that would allow people with disabilities to visit properties that may not be fully accessible.
- Offer more technical assistance to residents who want to file formal discrimination complaints.
- Increase community-based services to help disabled residents stay in their current housing.
- Provide more integrated housing.
- Create a cross-sector stakeholder working group to foster greater communication and education about how to address fair housing impediments.

Chicago Department of Family and Support Services (DFSS)²⁰

DFSS supports and coordinates a comprehensive network of programs to prevent and end homelessness in Chicago. According to the department's "2014 Point-in-Time Count & Survey Report," there are over 6,200 homeless individuals at any one time in Chicago, with 84 percent located within shelters and 16 percent living on the street (unsheltered). The department's Homeless and Human Services Division allocates more than \$43 million in federal, state, and local funding annually to support contracted services delivered by a network of more than 50 community-based delegate agencies. Of the more than \$43 million in funding, \$8.1 million comes from the HUD Community Development Block Grant, \$7.3 million from HUD Emergency Solutions Grant, and \$12.9 million comes from HUD Shelter Plus Care grants.

Services provided by DFSS delegate agencies include homelessness prevention, outreach and engagement, community-based case management, permanent supportive housing, and specialized services such as employment training and placement, assistance with public benefits applications, and substance use treatment. DFSS also administers programs for homeless individuals and families, including

²¹ "DFSS 2014 Homeless Services Overview," provided by DFSS Homeless and Human Services Division staff to AREA on February 19, 2015.

 $^{^{20}}$ This section is based on information provided by DFSS staff in the Homeless and Human Services Division as well as staff interviews.

nearly 3,000 beds of overnight shelter and interim housing, and it supports 14 homeless services program models (see Appendix I).

The department also manages 1,300 units of Shelter Plus Care, a rental housing subsidy program for homeless persons with disabilities such as HIV/AIDS, substance use disorders, or mental illness. Under Shelter Plus Care, HUD pays for housing subsidies for eligible clients, and local sponsor agencies provide a matching level of care for program participants.

DFSS transferred its Human Services Mobile Outreach services to Catholic Charities of the Archdiocese of Chicago in October 2012. Mobile outreach services respond to requests for shelter placement and transportation, well-being checks, emergency food assistance, and assistance to victims of fire and natural disasters. DFSS conducts other outreach efforts through its Homeless Outreach and Prevention (HOP) team, which cultivates relationships with homeless individuals living in public areas (for example, railroad tracks, bridges, along the Chicago River, viaducts and alleys, parks, and CTA train stations) and tries to engage them in support services. HOP teams also provide preventative services to residents being evicted or vacated from their homes, such as crisis counseling, case management services, information and referral, shelter placement and transport, and connections to other community resources.

In 2011 and 2012, DFSS and the Chicago Alliance to End Homelessness helped lead an intensive community-planning effort to develop an updated set of strategies that reaffirm and build on the core tenets of Chicago's original 2003 Plan to End Homelessness. Commonly referred to as "Plan 2.0," the updated approach represents a broad-ranging seven-year action plan that includes new strategies to improve access and opportunity for those residents who are most in need, including homeless youth. DFSS continues to play a lead role in implementing Plan 2.0 along with the Chicago Alliance.

Similar to MOPD's services and programs, most if not all of DFSS's services and programs support the City's efforts to further fair housing, as the department works to ensure that there is equitable access to all homelessness services and housing facilities system-wide. Many of DFSS's support services help to stabilize vulnerable individuals and prepare them to search for and acquire suitable housing. More recently, DFSS implemented two key actions that demonstrate how its efforts help to affirmatively further fair housing for society's most vulnerable:

In 2013, DFSS in partnership with MOPD conducted a survey of homeless shelters to assess how accessible they were to people with disabilities. The survey found that only 5 of 25 shelters under DFSS's purview were compliant with Section 504 of the Americans with Disabilities Act's accessibility guidelines. Consequently, DFSS developed formal policies for the department and its delegate agencies to ensure accessibility for persons with disabilities in all HUD-funded and DFSS-funded homeless shelters. DFSS also provides training to delegate agencies in this regard. The department's goals are to upgrade certain

facilities that can accommodate modifications for persons with disabilities to make the homeless services system as a whole more responsive.

Effective January 1, 2014, DFSS implemented a family preservation policy that promotes access to homeless program services for all families, regardless of the age of children, family composition, or marital status. All DFSS delegate agencies must have written standards for eligibility that reflect this family preservation policy. Families served must consist of one or more dependent children in the legal custody of one or more adults who, prior to losing housing, were living together and working cooperatively together to care for the children. This definition of family also includes two-parent and one-parent families, including those with same-sex partners, families with intergenerational and/or extended family members, unmarried couples with children, families that contain adults who are not the biological parents of the children, and other family configurations.

Impediments to Fair Housing/Recommendations. When asked about impediments to fair housing for DFSS constituents that still exist and that the City of Chicago needs to address, DFSS staff interviewed indicated the following:

- DFSS staff and delegate agencies do not have a complete understanding of fair housing laws, remedies for enforcement, or what it means to affirmatively further fair housing. DFSS staff interviewed stated that they tend to create "work arounds" to get people housed instead of directly addressing discrimination issues.
- DFSS staff do not keep track of discrimination complaints, primarily because any complaints are probably aired with delegate agencies, and the delegate agencies are not required to keep track of complaints.
- The new family preservation policy is not in line with policies of shelters operated by congregant churches who object to accepting non-traditional families (for example, same-sex couples) or intact families with adult men and teenaged children.
- There are not enough shelters in the system to serve homeless individuals and families; new shelters require zoning changes and permitting that are challenged by Not-in-My-Back-Yard (NIMBY) attitudes in certain neighborhoods. Some aldermen are also resistant to opening new shelters in their wards.
- The previous impediment also applies to locations for permanent supportive housing and rapid rehousing, particularly in neighborhoods that are saturated with affordable housing.
- Various funding sources can restrict how funding is utilized for shelter rehabilitation and modifications.
- Larger-size families often encounter barriers to finding appropriate housing.
- There are limited housing options for youth aged 18 to 25.

Recommended actions put forth by DFSS staff for the City's consideration include:

- Train DFSS staff and delegate agencies on Chicago's Fair Housing Ordinance, what it means to affirmatively further fair housing, how the department can contribute to these efforts, and remedies available to their constituents who may experience housing discrimination.
- Assess all City programs regarding their accessibility to all constituents.
- Develop a data-tracking system to demonstrate how people are being helped.
- Provide periodic updates from CCHR regarding housing discrimination complaints that can be incorporated into training for City staff.
- Reexamine the City's allocation of resources to support the continuum of housing options needed to assist persons who are homeless and prevent homelessness.
- Repurpose abandoned and foreclosed residential properties to house people in need.

Chicago Department of Planning and Development²²

As the principal planning agency for the City of Chicago, the Department of Planning and Development (DPD) promotes the comprehensive growth and well-being of the City and its neighborhoods. In addition to its planning functions, the department oversees the City's zoning and land-use policies, and through its economic development and housing bureaus employs a variety of resources to encourage business and real estate development as well as a diverse and stable housing stock throughout the city. Prior to January 1, 2014, DPD was known as the Department of Housing and Economic Development.

DPD's housing initiatives provide assistance for singles, working families, seniors, first-time homebuyers, and renters. The initiatives also serve owners who need repairs, rehabilitation, and tax relief, as well as developers seeking new housing opportunities in local communities. In addition, there are 68 delegate agencies that receive funding through DPD to support a variety of housing-related services: single and multifamily affordable housing development, supportive housing for homeless individuals, housing counseling, foreclosure prevention and mitigation, policy/advocacy, and fair housing advocacy/enforcement.

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 $^{^{22}}$ Information presented in this section comes from interviews conducted with DPD Bureau of Housing staff and the department's website, http://www.cityofchicago.org/city/en/depts/dcd.html.

DPD also utilizes numerous programs and tools to build, rehabilitate, and preserve housing. Several DPD initiatives that contribute to furthering fair housing include, but are not limited to, the following:

- Affordable Housing Plan Quarterly Reports. These reports describe progress by the City to achieve goals established in the affordable housing plan. Between 2009 and 2013, these quarterly reports presented progress on the goals set forth in the City of Chicago's previous five-year affordable housing plan (completed in 2009), "Accepting the Challenge," which committed \$2.1 billion in resources to assist more than 50,000 households. Starting in 2014, these quarterly reports present progress on the goals set forth in the City's fifth and most recent five-year housing plan, "Bouncing Back," which covers the years 2014 to 2018. The most recent plan outlines City investments of more than \$1.3 billion toward the construction, rehabilitation, and preservation of more than 40,000 housing units citywide.
- Affordable Rental Housing Resource List. This list consists of affordable rental housing opportunities by neighborhood that have been supported and developed by the City.
- Affordable Requirements Ordinance. This ordinance requires residential developments that receive financial assistance from the City or involve Cityowned land to provide a percentage of units at prices affordable to low- and moderate-income households. Developers that do not provide affordable housing units in their developments pay in-lieu fees dedicated to building affordable housing. This ordinance was recently amended and now requires downtown apartment developers to meet the City's 10-percent affordability requirement by creating 25 percent of those units either on-site or off-site (within two miles of the development).
- Chicago Community Land Trust. The land trust was founded by the City in 2006 as a nonprofit corporation to preserve the long-term affordability of homes created through City of Chicago programs. Its goals are to preserve the public and private subsidies used to make the homes affordable and maintain a permanent pool of homeownership opportunities for working families.
- Chicago Low-Income Housing Trust Fund. This fund provides rental subsidies in 55 of 77 Chicago community areas to meet the permanent housing needs of the city's lowest-income residents, those with annual incomes that do not exceed 30 percent of area median income.
- Chicago Rents Right Campaign. In partnership with tenant and landlord organizations, DPD formed the Rents Right campaign to educate Chicagoans about the legal responsibilities and rights of renters and property owners, as more than 60 percent of the city's residents live in rental housing. It also

provides mediation for landlords and tenants to resolve disputes in an informal and non-adversarial manner.

- Foreclosure Assistance and Information for Renters (FAIR). This is an information campaign that grew out of the Rents Right campaign and is designed to inform renters of their rights and responsibilities and the laws that protect them in foreclosure situations. DPD works with the Department of Business Affairs and Consumer Protection, delegate agencies, and other groups to direct renters to financial and legal resources and warn them about how to avoid fraud.
- Eri'ana Patton Smith and Coleman/Clark Kids Tenant Protection Ordinance. The Chicago City Council passed this ordinance on January 21, 2015; it targets residential building owners who are repeatedly cited for failing to provide tenants with basic services and protections, such as adequate heat, hot water, and working smoke and carbon monoxide detectors. The ordinance provides for a number of penalties against identified landlords that will incentivize better conditions for renters, improved maintenance of their buildings, and compliance with the Chicago Municipal Code.
- Neighborhood Lending Program for Home Purchase and Purchase/Rehab. Through this initiative, the City of Chicago and Neighborhood Housing Services of Chicago provide first and second mortgage loans for the purchase or purchase/rehabilitation of one- to four-unit buildings for homeowners who might otherwise be unable to purchase a home. Special subsidies are also available to income-eligible households to support these loans. Clients receive one-on-one counseling and classroom instruction in budgeting, financial planning, and credit repair.
- Small Accessible Repairs for Seniors (SARFS). This program provides safety, security, and accessibility improvements for seniors aged 60 or older who earn up to 80 percent of area median income. Typical repairs are grab bars, lever faucets, door repairs, smoke detectors, and wheelchair ramps. Both owners and renters are eligible for the repairs, although renters must have permission from their landlords, including an agreement not to increase the rent as a direct result of the SARFS improvements.
- Neighborhood Stabilization Program. Since 2009, the City of Chicago has received \$169 million in Neighborhood Stabilization Program (NSP) funds from HUD to assist 29 community areas affected by foreclosure through the purchase and rehabilitation of foreclosed properties that are then placed back in the market for sale or rent. There have been three phases of NSP, which continue to be simultaneously implemented.
- Micro-Market Recovery Program (MMRP). This is a neighborhood stabilization initiative that targets 13 small geographic areas that are experiencing higher-

than-normal problems with foreclosures. In each area, DPD works with sister agencies and community partners to reoccupy vacant residential buildings and help existing residents remain in their homes. Through its NSP and Multi-Family Tax Increment Financing Purchase Rehab initiative, the City has made subsidy money available for owner-occupants ready to buy or rehabilitate a home in an MMRP area. The Multi-Family TIF Purchase-Rehab program helps private developers purchase and rehabilitate vacant and foreclosed rental buildings within designated TIF districts. The City also offers forgivable loans to help current owner-occupants make home repairs.

- Protecting Tenants in Foreclosed Rental Property Ordinance. This ordinance, also known as the Keep Chicago Renting Ordinance, went into effect on September 17, 2013. The stated purpose of the ordinance is to preserve, protect, maintain, and improve rental property and prevent occupied buildings from becoming vacant after foreclosure. Specifically, the ordinance requires most entities that take possession of foreclosed rental properties to offer tenants rent-controlled leases for as long as the entity owns the building or give renters \$10,600 per unit in relocation assistance.
- Troubled Buildings Initiative. This initiative was established to compel landlords to maintain safe and drug-free environments. The program is implemented by several City agencies, including DPD, the Department of Buildings, Department of Law, and Department of Water Management. Key program goals include enforcing codes in rental properties, separating bad landlords from their properties if they refuse to conform to requirements, and speeding court processes to alleviate the burden of discomfort and inconvenience for renters that are created by process delays.
- Single-Room Occupancy (SRO) and Residential Hotel Preservation Ordinance. In December 2014, the City of Chicago passed this ordinance that requires property owners to notify tenants in writing 180 days prior to the sale or transfer of the property. Property owners must also notify DPD of intent to sell, and the department will forward this information to housing development businesses and organizations interested in preserving SRO properties. DPD will also meet with SRO buyers and existing SRO owners to review financing opportunities that support the preservation of affordable housing.

With respect to furthering fair housing, AREA learned from DPD housing staff that any multifamily housing development supported with public subsidy must be in compliance with fair housing laws; language in this regard is incorporated into all regulatory and redevelopment agreements. Developers must also complete a HUD affirmative fair housing marketing plan prior to closing. DPD housing staff also provide monitoring and compliance of these developments to ensure that lease agreements and tenant selection plans are being followed accordingly. Typically, these multifamily developments are located in areas of the city where residents who earn 60 percent to

70 percent of area median income can afford to rent the units, and a minimum of 20 percent of the units in the development are defined as affordable.

When interviewed, key staff from DPD also indicated that the template for fair housing regulations are incorporated into all delegate agency funding agreements; hence, City delegate agencies in effect agree to further fair housing when the agreements are executed. However, the exact number of delegate agencies that are actually engaged in activities to explicitly educate their constituents about fair housing laws and the City's Fair Housing Ordinance is unknown.

DPD does not actively conduct outreach and education to further fair housing. However, DPD incorporates fair housing regulations into all delegate agency funding agreements, and when notified of fair housing trainings taking place in the city, DPD staff will send out this information to its delegate agencies. DPD also makes available printed copies of the Residential Landlord Tenant Ordinance and the City's fair housing policies in its lobby, along with a list of DPD delegate agencies that residents can go to if they experience housing discrimination. Currently, CCHR is not listed as a referral resource, and DPD acknowledged the need to remedy this situation.

DPD staff indicated that typical projects for which developers currently seek funding or other forms of assistance involve new construction in the range of 70 to 100 units. Many of these new buildings target seniors as occupants. They also do not see as many applications for developments on the North Side and Northwest Side as they do for the South Side and West Side, and consequently, proposed developments on the north and northwest sides have a higher chance of being funded. DPD staff also discussed that they do not see many applications for development of smaller 6- to 12-flat buildings or for-sale housing. DPD has been devoting resources to addressing vacant and abandoned single-family homes and refers residents to Neighborhood Housing Services (NHS) to access loans for purchase/rehab. They also believe that developers are deterred from retrofitting older buildings to make them accessible for people with disabilities, in part because of the cost of retrofits.

Impediments to Fair Housing/Recommendations. In addition to the impediments identified above, when asked about impediments to fair housing that still exist and that the City of Chicago needs to address, DPD staff interviewed indicated the following:

- Stagnation of employment wages.
- Unemployment and its impact on people's ability to maintain their homes.
- Increasing housing prices, particularly in higher-income neighborhoods.
- Limited access to credit for those who want to purchase properties.
- Once-stable neighborhoods that have lost value due to foreclosures.
- The presence of "zombie" properties, which are abandoned properties that banks will not foreclose.
- Negative-equity appraisals of for-sale properties.

Recommended actions put forth by DPD staff for the City's consideration include:

- Examine additional potential funding sources for the Chicago Low-Income Housing Trust Fund.
- Continue to invest in once-stable neighborhoods that have lost value in the foreclosure crisis but are now showing signs of market improvement.

Chicago Housing Authority (CHA)²³

CHA currently serves over 18,000 households in public housing and over 39,000 families participating in the Housing Choice Voucher (HCV) program (the latter also includes project-based vouchers and other voucher programs). When combined, these households represent approximately 130,000 individuals living in affordable housing at CHA properties or in the private market with HCVs. Public housing and HCV programs are limited to households who earn 80 percent or less of the Area Median Income, which in 2014 was \$57,900 for a family of four. The majority of current heads of households in both public housing and HCV programs are female and African American; the numbers of White and Hispanic heads of household who live in public housing are approximately 15 percent of the total and have increased since 2000. The number of youths aged 17 and under who live in public housing has decreased over time, while the senior population has increased.

Currently, CHA supports 13 family developments, 22 mixed-income developments, and 46 senior developments. The family developments tend to be distributed in neighborhoods closer to Lake Michigan, whereas the mixed-income developments tend to be clustered on the Near West Side and the Bronzeville community on the city's South Side. Senior developments tend to be located in communities close to the lakefront on the North Side, and also on the West Side and Near South Side. Although HCV program participants live in neighborhoods throughout the city, there are high concentrations of HCV holders on the South Side and West Side, particularly in the neighborhoods of South Shore, Auburn Gresham, Austin, and North Lawndale. These data are illustrated in the maps on the following pages.

²³ Information in this section is derived from an interview conducted with Jessica Mallon, CHA Manager of Fair Housing and Section 3 Voluntary Compliance Agreement, along with information provided by CHA on March 16, 2015, in a formal response to data requested by AREA.

Exhibit V-1. CHA Family Housing Developments

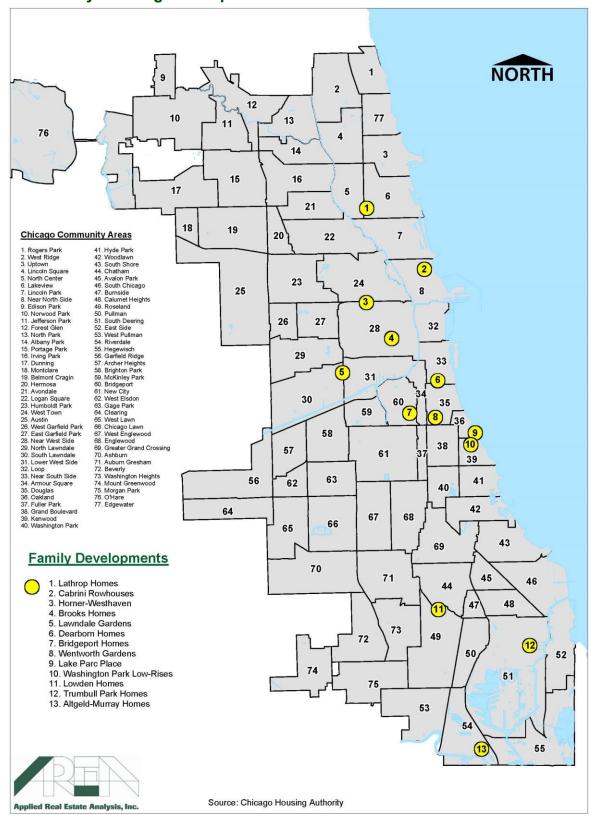


Exhibit V-2.
CHA Mixed-Income Housing Developments

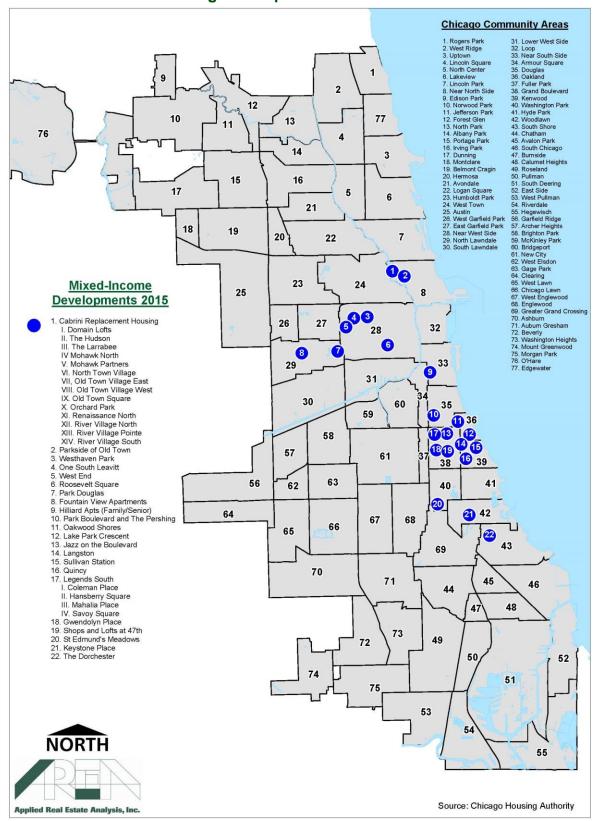


Exhibit V-3. CHA Senior Housing Developments

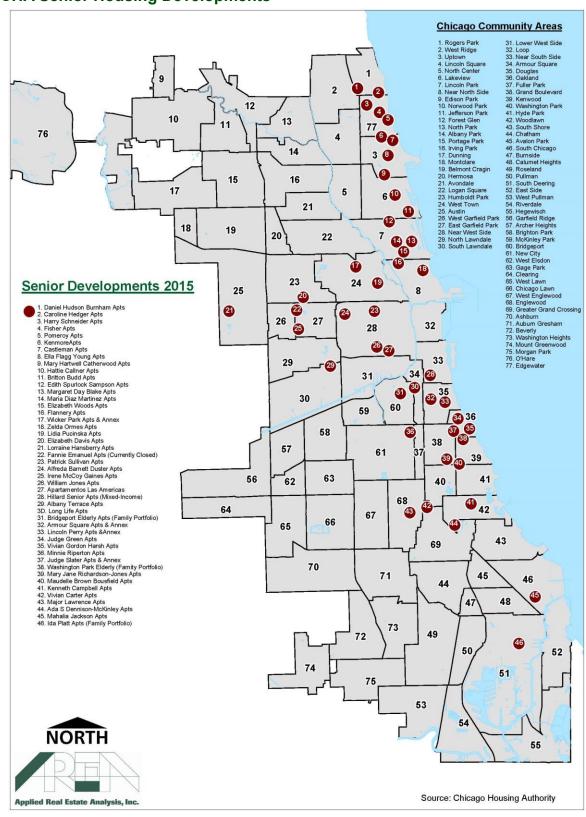


Exhibit V-4.
CHA Housing Choice Voucher Households by Community Area

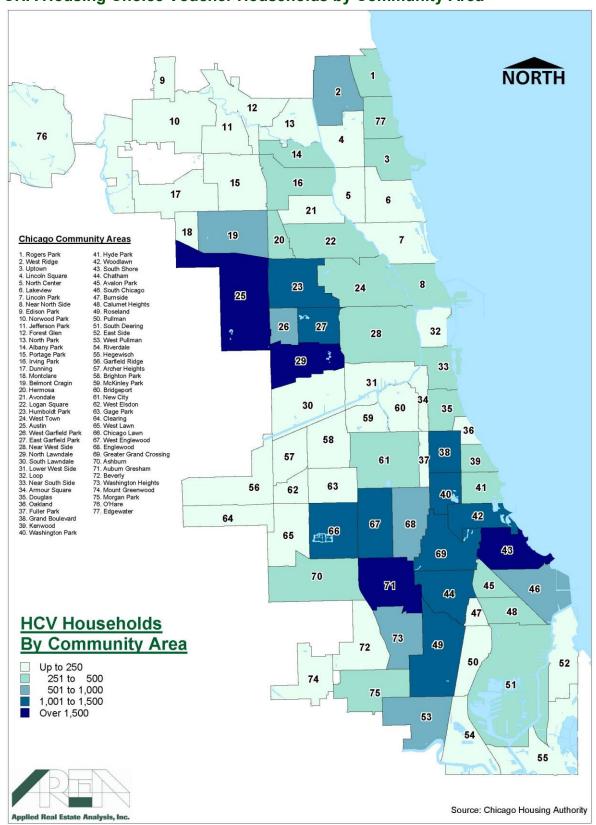
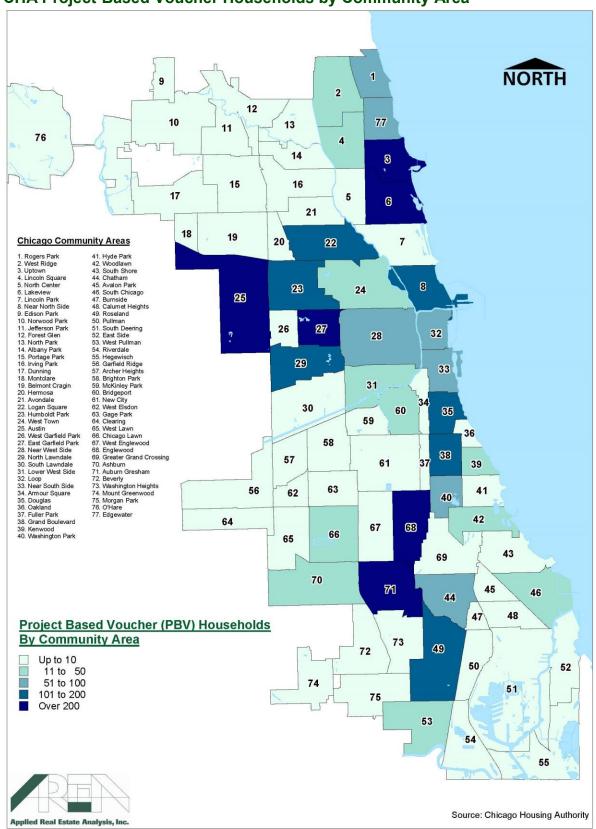


Exhibit V-5.
CHA Project-Based Voucher Households by Community Area



From October 27 through November 24, 2014, CHA opened its waiting lists for public housing family developments, HCVs, and project-based vouchers. Over 280,000 people applied for 96,000 wait list slots. CHA performed extensive outreach and advertising during the open wait list registration period, and consequently, CHA saw the largest number of applicants in the history of the program. CHA's housing programs are meant to accommodate 40,000 HCVs and 25,000 public housing units (although some of the 25,000 public housing units are as yet uncompleted).

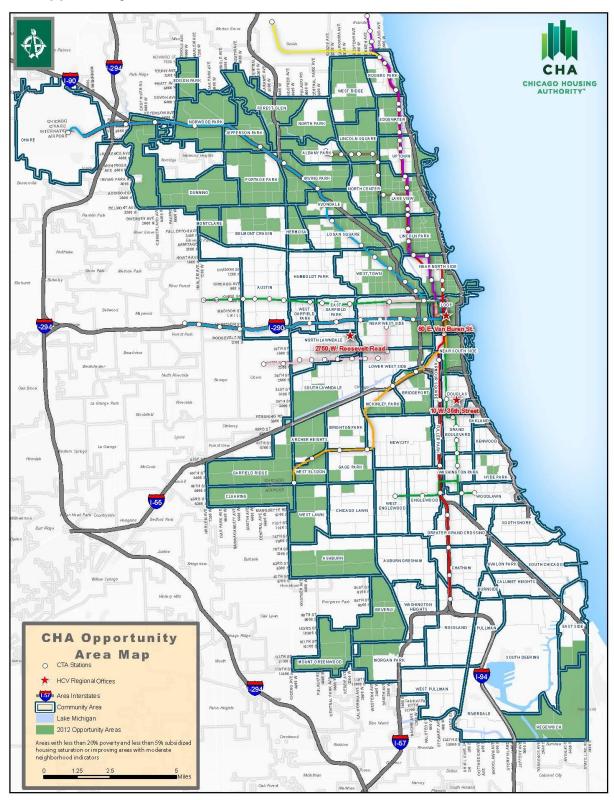
CHA's efforts to affirmatively further fair housing can be categorized into five areas: mobility counseling/opportunity areas, accessibility and reasonable accommodations, identification of impediments/fair housing testing, fair housing training (internal and external), and partnerships with fair housing organizations.

Mobility Counseling/Opportunity Areas. Historically, Chicago has been known as one of the most racially segregated cities in the nation, and also for having areas of concentrated poverty that intersect with racially segregated neighborhoods. Consequently, CHA seeks to expand housing choices for voucher holders by encouraging them to search for housing in "opportunity areas," which are census tracts in which less than 20 percent of households have income below the poverty level and a less than 5 percent concentration of subsidized housing. Some census tracts with low poverty, moderate subsidized housing, and improving community economic characteristics are also designated as opportunity areas. CHA contracts with Housing Choice Partners of Illinois, Inc., to provide mobility counseling to HCV families to help them move into CHA-designated opportunity areas within the city. A map of CHA-designated opportunity areas can be found on the following page.

Accessibility and Reasonable Accommodations. When developing new properties or rehabilitating existing developments, the CHA applies the most stringent codes and regulations pertaining to accessible units, and follows all federal, state, and local guidelines. As a rule, the CHA provides units that are accessible according to Uniform Federal Accessibility Standards throughout its properties at a higher percentage than prescribed by federal regulations. In addition, the CHA follows the City of Chicago's Building Code Chapter 18-11, which calls for 20 percent of all new units to be adaptable. Following these guidelines, the CHA has nearly 2,000 units that are certified as accessible to people with mobility and sensory disabilities.

Starting in 1999 under the CHA's Plan for Transformation, the agency began to demolish its irreparable housing stock and relocated residents within these developments either to other public housing units or to private housing using HCVs. Residents with disabilities were at a disadvantage in finding affordable, accessible housing in the private market. At the urging of disability advocates such as Access Living, CHA created a Modification Fund (Mod Fund), a pool of money set aside for the installation of accessibility features and devices such as grab bars, lifts, ramps, and sensory equipment for HCV participants who needed such features to utilize their HCVs.

Exhibit V-6. CHA Opportunity Areas



In April 2015, CHA planned to enter into an Intergovernmental Agreement with the City of Chicago's Mayor's Office for People with Disabilities for a two-year base term with two one-year options to extend. Under this agreement, MOPD will administer the CHA's Mod Fund by coordinating modifications for HCV participants with disabilities who require modifications to their private units to make them more accessible. Although CHA is not mandated to make modifications for HCV holders, this practice has led to it making more than 500 units accessible for voucher holders within the City.

In addition, CHA receives 1,200 requests for reasonable accommodations in housing each year. The CHA's Housing Rights and Nondiscrimination Department estimates that 97 percent of the reasonable accommodations granted are fulfilled. Unfulfilled requests are usually due to the requestor withdrawing their request or otherwise resolving the issue. The length of time to fulfill each accommodation request varies depending on the circumstances; however, the average time for an administrative accommodation (for example, adding a live-in aide) for both public housing and HCV units is approximately one month.

Identification of Impediments/Fair Housing Testing. The CHA's normal practice is to list impediments to fair housing in its annual plans, but it has not yet been required to complete a formal Analysis of Impediments to Fair Housing Choice report. To this end, in August 2010 CHA contracted with the Chicago Lawyers' Committee for Civil Rights Under Law (CLC) to conduct a Fair Housing Testing and Survey Project, in which trained investigators posing as prospective tenants inquired about housing availability, terms, and conditions to assess housing providers' compliance with laws prohibiting housing discrimination. The project was designed to assess fair housing compliance in three CHA programs: HCVs, senior developments, and family developments. The HCV testing involved landlords who rented to HCV holders as well as private landlords who did not.

The testing revealed widespread housing discrimination throughout the city based on race, disability, and family size. The testing also revealed inferior customer service in all three CHA programs, as well as widespread steering. Source of income discrimination was also revealed when testing private landlords in opportunity areas. The testing project also included three surveys with residents in family developments, residents with disabilities in family developments, and HCV participants to determine their knowledge of fair housing and customer service. Survey results revealed that the majority of respondents had a limited understanding of their fair housing rights, did not know how to file fair housing complaints, and were not aware of reasonable accommodation and modification rights for people with disabilities. The CHA has used the results of the CLC testing report to guide its efforts to put in place policies, practices, and trainings to mitigate these impediments.

Fair Housing Training. The CHA's Housing Rights and Nondiscrimination Department provides ongoing fair housing, disability, and Violence Against Women Act trainings to applicable property management staff and HCV contractors as well as outside agencies, such as real estate agencies and affordable housing providers. CHA fair

housing trainings provide a unique perspective for outside agencies, as they combine information on fair housing laws and an overview of the Housing Choice Voucher program's policies and procedures. The CHA also provides yearly training for internal staff and staff from City agencies. CHA has provided training for CCHR staff, and vice versa, but this has not occurred for several years.

Based on CHA's training log dating back to 2007, an average of two to four trainings occurred each year. The exception was in 2013, when eight fair housing/Americans with Disabilities Act (ADA) trainings were provided to a variety of audiences, consisting largely of property managers and landlords. CHA has tentatively scheduled three fair housing trainings with HCV participants in 2015.

Partnerships with Fair Housing Organizations. CHA has been more intentional about working with CCHR as well as the Chicago Lawyers' Committee, John Marshall Law School, Access Living, Lawyers' Committee for Better Housing, and others to help the agency become more responsive to addressing impediments to fair housing. CHA also educates these organizations on their various programs so that they in turn can help clients who seek them out for assistance when they experience discrimination. CHA acknowledges that these fair housing organizations provide a level of case management regarding fair housing that it does not have the capacity to directly provide.

FUNDING RECIPIENT ACTIVITIES

Chicago Delegate Agencies²⁴

As stated earlier, 68 delegate agencies receive funding through the Chicago Department of Planning and Development to support a variety of housing-related services and activities. AREA identified six delegate agencies that are actively engaged in efforts to affirmatively further fair housing. This list is not exhaustive and not intended to exclude other delegate agencies that may be engaged in similar activities.

• Access Living of Metropolitan Chicago. Access Living was founded in 1980 and is a cross-disability organization governed and staffed by a majority of people with disabilities. The organization works to foster the dignity, pride, and self-esteem of people with disabilities and enhance the options available to them so they may choose and maintain individualized and satisfying lifestyles. To this end, Access Living offers peer-oriented independent living services; public education, awareness, and development; individualized and systemic advocacy; and enforcement of civil rights on behalf of people with disabilities.

²⁴ Source: Individual organizational websites.

Access Living is one of the few centers for independent living in the country with a legal department where assigned attorneys work on several areas of focus, one of which is fair housing. Access Living's housing attorneys provide legal advice, counseling, and representation to people with disabilities who have meritorious discrimination complaints. Persons with disabilities who believe they have experienced housing discrimination can file a formal complaint electronically via Access Living's website or by visiting the office in person.

Access Living's fair housing project work also includes education and pro se assistance, through which it works with consumers to solve fair housing disputes on their own, instructs housing providers on how to comply with fair housing laws, and teaches architects and developers about new construction requirements. The project distributes materials, such as its Fair Housing Handbook (for consumers), Reasonable Accommodation Request Forms (for consumers), Fair Housing Outline (for attorneys and advocates), and Handbook on the New Construction Provisions of the Fair Housing Act and Section 504 of the Rehabilitation Act (for developers, builders, and architects). All these documents are available in alternative formats for individuals who are blind or vision impaired, and some are available in Spanish, Polish, and Mandarin.

Access Living is also actively engaged in collaborations and partnerships to affirmatively further fair housing on the local, state, and national level. The organization recommends policy changes to expand housing opportunities and advance fair housing protections for people with disabilities, ensures interagency coordination to further fair housing (for example, when deinstitutionalizing residents of nursing homes and related facilities), and educates and works with public and private partners on developing affordable, accessible, and integrated housing.

Latino Policy Forum. The Latino Policy Forum is the only organization in the Chicago area that facilitates the involvement of Latinos at all levels of public decision making. Originally founded in 1988 as Latinos United, the organization underwent a name change and expansion of its mission to a broader policy focus in 2008. The Latino Policy Forum's commitment to working on issues that come from community participatory processes is reflected in its name. It is through on-going community forums that the organization identifies issues, develops agendas, and increases civic participation in the Latino community. The Latino Policy Forum's goals are to improve education outcomes, advocate for affordable housing, promote just immigration policies, and engage diverse sectors of the community, with an understanding that advancing Latinos advances a shared future.

The Latino Policy Forum's initiatives related to affirmatively furthering fair housing include a) ensuring that Latino families have access to quality, affordable housing and other housing resources through its housing working group of community leaders, as well as advocacy with HUD and CHA, b)

bringing attention to the disproportionate impact of the mortgage foreclosure crisis in the Latino community through analysis and policy reports and advocacy with the Illinois Attorney General and the Illinois Housing Development Authority, c) educating consumers and service providers on fair housing through events and workshops, particularly those held regularly at the Consulate of Mexico in Chicago and in communities with high concentrations of Latino households, and d) developing curricula to provide practical education to help people looking for housing acquire and keep decent housing.

Lawyers Committee for Better Housing (LCBH). LCBH was founded in 1980 and its mission is to promote the rights of tenant access to safe, decent, and accessible affordable housing on a non-discriminatory basis through legal representation, advocacy, education, outreach, and supportive services.

LCBH's six program and service areas work in concert to affirmatively further fair housing.

- The Attorney of the Day Eviction Defense Program provides free quality legal representation to Chicago's most vulnerable renters facing eviction, including many elderly, disabled, and single mothers. According to LCBH, more than 90 percent of renters facing eviction in Cook County are not represented by a lawyer, and most experience eviction trials that last less than three minutes, on average, regardless of any valid legal defense.
- The Affordable Housing Preservation Program helps preserve and protect safe, accessible, and affordable housing in Chicago by providing legal assistance to individuals as well as groups of renters who are living with building code violations or other unsafe conditions due to deterioration or foreclosure.
- The Tenant Advocacy Project utilizes pro bono attorneys to provide preeviction assistance to renters whose utilities have been illegally shut off, have been locked out of their homes by the landlord, or experienced other serious, life-threatening issues.
- The Tenants in Foreclosure Intervention Project works to ensure that the laws protecting renters are upheld throughout the foreclosure process, and also provides legal representation, advocacy, and educational workshops for a variety of stakeholders including attorneys, community advocates, and renters. LCBH is the only legal aid agency in the Chicago area that focuses solely on the issues facing renters living in foreclosed buildings.
- The supportive services team provides tenants with assessments, and assists tenants in finding alternative affordable housing, applying for emergency funding, screening for public benefits, and identifying other essential services.

The Fair Housing Project, which spearheads the work of the Fair Housing Education Consortium (FHEC), is funded by the Chicago Department of Planning and Development. FHEC provides fair housing training to housing providers, tenants, community organizations, and the general public, creating awareness of and combating discrimination in housing. FHEC's education and outreach efforts are extensive and briefly summarized below.

The formation of the consortium was initiated by LCBH, which continues to coordinate the project. Other member agencies include Access Living, Chicago Lawyers Committee for Civil Rights Under Law, and the John Marshall Fair Housing Legal Support Center.

FHEC works to ensure training sessions cover the most pertinent topics, such as what constitutes unlawful discrimination, who can be sued, the protected classes, and relief available under fair housing laws in all jurisdictions: federal, state, county, and city. Additionally, FHEC trainings cover requests for reasonable accommodations, with an emphasis on reasonable modifications and accessibility requirements. FHEC trainings and educational materials target the housing industry, landlord organizations, legal community, delegate agencies, and tenant groups.

As part of FHEC's work, a variety of fair housing marketing posters and resources can be downloaded from LCBH's website. The fair housing marketing posters are in color and feature photos and narrative messages that highlight potential housing discrimination scenarios that could be experienced because of someone's race, disability, religion, family status, or community where they are searching for housing. There is also a poster targeting veterans. In addition, one can download the Chicago Renters' Resource Guide chapter on fair housing law, as well as the fair housing ordinances and laws enforced at the city, county, state, and federal levels. All fair housing posters and the Chicago Renters' Resource Guide fair housing chapter are available in English, Spanish, Polish, and Mandarin.

Finally, LCBH is actively involved in legislative advocacy for fair housing, and it has been an integral part of the efforts to pass the Single-Room Occupancy and Residential Hotel Preservation Ordinance and the Keep Chicago Renting Ordinance. It is also involved with the Chicago Housing Initiative and the Keeping the Promise Campaign to decrease homelessness in Chicago and increase access to affordable housing through the redeployment of resources from the Chicago Housing Authority.

Legal Assistance Foundation (LAF). For over 40 years, LAF (formerly the Legal Assistance Foundation of Metropolitan Chicago) has provided free legal services in non-criminal matters to people living in poverty in metropolitan Chicago. With more than 100 full-time attorneys and staff who provide LAF clients with comprehensive legal services, its advocacy results in such successes as gaining custody of a child, obtaining an order of protection against an abusive spouse, preventing an unfair eviction, or obtaining justice for a victim of consumer fraud.

With respect to furthering fair housing, LAF focuses on cases that help people living in poverty to keep decent, safe, and affordable housing. These legal cases include those that involve a) subsidized housing (public housing, Housing Choice Vouchers, and other rental assistance) involving evictions, termination of assistance, rent calculations, and admissions issues; b) discrimination and disability accommodation; c) eviction from mobile home parks; and d) housing protection for seniors, veterans, and people living with HIV/AIDS. LAF also focuses on cases that impact an individual or family's ability to keep housing and utility service, and protect limited income and resources from unfair collection, including foreclosure, utilities (electricity, gas, water), bankruptcy, car title and payday loans, unfair debt collection, and consumer fraud. Finally, LAF provides "know your rights" workshops to tenants through its Community Engagement Unit that conducts outreach to and works in partnership with community organizations in all parts of the city.

Neighborhood Housing Services of Chicago (NHS). NHS provides comprehensive services to help low- to moderate-income residents acquire and maintain affordable owner-occupied housing, including homebuyer education and foreclosure prevention workshops and financing for home purchase, rehab, and repairs. One of NHS's nonprofit affiliates, the NHS Redevelopment Corporation (NHSRC), buys, rehabilitates, and sells homes; builds new homes; works with housing court to stabilize vacant properties; and develops multifamily housing and senior citizen housing to support NHS's neighborhood revitalization efforts. In addition, NHSRC's real estate services include development of new and rehabbed single-family homes, property management of over 300 units of rental housing, brokerage services, and receivership.

Another NHS nonprofit affiliate, Neighborhood Lending Services, Inc. (NLS), is an Illinois Residential Mortgage licensee and Equal Housing Opportunity Lender. In partnership with the City of Chicago's Department of Planning and Development, NLS offers loan programs that finance home purchase, purchase with rehabilitation, home improvement, home safety repairs, and refinancing for low- and moderate-income borrowers and homebuyers throughout Chicago. All of NHS's services can be accessed through its nine neighborhood-based offices in the City of Chicago: Auburn Gresham/Englewood, Back of the Yards/Garfield Boulevard, North Lawndale, Roseland, South Chicago, West Englewood, and West Humboldt Park. Residents from other parts of the city can also access its services at its citywide office on Milwaukee Avenue.

NHS's neighborhood offices are actively involved with local community organizations in community revitalization and advocacy efforts to further fair

housing. Its innovation division converts the knowledge and experience NHS gains through its daily work in the neighborhoods to new programs and policy initiatives that can directly benefit those communities and the Chicago region. Over the past several years, the innovation division has spearheaded research on the foreclosure crisis, as well as changes to the federal Home Affordable Modification Program.

The John Marshall Law School Fair Housing Legal Support Center and Clinic. This clinic is dedicated to educating the public about fair housing law and providing legal assistance to private or public organizations that seek to eliminate discriminatory housing practices. The Legal Support Center organizes, presents, and participates in fair housing and fair lending seminars and training programs available to such agencies, attorneys, practitioners, and the public generally at the John Marshall Law School and throughout the United States. The center's website presents information and resources on fair housing and fair lending law, as well as research on particular areas and developing issues to support seminars and trainings.

The legal clinic provides law students the opportunity to work with clients who have complaints of housing and lending discrimination, and complaints can be filed electronically on the clinic's website. The clinic is a matriculated, graded course of the John Marshall Law School. It was started in 1985 in partnership with the Leadership Council for Metropolitan Open Communities to provide law students with externship experiences by working on fair housing cases in a clinical setting. In 1993, John Marshall transitioned the externships in-house and established the Fair Housing Legal Clinic, staffed with full-time attorneys to train and educate law students how to represent victims of housing discrimination. At that time, the clinic launched a comprehensive testing program designed to facilitate enforcement activities. The clinic regularly conducts systemic and complaint-based testing for fair housing violations, and its program is a model for fair housing testing throughout the United States.

The clinic continues to strengthen partnerships with local fair housing agencies and organizations, as well as HUD and the Chicago Commission on Human Relations, and collaborates with the Illinois Department of Human Rights to combat the problem of housing discrimination. Staff and students regularly conduct outreach activities in the community in an effort to educate the public of their housing rights under federal, state, and local laws and regulations.

Faculty, staff, and clinical interns regularly schedule free education and outreach presentations throughout the year. These presentations include a general overview of the Fair Housing Act and state and local laws and regulations as well as the services of the clinic, including enforcement activities. Every program includes a designated question-and-answer session. Clinic personnel are also available to briefly consult with attendees who may have housing concerns or believe they may be victims of housing discrimination.

ACTIVITIES OF OTHER KEY FAIR HOUSING STAKEHOLDERS

Chicago Lawyers' Committee for Civil Rights Under Law

The mission of the Chicago Lawyers' Committee for Civil Rights Under Law, Inc. (CLC), is to protect and promote civil rights by bringing the strength of the private bar to bear on the problems of poverty and discrimination. CLC was created in 1969 as a public interest consortium of Chicago law firms to provide pro bono legal services in significant civil rights cases. CLC provides free legal services to people with civil rights problems and nonprofit organizations that need help with transactional issues.

The mission of CLC's Fair Housing Project is to eliminate housing discrimination based on race, national origin, familial status, physical and mental disability, sexual orientation, source of income, religion, gender, and other bases to affirmatively further fair housing in the Chicago metropolitan area. To achieve that mission, staff and volunteers a) educate tenants, homeowners, landlords, and others about their rights and duties under fair housing and fair lending laws; b) advocate for progressive laws and public policies; c) conduct intake, referral, and investigation of housing discrimination complaints; and d) provide legal representation to individuals and groups in asserting and enforcing their fair housing rights and securing equal housing opportunities. CLC is a member of CAFHA and serves on its board of directors.

Chicago Area Fair Housing Alliance (CAFHA)²⁵

In line with efforts of the City's delegate agencies, CAFHA and its member organizations are actively working to affirmatively further fair housing in addition to promoting enforcement of discrimination. CAFHA is a coalition of housing and legal advocacy organizations, municipal entities, and individuals from the seven-county Chicago area region that works to stabilize, mobilize, and strengthen integrated communities. CAFHA has been in existence for over 25 years and currently includes 32 members, six of which are also City of Chicago delegate agencies (cited above). Its members have access to technical assistance and programming supported by CAFHA staff, committees, and other members that include the following:

- Consulting for jurisdictions and community groups to ensure fair housing compliance
- Strategic planning for programs and project development
- Demographic and housing data
- GIS mapping

Client and staff fair housing training

- Fair housing analysis and reporting
- Advocacy at federal and state levels, as well as locally
- Education and outreach

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²⁵ This section of the report is based on information provided at www.cafha.net and interviews with CAFHA's board and staff.

CAFHA has three working committees: 1) events and marketing, which engages members and other organizations in any upcoming meetings, lectures, panels, workshops, and social events; 2) policy and research, which focuses on crafting policy initiatives for the coalition, generating quarterly briefs to inform the membership of fair housing issues, and supporting the policy endeavors of member agencies; and 3) fair housing enforcement, which brings together every enforcement agency in the region to promote collaboration on enforcement-related issues, transparency of service areas, and enforcement consistency throughout the Chicago region. Some of CAFHA's recent policy reports include:

- "Fair Housing and Equity Assessment: Metropolitan Chicago." Published in partnership with the Chicago Metropolitan Agency for Planning, this report discusses and analyzes impediments to fair housing in the Chicago metropolitan area, identifies the root causes of segregation, describes the current state of fair housing infrastructure, and provides a series of recommendations focused on cultivating diversity, expanding access to areas of opportunity, and investing in disinvested communities.
- "Chicago Housing and Education Inequity Report." This report outlines research regarding the benefits of integrated schools, analyzes the link between housing and education, assesses the ways in which segregation has fueled the current state of education in Chicago and may be aggravated by Chicago Public Schools' reforms, and makes recommendations for ameliorating segregation and furthering school diversity.

Equally important, a section of CAFHA's website is devoted to fair housing: how it is defined, why it is important, what it means to "affirmatively further fair housing"; it also lists the various federal, state, and local laws that uphold fair housing. The City of Chicago's Fair Housing Ordinance is not listed as a reference, although the Cook County Human Rights Ordinance and Illinois Human Rights Act are listed; hence, all entities involved in furthering fair housing need to be diligent about ensuring that there are cross-references to each other's websites and resources.

Impediments to Fair Housing/Recommendations. When interviewed as part of the data-gathering process in the fall of 2014, CAFHA members noted that the report need to address issues of segregation as well as bring greater attention to neighborhoods that need economic investment so as to spur mixed-use housing and economic development. When asked about impediments to fair housing that still exist and that the City of Chicago needs to address, CAFHA members indicated the following:

In the past, complaints investigated by CCHR took a long time to resolve due to understaffing. Further, it is not clear which criteria are used to hire investigators. Despite these concerns, CAFHA members also acknowledged that the Commission now has good leadership and that the substantial backlog of complaints has been reduced.

- The construction of new subsidized housing is very limited but still targeted to specific geographic areas and thus reinforces housing segregation. Further, project-based housing vouchers are being awarded to non-opportunity neighborhoods.
- Public schools do not attract students from diverse neighborhoods, and this also reinforces segregation of neighborhoods.
- Some neighborhoods have incidents of intergroup racial tensions and hate crimes that create a negative public image.

Recommended actions put forth by CAFHA for the City's consideration include:

- Create a panel comprised of real estate professionals, landlords, and City staff to address the most prevalent forms of housing discrimination, particularly with respect to source of income.
- Consider adding additional target areas to the City's Micro-Market Recovery Program that are located close to opportunity neighborhoods and can offer affordable housing close to those stronger market areas.
- Provide financial assistance to "mom and pop" owners of two- to four-flat residential properties that can be rehabbed and/or carry affordable mortgages, and market these units as fair housing opportunities.
- Use Tax Increment Financing (TIF) to encourage investment in neighborhood infrastructure that supports the development of these small two- to four-unit residential properties and the development of infill housing.
- Promote development of market-rate housing on the city's South Side and West Side in neighborhoods that have an overabundance of subsidized housing. The City could focus housing development near transit terminals, and this type of investment should be coupled with investments in infrastructure, schools, and commercial development via "investment zones."
- Provide incentives to entities awarded New Markets Tax Credits to use them to catalyze neighborhood investment.
- Consider re-establishing New Homes for Chicago, a program that assisted households with home purchases, or creating a comparable program to support affordable homeownership.
- Invite representatives from the fair housing community to participate in various commissions and working committees, particularly for planning efforts such as Chicago's five-year housing plan.
- Consider adopting an inclusionary zoning ordinance to encourage affordable housing in opportunity areas.
- Involve Chicago Public Schools in fair housing and neighborhood revitalization efforts.

OTHER PRIVATE HOUSING ADVOCATES

Preservation Compact Committee

A number of organizations in Chicago work to support affordable housing development, which addresses the needs of many classes protected by the Fair Housing Ordinance. One example is the Preservation Compact Committee.

The Preservation Compact Committee is a private organization founded in 2007 that seeks to preserve affordable rental housing in Cook County. Funded by the MacArthur Foundation, the committee works to ensure resources exist to help owners of both subsidized and unsubsidized buildings maintain their rental housing in good condition with affordable rents. The organization is guided by the notion that "renters make up the backbone of the local economy" and "preservation is the most efficient and affordable" method to keep rental stock viable.

The Preservation Compact Committee is comprised of 12 partner organizations from a range of disciplines that work to identify affordable rental housing problems, offer solutions, and implement strategies that can assist developers, owners, tenants, government officials, and nonprofits to maintain safe affordable housing. One recent effort is the identification of federally subsidized housing units for low- and moderate-income households that are at risk of conversion to market-rate housing that is no longer affordable. After extensive research, the organization identified approximately 30 rental housing developments with expiring federal contracts that are located in strong housing markets and might be converted to market-rate units.

LIMITED PUBLIC UNDERSTANDING

Despite the concerted education and outreach efforts put forth by the various agencies described above, there is still more that can be done to educate the public. Section VII of this report discusses the results of the web-based surveys completed by residents, housing service providers and advocates, and real estate industry professionals, as well as findings from roundtable discussions conducted with these constituencies; generally, these groups acknowledge that while there are significant resources available to educate and help those who have experienced housing discrimination, the general public still has limited to no understanding of fair housing laws.

As noted by the National Commission on Fair Housing and Equal Opportunity, "[This] approach to fair housing has relied heavily on action taken by individuals who believe they have suffered discrimination and file a fair housing complaint. How will these individuals know to file a complaint if they don't know their rights? How will industry know how to comply with the [Fair Housing] Act unless we work to educate them?" 26

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²⁶ "The Future of Fair Housing." The National Commission on Fair Housing and Equal Opportunity, December 2008.

SECTION VI. FAIR HOUSING COMPLAINTS

REVIEW OF FAIR HOUSING DATABASES

Within Chicago, individuals have multiple options for filing complaints if they believe their fair housing rights have been violated. Complaints can be filed with either a public sector entity or nonprofit fair housing organizations:

- Chicago Commission on Human Relations (CCHR)
- Chicago Housing Authority (CHA)
- U.S. Department of Housing and Urban Development (HUD)
- Illinois Department of Human Rights
- Nonprofit fair housing enforcement agencies

The Chicago Commission on Human Relations, HUD, and the State of Illinois provided complaint information from 2003 through 2013. The total number of complaints filed with government entities during this time frame was 2,530. The most frequent bases of the complaints were race (28 percent) and disability (23 percent). This same frequency is seen again when data from each of these four sources are examined individually. CHA also provided complaint data for 2010 through 2014. Because of the different time period for data from CHA versus the other agencies, the CHA data were analyzed separately.

In some cases, a complaint may have been originally filed with HUD, which in turn assigned it to the State to investigate. To prevent a double count, we have removed the duplicative complaints to provide an accurate overall picture in the following exhibits. It is also important to note that the vast majority of CHA complaint cases (where the agency was named as the respondent) are handled by the other three government agencies. Hence, the data presented in Exhibits VI-1 and VI-2 account for complaint data pertaining to all four agencies. The duplicates are maintained in the individual charts for HUD, the State of Illinois, CHA, and CCHR to provide an understanding of activity at each level.

Exhibit VI-1.
Complaints Filed with HUD, State of Illinois, and City of Chicago January 1, 2003 through December 31, 2013

Basis	Number	Percentage
Age	25	1%
Ancestry	4	0%
Color	24	1%
Disability	593	23%
Gender/Identity	8	0%
Marital Status	14	1%
Military Discharge Status	0	0%
National Origin	216	9%
Other	3	0%
Parental Status	220	9%
Race	702	28%
Religion	79	3%
Retaliation	102	4%
Sex	204	8%
Sexual Orientation	52	2%
Source Of Income	284	11%
Total	2530	100%

^{*}Complaints filed with HUD and CCHR allow complainants to list multiple bases on the complaint form. This exhibit identifies only the first basis listed.

Sources: U.S. Department of Housing and Urban Development; Illinois Department of Human Rights; Chicago Commission on Human Relations.

Each entity has its own categories for basis and reason closed. In Exhibits VI-1 and VI-2, we combine the data utilizing the City's protected classes. In the remaining charts we utilize the entity's terminology. When reviewing the exhibits, it is important to remember that the protected classes for HUD, the State of Illinois, and the City of Chicago vary. Therefore, a complaint that may have been filed on one basis with HUD might have been filed on a different basis with the City.

We also analyzed the year in which the complaint was filed. From 2005 through 2006, complaints filed increased from 185 to 220, which represented a 19 percent increase. This increase may have reflected the predominance of predatory mortgage lending that took place during this time period. It was also during this period that Illinois House Bill 4050, which created a four-year pilot program in Cook County to combat predatory lending, was passed.²⁷ The pilot program targeted 10 zip codes in Chicago from which a significant number of high-risk mortgage products originated, and it required mandatory housing counseling for those seeking a residential mortgage; their mortgage information was also entered into a tracking database. The original intent of the legislation was to help mortgage seekers become more fully informed before entering into high-risk mortgage agreements; however, the legislation created a strong backlash from real estate and mortgage brokers who claimed that lending would be depressed due to the additional requirements. Ultimately, the pilot program was not implemented. In response to the HB 4050 backlash, the real estate market may have loosened for those seeking rental and for-sale housing and could be one reason why fair housing discrimination complaints decreased from 2006 to 2009. Complaints during this time period dropped from 220 to 170, a decrease of 23 percent.

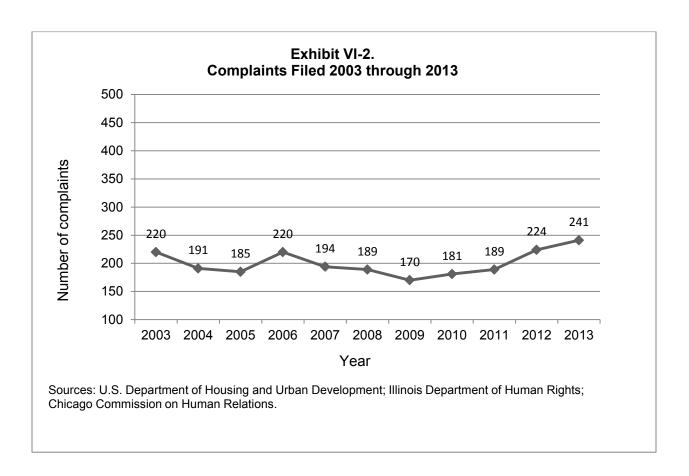
In 2008, the housing market crashed, and economic conditions were uncertain. It is possible that households focused on maintaining their existing housing and addressing other financial challenges and did not consider filing discrimination complaints. However, there has been a steady increase in fair housing discrimination complaints filed since 2009, and from 2011 to 2013 complaints filed increased from 189 to a 10-year-period high of 241. This represented a 42 percent increase from 2009 and a 28 percent increase from 2011.

A few possible explanations for this increase in complaints include:

- More households began considering their housing options due to changes in personal income.
- During the challenging economic period, respondents may have forgotten or ignored fair housing laws in favor of increasing revenue generated from the sale or rental of housing.

²⁷ State of Illinois Department of Financial and Professional Regulation, Transcript of Public Meeting on Predatory Lending Pilot Program House Bill 4050, November 27, 2006.

After the housing market crashed, residential foreclosures skyrocketed and forced many homeowners to abandon their properties and seek rental housing. At the same time, lenders tightened access to credit and became more conservative in their mortgage underwriting practices. Access to rental housing also became much more competitive, and renters had to undergo increased scrutiny of their credit. Hence, those seeking housing with blemished credit records may have encountered significant difficulties.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT COMPLAINTS

During the 11-year period from 2003 to 2013, 1,338 complaints of discrimination in housing in Chicago were filed with HUD. Some of these complaints were forwarded to the State of Illinois for investigation and enforcement. Seventy-two percent of the complaints filed included race (38 percent) and/or disability (33 percent) as a basis category.

Of the 1,338 complaints, 99 percent were closed as of May 30, 2014. The most frequent reasons for closure were a "no cause" determination, administrative closure, and the complaint being withdrawn by complainant after resolution.

Exhibit VI-3.
Complaints Filed with HUD
January 1, 2003 through December 31, 2013

Total complaints filed Basis of complaints*	1,338
Color	23
Disability	444
Familial Status	184
National Origin	185
Race	514
Religion	63
Retaliation	96
Sex	156
Sexual Harassment	0

^{*}Complaints filed with HUD can list up to three bases; therefore, the total number of complaints filed does not equal the sum of the number for each basis.

Source: U.S. Department of Housing and Urban Development.

Exhibit VI-4.
Status of Complaints Filed with HUD
January 1, 2003 through December 31, 2013

Open Closed	16 1322
Reason Closed:	
Administrative closure	319
Cause (FHAP)	39
Charged (HUD)	15
Conciliated/settlement successful	103
No cause determination	573
Withdrawn with resolution	272

Source: U.S. Department of Housing and Urban Development.

STATE OF ILLINOIS COMPLAINTS

Between January 1, 2003 and December 31, 2013, 1,135 complaints were filed with or referred to the State of Illinois Department of Human Rights. Nearly 50 percent of the complaints filed were based on race (24 percent) or physical disability (22 percent). It is important to note that the basis categories of "perceived sex" and "gender/identity" have been added since 2010.

As indicated in Exhibit VI-5, 99 percent of cases were closed as of December 31, 2013, and the most frequent reasons for closure were a "no cause" determination, administrative closure, and the complaint being withdrawn by complainant after resolution.

Exhibit VI-5.
Complaints Filed with the
Illinois Department of Human Rights
January 1, 2003 through December 31, 2013

Basis	Number	Percent	Number Closed	Percent Closed
Race	271	24%	266	98%
Physical Disability	248	22%	245	99%
Familial Status	136	12%	135	99%
Mental Disability	132	12%	132	100%
National Origin	112	10%	111	99%
Sex	79	7%	78	99%
Retaliation	51	4%	51	100%
Religion	26	2%	26	100%
Homosexual	21	2%	20	99%
Age	20	2%	20	100%
Marital Status	11	1%	11	100%
Other	10	0.9%	10	100%
Transgender	4	0.4%	4	100%
Perceived Sex	4	0.4%	4	100%
Color	4	0.4%	4	100%
Heterosexual	2	0.2%	2	100%
Not Categorized	2	0.2%	2	100%
Coercion	1	0.1%	1	100%
Gender/Identity	1	0.1%	1	100%
Total	1,135	100%	1,123	99%

Source: Illinois Department of Human Rights.

Exhibit VI-6.
Status of Complaints Filed with the Illinois Department of Human Rights
January 1, 2003 through December 31, 2013

Open	12
Closed 1,	123
Reason Closed:	
Administrative closure	38
Adjusted with terms (of settlement and agreement)	63
Adjusted and withdrawn	240
Default of the respondent due to failure to provide a verified	
response	16
Failure to proceed (i.e., complainant's failure to cooperate with the	
investigation)	146
Lack of substantial evidence	490
Substantial evidence	40
Withdrawn by complainant	68
Lack of jurisdiction	22

Source: Illinois Department of Human Rights.

CHICAGO HOUSING AUTHORITY COMPLAINTS

As shown in Exhibit VI-7, between January 2010 and December 2013 the Chicago Housing Authority recorded approximately 68 complaints, which were also filed with CCHR, the State of Illinois Department of Human Rights, and HUD. Nearly 50 percent of the complaints indicated biases against persons with disabilities, 14 percent complained of racial discrimination, and 10 percent were based on source of income discrimination.

Exhibit VI-7.	
Complaints Filed with the Chicago Housing Authority January 2010 through December 2013	
Basis of complaints*	
Age	1
Ancestry	2
Disability	37
Familial status	3

Marital status	1
National origin	2
Race	11
Religion	2
Sex	6
Source of income	8
Other or not listed	6

^{*}Complaints filed with the CHA can list up to three bases; therefore, the total number of complaints does not equal the sum of the number of each basis.

Source: Chicago Housing Authority.

Based on information provided by the CHA, all complaints received by the agency between 2010 and 2013 have been closed. Approximately 41 percent were dismissed because of lack of evidence, and nearly 20 percent of the persons filing complaints withdrew the complaints. (See Exhibit VI-8.)

Exhibit VI-8. Status of Complaints Filed with the Chicago Housing Authority January 2010 through December 2013

Complainant withdrew complaint19Complainant failure to respond1Closed by CCHR1Closed by HUD2Determination of compliance1Dismissal: Failure to proceed by tenant1Dismissal: Lack of substantial evidence28Dismissal: No reasonable cause of discriminatory housing practices4Dismissal of complaint1Dismissed2Finding of program compliance1Judge granted dismissal1Lack of jurisdiction3No probable cause1Order of dismissal issues1	Reason Closed	
Closed by CCHR Closed by HUD 2 Determination of compliance 1 Dismissal: Failure to proceed by tenant 1 Dismissal: Lack of substantial evidence 28 Dismissal: No reasonable cause of discriminatory housing practices Dismissal of complaint 1 Dismissed 2 Finding of program compliance 1 Judge granted dismissal 1 Lack of jurisdiction 3 No probable cause	Complainant withdrew complaint	19
Closed by HUD Determination of compliance Dismissal: Failure to proceed by tenant Dismissal: Lack of substantial evidence Dismissal: No reasonable cause of discriminatory housing practices Dismissal of complaint Dismissed Finding of program compliance Judge granted dismissal Lack of jurisdiction No probable cause 2 Dismissed 1 Dismissed 1	Complainant failure to respond	1
Determination of compliance 1 Dismissal: Failure to proceed by tenant 1 Dismissal: Lack of substantial evidence 28 Dismissal: No reasonable cause of discriminatory housing practices Dismissal of complaint 1 Dismissed 2 Finding of program compliance 1 Judge granted dismissal 1 Lack of jurisdiction 3 No probable cause 1	Closed by CCHR	1
Dismissal: Failure to proceed by tenant Dismissal: Lack of substantial evidence Dismissal: No reasonable cause of discriminatory housing practices Dismissal of complaint Dismissed Finding of program compliance Judge granted dismissal Lack of jurisdiction No probable cause 1	Closed by HUD	2
Dismissal: Lack of substantial evidence Dismissal: No reasonable cause of discriminatory housing practices Dismissal of complaint Dismissed Finding of program compliance Judge granted dismissal Lack of jurisdiction No probable cause 28 4 4 4 5 6 7 7 8 7 8 8 8 8 8 8 8 8 8	Determination of compliance	1
Dismissal: No reasonable cause of discriminatory housing practices Dismissal of complaint 1 Dismissed 2 Finding of program compliance 1 Judge granted dismissal 1 Lack of jurisdiction 3 No probable cause 1	Dismissal: Failure to proceed by tenant	1
practices Dismissal of complaint 1 Dismissed 2 Finding of program compliance 1 Judge granted dismissal 1 Lack of jurisdiction 3 No probable cause 1	Dismissal: Lack of substantial evidence	28
Dismissal of complaint 1 Dismissed 2 Finding of program compliance 1 Judge granted dismissal 1 Lack of jurisdiction 3 No probable cause 1	, , ,	4
Dismissed 2 Finding of program compliance 1 Judge granted dismissal 1 Lack of jurisdiction 3 No probable cause 1	!	_
Finding of program compliance 1 Judge granted dismissal 1 Lack of jurisdiction 3 No probable cause 1	Dismissal of complaint	1
Judge granted dismissal1Lack of jurisdiction3No probable cause1	Dismissed	2
Lack of jurisdiction 3 No probable cause 1	Finding of program compliance	1
No probable cause 1	Judge granted dismissal	1
•	Lack of jurisdiction	3
Order of dismissal issues 1	No probable cause	1
	Order of dismissal issues	1
Settlement agreement 1	Settlement agreement	1

Source: Chicago Housing Authority.

CITY OF CHICAGO COMPLAINTS

Complaints filed with the City of Chicago are submitted to the Chicago Commission on Human Relations. Complaints must be filed with the Commission within 180 days of the alleged violation. The Commission then investigates the complaint, including obtaining a response to the complaint from the alleged violator (respondent). At the conclusion of the investigation, the Commission determines whether there is substantial evidence of discrimination. Should the Commission find that there is substantial evidence, the Commission either assigns the case to a mediator for a settlement conference or to an independent administrative hearing officer for a hearing. If a settlement conference is not successful, the case is forwarded for a hearing.

Those who are found to have violated the Fair Housing Ordinance can be ordered by the Commission to do any of the following:

- Out-of-pocket damages: Pay the complainant any money lost because of the discrimination.
- **Emotional distress damages:** Pay the complainant for the personal stress caused by the discrimination.
- Punitive damages: Pay the complainant money to punish and deter the discrimination if it was proved to be willful, wanton, or in reckless disregard of the complainant's rights.
- Attorney fees and costs: Pay for the work the complainant's attorney performed on the case.
- Fines: Pay to the City of Chicago a fine up to \$1,000 for each violation of the discrimination ordinances.
- Injunctive relief: Order the respondent to take specific actions to end the discrimination.

From January 1, 2003 through December 31, 2013, the Commission received 773 complaints of discrimination in housing (see Exhibit VI-9). Though the Commission allows complainants to identify multiple bases for a complaint, the most frequent bases were source of income (49 percent), race (23 percent), and disability (22 percent). It is important to note that source of income is not a basis for discrimination under federal and state laws, and it was not considered a basis for discrimination in Cook County until recently. Therefore, the City of Chicago is the primary entity that addresses source of income discrimination in Illinois.

Of the 773 discrimination complaints filed, the adverse actions most commonly cited were refusal to rent/lease (348), discriminatory terms and conditions (176), and lease termination/eviction (97).

Exhibit VI-9.
Complaints Filed with the
Chicago Commission on Human Relations
January 1, 2003 through December 31, 2013

Total Complaints Filed Basis of Complaints:*	773
Age	34
Ancestry	14
Color	30
Disability	171
Gender/Identity	7
Marital Status	46
Military Discharge Status	1
National Origin	57
Parental Status	68
Race	179
Religion	26
Retaliation	18
Sex	68
Sexual Orientation	50
Source of Income	376

^{*}Complaints filed with the City of Chicago can list multiple bases; therefore, the total number of complaints filed does not equal the sum of the number for each basis.

Source: Chicago Commission on Human Relations.

Of the 773 cases, all but five are closed. The most frequent reasons for closure include "no substantial evidence" (252), "voluntary withdrawal" (175), and withdrawal under a private settlement (121). Ninety-two cases reached a settlement agreement facilitated by the Commission. Some settlement agreements and private settlement cases included monetary awards to the complainants ranging up to \$30,000, with the average award approximately \$1,791. Eight of the 13 cases closed by board ruling included sizeable monetary awards, such as emotional distress awards up to \$20,000, punitive damage awards up to \$60,000, and attorney fees as high as \$56,000.

Exhibit VI-10. Status of Complaints Filed with the Chicago Commission on Human Relations January 1, 2003 through December 31, 2013

Open	5
Closed	768
Reason Closed:	
Board ruling	13
Dismissed: Failed to cooperate	78
Dismissed: No jurisdiction	34
Dismissed: No substantial evidence	253
Settlement agreement	92
Withdrawn by complainant	175
Withdrawn: Private settlement	121
Other motion to dismiss granted	1
Dismissed: Federal filing/res judicata	1_

Source: Chicago Commission on Human Relations.

SECTION VII. FAIR HOUSING SURVEYS AND ROUNDTABLES

As part of the analysis, AREA developed two distinct web surveys — one for residents and a second for real estate industry professionals — to ascertain their perspectives on the subject of fair housing. Both surveys were offered in three languages — English, Mandarin, and Spanish — to solicit input from a wide range of stakeholders. The surveys were distributed to City delegate agencies, placed on the City's website and blog, and e-mailed to various nonprofit housing service providers and advocacy organizations. The Chicago Commission on Human Relations (CCHR) also distributed the surveys to community organizations with which it has relationships that serve the Hispanic/Latino and Chinese-American communities. The survey for real estate industry professionals was also posted on the websites of the Chicago Association of Realtors and Illinois Association of Realtors.

The response rate to both surveys was relatively high, and while not statistically significant, the responses can provide noteworthy guidance to the City in its efforts to affirmatively further fair housing. There were 426 respondents to the residents' survey (English = 249; Mandarin = 173; Spanish = 4), and 91 respondents to the real estate industry professionals' survey (English = 90; Mandarin = 1; Spanish = 0). Although the Spanish-language survey had a low response rate, it is possible that respondents from these communities used the English-language survey. In both residents' surveys, a number were completed by housing and advocacy organizations from the perspectives of their clients. It is also important to note that survey respondents did not necessarily answer all the survey questions posed; hence, the analysis below indicates both the total number of respondents and the breakdown of responses for each survey question. Survey questions and responses can be found in Appendix II.

AREA also conducted two roundtable discussions one with residents and nonprofit housing and advocacy organizations and a second with real estate industry professionals, to ascertain additional first-hand perspectives on the impediments to furthering fair housing and related recommendations. AREA also conducted follow-up interviews with key stakeholders as appropriate to clarify findings from the roundtable discussions. The roundtable findings are presented later in this section.

RESIDENT SURVEY FINDINGS

Demographics. When asked how long they have lived in the City of Chicago, 418 of 426 respondents provided an answer. Of the 418, 69 percent have lived in the city for more than 10 years, 17 percent have lived in the city between 5 and 10 years, and 14 percent have lived in the city less than 5 years.

Of the respondents, 261 of 365 (72 percent) indicated they are female, 23 percent indicated they are male, and 5 percent preferred not to answer.

Forty-eight of 376 respondents (13 percent) indicated they are between 19 and 29 years of age, 18 percent are between 30 and 39, 20 percent are between 40 and 49, 22 percent are between 50 and 59, 16 percent are between 60 and 69, and 6 percent are between 70 and 79. Therefore, the survey was able to capture a balanced cross-section of adult respondents.

Eighty-nine of 375 respondents (approximately 24 percent) have never been married, 45 percent are married, 2 percent are in a civil union, and 15 percent are divorced. The survey asked respondents to self-identify themselves and members of their households within various identity groups; the results of the English-survey respondents are indicated in Exhibit VII-1.

Exhibit VII-1.
Self-Identification of Chicago Households:
Response to the English-Language Residential Survey

	Respondents' Identity (of 364 Total)			
	Number	Percent	Number	Percent
African American/Black	94	45.8	89	50.0
American Indian/Alaskan Native	3	1%	1	0.56
Asian	8	3.9%	11	6.2
Native American or Other Pacific Islander	1	0.4%	2	1.1
White	72	35%	55	30.9
Hispanic/Latino	32	15.6	27	15.2
Other racial/ethnic group	12	5.9	13	7.3
Gay, Lesbian, Bisexual or Transgendered	13	6.3	21	11.8
Born outside the U.S.	9	4.4	12	6.7
Person with a disability	10	4.9	15	8.4
An active, retired, or discharged member of the armed forces	2	0.98	2	1.1

Source: Survey of Chicago Residents, Applied Real Estate Analysis, Inc.

Based on the data presented above, it appears that there are a number of English-language survey households that include members of different identities. Mandarin-and Spanish-language survey respondents indicated that they live for the most part in homogenous households. Two of three Spanish-language survey respondents indicated that they identify as Gay/Lesbian/Bisexual/Transgendered.

As for tenure, 191 of 391 respondents (49 percent) indicated they rent their housing units, whereas 162 (41 percent) indicated they own their housing; 23 (6 percent) indicated they live with family and do not have a rent or mortgage payment, and seven respondents indicated that they do not have a permanent place of residence.

Neighborhoods. Of the English-language survey respondents, 236 identified the neighborhood in which they live, and the data results indicate they live in all parts of the city. No more than 8 percent of survey respondents come from one neighborhood. The top 11 neighborhoods where English-language survey respondents live are indicated in Exhibit VII-2.

Exhibit VII-2.
Neighborhoods Where English-Language Survey Respondents Live

Neighborhood	Number	Percentage
Rogers Park	18	7.6%
Edgewater	14	5.9%
Logan Square	14	5.9%
Austin	11	4.7%
Hyde Park	11	4.7%
Chatham	9	3.8%
Roseland	9	3.8%
Uptown	9	3.8%
Englewood	7	3.0%
Humboldt Park	7	3.0%
Lakeview	7	3.0%

Source: Survey of Chicago Residents, Applied Real Estate Analysis, Inc.

In contrast, 74 of 146 Mandarin-language survey respondents (51 percent) indicated they live in Bridgeport. Other neighborhoods where Mandarin-language survey respondents live include, but are not limited to, Archer Heights (3 percent), Armour Square (7 percent), Brighton Park (7 percent), McKinley Park (5 percent), South Chicago (7 percent), and the Loop (3 percent). The three Spanish-language survey respondents live in Lakeview, South Lawndale, and West Town.

When asked why they have chosen to live in the neighborhood where they reside, 217 English-language survey respondents indicated the top reasons as proximity to transportation and work, affordability of the neighborhood, and community support. Being close to schools was the least likely reason, which may indicate the willingness of parents to enroll their children in the schools best suited for them, regardless of location. For 163 Mandarin-language survey respondents, proximity to transportation and work were the top reasons they chose to live in their particular neighborhoods. However, affordability did not rank as high among Mandarin-language respondents as it did among the English-language survey respondents; being close to family and friends, parks and recreation, and schools ranked higher. Two of the three Spanish-language survey respondents also indicated proximity to transportation and work as their top reasons for choosing the neighborhoods where they live.

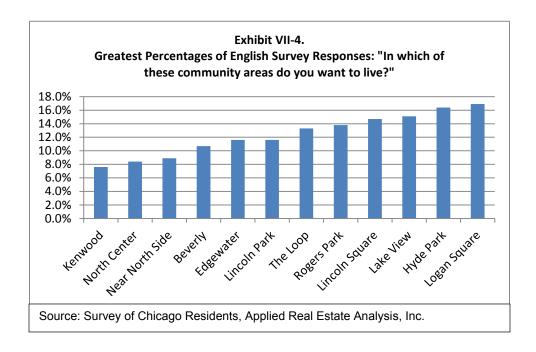
Specific responses to this question are indicated in Exhibit VII-3 (survey respondents were allowed to pick multiple answers).

Exhibit VII-3.
Reasons Why Survey Respondents Live in their Neighborhoods

	Eng	lish	Mar	ndarin	Spanish		
Reasons	No.	%	No.	%	No.	%	
Close to transportation	129	60%	61	52%	2	67%	
Close to work	124	57%	84	37%	2	67%	
It is a place I can afford to live	103	48%	26	16%	0		
Community support	86	39%	25	15%	1	33%	
Close to friends	80	37%	33	20%	0		
Close to parks and recreation	78	36%	32	20%	1	33%	
Close to family	76	35%	40	25%	0		
I can't afford to move	35	16%	4	2%	0		
Close to school	22	10%	31	19%	0		
Other reasons	0		6		0		
Total	217		163		3		

Source: Survey of Chicago Residents, Applied Real Estate Analysis, Inc.

When asked in which neighborhoods they would like to live, the top 12 neighborhoods indicated by 224 English-language survey respondents include Beverly (11 percent), Edgewater (12 percent), Hyde Park (16 percent), Kenwood (7 percent), Lakeview (15 percent), Lincoln Park (12 percent), Lincoln Square (15 percent), Logan Square (17 percent), the Near North Side (9 percent), Rogers Park (14 percent), North Center (8 percent), and the Loop (13 percent) (respondents were allowed to choose multiple answers). The majority of these neighborhoods has a large presence of middle- to upper-income households and are densely populated, and therefore difficult for low- to moderate-income residents to access. Most of the community areas also have somewhat diverse populations.



Of Mandarin-language respondents, 134 indicated they would like to live primarily in three neighborhoods (respondents were allowed to choose multiple answers): Bridgeport (55 percent), Lincoln Park (15 percent), and the Loop (13 percent); other neighborhoods chosen include but are not limited to Armour Square (7 percent), Brighton Park (7 percent), South Chicago (4 percent), and Lakeview (4 percent). Two of these community areas—Bridgeport and Armour Square—have substantial Asian populations, of 33 percent and 67 percent, respectively.

It appears that two of the three Spanish-language survey respondents prefer to stay in the neighborhoods they live in (Lakeview and West Town); the other respondent would like to live in the O'Hare neighborhood.

AREA also examined information from the English-language survey regarding neighborhoods in which respondents would like to live compared to the racial and ethnic characteristics of the respondents. As mentioned earlier, some respondents to the English-language survey indicated their racial and/or ethnic group, including some

who indicated they were Asian or Hispanic. Of the African American respondents who selected community areas among the 12 most frequently selected community areas, the most frequently chosen neighborhoods were Hyde Park (24 percent), Beverly (17 percent), the Loop (15 percent), and Kenwood (11 percent). Similarly, respondents who indicated that they were Hispanic selected Logan Square (33 percent) most often as the neighborhood in which they would like to live, and White respondents selected Lincoln Park (18 percent) most frequently as the community in which they would like to live. The data suggest that there might be a bias toward identification of neighborhoods with which the respondents are most familiar.

According to recent research led by Maria Krysan, Professor at the Institute of Government Affairs and the Department of Sociology at the University of Illinois at Chicago, people surveyed in Cook County (including the city of Chicago) often expressed interest in finding housing and living in diverse neighborhoods that do not necessarily have very high percentages of people who are of the surveyed individuals' race or ethnicity. However, there is often a mismatch between the types of diverse neighborhoods in which people express interest in living, where they search for housing, and where they live.

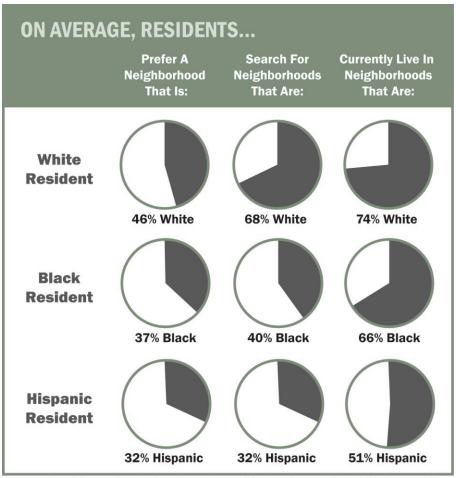
As shown in the following graphic based on data published by the research group, White residents expressed interest in living in areas that were only 46 percent White but both search for housing and live in predominately White areas. African American and Black residents expressed interest in living in areas that are 37 percent Black, search for housing in areas that are 40 percent Black, and live in areas that are over 66 percent Black. Similarly, Hispanic residents express interest in living in diverse areas and search for housing in these areas, but actually find housing in areas that are 51 percent Hispanic.

The research team's suppositions regarding why there is a disconnect between the types of areas in which residents would like to live, where they search for housing, and where they actually live include White residents' possible lack of knowledge of diverse communities and the possibility that African American residents encounter hostility or discrimination when searching for housing in diverse neighborhoods.²⁸

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²⁸ Krysan, Maria; Havekes, Esther, and Bader, Michael D.M., "Diverse Neighborhoods: The (mis)Match Between Attitudes and Actions," *Poverty & Race*, Poverty & Race Research Action Council, July/August 2015, Volume 24: Number 4, pages 9 to 11.

Exhibit VII-5.
Cook County Residents'
Neighborhood Preferences



Source: Maria Krysan; Esther Havekes, and Michael Bader D.M., "Diverse Neighborhoods: The (mis)Match Between Attitudes and Actions," Poverty & Race, Poverty & Race Research Action Council, July/Aug. 2015, Vol. 24: No. 4, p 9-11.

Housing Discrimination. When asked if they feel housing discrimination is common in Chicago, 95 of 227 English-language survey respondents (42 percent) say that it is extremely common, while another 34 percent say that it is somewhat common. When asked if they have personally experienced discrimination while either looking for or living in housing in Chicago, the majority of respondents indicated that they have not. This may imply that while a significant number of survey respondents have not personally experienced housing discrimination, they are aware of others who have. Specific data results are shown in Exhibit VII-6.

Exhibit VII-6.
Discrimination Experienced by English-Language Survey Respondents

	Experienced Discrimination while Looking for Housing	Experienced Discrimination while Living in Housing
Yes	73 (32.2%)	79 (34.5%)
No	110 (48.5%)	113 (49.3%)
Don't know	32 (14.1%)	28 (12.3%)
Prefer not to answer	12 (5.3%)	9 (3.9%)

Source: Survey of Chicago Residents, Applied Real Estate Analysis, Inc.

All three Spanish-language survey respondents indicated they believe housing discrimination is either extremely or somewhat common in Chicago, and two respondents indicated they have experienced discrimination while either looking for or living in housing.

In contrast to the English- and Spanish-language survey respondents, only 32 of 158 Mandarin-language survey respondents (20 percent) indicated that housing discrimination is somewhat common. Further, 37 percent of Mandarin-language survey respondents indicated they do not know if housing discrimination is common in Chicago, and another 45 (28 percent) indicated that housing discrimination is not common. In addition, approximately 63 percent of Mandarin-language survey respondents indicated that they have not experienced discrimination while either looking for or living in housing in Chicago.

A large majority of the 187 respondents to the question about experience with discrimination for all three surveys indicated that discrimination occurred either while looking to rent a unit (53 percent) or purchase a unit (18 percent). These percentages are higher for the English-language survey respondents (68 percent and 23 percent, respectively). It is also important to note that 38 of 74 Mandarin-language survey respondents indicated that they either did not know how to answer the question, were not sure if they had experienced discrimination, or preferred not to answer.

When those who had experienced discrimination were asked what they believed the discrimination was based upon, 102 of 198 respondents (52 percent) indicated that it was based on race, and 23 percent believe it was based on source of income. The bases for discrimination reported vary from there for each language survey. The full range of data results are shown in Exhibit VII-7 (survey respondents were allowed to select all answers that applied).

Exhibit VII-7.
Basis of Housing Discrimination Experienced by Survey Respondents

Basis	English	Mandarin	Spanish
Race	77 (64%)	33 (45%)	2 (67%)
Source of income	32 (27%)	13 (18%)	1 (33%)
Color	29 (24%)	5 (7%)	,
Age	24 (20%)	4 (5%)	
Sex	19 (16%)	, ,	
National origin	18 (15%)	11 (15%)	
Housing status	14 (12%)	5 (7%)	
Immigration status	10 (8%)	4 (5%)	
Parental status	11 (9%)	, ,	
Marital status	9 (7%)	1 (1%)	
Sexual orientation	9 (7%)	1 (1%)	2 (67%)
Ancestry	8 (7%)	1 (1%)	,
Religion	8 (7%)	, ,	
Section 8/	7 (6%)	1 (1%)	
Housing Choice Voucher	,	, ,	
Disability	7 (6%)	2 (3%)	
Gender identity	4 (3%)	()	
Military discharge status	0 (0%)		
Prefer not to answer/	5 (4%)	26 (35%)	
Don't know	3 (.,.,	= 3 (00,0)	
Other	10 (8%)		
	,		

Source: Survey of Chicago Residents, Applied Real Estate Analysis, Inc.

Several of the respondents that indicated "other" when asked about the basis for the housing discrimination they experienced provided the following comments.

English-language survey comments:

- "Legal status"
- "I'm a single mother with twin toddlers"
- "Landlords and property managers openly state that they only want to work with certain ethnic groups, despite being reminded that this is against the fair housing law"
- "Increasing number of requirements to apply for rental housing, particularly affecting refugee applicants (for example, required to have earned income three times the monthly rent; security deposit two to three times the monthly rent)"
- "I'm homeless"

- "Children; we have two"
- "Tenants' rights advocacy"

Mandarin-language survey comments:

- "I don't know"
- "Avoid conflicts"
- "Language"

When asked how best to describe the person who discriminated against them, 94 of 167 respondents to all three surveys (56 percent) indicated a landlord/property manager, 17 percent indicated a real estate agent/broker, 12 percent indicated a banker or mortgage loan officer, and 7 percent indicated a local government staff person. Thirteen percent of those who stated "other" indicated they were discriminated against by one or more of the following: neighbors/area residents (most common response), the owner of the home the respondent wanted to purchase, another condominium owner, development association, builder, appraiser, and a renter who did not want to rent from the respondent as a property owner.

Eighty-seven of the 166 survey respondents (52 percent) who believed they experienced housing discrimination preferred not to answer when asked what action they tried to take to report the incident(s). Twelve percent of respondents contacted a housing or nonprofit organization, 4 percent contacted the City of Chicago, 4 percent contacted an attorney, 3 percent contacted their "local government" (which could be the City, or it could be that those who experienced discrimination in Chicago lived elsewhere), and 2 percent contacted HUD. The remaining 24 percent (39 respondents) indicated "other," with the overwhelming majority of the comments indicating that they did not report the incident and decided to move on and/or look elsewhere for housing.

One of the respondents who did not report the incident stated that it would not have helped to do so because they believe they would have experienced problems with the neighbors if they had moved in. Another respondent who did not report the incident stated that these occurrences are common. Only one of the respondents indicated that they filed a formal complaint, and another respondent indicated that they contacted multiple agencies (HUD, lawyer, housing/disability organizations, and the City of Chicago). One noteworthy comment, probably by a housing advocate, was the following:

"We have called 311, reported to an Alderman once when we were showed two available units in the same building for rent and then told we could not rent the nicer one of the two, since the family 'was just going to destroy it anyway,' referred to Lakeside CDC, etc. However, we have not seen any results from reporting to the City and are reluctant because we cannot burn landlord bridges (rely on them to house newly arriving refugees)."

One hundred and seventy-six survey respondents admitted they chose not to take any action regarding housing discrimination. When asked why not, the majority of English-language survey respondents (52 percent) felt it would not make any difference, while a majority of Mandarin-language survey respondents (38 percent) indicated they did not know where to report the information. A significant number of English-language survey respondents (35 percent) also felt they did not think they would be able to prove the discrimination, while 24 percent stated they didn't know where to report the information. It is noteworthy that several respondents indicated that they would not want to live near/rent from/purchase from the person they believe had discriminated against them and that housing is easier to find/sell/rent somewhere else. Specific data responses are listed in Exhibit VII-8 (survey respondents were allowed to choose multiple responses).

Exhibit VII-8.
Reasons for Not Taking Action to Address Discrimination

Reasons for Not Taking Action Would not make any difference Did not think I would be able to prove discrimination	English 53 (52%) 35 (35%)	Mandarin 7 (10%) 8 (11%)	Spanish 1 (33%) 2 (67%)
Didn't know where to report the information	24 (24%)	27 (38%)	1 (33%)
Housing easier to find/sell/rent somewhere else	20 (20%)	6 (8%)	2 (67%)
Would not want to live near/rent from/purchase from the person discriminating	18 (18%)	9 (13%)	2 (67%)
It costs too much to pursue	17 (17%)	5 (7%)	1 (33%)
Did not have time	14 (14%)	11 (15%)	1 (33%)
Afraid of retaliation	12 (12%)	8 (11%)	1 (33%)
Discrimination was not that serious	4 (4%)	4 (6%)	1 (33%)
Prefer not to answer	7 (7%)	21 (29%)	0 (0%)
Other	10 (10%)		
Total	101	72	3

Source: Survey of Chicago Residents, Applied Real Estate Analysis, Inc.

Those respondents who indicated "other" to why they did not take action provided several noteworthy reasons: two respondents felt fear for their families if they had moved in, one respondent indicated they work for a nonprofit housing organization and wanted to maintain the relationship with the landlord, and another respondent indicated they were not sure discrimination was happening until they realized the real estate

agent was "steering" them to certain neighborhoods and properties: "[I]t just seemed like I was being directed to specific neighborhoods and units; I later discovered that others who were looking for units within the same price point were directed to nicer areas by the same agent." Another respondent felt it was too difficult to pursue action and vowed to be more involved next time with the selection of the appraiser who exhibited discriminatory behavior. One Mandarin-language survey respondent indicated that owing to a language barrier, it was hard for the survey respondent to get their point across.

When asked if anyone had ever provided them with information on housing rights, 155 of 355 survey respondents (44 percent) indicated "yes," 35 percent indicated "no," 14 percent indicated they "don't remember/not sure," and 27 (90 percent of the Mandarin-language survey respondents) preferred not to answer.

Respondents were asked if they would like to add anything else about this topic; 43 comments were received that addressed a variety of issues, such as:

- Challenges when searching for affordable housing and/or family-friendly housing with adequate space to accommodate children
- Experiences of discrimination by landlords
- Perceived favoritism shown toward one racial/ethnic group at the expense of another
- Source of income discrimination experienced by Housing Choice Voucher holders
- Perceptions of low-income residents being displaced
- The Chicago Housing Authority's slow pace in housing low-income residents
- Finding housing for the homeless
- Challenges obtaining a mortgage despite being highly qualified
- Need for the City to build more affordable housing and provide stronger enforcement of the Residential Landlord Tenant Ordinance in support of tenants' rights

REAL ESTATE INDUSTRY PROFESSIONALS SURVEY FINDINGS

Demographics. A total of 90 people responded to the real estate industry professionals' survey (89 = English; Mandarin = 1). Eighty-two respondents chose to identify themselves as follows: 36 (44 percent) are nonprofit housing providers, 13 (16 percent) are housing counselors/educators, nine (11 percent) are property managers, nine (11 percent) are property owners/investors, seven (8 percent) are residential real estate agents/brokers, six (7 percent) are housing rights professionals, five (6 percent) are residential developers, four (5 percent) are attorneys, three (4 percent) are

consultants, 1 (1 percent) is an insurer, and two (3 percent) are in other professions in the financial industry.

Thirty-three of 90 respondents (37 percent) have 20 or more years of experience in the residential real estate industry, 25 (28 percent) have 11 to 19 years of experience, 13 (15 percent) have 6 to 10 years of experience, and 19 (21 percent) have been in the residential real estate industry for five years or less.

Thirty-five of 71 respondents (50 percent) indicated that they are White, 28 (40 percent) are African American, 10 (14 percent) are Hispanic/Latino, 4 (6 percent) are Asian/Native American or Other Pacific Islander, and 4 (6 percent) indicated that they belong to another racial/ethnic group.

The single Mandarin-language survey respondent declined to answer the remaining questions in the survey; hence, the rest of the data in this section pertains only to the English-language survey respondents.

Of the respondents, 42 of 73 (58 percent) indicated they are female, 42 (58 percent) are between the ages of 40 and 59, 15 (21 percent) are between 60 and 79, and 15 (21 percent) are between the ages of 19 and 39 years.

Two of the 70 respondents (3 percent) were born outside of the United States, 7 (10 percent) identify as Gay/Lesbian/Bisexual/Transgendered, 1 (1 percent) has a disability, and 3 (4 percent) are active, retired, or discharged members of the armed forces.

When asked which Chicago neighborhoods they serve, 72 respondents indicated they serve neighborhoods all across the city. Some neighborhoods are served by as low as 7 respondents (10 percent), while others are served by as high as 26 respondents (36 percent). The top 26 neighborhoods served by at least 20 percent of respondents include those indicated in Exhibit VII-9.

Exhibit VII-9. Neighborhoods Served by Real Estate Respondents

Neighborhoods	Number/Percentage of Survey Respondents that Serve This Neighborhood
Albany Park	18 (25%)
Auburn Gresham	16 (22%)
Austin	15 (21%)
Belmont Cragin	15 (21%)
Chatham	18 (25%)
East Garfield Park	19 (26%)
Edgewater	22 (31%)
Englewood	24 (33%)
Greater Grand Crossing	17 (24%)
Humboldt Park	24 (33%)
Hyde Park	16 (22%)
Irving Park	15 (21%)
Lakeview	20 (28%)
Logan Square	18 (25%)
Near North Side	22 (31%)
Near South Side	17 (24%)
Near West Side	17 (24%)
North Lawndale	19 (27%)
Rogers Park	26 (36%)
South Shore	20 (28%)
Washington Park	17 (24%)
West Englewood	17 (24%)
West Garfield Park	16 (22%)
West Pullman	15 (21%)
West Ridge	26 (22%)
Woodlawn	20 (28%)

Source: Survey of Chicago Residents, Applied Real Estate Analysis, Inc.

Neighborhoods where less than 10 percent of the real estate survey respondents are active include O'Hare (7 percent); Oakland (8 percent); and Armour Square, Avondale Gardens, Brighton Park, Norwood Park, and Riverdale (each served by 9.6 percent).

Knowledge of Fair Housing. Forty-five of 83 survey respondents (54 percent) indicated that their particular industry's understanding of fair housing laws and best practices is strong or very strong, while 20 (24 percent) indicated that their industry's understanding is somewhat poor or poor. Sixty-four (77 percent) respondents indicated that they have attended a training/class/information session focused exclusively or primarily on housing rights.

When asked about their Chicago clients' understanding of their fair housing rights, eight of 83 (10 percent) rated their clients' understanding as very strong or strong, 24 percent rated their understanding as somewhat strong, 33 percent rated their understanding as somewhat poor, and 29 percent rated their clients' understanding as poor or very poor. Thirty-two of 78 respondents (41 percent) indicated that they had clients who raised a housing discrimination complaint, which is not surprising given that over 50 percent of the real estate survey respondents represent nonprofit housing providers, housing counselors/educators, and housing rights professionals. Twenty-seven of 72 respondents (38 percent) had clients that took actions to report/address the act of discrimination.

Twenty-seven of 79 survey respondents (34 percent) believe that housing discrimination in Chicago is extremely common, 41 percent believe that it is somewhat common, 14 percent believe that it is not common, and 10 percent have no opinion or don't know.

When asked how strongly they agree or disagree with whether various stakeholders were undertaking more activities to encourage equal access to housing, 78 survey respondents indicated the responses shown in Exhibit VII-10. Generally, the majority of respondents believe that local, state, and federal government officials are undertaking more activities to encourage equal access to housing, whereas real estate and financial industry professionals could be doing more.

Real estate professional survey respondents were also asked whether several impediments to fair housing existed in the City of Chicago; their responses are shown in Exhibit VII-11 on the following pages. Seventy-three or 74 of 89 respondents indicated that the top three very strong barriers/impediments to fair housing are: 1) an insufficient supply of affordable housing, 2) the presence of highly segregated communities in Chicago, and 3) the impact of the housing crisis and recession on minorities and low-income households. Survey respondents also indicated the following as very strong or strong barriers/impediments to fair housing: 1) lack of awareness of fair housing rights by residents, landlords, and property managers; 2) land use, zoning laws, and building codes that make developing housing difficult and/or expensive; and 3) prevalent "fear of others" by Chicagoans, including NIMBYism (Not in My Back Yard).

Respondents were asked if there was anything else they would like to say about this topic; 24 comments were documented that speak to a variety of issues, such as:

- Having a criminal background is a major barrier when searching for housing
- Diminishing supply/shortage of low-income/affordable housing
- Increasing rental prices
- Need for the City to create a housing plan that addresses housing barriers for low- to moderate-income renters
- Lack of oversight of developments that include low-moderate income set-asides
- City not proactively soliciting community input prior to passage of housing legislation
- The Chicago Housing Authority needs to increase its role in fair housing and provide more Housing Choice Vouchers
- Judges in eviction court who do not understand tenants' rights laws
- The need for stricter laws to hold absentee landlords accountable
- Loopholes in the Residential Landlord Tenant Ordinance that allows landlords to evict tenants who have tried to assert their rights under the law
- Resistance from landlords to working with supportive housing programs
- Neighborhood gentrification

Exhibit VII-10.

Opinions of Chicago Real Estate Professionals As to Whether Stakeholders Are Undertaking More Activities to Encourage Equal Access to Housing

	Strongly Agree		Agree		Neutral/Neither Agree nor Disagree		Disagree		Strongly Disagree		No Opinion		То	tal
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	
Real estate industry professionals are undertaking more activities to encourage equal access to housing	7	9%	18	23%	22	28%	20	26%	9	12%	2	3%	78	100%
Financial industry professionals are undertaking more activities to encourage equal access to housing	1	1%	17	22%	22	28%	22	28%	14	18%	2	3%	78	100%
Local government officials are undertaking more activities to encourage equal access to housing	4	5%	32	41%	19	24%	12	15%	11	14%	1	1%	79	100%
State of Illinois government officials are undertaking more activities to encourage equal access to housing	2	3%	25	32%	23	29%	16	20%	10	13%	3	4%	79	100%
Federal government officials are undertaking more activities to encourage equal access to housing	6	8%	37	47%	14	18%	9	11%	10	13%	3	4%	79	100%

Source: Real estate professionals web surveys administered by Applied Real Estate Analysis, Inc.

Exhibit VII-11.
Identification of Impediments by Chicago Real Estate Professionals

	Bar	Barrier/		Strong Barrier/		Somewhat of a Barrier/ Impediment		Minor Barrier/ Impediment		Not a Barrier/		Do Not Know / No Opinion		tal
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	
People being denied mortgages at a higher rate because of their background	25	35%	16	22%	13	18%	3	4%	1	1%	3	4%	74	100%
Jobs, housing, and transit are not located near each other	20	27%	23	31%	21	28%	6	8%	1	1%	3	4%	74	100%
The housing crisis and recession have impacted minorities more than others	33	45%	22	30%	15	20%	2	3%	1	1%	1	1%	74	100%
The housing crisis and recession have impacted renters more than owners	21	29%	21	29%	16	22%	7	10%	4	5%	4	5%	73	100%
The housing crisis and recession have impacted lower-income households more than higher-income households	37	50%	22	30%	12	16%	1	1%	1	1%	1	1%	74	100%
Certain City of Chicago policies and procedures do not encourage fair housing	23	31%	17	23%	16	22%	3	4%	9	12%	6	8%	74	100%
An insufficient supply of affordable housing in Chicago	54	74%	10	14%	6	8%	3	4%	0	0%	0	0%	73	100%
There are highly segregated communities in Chicago	46	62%	15	20%	9	12%	1	1%	3	4%	0	0%	74	100%

Exhibit VII-11.
Identification of Impediments by Chicago Real Estate Professionals (Continued)

tuonimoution of impounito	Very S Bar	Very Strong Barrier/ Impediment Impedimen		Barrier/	Barrier/		Minor Barrier/ Impediment		Not a Barrier/		Do Not Know / No Opinion		Total	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	
Lack of awareness of housing rights by residents	22	30%	18	24%	23	31%	7	9%	3	4%	1	1%	74	100%
Lack of awareness of housing rights by real estate agents	5	7%	20	27%	24	32%	6	8%	14	19%	5	7%	74	100%
Lack of awareness of housing rights by landlords and property managers	23	31%	20	27%	14	19%	10	14%	7	9%	0	0%	74	100%
Lack of awareness of housing rights by banks and mortgage companies	12	16%	15	20%	19	26%	8	11%	10	14%	10	13%	74	100%
Lack of awareness of housing rights by property insurance companies	7	9%	18	24%	14	19%	9	12%	11	15%	15	20%	74	100%
Lack of awareness of housing rights by appraisers	7	10%	15	21%	13	18%	6	8%	13	17%	19	26%	73	100%
Lack of awareness of housing rights by local government staff	8	11%	21	28%	16	22%	13	18%	13	17%	3	4%	74	100%
Land use, zoning laws, and building codes that make developing housing difficult and/or expensive	20	27%	26	36%	13	18%	5	7%	4	5%	5	7%	73	100%
Prevalent "fear of others" by Chicagoans, including NIMBYism	28	28%	22	30%	12	16%	4	5%	3	4%	5	7%	74	100%

Source: Real estate professionals web surveys administered by Applied Real Estate Analysis, Inc.

ROUNDTABLE GROUP FINDINGS

Residents and Nonprofit Housing/Advocacy Organizations

On November 6, 2014, AREA facilitated a citizens' roundtable on behalf of the Chicago Commission on Human Relations and City of Chicago Office of Budget and Management (OBM) to solicit feedback from residents and nonprofit housing/advocacy organizations about what they view as impediments to fair housing choice and recommendations for further action. Fourteen people attended the roundtable discussion; they primarily represented nonprofit housing and legal advocacy organizations. CCHR and OBM staff were also in attendance. A list of attendees can be found in Appendix III.

Types of Discrimination. When asked about the type of discrimination their clients typically encounter, the majority of participants stated that source of income, race, and disability were the three primary discriminatory complaints they most often hear about. Source of income discrimination comes up particularly with Chicago Housing Authority (CHA) Housing Choice Voucher (HCV; formerly known as Section 8) holders who are seeking housing in certain areas of the city. According to several roundtable participants, landlords on the city's North Side and in or near downtown are resistant to accepting HCVs and will cite units as unavailable. Organizations that work primarily with immigrant communities stated that discrimination also occurs due to language and cultural barriers that immigrants who seek housing have a difficult time overcoming. Roundtable participants also discussed that predatory lending practices still occur and that they impact their clients' ability to access quality for-sale housing.

How Complaints Are Handled. Roundtable participants generally refer their clients that encounter discrimination to one of the four primary agencies that handle housing discrimination complaints: Access Living, Chicago Lawyers Committee for Civil Rights Under Law, John Marshall Law School's Legal Clinic, and Lawyers Committee for Better Housing. Clients are also referred to private civil rights law attorneys when appropriate. Although everyone present was aware of the fair housing discrimination enforcement provided by CCHR, several roundtable participants commented that CCHR has limited resources (of both staff and funding) to efficiently investigate and rule on housing discrimination complaints.

Impediments to Furthering Fair Housing. Though a wide range of issues and concerns were raised by roundtable participants, the impediments to fair housing that were emphasized include the following:

• Time required to file a complaint and follow through. Some roundtable participants discussed how they have many clients who experience discrimination but do not file complaints because of fear as well as the time it takes to follow through on filing a complaint. Their clients are too involved with finding housing, and they feel the time and energy required to file a complaint is not worth the effort. This finding was also echoed in the resident web surveys.

- Limited to no knowledge of fair housing laws and available resources. Several roundtable participants commented on the lack of education of both prospective homebuyers and renters about fair housing laws, what their rights are, and how discrimination is defined. In addition, they stated that most people don't know that they can file a formal complaint with the City and have limited to no knowledge of the work of CCHR. One roundtable participant also discussed how people generally need to be made more aware of what resources are available to help them access housing. Everyone cited several times during the session how more education and awareness about fair housing laws and available resources should be promoted by the City.
- Lack of affordable housing. Some roundtable participants commented that there is not enough affordable housing available in Chicago, particularly rental housing. They stated that a predominance of investor-owned properties in certain communities has raised rents, and higher rents make it hard for low- to moderate-income renters to access quality housing.
- Vulnerability within immigrant communities. Representatives of housing organizations that work with immigrants stated that they don't have the same access or understanding of the housing system as others, and that many move constantly so as to find affordable housing that can accommodate larger families. Consequently, immigrants often find that they have to move to suburban communities and commute for two to three hours to their jobs, core social circles, and resources. These roundtable participants also discussed how new immigrants are often discriminated against and taken advantage of by people who belong to their ethnic/cultural community, as housing is often offered in connection to low-wage jobs offered by landlords in these communities. New immigrants not only do not know about fair housing laws and how they offer protection from discrimination, new immigrants often feel captive to their landlords and that there is no other place to go.
- (Mis)perceptions of HCV program and participants. Several roundtable participants stated that some landlords continue to refuse to rent to people using Housing Choice Vouchers, particularly on the city's North Side, due to perceptions of the HCV program and its participants. Some roundtable participants discussed how the process for landlords to receive approval to accept HCV holders can be cumbersome, and that the CHA needs to do more to make the landlord-approval process more efficient. In addition, roundtable participants cited how misperceptions of HCV participants create additional barriers to furthering fair housing.

One roundtable participant mentioned that landlords on the city's North Side tend to discriminate against HCV participants because 1) they have negative perceptions related program participants' low income status, 2) they equate low income with large families, and 3) large families may have teenagers that exhibit

problematic behavior. When these negative perceptions are viewed through a lens of race and the fact that HCV participants are primarily African American, these negative misperceptions are difficult to overcome for HCV program participants searching for quality housing. Roundtable participants responded that HCV holders generally do not know what their recourse is and how to address this type of discrimination. Another participant indicated that immigrant landlords are resistant to rent to HCV holders — despite the fact that they come with guaranteed rent payments — and prefer to rent to people in their own community who are referred to them. Misperceptions of HCV participants feed into this resistance.

- Lack of accountability for those who promote housing discrimination. Because the nature of fair housing laws are "self-enforcing," some roundtable participants cited how there is a lack of accountability for landlords and property managers who discriminate against those who belong in the protected classes. Furthermore, enforcement mechanisms tend to be weak. Roundtable participants stated that in most instances, those who are accused of discriminating via a formal complaint are required to attend fair housing training, but no follow-up is done to ensure that these individuals act in compliance with the law. Another related impediment raised by some roundtable participants is that media outlets are not held accountable for posting discriminatory advertising, and this presents a significant barrier to furthering fair housing. Some Internet advertising services and newspapers allow advertising for housing to list "no Section 8 allowed," which is illegal. It is recommended that media outlets be held accountable and liable for allowing these types of discriminatory postings.
- Foreclosure crisis and its impact on credit/mortgage lending. Several roundtable participants cited that many homeowners now have poor credit due to challenges they faced during the recent economic recession and foreclosure crisis. Consequently, many are now former homeowners in the rental market, searching for housing with credit blemishes on their records. Renters' credit records have also been adversely impacted by landlords who went into foreclosure. Roundtable participants pointed out that renters in both categories are having increasing difficulty finding housing because of credit blemishes and unfair eviction filings. In addition, prospective homebuyers with credit blemishes face challenges in finding for-sale housing. This situation could, once again, lead to an increase in predatory lending and high-risk mortgage products. The foreclosure crisis has led to poor credit records for people who now must find places to rent. Housing organizations such as Neighborhood Housing Services of Chicago (NHS) regularly work with clients who have been discriminated against in lending and/or provided with predatory loans that require large mortgage payments. Often these clients are in danger of losing their homes and approach NHS for mortgage refinancing that have more favorable terms.

- Unresponsiveness from banks and law firms when homes/buildings are in foreclosure. One roundtable participant discussed his prior first-hand experience defending clients in the midst of foreclosure and the challenges he had trying to communicate and get responses from banks and law firms involved in foreclosure proceedings. He stated that at times it was immensely challenging to obtain information about when a house was going to be sold as well as the status of a loan modification or a short sale. The situation as described represents an impediment for individuals who belong to a protected class who are trying to purchase residential properties. The unresponsiveness of banks also has a negative impact on households in foreclosure as they are unable to access pertinent information that could be used to help save their homes.
- Structural barriers for people with disabilities. One roundtable participant cited an impediment related to resources needed for home modifications for people with disabilities. As required by law, landlords have to pay for reasonable accommodations for tenants with disabilities, but they are not mandated to provide home modifications. This represents a structural barrier built into the fair housing law that adversely impacts people with disabilities. The roundtable participant recommended that the City involve people with disabilities in the design of housing programs intended to help these constituents so that they have a greater chance of being successfully implemented.
- Racial segregation and poverty concentration. The majority of roundtable participants in various references discussed how this issue is at the heart of the problem in furthering fair housing in Chicago. Roundtable participants discussed how barriers to accessing housing in different areas of the city and region based on income and race restrictions persist. They believe the housing market mirrors and perpetuates long-standing institutional racism. Related to this, roundtable participants also expressed concerns about how HCV participants are concentrated in high poverty areas of the city (south and west), despite efforts made by Housing Choice Partners to move people to low poverty concentration neighborhoods. They discussed how CHA needs to make a more concerted effort to market to and recruit landlords located on the North Side and in immigrant communities.

CCHR's Efforts to Affirmatively Further Fair Housing. When asked how they would assess the Commission's efforts to further fair housing, roundtable participants responded that the Commission does good work but that it is understaffed and not equipped to respond to the number of discrimination complaints filed annually. They went on to say that the investigation and adjudication process can be lengthy, and that investigators need to be better trained. Roundtable participants also discussed how it would be helpful if CCHR could focus on resolving complaint cases via mediation and settlement.

A representative from the Chicago Lawyers Committee (CLC) recommended that the City determine how to make its Fair Housing Ordinance "substantially equivalent" with the Federal Fair Housing Act. The CLC representative stated that doing so would allow the Commission to receive funding from HUD that could support more fair housing education and training for the general public and provide additional resources to train investigators. Finally, roundtable participants indicated that the general public is unaware of the Commission's work and its efforts to enforce the Fair Housing Ordinance, and that this is particularly true for those who come from immigrant communities.

Recommendations. Roundtable participants provided several recommendations that the City and/or the Commission should consider implementing as part of its efforts to affirmatively further fair housing, namely:

- Increase education and awareness of fair housing laws with the general public. All roundtable participants discussed the importance of conducting outreach and trainings on fair housing throughout the city year-round. CCHR could partner with another entity such as CAFHA or the Rents Right Committee of the Department of Planning and Development to facilitate the trainings as well as launch a multimedia campaign designed to heighten public awareness of fair housing. As stated by one roundtable participant, fair housing is not a high-profile issue in Chicago, and generally one does not hear of fair housing discrimination cases in the media, through which the general public could learn about the issues and ramifications for furthering discrimination. Fair housing is a civil right that the public needs to fully understand. Though CAFHA also facilitates fair housing trainings and outreach, it would help to have multiple partners perform this function.
- Integrate fair housing into the City's five-year housing plan. According to a CAFHA representative, fair housing was not adequately addressed or integrated into the City's five-year housing plan, and several housing providers were not consulted before the plan was released.
- Connect discussions about fair housing to other relevant issue areas; namely, transportation, education, and other issues, to better promote equal access to neighborhoods.
- Change the narrative related to fair housing. As stated by a CAFHA representative, fair housing is often thought of as a burden and legal requirement and more needs to be done to promote how fair housing benefits everyone, not only those that belong to the protected classes. The language around fair housing is also saturated in language about affordability and enforcement. Although affordability of housing is critical, there are 15 protected classes under the ordinance that should be protected from housing discrimination. It is recommended that the City be more proactive in educating tenants, real estate

professionals, and landlords about the law to shift the focus from enforcement to initiatives that help to further fair housing.

The Chicago Housing Authority should be more aggressive in marketing the HCV program. According to comments from roundtable participants, marketing needs to be targeted toward landlords on the North Side as well as the West Side of the city. HCV holders are primarily African American and heavily concentrated on the South Side and West Side. Therefore, a more even distribution of HCV holders would also help to mitigate racial segregation as well as poverty concentration. Finally, one roundtable participant asserted that the CHA needs to educate landlords about how the internal processes to bring landlords into the program are improving.

Real Estate Professionals

On November 13, 2014, AREA facilitated a roundtable of real estate industry professionals to solicit their feedback about what they view as impediments to fair housing choice and recommendations for further action. Seven real estate industry professionals attended the roundtable discussion, and they primarily represented residential realtors and real estate brokers. One participant is an appraiser. One participant represented the Chicago Association of Realtors, and several participants were members of the Dearborn Realtist Board. Roundtable participants expressed their views as individuals and not as representatives of the trade associations to which they belong. All participants had at least 13 years of experience working in the industry, some with more than 20 years of experience, and they served neighborhoods throughout the city. Two participants work with an active portfolio of real estate owned (REO) and short-sale properties, and one participant is an appraiser. Several started their careers in residential mortgage lending with banks. A list of attendees can be found in Appendix III.

When asked what comes to mind when they think of fair housing, most participants stated they thought of access to quality housing, fair lending practices, legal compliance with fair housing laws, the "ideal" state of the world we strive to live in, the resources and advocacy needed to ensure equal access to housing, and housing that is free from any type of discrimination.

All roundtable participants indicated that they were fully aware of the Chicago Fair Housing Ordinance, and based on the roundtable discussion, all of them had a good understanding of fair housing laws. One roundtable participant stated that fair housing practices are ingrained in his thinking due to his tenure in the industry. Almost all the roundtable participants serve low- to moderate-income communities; hence, one roundtable participant emphasized how they have to know fair housing laws to help their clients access housing that meets their needs.

When asked if in their view the City's five-year housing plan addressed fair housing, one roundtable participant indicated that it did not contain this information. The participant stated that he was aware the City was required to produce plans that addressed fair

housing as a condition of federal funding, and that he has a sincere interest in understanding the City's fair housing plan so that through his work he can contribute to the City meeting its fair housing goals.

Almost all the roundtable participants have not had training in fair housing apart from what is required to maintain their licenses. However, roundtable participants discussed how issues of fair housing ordinance compliance are often addressed when discriminatory behavior is either exhibited or observed by their peers. One roundtable participant discussed how an office receptionist in their firm responded to a phone inquiry by stating that a housing unit was not Section 8 approved, which is discriminatory. The receptionist was reprimanded and the situation discussed officewide to increase awareness about this issue. In general, the roundtable participants are mindful of educating landlords who exhibit discriminatory behavior toward their clients about the fair housing ordinance. This is an example of a practice real estate professionals can perform on their own to further fair housing.

Impediments to Furthering Fair Housing. Though a wide range of issues and concerns were raised by roundtable participants, the impediments to fair housing that were emphasized include the following:

- Appraisers do not know how to value property on the South Side and West Side. There are appraisers who are assigned to value homes on the South Side and West Side who may provide inaccurate appraisal values because of their lack of knowledge of the local housing market. These inaccurate appraisals tend to undervalue these homes, and consequently, jeopardize the approval of mortgage financing. One roundtable participant cited an example of his efforts to market a nice short-sale home in the Bronzeville community that was a rehabilitated historic property and should have sold quickly. He identified three potential buyers for the property, but all three were denied financing because of a faulty appraisal. The bank did not want to finance the home, so it put the property back into its REO (real estate owned) inventory.
- Challenges to accessing capital. This is an impediment to furthering fair housing that was raised multiple times by roundtable participants and one that is connected to other impediments. Roundtable participants highlighted a particular dynamic that can occur in a neighborhood that has affordable housing stock but in which capital financing is difficult to access. In this instance, the bank may not be willing to provide financing to support purchase of relatively low-value housing. Prospective homebuyers who applied for mortgage financing would be denied, and this would signal property investors with cash to purchase low-value, foreclosed, and short-sale properties. Roundtable participants indicated that if investors who do not live in the community continue to purchase properties, the character of the community could completely change in five to ten years. Roundtable participants stressed how affordability and access to capital go hand in hand to further fair housing, and that access to capital is imperative for those who want to purchase and live in housing that is affordable.

Poor credit histories create challenges to accessing quality housing. Some roundtable participants stated that it is difficult to help individuals with poor credit records (or no credit) to access quality housing. It is also challenging for those who have relatively high credit scores but may not meet the minimum credit score in the finance underwriting criteria. Therefore, one who has a poor credit history will likely face barriers in searching for fair housing. Some roundtable participants discussed how these individuals need to be educated about how to manage their finances and raise their credit scores, and thereby increase their housing options (this applies to both rental and for-sale housing).

On the other hand, some roundtable participants discussed how credit scores should not be the primary factor used to determine one's ability to pay for housing. They argued that this may be an opportune time to revisit the use of FICO scores and explore the creation of alternative criteria for evaluating readiness for homeownership. Prior to relying on FICO scores, banks reviewed the bill payment history of potential borrowers as a determinant of ability to pay.

- Lack of commercial investment in low- to moderate-income communities. Roundtable participants discussed how this impediment (also tied to access to capital) is difficult to overcome even if housing in the community is affordable and of quality. Everyone wants to live in communities with neighborhood amenities that contribute to the quality of one's life experience. A community with little to no commercial activity can lead to disinvestment in the housing stock and deterioration of the neighborhood. Those with limited housing options are either forced to remain there or move there because of the affordability of housing.
- Lack of education/public awareness about how to address discriminatory behavior. As in the citizens' roundtable, real estate industry roundtable participants discussed how people in general do not know where to go to report housing discrimination complaints and what redress is available. They admitted that they do not interact often with clients who have experienced discrimination because they are usually present to intervene and educate landlords that exhibit such behavior about their obligations under fair housing law.
- Systemic inequality in bank underwriting and its impact on access to homeownership. Roundtable participants discussed that there is systemic inequality in the way banks apply underwriting guidelines for mortgage financing. They stated that current data that indicate that people of color who may have been fully qualified for a mortgage based on the bank's underwriting standards are denied access based on where they choose to live. One roundtable participant who previously worked for a large bank discussed how some banks use in-house algorithms to calculate a potential borrowers' FICO credit score. Thus, this type of calculation could lead to an instance in which otherwise qualified individuals are denied financing. One participant described how he had worked with a client to appeal a faulty appraisal and won, and yet the client was still denied financing. Two roundtable participants asserted that bank redlining of

communities still happens but manifests differently today than in the late 1970s when the Community Reinvestment Act was enacted.

Roundtable participants also discussed how access to credit can be denied in some instances and approved for others with similar credit histories that live in different communities. Again, this is related to where one chooses to live and how they are evaluated during underwriting. One roundtable participant challenged others in the group to think about how this dynamic manifests on the North Side in neighborhoods that have also experienced high incidences of foreclosure. He asserted that households that went into foreclosure on the North Side are able to overcome credit record blemishes when searching for housing because of where they had lived and/or because they may belong to a racial/ethnic group that may not experience blatant discrimination.

- The impact of the foreclosure crisis on neighborhood-wide home values. Roundtable participants discussed how the housing market recovery has been uneven in Chicago, where housing prices in some neighborhoods are increasing while other neighborhoods continue to experience depressed prices due to foreclosures. This situation leads to a deterioration of the housing stock and inequitable housing for those who remain in those neighborhoods, and therefore serves as an impediment to furthering fair housing. Homeowners who want to sell may have negative equity in their homes and have no choice but to stay or otherwise abandon their homes. Homeowners also find it difficult to refinance their properties under these circumstances.
- Real estate professionals are reluctant to assist low-income renters and HCV holders in housing searches. Roundtable participants discussed how their reluctance to work with these populations is tied to how they are compensated. Brokers who assist individuals in finding rental housing usually receive the equivalent of one month's rent as a fee. This fee is paid to the broker by the landlord out of the first month's rent, which is usually paid with the security deposit. There are instances where landlords will agree to have low-income renters move in upon payment of the security deposit, and compensation to the broker can be delayed until the first month's rent is paid. Similarly, CHA payments for first month's rent for HCV holders can be delayed. Some roundtable participants stated that to mitigate this situation, their contract agreements with landlords require them to be paid upon placement of the renter regardless of when the landlord receives the first month's rent.
- Housing Choice Voucher holders have challenges finding housing due to negative perceptions of the program. Roundtable participants discussed how HCV holders must overcome negative perceptions created by the poor behavior of some HCV holders. Landlords also question whether it is worth the hassle of certifying their units to receive HCV renters, despite the guarantee of rental income from CHA.

- Lack of code enforcement to ensure that leased properties are maintained by landlords. Roundtable participants discussed how the City could do more to inspect rental properties and hold landlords accountable for maintaining housing that is in compliance with building code regulations, and thereby ensure that renters are not forced to live in poor quality housing.
- Real estate industry associations are not actively engaged in fair housing awareness. Roundtable participants acknowledged that more could be done by industry associations such as the Chicago Association of Realtors to encourage greater awareness and understanding of the Fair Housing Ordinance among the general public.
- Recommendations. Roundtable participants put forth three recommendations for consideration by the City: 1) develop partnerships and on-going dialogue with real estate industry associations to promote greater awareness of fair housing laws and how to further fair housing throughout the city; 2) incentivize banks to provide greater access to capital using the City's bank deposit programs as leverage; and 3) create a special pool of funding that can be used to help people either purchase or maintain homes in neighborhoods impacted by the foreclosure crisis to stabilize local housing markets.

SECTION VIII.

FINDINGS/IDENTIFIED IMPEDIMENTS AND RECOMMENDED ACTIONS

The purpose of this section is to provide an initial list of the impediments identified during the course of this analysis. The impediments were developed after thorough analysis of the various data sources highlighted in the preceding chapters, discussions with stakeholders, and reviews of previously conducted studies on fair housing. This list of impediments is not intended to be all-inclusive; there are possibly other impediments that exist that were not revealed in our discussions or in the review of data.

The recommendations in this section provide a general framework on which the City of Chicago can build its efforts to "affirmatively further fair housing." The federal government has recently created new guidelines to encourage communities to analyze challenges to fair housing choice and establish goals and objectives to address barriers to choice. The final rule on Affirmatively Furthering Fair Housing was released on July 8, 2015, after the analysis of impediments to fair housing in Chicago was well under way. The new federal guidelines do not yet affect the City of Chicago's AI process and this document; however, they further emphasize the need to proactively establish and implement policies and programs that counteract and offset discriminatory housing practices and impacts. Although the City itself might not undertake discriminatory housing practices and programs, it should recognize that it cannot take a passive approach to addressing conditions that result in segregative housing patterns but must instead take action to correct distortions in the housing market that prevent free housing choice.

Like many cities, Chicago currently suffers from severe budgetary constraints. The recommendations in this section provide guidance for an action plan that may well be limited by budgetary concerns that affect the ability for timely implementation of some activities. Allowances may be required for fiscal realities.

The impediments identified through the analysis have been divided into 13 primary groupings. Within these groupings, some impediments were further subdivided:

- Impediment 1: Lack of Awareness of Fair Housing Laws
- Impediment 2: A Prevalent "Fear of Others" Exists Among Residents, Including
 - NIMBYism, and Discrimination Persists
- Impediment 3: An Insufficient Supply of Affordable Housing in the City
- Impediment 4: Limited and/or Inconsistent Coordination Among Some City
 - Departments
- Impediment 5: Certain City Policies and Procedures Do Not Encourage Fair
 - Housing

Impediment 6: The Lack of a Systematic Approach to Fair Housing Planning

Impediment 7: Members of the Protected Classes Are Denied Mortgages at a

Higher Rate

Impediment 8: The Perpetuation of Discriminatory Practices That Are Not

Addressed by the Fair Housing Ordinance

Impediment 9: The Housing Crisis and Recession Have Disproportionately

Impacted Members of the Protected Classes

Impediment 10: Real Estate Professionals Have No Explicit Role in Furthering Fair

Housing

Impediment 11: There Are Highly Segregated Communities in the City of Chicago

Following each impediment is a set of recommended actions. These actions will be confirmed following discussions with City staff from the Commission on Human Relations, Mayor's Office for People with Disabilities, Department of Family and Support Services, Department of Planning and Development, Office of Budget and Management, and local fair housing organizations. Some of the recommended actions may build on those put forth in the City's most recent five-year housing plan (2014–2018), and some recommendations may also come from comments provided by roundtable participants and respondents to the web surveys. Some recommendations may require additional staff and funding support, when possible, given the City's severe budgetary constraints.

IMPEDIMENT 1: LACK OF AWARENESS OF FAIR HOUSING LAWS (PUBLIC AND PRIVATE)

Perhaps the primary impediment to fair housing in the City of Chicago is a lack of awareness and/or full understanding of city, state, and federal housing laws by residents and some real estate industry professionals. Our research found that because there is limited understanding of fair housing laws, additional impediments are generated.

1.1 Affected individuals and families are frequently unaware that their fair housing rights have been violated and are unaware of options for redress.

The general public does not have a strong understanding of fair housing laws and that certain practices are illegal. In fact, the public has limited to no awareness of the existence of the Chicago Fair Housing Ordinance, which is one of the strongest ordinances in the country. As a result, if residents' rights have been violated, they may recognize that they have been treated unfairly but they may not necessarily equate it with a violation of a law. The general public is also not aware of what formal actions and remedies can be pursued under the Fair Housing Ordinance. In some cases, residents only become aware of a fair housing violation after informing housing advocacy agencies of a problem with the physical condition of a housing unit. When reporting problems, residents

have mentioned comments or other disparaging remarks related to race, source of income, or familial status. There are also a significant number of individuals that know they are being discriminated against but decide not to file a formal complaint or pursue legal action because of the time and hassle required to pursue it. Many respondents to the web surveys who believe they experienced discrimination while looking for housing said they decided to simply pursue housing elsewhere.

Per the findings reported earlier by housing organizations that participated in the citizens' roundtable, new immigrants are often discriminated against and taken advantage of by immigrant landlords who also provide access to low-wage employment. Not only are new immigrants unaware of fair housing laws and how they can protect them from discrimination, recent immigrants often feel captive to their landlords and that there is no place to go.

- 1.2 Private sector individuals are frequently unaware that they are violating fair housing laws. With the recent changes in the housing market, the types of individuals who become landlords have shifted. There are more investor-landlords who do not live in the same community (or sometimes even the same state) as their rental properties, individuals newly entering the rental market (often referred to as "mom and pop landlords"), immigrant landlords who tend to provide housing by referral only to those from their community, and condominium unit owners or condominium associations that have obtained control of foreclosed units that are then rented. Many of these groups are not knowledgeable of fair housing laws, and as a result, renters are more likely to have their fair housing rights violated. In some cases, condominium associations have stated that they are not subject to fair housing laws. In the case of immigrant landlords, they may know their practices are discriminatory but are confident their renters feel they have no other housing options due to their immigration status.
- 1.3 Widespread confusion between affordable housing and fair housing. A significant number of individuals and organizations with whom we spoke—including real estate industry professionals—associated providing affordable housing with affirmatively furthering fair housing. A consequence of this perception is that the solutions proposed for fair housing end up focused on the lower-income populations within the protected classes instead of the larger protected class. Organizations also then assume that they are affirmatively furthering fair housing simply by providing information and access to affordable housing independent of the housing's location or services offered.
- **1.4 Language around furthering fair housing is also heavily saturated in enforcement.** According to discussions with local fair housing advocates, efforts to further fair housing tend to rely heavily on remedies that can be sought via enforcement and litigation, instead of education and proactive outreach to increase the public's understanding of their rights under fair housing laws. Due to

limited resources, CCHR, Chicago Housing Authority (CHA), and other city agencies have been limited as to the level of proactive outreach they can undertake. Though there are nonprofit housing and legal advocacy organizations that provide this outreach as part of their mission, they also are working with limited resources and acknowledge that more can always be done.

In addition, the City's efforts to develop affordable housing are disconnected from efforts to further fair housing. The Department of Planning and Development (DPD) requires compliance with the Fair Housing Ordinance as part of the regulatory and redevelopment agreements with developers, but it does not actively promote fair housing.

1.5 Widespread assumptions that fair housing laws only apply to lower-income individuals, African Americans, and persons with a disability. As previously discussed, there is an assumption that "affordable housing" and "fair housing" are synonymous. As a result, many discussions regarding fair housing focus on lower-income individuals. This may in part be because entities wish to provide assistance to those most in need and lower-income individuals and households have limited available resources or because lower-income individuals have fewer housing options independent of discrimination. What is important is that all in the City of Chicago understand that fair housing is a right independent of a household's income.

Perhaps because fair housing laws were initially passed during the civil rights movement and because African Americans are the largest minority group in Chicago, there tends to be a focus on the African American population when methods for addressing fair housing are discussed. The danger this presents is that fair housing issues faced by other protected classes may not receive as much attention. To the extent possible, the City (through marketing efforts by CCHR and OBM) worked with AREA to address this impediment by soliciting survey responses from the Chinese-American and Hispanic/Latino communities.

RECOMMENDED ACTIONS 1

One recommendation universally cited by all roundtable participants and organizations interviewed was the need to heighten education and awareness of fair housing laws with the general public. Hence, it is recommended that the City of Chicago increase its involvement in education and outreach related to fair housing that includes City staff, the public at large, housing organizations, and real estate professionals. To do this, there are several proposed actions.

Conduct fair housing trainings for City staff, delegate agencies, and community-based service providers. The Chicago Commission on Human Relations should establish and conduct standing fair housing trainings at least once a year at a minimum, with one training session in each region (north, south, and west) and a citywide training session in a central location. City delegate agencies, nonprofit housing service providers, community-based service providers, and staff from City departments and offices whose work involves housing should be encouraged to participate in these fair housing trainings. Although CCHR attends and participates in numerous events throughout the year as part of its mission to promote understanding among various segments of society, the Commission provides a limited number of training sessions dedicated to fair housing.

Further, fair housing advocacy organizations, such as the Lawyer's Committee for Better Housing (LCBH) and the Chicago Area Fair Housing Allowance (CAFHA) and its members, should be invited to make presentations at each of the fair housing trainings. Most have already conducted numerous trainings on fair housing and can provide complementary resources. LCBH, CAFHA, and other fair housing advocates can also provide additional perspectives and recommendations regarding furthering fair housing. The additional benefit would be that more delegate agencies, City staff, and community-based service providers could develop and/or deepen their relationships with fair housing organizations and rely on them more as resources for their constituents.

Multiple training sessions should be held in April in coordination with National Fair Housing Month.

Increase capacity to offer fair housing roadshows. Currently, CCHR typically provides fair housing training when requested for various community and government agencies. In addition to providing the standing trainings recommended above, the Commission should consider providing fair housing trainings with constituents in different parts of the city on a quarterly basis. The Commission should also leverage its other non-housing—related outreach engagements as opportunities to advertise when the fair housing trainings will take place. City delegate agencies that are based in areas where the trainings take place should be encouraged to provide information to their constituents through existing communication tools such as newsletters and websites.

The Commission should also consider offering fair housing trainings that target landlords, property managers, and real estate industry professionals. Although CCHR may want to invite these stakeholders to participate in the other trainings offered to housing, City, and community stakeholders throughout the year, the Commission may also want to offer trainings tailored to landlords and property managers. The CHA has developed exceptional training materials on fair housing for landlords and property managers, and it is recommended that the Commission partner with CHA in this capacity.

• Create a City fair housing website or webpage. The City should create a website or web page for fair housing that can be accessed via the homepage of the City of Chicago's website, with links to the fair housing site posted on the pages of CCHR, DPD, Department of Family and Support Services (DFSS), Mayor's Office for People with Disabilities (MOPD), and other City agencies. The website would contain flyers and posters on fair housing (obtained from CCHR and HUD) that housing agencies, landlords, and real estate professionals could use. Best practice documents, case studies, and video testimonials can be maintained on the website, which should include examples of how various stakeholders promote fair housing within their communities. The website should also list any fair housing events planned by the City as well as other organizations, including LCBH, CAFHA, and other fair housing advocacy organizations. Responsibility for maintaining and updating the website and its content would lie with the Commission. The website will only have value if content is relevant and updated on a regular basis.

The City's fair housing website should have options for an RSS feed as well as email subscriptions. A presentation on the site and resources available on it should be made during the fair housing trainings.

- Coordinate outreach activities in partnership with fair housing advocacy organizations. LCBH, CAFHA, and other fair housing advocacy organizations regularly hold training sessions and outreach events throughout the city. CCHR should attend these events to provide information on its role in furthering fair housing.
- Convene fair housing stakeholders from nonprofit housing advocacy organizations and real estate industry professionals to foster cross-sector dialogue and understanding. Several roundtable participants expressed the desire to meet with the Commission and fair housing stakeholders from various industry sectors to gain a better understanding of the challenges they each face in promoting fair housing. This could be a working group facilitated by CCHR that meets periodically to discuss issues and develop strategies to further fair housing in their respective sectors.
- Develop marketing and media awareness campaign. Many of the roundtable participants and stakeholders interviewed by AREA recommended that the City develop a media and marketing campaign to promote fair housing. As part of the marketing effort, the City could develop promotional materials that delegate agencies could distribute in their neighborhoods that demonstrate how their community areas welcome diversity. At a minimum, these materials should include a diverse group of human models and the equal housing logo. The materials should be offered in languages other than English and made available in City Hall, City department offices, and on the City's fair housing web page. The City should hire a media and communications consultant that can work with CCHR to develop and implement a multimedia campaign.

Participate in MPC, CMAP, or ULI events when appropriate. The Metropolitan Planning Council, Chicago Metropolitan Agency on Planning, and Urban Land Institute all hold regular meetings and events where housing professionals from the public and private sectors obtain industry information and learn of best practices. CCHR's attendance at these meetings is low cost and will provide a broader audience with information on fair housing.

IMPEDIMENT 2: A PREVALENT "FEAR OF OTHERS" EXISTS AMONG RESIDENTS, INCLUDING NIMBYISM, AND DISCRIMINATION PERSISTS (PRIVATE)

Housing choice is limited for protected classes in part because racism and prejudice still exist, individuals are stereotyped based upon various socioeconomic characteristics, and there is a fear of people who are dissimilar in some way living in areas that have been largely homogenous. The consequence is that individuals and households often self-segregate by locating in community areas with others who are of the same racial or ethnic background. Upon seeing communities with concentrations of a particular race, ethnicity, or national origin, those who are not a member of the predominant racial, ethnic, or income group often develop ideas of that neighborhood that prevent them from considering living there.

Additionally, there is an incorrect belief that an increase in the number or percentage of minorities in a community area will result in decreased property values, which results in some communities desiring to minimize or prevent diversification. These beliefs and fears then perpetuate historical patterns of segregation throughout the city.

The most frequent complaints of housing discrimination filed with the City of Chicago, HUD, and the State of Illinois cited race and disability at the basis of unfair treatment. Fewer complaints cited source of income, sexual orientation, or gender identity as the cause of the complaints, suggesting that the community may not be as aware of these local protections. Testing for the Chicago Housing Authority by the Chicago Lawyers' Committee for Civil Rights Under Law revealed widespread housing discrimination based on source of income as well as race, disability, and family size.

RECOMMENDED ACTION 2

Falsely held beliefs and fears are rarely directly mitigated. Through implementation of the other recommended actions, the hope is that increased understanding of fair housing and interaction with diverse groups of individuals will decrease this impediment. The Commission is engaged in various activities and convenings as part of its mission to promote societal harmony and understanding, and CCHR should determine how to make these efforts more widely known and connected to its efforts of affirmatively furthering fair housing.

Similarly, efforts to combat persistent discrimination must rely primarily on training and the dissemination of information about fair housing rights and options for redress of rights violations, which are discussed in the recommended actions for Impediment 1.

IMPEDIMENT 3: AN INSUFFICIENT SUPPLY OF AFFORDABLE HOUSING IN THE CITY (PUBLIC AND PRIVATE)

As discussed earlier, fair housing laws apply to all income groups—not just those who require affordable housing. However, minority households have greater difficulty becoming homeowners and suffered disproportionately in the loss of owner-occupied homes due to foreclosures during the most recent recession. In addition affordable rental housing is in short supply, especially in strong housing market areas, many of which have limited racial and ethnic diversity.

The supply of affordable housing in the city is insufficient: this includes both rental and for-sale housing. During the housing market bubble, many units were lost through conversion to homeownership and demolition to accommodate redevelopment. More recently, losses have occurred due to foreclosure of both owner- and renter-occupied dwellings in some neighborhoods. Since the housing market crash, the challenge has increased.

- 3.1. There is higher demand for affordable housing with the decrease in incomes resulting from job loss, which continues to affect African American and Hispanic population groups to a greater extent than other population groups, despite recent improvements in the overall economy.
- 3.2 Affordable housing is often located in neighborhoods with limited commercial amenities and job opportunities.
- **3.3.** Affordable housing is often located in neighborhoods that have higher concentrations of minorities. Affordable housing is seen as synonymous with poverty concentrations, thereby stigmatizing the neighborhood in which it is located.
- 3.4. The City of Chicago has limited affordable housing that is accessible by persons with physical disabilities. Like many older central cities, much of the city's housing stock is older and is difficult to retrofit for accessibility because it consists of multistory dwellings with stairs.

RECOMMENDED ACTIONS 3

As discussed in Section V of this report, the City of Chicago has recently developed its five-year housing plan for 2014 to 2018, "Bouncing Back," which establishes a strategy for addressing the city's current as well as long-term housing needs. The plan includes a wide range of policies and programs to preserve the existing housing stock, strengthen neighborhoods that have suffered from disinvestment, and encourage the construction of affordable housing in all types of neighborhoods. Potential actions that the City could undertake to affirmatively further fair housing by increasing the availability of affordable housing include the following:

 The City should review its zoning and land-use plan to identify any amendments needed to support the preservation and expansion of affordable housing in highopportunity areas.

The City took steps in this direction in April 2015 when the City Council approved changes to the Affordable Requirements Ordinance (ARO), which was originally enacted in 2007. Following a detailed process involving local affordable housing advocates and real estate industry representatives, the City revised the ARO to tailor requirements for contributions of affordable units or fees to specific geographic areas within the city based on the strength of market conditions in low- to moderate-income, higher-income, and downtown areas. However, the ordinance, which takes effect in September 2015, will be limited to developments for which owners seek a public benefit, such as a zoning change, City land sale, or financial assistance. Many cities have mandatory inclusionary housing programs for all residential developments that exceed a certain unit threshold, and local affordable housing advocates continue to encourage the City to consider this broader approach to inclusionary housing.

Additional revisions to the City's transit-oriented development (TOD) ordinance could also reduce housing costs and facilitate additional less costly housing in strong market areas near transit stations. In addition to overall strengthening of the requirements for affordable housing units and/or funds resulting from some new residential development, the recent revision of the ARO created an overlay on top of the City's TOD ordinance that rewards mixed-income TOD projects with additional density bonuses and reduced parking requirements.

Although the TOD ordinance, which was established in 2013, took a significant step toward rewarding new construction near the city's local and regional transportation facilities, many affordable housing advocates believe that additional changes would reduce housing construction costs in highly desirable neighborhoods with transit options. In particular, local housing advocates are concerned that zoning regulations are still too restrictive of the size and types of buildings allowed near transit—especially when rules limit mixed-use residential and commercial structures. The City should continue to research opportunities to

encourage denser and, consequently, less costly development near transportation facilities.

- The Chicago Housing Authority should continue its efforts to improve the city's public housing stock by deconcentrating developments and providing housing options in its designated housing opportunity areas.
- To expand the availability of accessible housing, including that which is affordable, the Mayor's Office for People with Disabilities should arrange workshops for developers and architects to broaden awareness of the concepts of universal design. In addition, the City should continue to encourage removal of barriers to accessibility as part of the HomeMod program to rehabilitate existing units.

IMPEDIMENT 4: LIMITED AND/OR INCONSISTENT COORDINATION AMONG SOME CITY DEPARTMENTS (PUBLIC)

Although the City departments interviewed by AREA have a solid understanding of fair housing laws, communication and coordination among some departments is limited and/or inconsistent.

For example, the City's Department of Planning and Development requires fair housing laws and regulations to be included as part of all regulatory and redevelopment agreements with developers that provide affordable multifamily housing. The department also has general information about the City's fair housing ordinance and where the public can go for help if they feel they have experienced discrimination. However, the materials list HUD as well as agencies such as the Legal Assistance Foundation and Lawyers Committee for Better Housing as resources where one can file discrimination complaints — not the CCHR, the department's sister agency.

The Department of Family and Support Services is another department that CCHR has little to no contact with, and when interviewed, DFSS staff were appreciative that CCHR reached out to include their feedback in the AIFHC report, as the department was not involved in the previous report. In addition, DFSS staff who work with homeless persons and supportive housing agencies for the homeless admitted that they need more training in and understanding of the City's Fair Housing Ordinance and available remedies that can be pursued if clients experience discrimination when looking for housing.

The lack of communication and coordination among City agencies involved in enforcing fair housing and those responsible for implementing programs to achieve fair housing goals is indicative of how some government agencies tend to work in silos (that is, focus almost exclusively on their own priorities as opposed to interagency goals, objectives, and programs) because of the nature of their day-to-day activities. Fortunately, CCHR staff were present at all of AREA's interviews with relevant City departments, and this

provided an opportunity for the Commission's staff to ask and answer questions about their respective practices to further fair housing.

RECOMMENDED ACTION 4

As an extension to Recommended Actions 1, CCHR should conduct fair housing trainings with the appropriate City agencies over the next 12 months, namely DPD, DFSS (which includes the Department of Aging), and MOPD, among others. Once the key staff from all the appropriate departments have been trained, CCHR should offer one annual training for all new City agency staff to educate them about the Chicago Fair Housing Ordinance and encourage interdepartmental coordination and communication. CCHR staff leadership should also consider having periodic meetings with their department counterparts to share data and information about their respective efforts to further fair housing.

IMPEDIMENT 5: CERTAIN CITY POLICIES AND PROCEDURES DO NOT ENCOURAGE FAIR HOUSING (PUBLIC)

Through the development of this Analysis of Impediments to Fair Housing Choice, several impediments have been identified that exist as a result of the City's implementation of certain policies and procedures.

- 5.1. The City has a large budget deficit. When research was conducted for the AIFHC in spring 2014, the City faced a projected operating budget deficit of approximately \$430 million and was obligated to make an additional \$550 million in payments to the police and fire departments' pension funds. This situation has not substantially improved in subsequent months. Consequently, each agency and department will likely have to reduce its individual budget as well as overall staffing. This endangers efforts to enhance fair housing enforcement because some of the proposed actions as well as mandated activities require additional staff and funding. The Commission on Human Relations now has four investigators who focus on fair housing complaints, and the timing for processing complaints has recently decreased. However, additional staff may be needed to continue to provide efficient investigation and adjudication of fair housing discrimination complaints.
- 5.2. The Commission on Human Relations' section of the City's website focuses primarily on explaining how to file discrimination complaints and its efforts to promote societal harmony and understanding, not the City's overall approach to furthering fair housing. The CCHR website provides a number of relevant items, including contact information for the Commission as well as the process and relevant forms for filing fair housing discrimination complaints. However, because CCHR is primarily focused on fair housing enforcement, its web page has very limited information to educate the general public on fair housing laws and how individuals and communities can be

proactive in promoting them to further fair housing. Although the City's website contains a search function that can help users find the City's five-year housing plan and other related reports, these items are very difficult for the average person to locate as there is no easily identifiable webpage that links to all the City's housing resources and publications. Thus, the City needs to create a fair housing web page as cited in Recommended Actions 1, above.

- 5.3 The Department of Planning and Development does not have an explicit responsibility for affirmatively furthering fair housing. The Commission has clear responsibility for enforcing Chicago's Fair Housing Ordinance. However, given that DPD is responsible for co-managing (along with OBM) the CDBG, HOME, and ESG programs, it also should have a more explicit role in addressing the City's fair housing goals and objectives. As stated earlier, DPD does ensure that all regulatory and redevelopment agreements with developers include mandated compliance with the fair housing ordinance; it also monitors developments while under construction or rehab, and reviews tenant selection plans and lease agreements to ensure they are in compliance with fair housing regulations. Many of DPD's housing and neighborhood revitalization and development programs have the impact of furthering fair housing; however, their role in this process should be more explicit.
- 5.4 Subsidized housing and project-based vouchers tend to be concentrated in high poverty areas of the city. Because of negative perceptions of individuals and families who live in subsidized housing, the City faces challenges when trying to work with developers to undertake subsidized housing projects in opportunity neighborhoods. Changes over the years in some programs, such as the Illinois Housing Development Authority's criteria for approving projects funded using Low-Income Housing Tax Credits, have encouraged dispersal of subsidized housing to some extent, and the revised ARO promises to further this effort. All parties involved may be leery of the backlash that could result from these types of efforts; however, continued attempts to deconcentrate subsidized housing require a combination of adequate funding and political will.
- 5.5 The Chicago Housing Authority's efforts to further fair housing continue to be negatively impacted by the nature of Chicago's housing market and perceptions of the agency. As the City's sister agency that develops and manages public housing for the city's lowest-income families, CHA is constantly under public scrutiny. Its efforts to further fair housing are often overshadowed by the slow implementation of projects it has taken under its Plan for Transformation (now known as Plan Forward) since 1999 to meet its obligation to provide 25,000 public housing units. It is also undisputed that CHA's housing development efforts were hampered by the most recent economic recession. Although the agency is moving forward with building new mixed-income developments to meet its housing production goals, CHA continues to face challenges as it attempts to balance rebuilding units on previous public housing sites with building and/or rehabilitating units in off-site locations and in a wider variety of neighborhoods to

reduce concentrated poverty in the city. In addition, as of late 2014 CHA had a wait list of 27,000 in a city that has had a shortage of affordable housing for quite some time.²⁹ Faced with federal funding reductions as well as adverse market conditions, the agency has faced challenges in maintaining its housing production schedule.

CHA's efforts to further fair housing are also impacted by negative public perceptions that the agency historically lacked transparency. In addition, funding dedicated to helping CHA residents move into low-poverty opportunity areas via Housing Choice Partners continues to decrease.³⁰

RECOMMENDED ACTIONS 5

- Increase staff dedicated to fair housing. Although we recognize that funding is limited, the City should nevertheless add a full-time staff person within the Commission on Human Relations who can focus exclusively on the promotion of fair housing practices instead of enforcement. It is also recommended that DPD identify a staff person who can be a counterpart to the new CCHR staff person responsible for furthering fair housing. Staff from these agencies should coordinate and work together closely to ensure continued coordination of activities between the two departments, and help develop a unified strategy that will guide how the City furthers fair housing.
- Leverage existing relationships and other funding sources. There are several organizations that work in and around the Chicago area that undertake activities that expressly or inherently support fair housing. As the official regional planning organization for northeastern Illinois, CMAP could assist in planning and zoning issues and help spread understanding of fair housing. In partnership with CAFHA, CMAP published a report in November 2013 for HUD that provided a "fair housing and equity assessment for Metropolitan Chicago." The report is intended to serve as a starting point to analyze the ramifications of housing inequities, illustrate how patterns of segregation have shaped the Chicago region, and consider the implications for furthering fair housing. Research projects of this nature represent opportunities for the City to partner and collaborate with organizations in its efforts to further fair housing and promote racial and economic neighborhood integration.

The Metropolitan Planning Council is another agency that the City should continue to cultivate as a like-minded key partner that performs instrumental work to impact housing and economic development policies and practices.

³⁰ "Comments on Chicago's Consolidated Plan and Analysis of Impediments to Fair Housing Choice, November 17, 2014," submitted by Christine Klepper, Executive Director, Housing Choice Partners.

Chicago Housing Authority Quarterly Report, 4th Quarter 2014. Does not include waiting lists for the Housing Choice Voucher and Property Rental Assistance (project-based vouchers) programs.

Finally, the City should continue to cultivate its relationship with local fair housing advocacy agencies to develop joint opportunities to affirmatively further fair housing.

• Conduct additional analyses related to fair housing and more effectively integrate fair housing into the housing planning process. It is recommended that the Commission, in partnership with DPD and CHA, consider undertaking additional analyses as well as soliciting additional consultation from local fair housing organizations, HUD, the State of Illinois, and the community at large. One additional recommended analysis is an assessment of impediments by area of the city (that is, south, west, and north). Another recommended analysis would connect issue analyses together, such as the lack of affordable housing, the need for affordable housing in opportunity neighborhoods, and the long-term negative impact of foreclosures on some neighborhoods. By working in partnership with DPD and CHA, these additional analyses can help inform where to pursue housing developments that meet the needs of those protected classes that have been subject to numerous incidents of discrimination.

As part of HUD's recently released Affirmatively Furthering Fair Housing rule, the agency expects the City to submit updated assessments of the status of fair housing policies and programs in the form of an Assessment of Fair Housing (AFH) that is in line with its Consolidated Plan cycle (every five years). Although the new AFH process is similar to that of the current Analysis of Impediments to Fair Housing Choice, HUD has placed even greater emphasis on analyzing the distribution of racial and ethnic groups throughout communities. In the interim years between five-year plans, the City should have an independent third party evaluate its progress in meeting benchmarks established in the existing AIFHC plan.

Expand CHA's mobility program and implement comparable efforts citywide. Housing Choice Partners (HCP) has served as the primary agency that assisted the CHA as it moved residents into low-poverty opportunity neighborhoods over the last 20 years using Housing Choice Vouchers. HCP has performed well in helping thousands of low-income households over that time period. However, budget reductions during the last few years have reduced efforts by HCP and other organizations to assist HCV recipients to move to opportunity neighborhoods. As HUD places greater emphasis on the mobility of low- and moderate-income households, the CHA should consider increasing funding to operate mobility counseling programs. The City should also consider how to create a comparable mobility program that can be utilized by MOPD, DFSS, and City delegate agencies to assist their clients in accessing housing in opportunity neighborhoods.

Focus CHA's new construction efforts in opportunity neighborhoods. To obtain units in opportunity areas, the CHA should take advantage of the revised ARO, which provides housing developers with fee reductions if they lease some units to the CHA. The agency should pursue this option especially in strong market areas. In addition, the CHA should consider purchasing properties in opportunity areas for use as public housing. Although new construction of public housing in these areas is probably cost prohibitive, acquisition of existing properties should be financially viable in many opportunity areas.

The CHA should also consider changes in its long-standing policy of redeveloping existing public housing with developments that are "1/3, 1/3, 1/3" — equal proportions of public, affordable, and market-rate housing. Instead, the agency should consider higher percentages of affordable and public housing for redevelopment projects in opportunity neighborhoods, such as Parkside of Old Town in the Near North Side community area, and higher percentages of market-rate housing for redevelopment projects in areas that already have high concentrations of subsidized housing and low-income households, such as the Roosevelt Square development and West Haven Park development in the Near West Side community area.

To facilitate and encourage housing in opportunity neighborhoods, the City should continue to use the recently updated ARO to provide fee reductions for housing developers if they lease units to the CHA in housing built or rehabilitated in strong market areas.

Promote and catalyze economic investments in low-income **neighborhoods.** Although efforts to move low-income residents to opportunity areas are still greatly needed, there also needs to be more of a concerted effort by the City and DPD to promote and catalyze economic investment in communities with significant poverty concentrations. Everyone cannot leave a poor community to move elsewhere, and residents in these communities have the same needs concerning access to quality housing, schools, jobs, commercial business corridors, and recreational areas. The City's five-year housing plan includes a chapter titled "Energizing Neighborhoods" that discusses the City's plans to increase economic investments in targeted neighborhoods through initiatives such as the Micro-Market Recovery Program, Chicago Neighborhoods Now, and a pilot program to reuse vacant land and/or single-family homes. These initiatives should be viewed as part of a dual investment strategy coupled with investment in housing mobility programs such as those implemented by Housing Choice Partners that can help residents who wish to move to opportunity areas.

IMPEDIMENT 6: THE LACK OF A SYSTEMATIC APPROACH TO FAIR HOUSING PLANNING (PUBLIC)

Several housing organizations that participated in the roundtable believe that the City tends to develop multiple assessment and planning efforts that address housing in a way that is perceived as disjointed and not fully inclusive of all stakeholders' perspectives. More recently, the City attempted to engage community representatives in the analysis and policy planning of the five-year housing plan; however, some fair housing advocacy groups indicated that they felt excluded from the process.

As noted earlier, the City's approach to furthering fair housing has emphasized the Commission's enforcement of the Fair Housing Ordinance. However, the Department of Planning and Development could play a complementary role if it had more explicit responsibility for furthering the City's fair housing goals and objectives and actively promoted this effort through the City's delegate agencies.

RECOMMENDED ACTIONS 6

- Create an interconnected assessment and planning approach. Per the recommendation of roundtable participants, the City should consider a revised approach to developing its next fair housing assessment report, Consolidated Plan, and five-year housing plan. To the City's credit, the most recent five-year housing plan includes a recommendation to better coordinate the City's various planning efforts, including Chicago's Plan 2.0 to End Homelessness and CHA's Plan Forward. A more unified approach could promote greater consistency and continuity of analyses and recommended actions between the various initiatives.
- Provide annual fair housing training for City delegate agencies. City of Chicago delegate agencies tend to be aware of and promote fair housing as part of the services they provide. In fact, the City's Department of Planning and Development includes fair housing regulations in its funding agreements with the delegate agencies. However, some of the agencies may not be fully aware of all the protected classes, available legal actions and remedies, and/or where to refer their clients who have experienced discrimination. To ensure that delegate agencies participate in trainings and also send staff who can act as local champions of fair housing, DPD should consider whether to require participation in the yearly training as a condition of delegate agency funding. The training sessions could conduct a brief test at the end of each session to ensure that attention and attendance are maintained throughout the sessions. Whereas the Commission should continue to maintain responsibility for organizing and conducting the trainings, DPD should maintain records of delegate agencies that do and do not attend.

IMPEDIMENT 7: MEMBERS OF THE PROTECTED CLASSES ARE DENIED MORTGAGES AT A HIGHER RATE (PRIVATE)

In addition to being denied mortgages at a higher rate, members of the protected classes tend to be offered subprime loans more often than others. These limited financing options reduce the chance of homeownership, and when homeownership is achieved, it may be unaffordable. Real estate professionals that participated in the roundtable indicated that despite some improvement in the general availability of mortgage credit, funds are still limited for households located in low- and moderate-income neighborhoods. They also cited examples in which banks work with prospective homebuyers with comparable financial backgrounds that belong to different races, but may introduce subjective interpretations during the underwriting process that result in favoring one applicant over another. Evidence of racial disparities in lending has been documented in numerous reports, including the joint report by the Woodstock Institute and six other organizations, "Paying More for the American Dream VI: Racial Disparities in FHA/VA Lending," which examined lending practices in seven metropolitan areas, including Chicago.³¹

RECOMMENDED ACTION 7

The City's Department of Planning and Development should continue funding housing counseling agencies with a focus not only on those at risk for foreclosure but also those interested in obtaining a mortgage. The City should also provide incentives that encourage banks and financial institutions to develop more equitable underwriting guidelines and offer comparable mortgage products to encourage long-term stable homeownership. The City should consider using investment tools such as linked deposit programs to incentivize lenders' behavior to provide mortgage products equitably. In addition, the City should provide information to the public about lending discrimination in the form of brochures and other written and Web-based materials.

IMPEDIMENT 8: THE PERPETUATION OF DISCRIMINATORY PRACTICES THAT ARE NOT ADDRESSED BY THE FAIR HOUSING ORDINANCE (PUBLIC)

Some housing organizations and real estate professionals that participated in the roundtables cited barriers to furthering fair housing that are not currently addressed by the Fair Housing Ordinance.

racial-disparities-fhava-lending

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³¹ California Reinvestment Coalition, Empire Justice Center, Massachusetts Affordable Housing Alliance, Neighborhood Economic Development Advocacy Project, Ohio Fair Lending Coalition, Reinvestment Partners, and Woodstock Institute, "Paying More for the American Dream VI: Racial Disparities in FHA/VA Lending," July 2012. http://www.woodstockinst.org/research/paying-more-american-dream-vi-

- 8.1 The use of rental housing eviction filings to deny access to housing. The Metropolitan Tenants Organization supplied written correspondence to AREA that describes discriminatory practices by landlords that rely on eviction filings rather than eviction judgments as a screening tool when deciding whether to rent to prospective tenants. Many tenants are the victims of foreclosures that they had no control over and end up with eviction filings on their records without their knowledge. Consequently, these renters often have a difficult time finding landlords that will rent to them.
- **8.2** The posting of discriminatory advertising on the Internet and in newspapers. Media outlets are not held accountable for posting housing ads placed by landlords and property managers with wording such as "no Section 8 allowed" or that include discriminatory language that is clearly illegal. Roundtable participants expressed concern that there is nothing in the Fair Housing Ordinance that holds media outlets accountable for promoting such a discriminatory practice.
- **8.3 Neighbor-on-neighbor harassment is not covered under the Fair Housing Ordinance**. Similar to the treatment of credit discrimination, harassment of individuals by their neighbors is not prohibited under the City's discrimination ordinances.

RECOMMENDED ACTION 8

Consider amendments to the Fair Housing Ordinance to include provisions to address the aforementioned discriminatory practices. Housing advocates in the legal community have suggested that the ordinance should hold media outlets liable for posting advertisements that contain illegal and discriminatory language designed to discourage certain protected classes from seeking housing. Per the recommendation from the Chicago Lawyers Committee for Civil Rights Under Law dated December 19, 2014, the City should also consider amending the ordinance "... to prohibit discriminatory treatment including harassment by parties that are not part of real estate transactions, such as neighbors."

IMPEDIMENT 9: THE HOUSING CRISIS AND RECESSION HAVE DISPROPORTIONATELY IMPACTED MEMBERS OF THE PROTECTED CLASSES (PUBLIC AND PRIVATE)

The recent housing market crash and the most recent recession impacted every group in the U.S. However, research has shown that members of the protected classes as well as lower-income households have been impacted more by these crises and the negative impacts have been reversed more slowly. Specifically:

- 9.1 The foreclosure crisis has impacted minority and immigrant communities at a disproportionate rate.
- **9.2** "Mom and pop" one- to five-unit buildings had a higher foreclosure rate. These units were a substantial supply of affordable housing in the city.
- 9.3 "Mom and pop" landlords have also encountered difficulty obtaining financing for property acquisition and rehabilitation, as shown in research by DePaul University's Institute for Housing Studies. According to a recent study, "since 2005, there has been a sharp decline in multifamily mortgages less than \$1 million, particularly in [Cook C]ounty's lower-income neighborhoods." 32
- 9.4 Areas with concentrations of minorities have had higher foreclosure rates. The large number of foreclosures has made it difficult for banks to properly maintain its owned real estate, resulting in decreased curb appeal for some community areas. Consequently, Chicago has experienced a mixed housing market recovery as several majority-minority neighborhoods continue to experience depressed housing prices and properties with negative equity.

RECOMMENDED ACTIONS 9

- Allocate funding to neighborhoods with high foreclosure rates to improve infrastructure and encourage economic development. Although these neighborhoods may not need additional housing, funding can be used to improve other aspects of the community to maintain or increase the appeal of the neighborhoods.
- Encourage housing developers (nonprofit and for-profit) to purchase and rehab foreclosed properties. In the case of for-sale housing, housing developers could sell the properties at affordable prices and thereby help to increase affordable homeownership opportunities. Alternatively, where for-sale housing markets are weak, nonprofit—as well as for-profit—developers could rehabilitate the properties and rent them at levels that are affordable based upon the area median income. This would also provide a revenue stream to the nonprofit housing developers that could be used to help them sustain their housing services and potentially purchase and rehabilitate more housing units. The City's most recent five-year housing plan also incorporates plans to support these types of initiatives, and the Micro-Market Recovery Program has successfully addressed the needs of thousands of units in hundreds of previously vacant and abandoned buildings.

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Institute for Housing Studies at DePaul University, "Understanding Neighborhood Multifamily Lending Trends in the Wake of the Housing Crisis," November 9, 2014. http://www.housingstudies.org/research-publications/state-of-housing/understanding-neighborhood-multifamily-lending-tre/

IMPEDIMENT 10: REAL ESTATE PROFESSIONALS HAVE NO EXPLICIT ROLE IN FURTHERING FAIR HOUSING (PRIVATE)

Although this impediment could be considered a subset of Impediment 1, the role of the real estate industry is such that it warrants separate treatment. Changes in real estate professional standards in the last few years have resulted in real estate agents and brokers refraining from making any comments or assessment of a neighborhood's quality, socioeconomic characteristics, schools, and crime rates, among other factors. As a result, some brokers are apprehensive to consider issues related to fair housing. Although some associations of real estate industry professionals discuss fair housing as a topic in training sessions, others do not.

- 10.1 Some real estate professionals are reluctant to work with Housing Choice Voucher holders and/or low-income individuals that have low credit scores. Realtors and brokers who search for and place renters in housing units are compensated by receiving the renter's first month's rent via the landlord. Roundtable participants stated that there have been instances when their compensation was delayed because the renter had paid the landlord the security deposit but not the first month's rent. Roundtable participants stated that with HCV holders, the first month's rent payment from CHA to the landlord is often delayed. To mitigate this situation, one roundtable participant structures his contract arrangements so that he is paid the equivalent of the first month's rent as soon as the renter is placed, and then it is up to the landlord to collect the additional funds owed.
- **10.2** Real estate professionals also noted the difficulty of obtaining reliable appraisals in some low-income neighborhoods. Roundtable participants commented that few appraisers are familiar with Chicago's low-income neighborhoods and that they have difficulty obtaining reliable comparable units for use in appraising properties, which results in underestimates of property values that do not reflect true market conditions. Attention has recently been paid to the role of appraisals in predatory lending and over-valuing residential real estate; however, little research exists on the impact of the lack of sales data or access to sales data in minority neighborhoods on the accurate valuation of homes in these areas. The recent article "Appraisals: A Missing Link in Fair Housing/Fair Lending Debates" discusses the negative impact of inaccurate, low property valuations.³³

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³³ Squires, Gregory D., "Appraisals: A Missing Link in Fair Housing/Fair Lending Debates," The BLOG, http://www.huffingtonpost.com/gregory-d-squires/appraisals-a-missing-link_b_5596879.html

RECOMMENDED ACTIONS 10

- Offer fair housing training to local real estate professionals. The Commission can provide fair housing training on an annual or semiannual basis to real estate professionals. Though the agenda will most likely be similar to those offered to fair housing stakeholders and City staff, limiting the class to real estate industry professionals will allow for a focus on issues particular to their field. This training could also be conducted in conjunction with training sessions for landlords and property managers in partnership with the CHA.
- Participate in training sessions of professional real estate organizations. The Commission should also contact organizations of real estate professionals, including the Chicago Association of Realtors and the Dearborn Realtist Board (an association of African American real estate industry professionals), to offer training sessions and provide dates of City training sessions. The sessions should include those that focus exclusively on fair housing as well as those that provide fair housing as a topic during a larger training session. These professional associations also provide homeownership training in neighborhoods across the city as a way to market their services, and the Commission should explore the opportunity to present information on fair housing at these trainings.
- Work with professional organizations and appraisers. The Commission should encourage professional organizations that offer educational training sessions to appraisers to emphasize not only fair housing issues affecting appraisals, but also offer specialized training in the valuation process in low-income residential areas. CCHR could assist with the fair housing training.

IMPEDIMENT 11: THERE ARE HIGHLY SEGREGATED COMMUNITIES IN THE CITY OF CHICAGO (PUBLIC AND PRIVATE)

There are several neighborhoods in the city, primarily on the South Side and West Side, which have high concentrations of minorities. Some neighborhoods also include high concentrations of lower-income populations. These same neighborhoods have also been subject to intentional economic disinvestment that then fosters further racial segregation and/or poverty concentration. Although fair housing laws are designed to prevent illegal discrimination, fair lending laws alone are not sufficient to meet the larger goal of creating integrated communities with equal access to neighborhood amenities that make them desirable to live in.

As discussed earlier, the majority of participants in the citizens' roundtable were very vocal about how this issue is at the heart of the problem in furthering fair housing in Chicago. Roundtable participants stated that there are still barriers to accessing housing in certain neighborhoods across the city based on income and race restrictions, and that the housing market mirrors and perpetuates long-standing institutional racism. Related

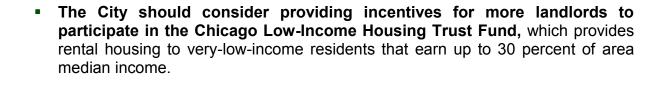
to this, roundtable participants also expressed concerns that HCV participants continue to be concentrated on the South Side and West Side.

In addition, the issue of racial segregation and its impact on housing and access to equal opportunities have recently been more prominent in the media. This is evidenced by a cover story in the *Chicago Reader* published on February 5, 2015 titled "Still Separate, Unequal and Ignored" about racial segregation in Chicago.

Further, until recently HUD had not updated its affirmatively furthering fair housing rule, due in large part to legal challenges to "disparate impact," which assumes that a practice can have discriminatory effect—even if one was not intended—when it results in a disparate impact on a group of persons or perpetuates segregated housing patterns based on the federal protected classes. The U.S. Supreme Court's finding in July 2015 in *Texas Department of Housing and Community Affairs v. The Inclusive Communities* was a much-awaited decision that stated that disparate-impact claims are consistent with the central purpose of the Fair Housing Act.

RECOMMENDED ACTIONS 11

- Conduct trainings on the value of diversity. This can continue to be done by the Inter-Group Relations division of the Commission as part of its normal outreach and trainings. The trainings should address some commonly held myths and also point to some community areas that have diverse populations as well as mass-market appeal.
- Engage community groups. There are a number of community groups and nonprofit organizations that focus on ending discrimination and addressing stereotypes. CCHR should contact these organizations for additional recommendations on steps that can be taken, and partner with them to hold joint community events to foster societal harmony among various groups.
- Encourage City agencies and housing delegate agencies to engage in more affirmative marketing strategies. As discussed in an earlier recommendation, affirmative marketing strategies can yield two important results. First, they can assist in expanding the housing options available to current and potential residents of the city. Second, the strategies can combat NIMBYism and the "fear of others" by promoting the value of diversity in communities.
- The Chicago Housing Authority should be more aggressive in marketing the Housing Choice Voucher and project-based voucher programs to landlords on the North Side and other low-poverty neighborhoods. This recommendation was raised several times by housing and legal advocacy organizations that participated in the focus group. CHA should create landlord incentives to foster greater program participation.



SECTION IX. IMPLEMENTATION

The development of this Analysis of Impediments to Fair Housing Choice is the first major step in a longer-term process to ensure that fair housing is being affirmatively furthered in Chicago. To take the AIFHC from an analysis and plan to actual actions, it is imperative that the City and its various departments implement the recommendations proposed as well as continue to work with local fair housing advocacy organizations, real estate industry professionals, affordable housing developers and operators, community representatives, city residents, and HUD, among others.

Given the complexity of AIFHC implementation, outside factors affecting City staff workload, and resource limitations facing the City, AREA and the City have identified several key recommendations for initial priority action items that will help establish a framework for full implementation over time.

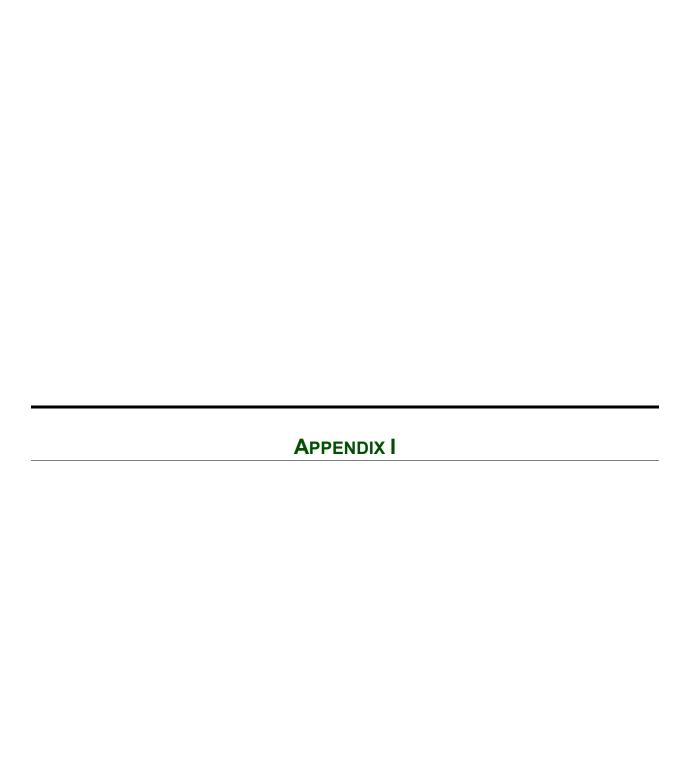
These recommendations are:

- Develop benchmarks for outreach and training
- Increase the public's understanding of fair housing and interaction with diverse groups
- Continue to preserve the stock of affordable and accessible housing
- Pursue City policies and procedures that encourage fair housing
- Continue to address the negative impacts that the housing crisis and recent recession have disproportionately had on members of protected classes

On at least an annual basis, the City will report its progress in implementing these and other recommendations found in Section VIII.

The priority and proposed phasing for implementation of the above recommendations is provided in Exhibit IX-1 on the following page. Implementation strategy and priorities are subject to change at the City's discretion, based upon evolving funding availability, administrative capacity and resources, local needs and priorities, and federal regulations affecting fair housing. The development of a detailed timeline is not feasible due to the natural variability in the cycle of project management as well as potential changes in HUD policy, requests, and expectations.

Exhibit I			
Priorit _, ▼	Recommendation	Phase	Activities
1	Develop benchmarks for outreach and training	Year 1	Update the City's fair housing website.
			Conduct fair housing training sessions for City staff and promote interdepartmental coordination regarding fair housing.
			Identify organizations with which to collaborate to deliver fair housing presentations and provide fair housing materials. Provide fair housing training to City-funded delegate agencies.
			Distribute materials on fair housing to landlords and to developers that receive City assistance.
	Increase the mubilials understanding of		Convene fair housing stakeholders from nonprofit housing advocacy organizations and real estate industry professionals to foster cross-sector dialogue and understanding.
2	Increase the public's understanding of fair housing and interaction with diverse groups	Year 1	Continue the work of the Chicago Commission on Human Relations to provide community outreach and education through its Adjudication Unit and Intergroup Relations Unit.
3	Preserve the stock of affordable and accessible housing	Current and Ongoing	Continue to implement zoning and land-use plans that support preservation and expansion of affordable housing in high opportunity areas. This includes the current Affordable Requirement Ordinance.
			Continue to pursue transit oriented developments to reduce housing costs and facilitate additional less costly housing in strong market areas.
			Support the Chicago Housing Authority's (CHA's) continued efforts to deconcentrate developments and provide more housing options.
			Continue to fund the Low-Income Housing Trust Fund and look for opportunities to encourage more landlords to participate.
			Continue programs that promote affordable and accessible housing, including those that encourage removal of barriers to accessibility, such as the HOME Mod and Small Accessible Repairs for Seniors programs.
5	Pursue City policies and procedures that encourage fair housing	Year 2	Integrate fair housing into the next five-year affordable housing planning process.
			Support the CHA's mobility counseling programs, particularly in opportunity areas where the City's affordable housing developments are located or planned.
			Continue to focus economic investments in low-income neighborhoods, including supporting CHA's new construction efforts in opportunity neighborhoods.
	Continue to address negative impacts that the housing crisis and the recent recession have disproportionately had on members of the protected classes	Current and Ongoing	Continue to fund programs such as the Micro-Market Recovery Program and Troubled Buildings Initiatives in neighborhoods with high foreclosure rates to improve infrastructure and encourage economic development.



Appendix I, Exhibit 1. City of Chicago Zoning Ordinance Residential District Requirements

	S	ingle-Family	1	Two-F	Flat, Townhous	e, Multi-Unit			Multi-Unit		
District Residence	RS1	RS2	RS3	RT3.5	RT4	RT4A	RM4.5	RM5	RM5.5	RM6	RM6.5
уре											
/linimum Lot A	nimum Lot Area per Dwelling Unit (square feet)										
Single- Family	6,250	5,000	2,500								
Two-Family				1,250							
Multifamily					1,000/Dwelling 1,000/Efficienc y 500/SRO	1,000/Dwelling 1,000/Efficienc y 500/SRO	700/Dwelling 700/Efficienc y 500/SRO	400/Dwelling 400/Efficienc y 200/SRO.	400/Dwelling 400/Efficienc y 200/SRO	300/Dwelling 135/Efficienc y 135/SRO	300/Dwelling 135/Efficien y 135/SR0
	6,250	5,000	2,500	2,500	1,650	1,650	1,650	1,650	1,650	1,650	1,65
'ard Requirem	ents	,	,	·	,		1,650	,	,	,	1,65
'ard Requirem Front Setback	ents 20 feet	5,000	depth,	·	1,650 15 feet or 12% of lowhichever is great the second se	ot depth,	1,650	15 fe	1,650 et or 12% of lot d	epth,	1,65
Front Setback Rear yard open space	ents 20 feet	of 16% of lot of	depth,	·	15 feet or 12% of lo	ot depth,	1,650	15 fe	et or 12% of lot d	epth,	1,65
Front Setback Rear yard	ents 20 feet	of 16% of lot of	depth,	·	15 feet or 12% of lo	ot depth,	1,650	15 fe	et or 12% of lot d	epth,	1,65
Front Setback Rear yard open space (square	ents 20 feet w	of 16% of lot o	depth, s	1	15 feet or 12% of lo whichever is gre	ot depth, eater		15 fec	et or 12% of lot d hichever is greate	epth, er	
Front Setback Rear yard open space (square feet/% of lot) Space on	20 feet W 400/6.5	of 16% of lot of hichever is less 400/6.5	depth, s 225/6.5	100/6.5	15 feet or 12% of lowhichever is grade 65/6.5	ot depth, eater 65/6.5	50/6.5	15 fee wl 36/5.25	et or 12% of lot d hichever is greate 36 5 to 15	epth, er 36 5 to 15	3 5 to 1
Front Setback Rear yard open space (square feet/% of lot) Space on either side	20 feet w/ 400/6.5 20 Combined, must equal	400/6.5 Combined, must equal	depth, s 225/6.5 15 Combinequal 20% o	100/6.5 12 ned, must f lot width	15 feet or 12% of lowhichever is great the second of the s	ot depth, eater 65/6.5 12 Combined, must equal	50/6.5 10 Combined, must equal	15 fer wl 36/5.25 10 Combined, must equal	et or 12% of lot d hichever is greate 36 5 to 15 Combined, must equal	epth, er 36 5 to 15 Combined, must equal	5 to 1 Combined must equa
Front Setback Rear yard open space (square feet/% of lot) Space on either side (feet)	20 feet w/ 400/6.5 20 Combined, must equal 30% of lot width with	400/6.5 20 Combined, must equal 30% of lot width with	depth, s 225/6.5 15 Combinequal 20% o with neither less than 2f	100/6.5 12 ned, must f lot width er setback t or 8% of	15 feet or 12% of lowhichever is great to the second of lotwidth with	ot depth, eater 65/6.5 12 Combined,	50/6.5 10 Combined,	15 fee wl 36/5.25 10 Combined,	et or 12% of lot dhichever is greated as 36 5 to 15 Combined, must equal 20% of lot width with	epth, er 36 5 to 15 Combined, must equal 20% of lot width with	5 to 1 Combined
Front Setback Rear yard open space (square feet/% of lot) Space on either side	20 feet w/ 400/6.5 20 Combined, must equal 30% of lot	400/6.5 Combined, must equal 30% of lot	depth, s 225/6.5 15 Combinequal 20% o with neither	100/6.5 12 ned, must f lot width er setback t or 8% of	15 feet or 12% of lowhichever is great to the second of the second of lot 12%	65/6.5 Combined, must equal 20% of lot width with	50/6.5 10 Combined, must equal 20% of lot width with	15 fer wl 36/5.25 10 Combined, must equal 20% of lot width with	et or 12% of lot d hichever is greate 36 5 to 15 Combined, must equal 20% of lot	epth, er 36 5 to 15 Combined, must equal 20% of lot	5 to 2 Combine must equ 20% of I width wi

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Source: City of Chicago Zoning Ordinance.

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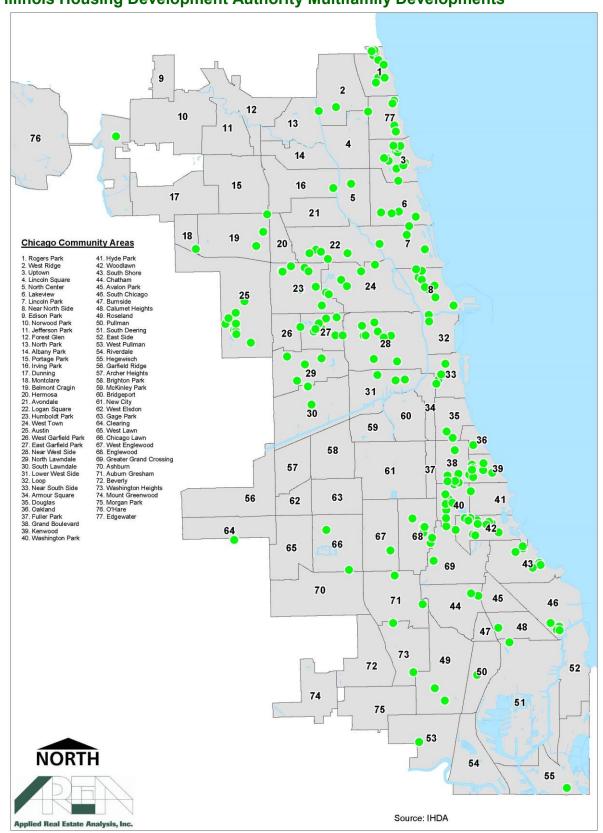
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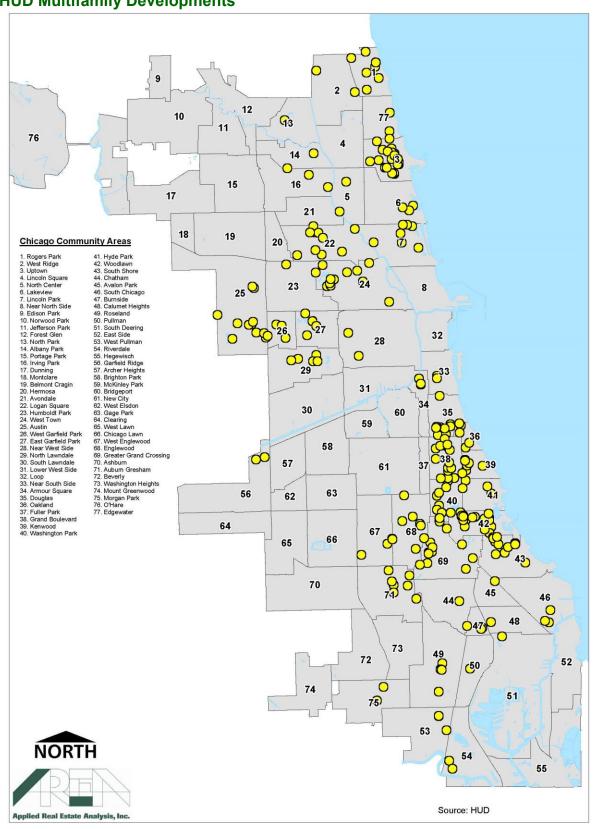
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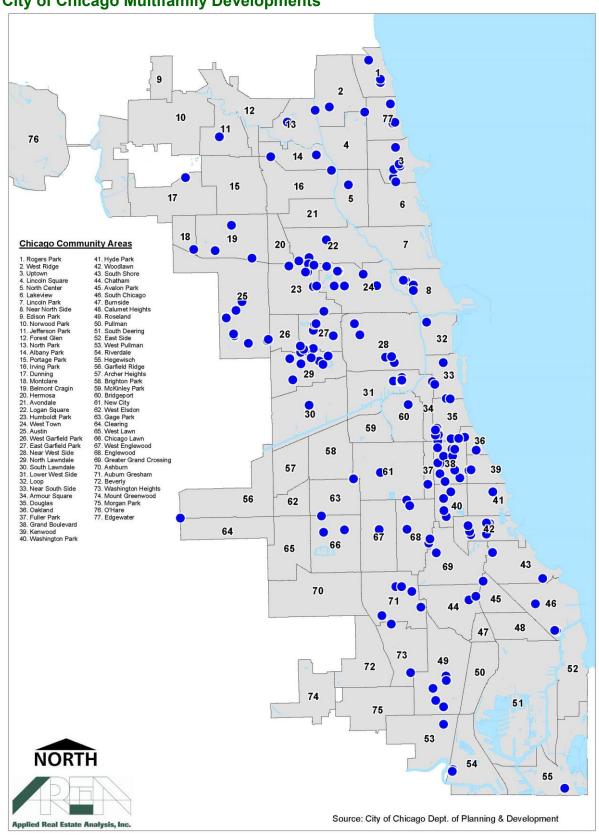
Appendix I, Exhibit 2. Illinois Housing Development Authority Multifamily Developments

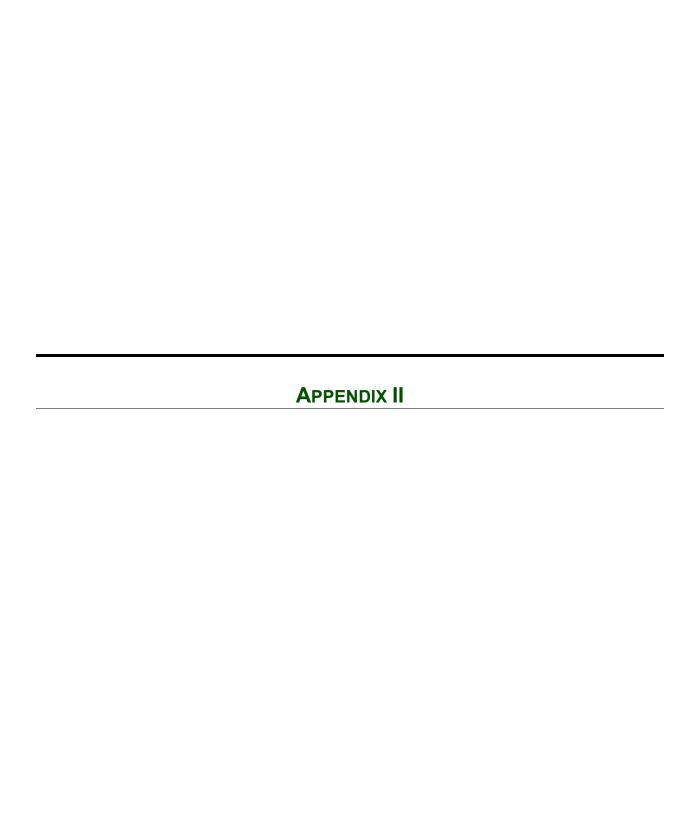


Appendix I, Exhibit 3. HUD Multifamily Developments



Appendix I, Exhibit 4. City of Chicago Multifamily Developments





City of Chicago Analysis of Impediments Resident Survey	
The City of Chicago has hired Applied Real Estate Analysis (AREA), Inc., to conduct a housing study for communities across Chicago. As part of the study, the City would like to have a stronger understanding of any potential challenges faced by residents (or potential residents) in finding housing in the city of Chicago.	
This is not a test, and there is no such thing as a wrong answer. You do not have to answer any question with which you feel uncomfortable. There will be an opportunity at the end of the survey to provide additional comments if you feel they were not addressed in the survey. Your response is confidential.	
1. How long have you lived in the City of Chicago?	
Less than one year	
1-2 years	
3-4 years	
5-6 years	
7-8 years	
9-10 years Mare then 10 years	
More than 10 years I do not currently live in Chicago but I'm looking for housing in the city.	
I do not currently live in Chicago but his looking to mousing in the city.	
2. In which community area do you live?	
Other (please specify)	

City of Chicago Analysis of Impediments Resident Survey 3. In which of these community areas do you WANT to live? (Please choose as many as you need.) Albany Park Gage Park Norwood Park Archer Heights Garfield Ridge Oakland Grand Boulevard O'Hare Armour Square Ashburn Greater Grand Crossing Portage Park Auburn Gresham Hegewisch Pullman Austin Hermosa Riverdale Avalon Park Humboldt Park Rogers Park Avondale Hyde Park Roseland Avondale Gardens Irving Park South Chicago Belmont Cragin Jefferson Park South Deering Kenwood South Lawndale Lake View South Shore Bridgeport Brighton Park Lincoln Park The Loop Burnside Lincoln Square Uptown Calumet Heights Logan Square Washington Heights Lower West Side Washington Park Chatham McKinley Park West Elston Chicago Lawn West Englewood Clearing Montclare West Garfield Park Douglas Morgan Park Mount Greenwood West Lawn Dunning East Garfield Park Near North Side West Pullman East Side Near South Side West Ridge Edgewater Near West Side West Town Edison Park New City Woodlawn Englewood North Center Other (list) Forest Glen North Lawndale Fuller Park North Park

City of Chicago Analysis of Impediments Resident Survey					
4. What are the reasons that you have chosen to live in these community/ies?					
(Select all that apply.)					
Close to work	It is a place I can afford to live				
Close to transport	Close to parks & recreation				
Close to family	Close to school				
Close to friends	I can't afford to move				
Community support					
Other (please specify)					
(Final spensy)					

City of Chicago Analysis of Impediments Resident Survey 5. Do you own or rent the place in which you live? Rent Own Live with family (no rent or mortgage payment) Do not have a permanent place of residence Prefer not to answer 6. Do you feel that housing discrimination is common in Chicago? Yes, it is extremely common Yes, it is somewhat common No, it is not common O Don't know Prefer not to answer 7. Do you feel you have experienced discrimination while looking for housing in Chicago? O Don't know Prefer not to answer

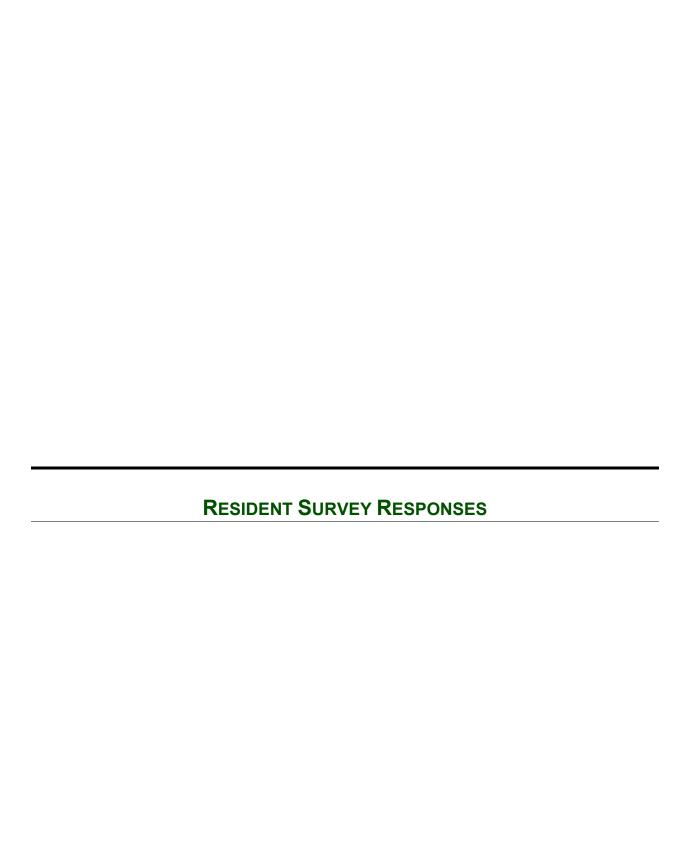
City of Chicago Analysis of Impediments Resident Survey	
8. Do you feel you have experienced discrimination while living in housing in Chicago?	
Yes	
O No	
O Don't know Prefer not to answer	
O Hoo horound	

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City of Chicago Analysis of Impediments Resident Survey			
10. If you have experienced housing d	iscrimination, were you:		
Looking to rent a unit to live in			
Looking to rent a unit to someone			
Looking to buy a unit			
Looking to sell a unit			
Prefer not to answer			
Other (please explain)			
11. If you have experienced housing di	scrimination, what do you believe it was based		
upon? (Select all that apply)			
Race	Immigration status		
Color	Marital status		
Sex	Parental status		
Age	Military discharge status		
Religion	Source of income		
Disability	Gender identity		
National origin	Housing status		
Ancestry	Section 8/Housing Choice Voucher		
Sexual orientation	Prefer not to answer		
Other (please specify)			
12. Which of the following best describ	bes the person who discriminated against you?		
Candlord/property manager			
Real estate agent/broker			
Banker or mortgage loan officer			
Home owner's insurance agent			
Local government staff			
Other (please specify)			

City of Chicago Analysis of Impediments Resident Survey 13. If you have experienced housing discrimination, did you do any of the following? () Contacted a lawyer Contacted a housing or non-profit organization Contacted my local government Contacted City of Chicago Contacted Department of Housing and Urban Development (HUD) Prefer not to answer Other (please specify) 14. If you did not take any action regarding the housing discrimination, why not? (Select all that apply.) Did not have time Didn't know where to report the information Afraid of retaliation Would not make any difference Housing easier to find/sell/rent somewhere else Would not want to live near/rent from/purchase from the person discriminating Did not think I would be able to prove discrimination It costs too much to pursue Discrimination was not that serious Prefer not to answer Other (please specify) 15. Has anyone ever provided you information on housing rights? () Don't remember/Not sure Prefer not to answer

City of Chicago Analysis of Impediments Resident Survey 16. Do you identify yourself as: Female Male Prefer not to answer 17. What is your current age? 18 years of age and younger 19-29 years old 30-39 years old 40-49 years old 50-59 years old 60-69 years old 70-79 years old 80 years of age and older Prefer not to answer 18. What is your marital status? Never married Married Civil union () Widowed Divorced/separated Prefer not to answer



City of Chicago Analysis of Impediments Resident Survey

1. How long have you lived in the City of Chicago? Response Response **Answer Options** Percent Count Less than one year 0.0% 0 11 1-2 years 4.4% 3-4 years 14 5.6% 5-6 years 3.6% 9 7-8 years 4.4% 11 9-10 years 14 5.6% More than 10 years 190 76.3% I do not currently live in Chicago but I'm 2.4% 6 answered question 249 skipped question 1

2. In which community area do you live?

Answer Options	Response Percent	Response Count
Albany Park	1.7%	4
Archer Heights	0.0%	0
Armour Square	0.0%	0
Ashburn	1.3%	3
Auburn Gresham	1.7%	4
Austin	4.7%	11
Avalon Park	0.8%	2
Avondale	2.5%	6
Avondale Gardens	0.4%	1
Belmont Cragin	2.1%	5
Beverly	1.7%	4
Bridgeport	0.0%	0
Brighton Park	1.3%	3
Burnside	0.4%	1
Calumet Heights	0.4%	1
Chatham	3.8%	9
Chicago Lawn	1.3%	3
Clearing	0.4%	1
Douglas	1.3%	3
Dunning	0.4%	1
East Garfield Park	0.8%	2
East Side	0.8%	2
Edgewater	5.9%	14
Edison Park	0.4%	1
Englewood	3.0%	7
Forest Glen	0.4%	1
Fuller Park	0.8%	2
Gage Park	0.0%	0
Garfield Ridge	0.4%	1

2. In which community area do you live?			
Answer Options	Response Percent	Response Count	
Grand Boulevard	0.8%	2	
Greater Grand Crossing	0.0%	0	
Hegewisch	0.0%	0	
Hermosa	0.0%	0	
Humboldt Park	3.0%	7	
Hyde Park	4.7%		
Irving Park	1.3%	3	
Jefferson Park	0.8%	2	
Kenwood	1.3%	3	
Lake View	3.0%	7	
Lincoln Park	0.0%	0	
Lincoln Square	2.1%	<u></u>	
·	5.9%	<u>5</u> 14	
Logan Square Lower West Side	1.3%	3	
	0.8%	2	
McKinley Park			
Montclare	0.0%	0	
Morgan Park	0.8%	2	
Mount Greenwood	0.8%	2	
Near North Side	1.7%	4	
Near South Side	0.4%	1	
Near West Side	0.8%	2	
New City	0.0%	0	
North Center	0.8%	2	
North Lawndale	1.7%	4	
North Park	0.0%	0	
Norwood Park	0.0%	0	
Oakland	1.3%	3	
O'Hare	0.0%	0	
Portage Park	0.8%	2	
Pullman	0.4%	1	
Riverdale	0.0%	0	
Rogers Park	7.6%	18	
Roseland	3.8%	9	
South Chicago	1.7%	4	
South Deering	0.8%	2	
South Lawndale	0.8%	2	
South Shore	2.1%	5	
The Loop	0.0%	0	
Uptown	3.8%	9	
Washington Heights	0.0%	0	
Washington Park	0.0%	0	
West Elsdon	0.0%	0	
West Englewood	0.0%	0	
West Englewood West Garfield Park	0.0%		
		0	
West Lawn	0.0%	0	
West Pullman	0.8%	2	
WestRidge	1.7%	4	
WestTown	2.1%	5	
Woodlawn	0.8%	2	
Other (please specify)		12	
	answered question	23	
	skipped question	1	

3. In which of these community areas do you WANT to live? (Please choose as many as you need.)

Answer Options	Response Percent	Response Count
Albany Park	5.3%	12
Archer Heights	1.3%	3
Armour Square	0.9%	2
Ashburn	1.8%	4
Auburn Gresham	0.9%	2
Austin	4.0%	9
Avalon Park	0.9%	2
Avondale	5.8%	13
Avondale Gardens	0.9%	2
Belmont Cragin	2.2%	5
Beverly	10.7%	24
Bridgeport	4.9%	11
Brighton Park	1.3%	3
Burnside	0.4%	1
Calumet Heights	0.4%	2
Chatham	3.6%	8
	2.7%	6
Chicago Lawn		2
Clearing	0.9%	5
Douglas	2.2%	
Dunning Frank Option II Dayle	1.3%	3
East Garfield Park	1.3%	3
East Side	1.8%	4
Edgewater	11.6%	26
Edison Park	2.2%	5
Englewood	2.7%	6
Forest Glen	1.3%	3
Fuller Park	0.9%	2
Gage Park	0.4%	1
Garfield Ridge	1.8%	4
Grand Boulevard	2.2%	5
Greater Grand Crossing	1.8%	4
Hegewisch	0.9%	2
Hermosa	1.3%	3
Humboldt Park	6.2%	14
Hyde Park	16.4%	37
Irving Park	5.8%	13
Jefferson Park	3.6%	8
Kenwood	7.6%	17
Lake View	15.1%	34
Lincoln Park	11.6%	26
Lincoln Square	14.7%	33
Logan Square	16.9%	38
Lower West Side	3.1%	7
McKinley Park	1.8%	4
Montclare	0.4%	1
Morgan Park	1.3%	3
Mount Greenwood	1.8%	4
Near North Side	8.9%	20

3. In which of these community areas do you WANT to live? (Please choose as many as you need.)

Answer Options	Response	Response
•	Percent	Count
Near South Side	4.9%	11
Near West Side	5.8%	13
New City	1.8%	4
North Center	8.4%	19
North Lawndale	4.0%	9
North Park	3.1%	7
Norwood Park	2.2%	5
Oakland	1.8%	4
O'Hare	0.9%	2
Portage Park	3.1%	7
Pullman	2.7%	6
Riverdale	0.4%	1
Rogers Park	13.8%	31
Roseland	2.2%	5
South Chicago	1.3%	3
South Deering	0.4%	1
South Lawndale	2.2%	5
South Shore	3.6%	8
The Loop	13.3%	30
Uptown	6.2%	14
Washington Heights	0.4%	1
Washington Park	2.2%	5
West Elston	0.4%	1
West Englewood	0.4%	1
West Garfield Park	1.3%	3
West Lawn	0.9%	2
West Pullman	1.8%	4
WestRidge	2.7%	6
WestTown	6.2%	14
Woodlawn	1.3%	3
Other (list)	6.2%	14
	answered question	225
	skipped question	25

4. What are the reasons that you have chosen to live in these community/ies? (Select all that apply.)

Answer Options	Response Percent	Response Count
Close to work	56.9%	124
Close to transport	59.6%	130
Close to family	35.3%	77
Close to friends	36.7%	80
Community support	39.4%	86
It is a place I can afford to live	47.2%	103
Close to parks & recreation	35.8%	78
Close to school	10.1%	22
I can't afford to move	16.1%	35
Other (please specify)		36
-	answered question	218
	skipped question	32

	Other (please specify)					
1	Galewood					
2	Nice, low-key area. gay friendly.					
3	Where I grew up					
4	Security					
5	Vibrant business community walking distance					
6	The community is on the rise					
7	We just moved here, we found a house we liked.					
8	Close to Lake					
9	Diversity, adequate city services					
10	Safety					
11	Close to church					
	safe, family-friendly					
13	you don't hear about a lot of crime going on in these areas					
14	local activities and park center					
15	Nicer area, then current location					
16	Safety					
	Close to refugee resettlement agencies, refugee community, ethnic					
	grocery stores, etc.					
-	Bucktown					
	I like the community					
	Safety					
	would like to live near the lake/beaches					
22	Safer, good alderman, state legislators, Congressmen					
	I live in Uptown but I want to live in Lincoln Park, Edgewater, Lakeview,					
	Lincoln Square, the Loop but I can not afford to live in these areas. I also					
	believe that crime in these areas are low. Some of these areas have					
	better school options too.					
	I feel safe in this neighbourhood					
	They make me feel safer.					
26	safety reasons					
	Diverse racially and economically; the lake; good community-based					
	7 organizations					
28	founded my organization here for at risk youth					
	I think it is a great community to live in there is great things in the					
	community come see					
	Native of this Community					
	Very peaceful,diverse, and beautiful					
	I have always loved living in SS and am working to turn it around.					
	Bought house from mother in law; safe place to live.					
	Near the lake					
35	To aid and assist in the areas where I grew up					
	Involvement in a community I care about; for many years I worked in the					
36	community too					

5. Do you own or rent the place in which you live?

Answer Options	Response Percent	Response Count
Rent	51.1%	117
Own	40.2%	92
Live with family (no rent or mortgage payment)	4.8%	11
Do not have a permanent place of residence	2.6%	6
Prefer not to answer	1.3%	3
answ	ared auestion	220

reter not to answer	1.3%	3
	answered question	229
	skipped question	21

6. Do you feel that housing discrimination is common in Chicago?

Answer Options	Response Percent	Response Count
Yes, it is extremely common	42.1%	96
Yes, it is somewhat common	33.3%	76
No, it is not common	8.3%	19
Don't know	15.4%	35
Prefer not to answer	0.9%	2
	answered question	228
	skinned auestion	22

7. Do you feel you have experienced discrimination while looking for housing in Chicago?

Answer Options	Response Percent	Response Count
Yes	32.0%	73
No	48.2%	110
Don't know	14.0%	32
Prefer not to answer	5.7%	13
answ	ered question	228
skip	ped question	22

8. Do you feel you have experienced discrimination while living in housing in Chicago?

Answer Options	Response Percent	Response Count
Yes	56.7%	68
No	16.7%	20
Don't know	20.8%	25
Prefer not to answer	5.8%	7
	answered question	120
	skipped question	130

9. Do you feel you have experienced discrimination while living in housing in Chicago?

Answer Options	Response Percent	Response Count
Yes	10.9%	12
No	84.5%	93
Don't know	2.7%	3
Prefer not to answer	1.8%	2
	answered question	110
	skipped question	140

10. If you have experienced housing discrimination, were you:

Answer Options	Response Percent	Response Count
Looking to rent a unit to live in	68.2%	75
Looking to rent a unit to someone	3.6%	4
Looking to buy a unit	22.7%	25
Looking to sell a unit	1.8%	2
Prefer not to answer	10.9%	12
Other (please explain)		9
	answered question	110
	skipped question	140

	Other (please explain)
1	already living in housing
2	Buy a Condo
3	N/A
	I have not experienced housing discrimination it is more so class
4	discrimination
5	no discrimination
6	N/A
7	African American Homes are only being sold to latinos
8	n/a
9	N/A

11. If you have experienced housing discrimination, what do you believe it was based upon? (Select all that apply)

Answer Options	Response Percent	Response Count
Race	63.1%	77
Color	23.8%	29
Sex	15.6%	19
Age	19.7%	24
Religion	6.6%	8
Disability	5.7%	7
National origin	14.8%	18
Ancestry	6.6%	8
Sexual orientation	7.4%	9
Immigration status	8.2%	10
Marital status	7.4%	9
Parental status	9.0%	11
Military discharge status	0.0%	0
Source of income	26.2%	32
Gender identity	3.3%	4
Housing status	11.5%	14
Section 8/Housing Choice Voucher	5.7%	7
Prefer not to answer	4.1%	5
Other (please specify)	9.0%	11
ans	wered question	122
sk	kipped question	128

Other (please specify)

- 1 rules don't apply to everyone
- 2 legal background
- 3 N/A
- 4 I'm a single mother with twin toddlers

As the housing coordinator for my agency (refugee resettlement agency), we commonly have landlords and property managers who openly state that they only want to work with certain ethnic groups, not with others, etc. Despite being reminded this is against fair housing law. Staff are routinely asked what country the client is coming from before the landlord will rent to us, even though they insist "it doesn't matter to me." In the past several years we have also seen an uptick in the number of requirements to apply for rental housing that refugee applicants cannot meet. This includes being asked to make 3x the rent in income, pay security deposits 2-3

- 5 times monthly rent, etc.
- 6 N/A
- 7 I'm homeless
- 8 Children we have 2
- 9 n/a
- 10 N/A
- 11 tenants' rights advocacy

12. Which of the following best describes the person who discriminated against you?

Answer Options	Response Percent	Response Count
Landlord/property manager	54.7%	64
Real estate agent/broker	14.5%	17
Banker or mortgage loan officer	11.1%	13
Home owner's insurance agent	1.7%	2
Local government staff	6.0%	7
Other (please specify)	12.0%	14
	answered question	117
	skipped question	133

	Other (please specify)
1	Other Condo owner
2	Development association
3	Builder
4	N/A
5	homeowner/neighbors
6	Appraiser
	as a renter, from a property management company; as a property owner,
7	from a tenant
8	other
9	none
10	N/A
11	neighbors and owner of home that i wanted to purchase
12	n/a
13	area residents
14	N/A

13. If you have experienced housing discrimination, did you do any of the following?

Answer Options	Response Percent	Response Count
Contacted a lawyer	2.0%	2
Contacted a housing or non-profit organization	11.2%	11
Contacted my local government	1.0%	1
Contacted City of Chicago	5.1%	5
Contacted Department of Housing and Urban	1.0%	1
Prefer not to answer	41.8%	41
Other (please specify)	37.8%	37
answe	ered question	98
skip	ped question	152

	Other (please specify)
1	pending
	I did not report the occurrence of this discrimination.
	chose not to take action against the potential landlord.
	Can not fight the system
	no i did not do anything
	N/A
	did nothing-it wouldn't have helped-even if i was allowed to move in, i
7	would have still experienced trouble from the neighbors
8	did nothing
	nothing it common
	No, because the response to the denial was plausible. Nothing court
10	worthy.
	no
	nothing
	looked elsewhere
	Nothing
	Didn't contact any entity
	I did not report it.
	no
	We have called 311, reported to an Alderman once when we were
	showed two available units in the same building for rent and then told we
	could not rent the nicer one of the two, since the family "was just going to
18	destroy it anyway," referred to Lakeside CDC, etc. However we have not
	seen any results from reporting to the City and are reluctant because we
	cannot burn landlord bridges (rely on them to house newly arriving
	refugees).
19	I did nothing.
	I did nothing.
	n/a
	no
	contacted HUD, lawyer, housing org, disability org, and City of Chgo
	file a compaint agaist the person
	Nothing
	did nothing found another area that was easy to be a part of
	No
	n/a
	nothing
	Did not contact anyone
	nothing
	Did nothing
	Nothing, Looked in another area.
	none of the above, I accepted and moved on dissappointed; no doubt
	N/A
	Did not contact anyone. Just moved on.

37 handled it on my own

14. If you did not take any	action regarding the housing
discrimination, why not?	(Select all that apply.)

Answer Options	Response Percent	Response Count
Did not have time	13.7%	14
Didn't know where to report the information	23.5%	24
Afraid of retaliation	12.7%	13
Would not make any difference	52.9%	54
Housing easier to find/sell/rent somewhere	19.6%	20
Would not want to live near/rent	17.6%	18
Did not think I would be able to prove	34.3%	35
It costs too much to pursue	16.7%	17
Discrimination was not that serious	3.9%	4
Prefer not to answer	6.9%	7
Other (please specify)	9.8%	10
answ	102	
skij	148	

Other (please specify)

- 1 N/A
- 2 fear for my family if we would have moved in
- Too difficult to pursue--I just resolved to be more involved in the selection of the appraiser the next time.
- 4 n/a
- 5 n/a
- I wasn't sure ti was happening -- it just seemed like I was being directed to specific neighborhoods and units; I later discovered that others who were looking for units within the same price point, were directed to nicer areas by the same agent
- 7 need to maintain the landlord relationship / work for Heartland Alliance non-profit
- 8 I chose to let the comment go
- 9 i have young males as children wanted them to be safe
- 10 n/a

15. Has anyone ever provided you information on housing rights?

Answer Options	Response Percent	Response Count		
Yes	53.8%	113		
No	35.2%	74		
Don't remember/Not sure	9.5%	20		
Prefer not to answer	1.4%	3		
	answered question	210		
	skipped question	40		

16. Do you identify yourself as:		
Answer Options	Response Percent	Response Count
Female	73.3%	154
Male	24.8%	52
Prefer not to answer	1.9%	4
answ	ered question	210
skij	pped question	40

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			LAL.	au.	•			-	_	.	•	.	. ~		•	~	•	

Answer Options	Response Percent	Response Count
18 years of age and younger	0.0%	0
19-29 years old	12.8%	27
30-39 years old	21.3%	45
40-49 years old	22.3%	47
50-59 years old	24.6%	52
60-69 years old	15.6%	33
70-79 years old	2.4%	5
80 years of age and older	0.0%	0
Prefer not to answer	0.9%	2
	answered question	211
	39	

18. What is your marital status?

Answer Options	Response Percent	Response Count
Never married	32.4%	69
Married	31.0%	66
Civil union	3.3%	7
Widowed	2.8%	6
Divorced/separated	23.5%	50
Prefer not to answer	7.0%	15
	answered question	213
	skipped question	37

19. Do you identify yourself as a member of any of the following
groups (Select all that apply.)

Answer Options	Response Percent	Response Count
African-American/Black	45.6%	94
American Indian/Alaskan Native	1.5%	3
Asian	3.9%	8
Native American or Other Pacific Islander	0.5%	1
White	35.0%	72
Hispanic/Latino	15.5%	32
Other racial/ethnic group	6.3%	13
Gay, lesbian, bisexual, or transgendered	6.3%	13
Born outside of the U.S.	4.4%	9
A person with a disability	4.9%	10
An active, retired, or discharged member of	1.0%	2
answ	ered question	206
skij	44	

20. Do any of your household members identify themselves as a member of any of the following groups? (Select all that apply.)

Answer Options	Response Percent	Response Count
African-American/Black	49.7%	89
American Indian/Alaskan Native	0.6%	1
Asian	6.1%	11
Native American or Other Pacific Islander	1.1%	2
White	30.7%	55
Hispanic/Latino	15.1%	27
Other racial/ethnic group	7.8%	14
Gay, Lesbian, Bisexual, or Transgendered	11.7%	21
Born outside of the United States	6.7%	12
A person with a disability	8.4%	15
An active, retired, or discharged member of	1.1%	2
answ	ered question	179
skij	71	

21. Is there anything else you would like us to know on these topics? (Optional written response.)

Answer Options	Response Count	
	43	
answered question	43	
skipped question	207	

Response Text

- affordability in Chicago ,for people who are low income are pushed into area of high poverty,crime ridden & substandard housing areas. Especially with a voucher or rental asssistance. C.H.A. is dragging feet & putting university students & moderate income people in units. Poor are being displaced.
- 2 I would like you to know that the CHA is discriminating against people based on income.
- 3 ISTRONGLY URGE the City to to meet with community organizations and to present the initial findings for discussion BEFORE completing this Analysis. Community groups are scrambling to keep up with so many issues, but fair housing is a major concern. Many of the people impacted do not have regular internet access and/or are not comfortable filling out an online survey. Thank you.
- 4 Completed from the perspective of my clients.
- 5 Responses done on behalf of residents
- 6 I answered this survey based on perspective of clients.
- 7 no
- 8 None
- 9 I need a way out of the mortgage so i can move from this neighborhood i'm afraid to go in or out and feel trapped and have no way out. The summers are like a war zone.
- This survey was very soft. I don't know how effective it will be. When you look at the data of where different groups live you see segregation which was based on past discrimination and discriminatory practices. But economics is also a big part of it. When you listen to NPR reports on gentrification you hear banks redlining and discouraging integration by refusing to loan in certain areas even when progressive people try to integrate a community you know we have not really solved the problem here in Chicago. This survey needs to capture some of this. The roots of housing discrimination in Chicago are deep and racial and supported by well thought out systems that your survey does not uncover. (I do have past work experience in Fair Housing in another state and years of experience as an activist in civil and human rights). SO my suggestion try and create something that reflects Chicago's reality then you will have something to rally around and actually make a difference with. A diverse community is a beautiful thing. Peace.
- 11 while my family has not directly experienced discrimination in housing, we have witness the act of discrimination when new families move into our block, who are either african american or hispanic- by our current neighbors, who are primarily anglo/caucasian. the rationale or defense of their prejudice stems from feeling that "property value will go down" in regard to their own homes.
- 12 NO
- 13 It took me akmost 5 months to rent an apartment for my daughters and myself in spring/summer 2014. I was told repeatedly by landlords that they didn't want to rent to me because I had two young children.
- 14 friends share stories of landlords not letting them rent because of the number of children they have; they also find it difficult to find affordable housing; this is especially difficult for women getting out of domestic violence
- 15 I have not experienced housing discrimination because I am the definition of privilege. However, I have heard from friends, colleagues, and research that it remains a serious problem.
- 16 The income requirements for market rate housing is unjust. I know that there isn't anything we can do about it legally, but it is a barrier for low-income families.
- 17 The city of Chicago needs to address housing discrimination more seriously

Response Text

- 18 I am a parent.
- 19 Chicago has very strong tenant rights laws. Unfortunately it is much harder to make sure they are enforced.
- These people would rather for you to be homeless then help you.and can be negligent at times, and are not compassionate or dont have no remorse.
- As a senior citizen I would love to have affordable housing that is not the size of a small box. I would love to live in a decent neighborhood without fear so that I can do my share to help beautify the area where I live.
- housing is a human right. provide housing for women and children in this city. Use existing abandon homes allow youth to fix them and rent them on an affordable income ratio basis
- 23 no
- 24 Minoritys, especially African-Americans, have always been discriminated against in Chicago. Chicago is a very racist city.
- 25 It seems that only Latinos (some of whom are illegal, able to afford to by homes in the community. Before an African American can call the realestate agent, a Latino is purchased the home in this area. It's being targeted for Latinos only.
- 26 yes. on a limited income i have always managed to pay my rent on time.last year, after we had been model tenants for 4 years we were told we had to move in less than a month or face eviction- as the landlord decided to sell the unit we were living in. not wanting an eviction on our record, we searched like crazy with an excellent work record but low credit rating, the apartment search put my family in peril. we were lucky enough to find a landlord who would rent to us but we needed to borrow money to move, the landlord who asked us to leave did not give us our security or overpaid rent back even though we left on time and left the unit better than we found it. we contacted the lawyers committee for better housing only to be told we would have to hire a lawyer and sue our old landlord for the money she owed us. we couldn't afford it. now we are in this tiny apartment that is kept up just passably, my husband and i have both lost and found work since we have lived here and never been late with the rent. we were recently asked, 3 months ahead of time, to commit to a renewal- and pay a \$30/ month increase in the rent. we need more space for our growing family, my daughter has not found work after losing her job 2 years ago, is now pregnant, with no means to move out on her own. we have nothing in the bank. how on earth are the poor supposed to survive? any help getting our \$1800 from the landlord who owes us from the last move would be greatly appreciated, at least i think you should know. PERSONAL INFORAMTION REDACTED. thanks for letting me rant.. and if there is a way to get housing assistance so i can actually afford my rent, or at least find a place that allows a (good/crate trained) dog, 5 adults and a baby in April, does not require expensive credit checks, please let me know. thank you.
- 27 Loopholes in the RLTO which allow landlords to evict tenants who access their rights under the law. Judges in housing/eviction court and administrative hearing who do not understand--or support--the RLTO.
- 28 I have tried to move but can't afford to move
- 29 No
- 30 No thank you though

Response Text

- 31 if you don't have a good inome you are likely to live in a high crime area with little resources and that's sad.
- 32 What does our race have to do with housing?
- 33 In addition to having been discriminated against in rentals, years later I stopped selling real estate, too, because lenders were refusing to lend mortgages to African-Americans who clearly were highly qualified.
- 34 In general Chicago, although considered segregated it appears its culturally motivated and adds to the city's richness and diversity, not a result of discrimination in my opinion.
- 35 No
- I am on the board of Hands To Help, a homeless assistance organization the helps the homeless and those at risk of being homeless. The homeless have a very difficult time finding housing even when they have the means to pay. If you don't have an address, people don't want to rent to you. It makes it difficult to break the cycle of homelessness.
- A challenge to obtaining quality housing in Chicago are income requirements, especially for people with disabilities those living on fixed incomes. This also has a racial component as many people people of color are living at or below the poverty line and cannot accesss quality housing opportunities.
- 38 MORE AFFORDABLE HOUSING FOR SINGLE WOMEN WITH CHILDREN
- Yes,initially, property acceptance of each subsidized program should be fully disclosed, instead of a pretense that they have no knowledge when asked. Also, the law for the section 8 voucher should be changed as well. Discrimination also comes in the form of allowing those who can help themselves to occupy space in the place of those who have a present need.
- 40 N/A
- 41 It is still very difficult for someone with a housing choice voucher to find a willing landlord in a middle/upper class neighborhood. It may be illegal to discriminate based on source of income, but without an incentive this will continue. This contributes to extreme concentrations of poverty in Chicago.
- I still need housing and I am getting no where after 4 months of searching. My wife and I are now living in a shelter.
- Need low-income and affordable housing for low-income and people with fixed income such as SSI, and SSDI. This type of housing is reducing in Chicago.

芝加哥居民障碍调查分析 - Chinese Resident Survey Responses

1. 您在芝加哥市住了多久?

Response Percent	Response Count				
3.6%	6				
4.2%	7				
10.8%	18				
8.4%	14				
6.6%	11				
6.6%	11				
57.8%	96				
1.8%	3				
answered question					
ped question	7				
	Percent 3.6% 4.2% 10.8% 8.4% 6.6% 6.6% 57.8% 1.8% ered question				

2. 您住在哪一个社区?(请只圈出一个)

Answer Options	Response Percent	Response Count
Albany Park	0.0%	0
Archer Heights	3.4%	5
Armour Square	6.8%	10
Ashburn	0.0%	0
Auburn Gresham	0.0%	0
Austin	0.7%	1
Avalon Park	0.0%	0
Avondale	0.0%	0
Avondale Gardens	0.0%	0
Belmont Cragin	0.0%	0
Beverly	0.0%	0
Bridgeport	50.7%	74
Brighton Park	6.8%	10
Burnside	0.0%	0
Calumet Heights	0.0%	0
Chatham	0.0%	0
Chicago Lawn	2.1%	3
Clearing	0.0%	0
Douglas	0.0%	0
Dunning	0.0%	0
East Garfield Park	0.0%	0
East Side	0.0%	0
Edgewater	2.1%	3
Edison Park	0.0%	0
Englewood	0.0%	0
Forest Glen	0.0%	0
Fuller Park	0.7%	1
Gage Park	2.1%	3
Garfield Ridge	0.0%	0

Answer Options	Response Percent	Response Count
Grand Boulevard	0.0%	0
Greater Grand Crossing	0.0%	0
Hegewisch	0.0%	0
Hermosa	0.0%	0
Humboldt Park	0.0%	0
Hyde Park	0.0%	0
Irving Park	0.0%	0
Jefferson Park	0.7%	1
Kenwood	0.0%	0
Lake View	1.4%	2
Lincoln Park	1.4%	2
Lincoln Square	0.7%	1
· · · · · · · · · · · · · · · · · · ·	0.0%	0
Lower West Side	0.0%	0
McKinley Park	4.8%	7
Montclare Marran Dark	0.0%	0
Morgan Park	0.0%	0
Mount Greenwood	0.0%	0
Near North Side	0.0%	0
Near South Side	0.7%	1
Near West Side	0.0%	0
New City	0.0%	0
North Center	0.0%	0
North Lawndale	0.0%	0
North Park	0.0%	0
Norwood Park	1.4%	2
Oakland	0.0%	0
O'Hare	0.0%	0
Portage Park	0.0%	0
Pullman	0.0%	0
Riverdale	0.0%	0
Rogers Park	0.0%	0
Roseland	0.0%	0
South Chicago	7.5%	11
South Deering	0.0%	0
South Lawndale	0.0%	0
South Shore	0.7%	1
The Loop	3.4%	5
Uptown	0.7%	1
Washington Heights	0.7%	1
Washington Park	0.0%	0
West Elston	0.0%	0
West Englewood	0.0%	0
West Garfield Park	0.0%	0
West Lawn	0.7%	1
WestPullman	0.0%	0
West Ridge	0.0%	0
WestTown		
	0.0%	0
Woodlawn	0.0%	0
其他(请列明)		2
	answered question	146
	skipped question	27

Answer Options	Response Percent	Response Count
Albany Park	0.7%	1
Archer Heights	3.0%	4
Armour Square	6.7%	9
Ashburn	0.0%	0
Auburn Gresham	0.0%	0
Austin	0.0%	0
Avalon Park	0.0%	0
Avondale	0.0%	0
Avondale Gardens	0.7%	1
Belmont Cragin	0.0%	0
Beverly	0.0%	0
Bridgeport	55.2%	74
Brighton Park	6.7%	9
Burnside	0.0%	0
Calumet Heights	0.0%	0
Chatham	0.0%	0
Chicago Lawn	1.5%	2

Clearing

Douglas

Dunning

East Side

Edgewater

Englewood

Forest Glen

Fuller Park

Gage Park

Hegewisch

Humboldt Park

Jefferson Park

Hermosa

Hyde Park

Irving Park

Kenwood Lake View

Lincoln Park

Lincoln Square

Logan Square

McKinley Park

Morgan Park

Montclare

Lower West Side

Mount Greenwood

Near North Side

Near South Side

Near West Side

Garfield Ridge

Grand Boulevard

Greater Grand Crossing

Edison Park

East Garfield Park

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3. 您「想」住在哪些社区? (请尽量圈出)

Answer Options	Response	Response
Answer Options	Percent	Count
New City	0.0%	0
North Center	0.7%	1
North Lawndale	0.0%	0
North Park	0.0%	0
Norwood Park	0.7%	1
Oakland	0.0%	0
O'Hare	0.0%	0
Portage Park	0.0%	0
Pullman	0.0%	0
Riverdale	0.0%	0
Rogers Park	0.0%	0
Roseland	0.0%	0
South Chicago	4.5%	6
South Deering	0.0%	0
South Lawndale	0.0%	0
South Shore	0.7%	1
The Loop	13.4%	18
Uptown	0.7%	1
Washington Heights	0.0%	0
Washington Park	0.0%	0
West Elsdon	0.0%	0
West Englewood	0.0%	0
West Garfield Park	0.0%	0
WestLawn	0.0%	0
West Pullman	0.0%	0
West Ridge	0.0%	0
WestTown	0.0%	0
Woodlawn	0.0%	0
其他(请列明)		9
	answered question	134

4. 有哪些理由令您选择住在以上圈出的社区?(请选择所有适用的)

Answer Options	Response Percent	Response Count
靠近工作	37.4%	61
靠近交通	51.5%	84
靠近家庭	24.5%	40
靠近朋友	20.2%	33
社区支援	15.3%	25
这是我有能力住的地方	16.0%	26
靠近公园及休□设施	19.6%	32
靠近学校	19.0%	31
我沒能力搬家	2.5%	4
其他	3.7%	6
	answered question	163
	skipped question	10

skipped question

39

5. 您是拥有还是租住目前的居所?

Answer Options	Response Percent	Response Count
租住	46.3%	74
拥有	43.1%	69
与家人同住(没有付租或房贷)	7.5%	12
沒有永久居所	0.6%	1
不回答	2.5%	4
	answered question	160

6. 您是否觉得住房歧视在芝加哥很普遍?

Answer Options	Response Percent	Response Count
是, 极之普遍	5.7%	9
是, 有些普遍	20.3%	32
不, 並不普遍	28.5%	45
不知道	37.3%	59
不回答	8.2%	13
	answered auestion	158

answered question 158
skipped question 15

skipped question

13

7. 您是否觉得您在芝加哥寻找住房时曾遇上歧视?

Answer Options	Response Percent	Response Count
是	6.7%	11
不	63.2%	103
不知道	25.2%	41
不回答	4.9%	8
	answered question	163
	skipped question	10

8. 您是否觉得您在芝加哥居住时曾遇上歧视?

Answer Options	Response Percent	Response Count
是	30.6%	19
不	27.4%	17
不知道	35.5%	22
不回答	6.5%	4
	answered question	62
	skipped question	111

9. 您是否觉得您在芝加哥居住时曾遇上歧视?

Answer Options	Response Percent	Response Count
是	5.8%	6
不	83.5%	86
不知道	7.8%	8
不回答	2.9%	3
ans	wered question	103
si	kipped question	70

10. 如果您曾遇上住房歧视,您是否:

Answer Options	Response Percent	Response Count
在找單位租住	29.7%	22
在找人租住您的單位	4.1%	3
准备买一个单位	9.5%	7
准备出售单位	4.1%	3
其他, 请解释	5.4%	4
不回答	51.4%	38
	answered question	74

answered question 74 skipped question 99

11.

如果您曾遇上住房歧视,您相信是基于甚么原因吗?(请选择所有适用的)

Answer Options	Response Percent	Response Count
种族	44.6%	33
肤色	6.8%	5
性别	0.0%	0
年龄	5.4%	4
宗教	0.0%	0
残障	2.7%	2
原国籍	14.9%	11
祖先	1.4%	1
性取向	1.4%	1
移民状況	5.4%	4
婚姻状况	1.4%	1
双亲状况	0.0%	0
退伍状況	0.0%	0
收入来源	17.6%	13
性别认同	0.0%	0
住房状況	6.8%	5
第8节/房租代用券	1.4%	1
不回答	35.1%	26
其他, 请解释:		3
	answered question	74

12. 以下哪一项最能描述歧视您的人?

Answer Options	Response Percent	Response Count
房 东/物业管理人员	60.4%	29
房地 产代理人/中介人	25.0%	12
银行家或房屋抵押贷款人员	12.5%	6
屋主的保险代理人	0.0%	0
地方政府人员	8.3%	4
其他, 请解释:		8
	answered question	48
	skipped question	125

skipped question

99

13. 如果您曾遇上住房歧视,您有没有做以下任何一项?

Answer Options	Response Percent	Response Count
联络律师	7.4%	5
联络住房或不牟利机构	14.7%	10
联络地方政府	5.9%	4
联络芝加哥市	2.9%	2
联络联邦屋宇及城市发展部(HUD)	2.9%	2
不响答	66.2%	45
其他, 请解释:		3
	answered question	68

skipped question

skipped question

105

101

14.

如果您沒有就住房歧视采取任何行动,为什么沒有?(请选择所有适用的)

Answer Options	Response Percent	Response Count
沒有时間	15.3%	11
不知道到哪里報告有关信息	37.5%	27
害怕报复	11.1%	8
不会有任何分別	9.7%	7
在其他地方更易找/出售/租用住房	8.3%	6
不想住近/租自/ 购自歧视別人的人	12.5%	9
不 认为我可以证明歧视	11.1%	8
太贵了去追求	6.9%	5
歧 视没有那么严重	5.6%	4
不回答	29.2%	21
其他, 请解释:		1
	answered question	72

15. 有沒有向您提供住房权益的信息?

Answer Options	Response Percent	Response Count
有Yes	28.7%	41
沒有No	35.0%	50
不記得/不肯定	19.6%	28
不响答	16.8%	24
	answered question	143
	skipped question	30

16. 您会把自已识別為:		
Answer Options	Response Percent	Response Count
女性	69.3%	106
男性	20.9%	32
不回答	9.8%	15
é	answered question	153
	skipped question	20

17. 您目前的年龄是?

Answer Options	Response Percent	Response Count	
岁及以下	0.0%	0	
19-29 岁	12.9%	21	
30-39 岁	13.5%	22	
40-49 岁	18.4%	30	
50-59 岁	16.6%	27	
60-69 岁	16.6%	27	
70-79 岁	11.7%	19	
80岁及以上	6.1%	10	
不回答	4.3%	7	
	answered question	163	
	skipped question	10	

18. 您的婚姻状況是什么?

Answer Options	Response Percent	Response Count
从沒結婚	11.9%	19
已婚	63.8%	102
民事结合	0.0%	0
寡	11.9%	19
离婚/分居	4.4%	7
不回答	8.1%	13
	ered question	160
skij	pped question	13

19. 您会把自已识別为以下任何组别的成员(请选择所有适用的)

Answer Options	Response Percent	Response Count
非裔美国人/黑人	0.0%	0
美洲印第安人/阿拉斯加原居民	0.0%	0
亞裔	96.8%	151
美洲原居民或其他太平洋岛居民	0.0%	0
白人	0.0%	0
西班牙裔/拉丁美洲人	0.0%	0
其他种族/民族	1.3%	2
男同性恋、女同性恋、双性恋或变性人	0.0%	0
在美国以外出生	7.7%	12
残障人士	0.0%	0
武装部队现役、退休或退役人员	0.0%	0
	answered question	156

answered question 156 skipped question 17

skipped question

25

20. 您家中是否有成员把自已识别为以下任何组别的成员?(请选择所有适用的)

Answer Options	Response Percent	Response Count
非裔美国人/黑人	0.0%	0
美洲印第安人/阿拉斯加原居民	0.0%	0
亞裔	98.6%	146
美洲原居民或其他太平洋岛居民	0.0%	0
白人	0.7%	1
西班牙裔/拉丁美洲人	0.0%	0
其他种族/民族	0.7%	1
男同性恋、女同性恋、双性恋或变性人	0.0%	0
在美国以外出生	8.1%	12
残障人士	0.0%	0
武装部队现役、退休或退役人员	0.0%	0
	answered question	148

21.

关于这些课题, 您有沒有任何事想我們知道? (可选性书面回

Answer Options	Response Count	
	20	
answered question	20	
skipped question	153	

City of Chicago Analysis of Impediments Resident Survey - Spanish

1. ¿Cuánto tiempo hace que vive en la ciudad de Chicago? Response Response **Answer Options** Percent Count Menos de un año 25.0% 1 0 1-2 años 0.0% 0 3-4 años 0.0% 5-6 años 0.0% 0 7-8 años 25.0% 1 9-10 años 0.0% 0 2 Más de 10 años 50.0% Actualmente no vivo en Chicago pero estoy 0.0% 0 answered question 4 skipped question 0

2. ¿En qué comunidad vives? (Favor de circular una.)

Answer Options	Response Percent	Response Count
Albany Park	0.0%	0
Archer Heights	0.0%	0
Armour Square	0.0%	0
Ashburn	0.0%	0
Auburn Gresham	0.0%	0
Austin	0.0%	0
Avalon Park	0.0%	0
Avondale	0.0%	0
Avondale Gardens	0.0%	0
Belmont Cragin	0.0%	0
Beverly	0.0%	0
Bridgeport	0.0%	0
Brighton Park	0.0%	0
Burnside	0.0%	0
Calumet Heights	0.0%	0
Chatham	0.0%	0
Chicago Lawn	0.0%	0
Clearing	0.0%	0
Douglas	0.0%	0
Dunning	0.0%	0
East Garfield Park	0.0%	0
East Side	0.0%	0
Edgewater	0.0%	0
Edison Park	0.0%	0
Englewood	0.0%	0
Forest Glen	0.0%	0
Fuller Park	0.0%	0
Gage Park	0.0%	0
Garfield Ridge	0.0%	0

2. ¿En qué comunidad vives? (Favor de circular una.)		
Answer Options	Response Percent	Response Count
Grand Boulevard	0.0%	0
Greater Grand Crossing	0.0%	0
Hegewisch	0.0%	0
Hermosa	0.0%	0
Humboldt Park	0.0%	0
Hyde Park	0.0%	0
Irving Park	0.0%	0
Jefferson Park	0.0%	0
Kenwood	0.0%	0
Lake View	33.3%	1
Lincoln Park	0.0%	0
Lincoln Square	0.0%	0
Logan Square	0.0%	0
Lower West Side	0.0%	0
McKinley Park	0.0%	0
Montclare	0.0%	0
Morgan Park	0.0%	0
Mount Greenwood	0.0%	0
Near North Side	0.0%	0
Near South Side	0.0%	0
Near West Side	0.0%	0
New City	0.0%	0
North Center	0.0%	0
North Lawndale	0.0%	0
North Park	0.0%	0
Norwood Park	0.0%	0
Oakland	0.0%	0
O'Hare	0.0%	0
Portage Park	0.0%	0
Pullman	0.0%	0
Riverdale	0.0%	0
Rogers Park	0.0%	0
Roseland	0.0%	0
South Chicago	0.0%	0
South Deering	0.0%	0
South Lawndale	33.3%	1
South Shore	0.0%	0
The Loop	0.0%	0
Uptown	0.0%	0
Washington Heights	0.0%	0
Washington Park	0.0%	0
West Elston	0.0%	0
West Englewood	0.0%	0
West Garfield Park	0.0%	0
West Lawn	0.0%	0
West Pullman	0.0%	0
West Ridge	0.0%	0
West Town	33.3%	1
Woodlawn	0.0%	0
Otro, por favor explique	U.U /0	0
Ono, por lavor explique	anguarad avastics	
	answered question skipped question	3

3. ¿En cuál de estas área de la comunidad ¿QUIERE vivir? (Por favor círcula tantas como necesites.)

Answer Options	Response Percent	Response Count
Albany Park	0.0%	0
Archer Heights	0.0%	0
Armour Square	0.0%	0
Ashburn	0.0%	0
Auburn Gresham	0.0%	0
Austin	0.0%	0
Avalon Park	0.0%	0
Avondale	0.0%	0
Avondale Gardens	0.0%	0
Belmont Cragin	0.0%	0
Beverly	0.0%	0
Bridgeport	0.0%	0
Brighton Park	0.0%	0
Burnside	0.0%	0
Calumet Heights	0.0%	0
Chatham	0.0%	0
Chicago Lawn	0.0%	0
Clearing	0.0%	0
Douglas	0.0%	0
Dunning	0.0%	0
East Garfield Park	0.0%	0
East Side	0.0%	0
Edgewater	0.0%	0
Edison Park	0.0%	0
Englewood	0.0%	0
Forest Glen	0.0%	0
Fuller Park	0.0%	0
Gage Park	0.0%	0
Garfield Ridge	0.0%	0
Grand Boulevard	0.0%	0
Greater Grand Crossing	0.0%	0
Hegewisch	0.0%	0
Hermosa	0.0%	0
Humboldt Park	0.0%	0
Hyde Park	0.0%	0
Irving Park	0.0%	0
Jefferson Park	0.0%	0
Kenwood	0.0%	0
Lake View	33.3%	1
Lincoln Park	0.0%	0
Lincoln Square	0.0%	0
Logan Square	0.0%	0
Lower West Side	0.0%	0
McKinley Park	0.0%	0
Montclare	0.0%	0
Morgan Park	0.0%	0
Mount Greenwood	0.0%	0
Near North Side	0.0%	0
Near South Side	0.0%	0
Near West Side	0.0%	0
New City	0.0%	0
North Center	0.0%	0
NOTHIT CETTER	0.0%	U

3. ¿En cuál de estas área de la comunidad ¿QUIERE viv		Response	
Answer Options		Percent	Count
North Lawndale		0.0%	0
North Park		0.0%	0
Norwood Park		0.0%	0
Oakland		0.0%	0
O'Hare		33.3%	1
Portage Park		0.0%	0
Pullman		0.0%	0
Riverdale		0.0%	0
Rogers Park		0.0%	0
Roseland		0.0%	0
South Chicago		0.0%	0
South Deering		0.0%	0
South Lawndale		0.0%	0
South Shore		0.0%	0
The Loop		0.0%	0
Uptown		0.0%	0
Washington Heights		0.0%	0
Washington Park		0.0%	0
West Elsdon		0.0%	0
West Englewood		0.0%	0
West Garfield Park		0.0%	0
WestLawn		0.0%	0
West Pullman		0.0%	0
West Ridge		0.0%	0
WestTown		33.3%	1
Woodlawn		0.0%	0
Otro, por favor explique			0
	answe	red question	(
	skip	ned question	

4. Cuáles son las razones por las que escogió vivir en las comunidad que circuló arriba? (Selecciones todas las que apliquen.)

Answer Options	Response Percent	Response Count
Cerca del trabajo	66.7%	2
Cerca de transportación	66.7%	2
Cerca de la familia	0.0%	0
Cerca de amigos	0.0%	0
Apoyo de la comunidad	33.3%	1
Es un lugar que puedo permitirme vivir	0.0%	0
Cerca de parques & recreación	33.3%	1
Cerca de escuelas	0.0%	0
No puedo darme el lujo de mover	0.0%	0
Otras razones	0.0%	0
	answered question	3
	skipped auestion	1

5. ¿Posee o alquila el lugar en que vives?

vivienda en Chicago?

Answer Options	Response Percent	Response Count
Renta	33.3%	1
Dueño	33.3%	1
Vive con familia (no renta ni paga hipoteca)	0.0%	0
No tiene un sitio permanente de residencia	0.0%	0
Prefiero no contestar	33.3%	1
ane	wered auestion	3

answered question 3
skipped question 1

6. ¿Crees que la discriminación en la vivienda es común en Chicago?

Answer Options	Response Percent	Response Count
Sí, es muy común	33.3%	1
Sí, es algo común	66.7%	2
No, no es común	0.0%	0
No sé	0.0%	0
Prefiero no contestar	0.0%	0
	answered question	3
	skipped auestion	1

7. ¿Te sientes que han experimentado discriminación al buscar

Answer Options	Response Percent	Response Count
Sí	66.7%	2
No	0.0%	0
No sé	33.3%	1
Prefiero no contestar	0.0%	0
	answered auestion	3

answered question 3 skipped question 1

8. ¿Siente usted que han experimentado discriminación en la vivienda viviendo en Chicago?

Answer Options	Response Percent	Response Count
Sí	33.3%	1
No	33.3%	1
No sé	33.3%	1
Prefiero no contestar	0.0%	0
	answered question	3
	skipped question	1

9. ¿Siente usted que han experimentado discriminación en la vivienda viviendo en Chicago?

Answer Options	Response Percent	Response Count
Sí	0.0%	0
No	0.0%	0
No sé	0.0%	0
Prefiero no contestar	0.0%	0
	answered question	0

answered question 0 skipped question 4

10. Si ha experimentado discriminación en la vivienda, estabas:

Answer Options	Response Percent	Response Count
Buscando una unidad para vivir	66.7%	2
Buscando rentar una unidad a alguien	0.0%	0
Buscando comprar una unidad	33.3%	1
Buscando vender una unidad	0.0%	0
Prefiero no contestar	0.0%	0
Otro, por favor explique		0
	answered question	3
	skipped question	1

11. Si ha experimentado discriminación en la vivienda, ¿sobre qué crees que se basaba? (Seleccione todas las que apliquen.)

Answer Options	Response Percent	Response Count
Raza	66.7%	2
Color	0.0%	0
Sexo	0.0%	0
Edad	0.0%	0
Religión	0.0%	0
Discapacidad	0.0%	0
Origen nacional	0.0%	0
Ancestros (Antepasados)	0.0%	0
Orientación sexual	66.7%	2
Estatus de inmigración	0.0%	0
Estado marital	0.0%	0
Estado paternal	0.0%	0
Estado de descarga militar	0.0%	0
Fuente de Ingresos	33.3%	1
Identidad de Genero	0.0%	0
Estado de Vivienda	0.0%	0
Sección 8/Vales para Escoger Vivienda	0.0%	0
Prefiero no contestar	0.0%	0
Otro, por favor especifique:		0
aı	swered question	3
	skipped question	1

12. ¿Cuál de los siguientes describe mejor la persona que discriminó contra usted?

Answer Options	Response Percent	Response Count
Dueño/encargado de la propiedad	66.7%	2
Agente de Bienes Raíces/ broker	0.0%	0
Banquero u oficial de préstamo de hipoteca	33.3%	1
Agente de seguro de propietario de la casa	0.0%	0
Empleado del gobierno local	0.0%	0
Otro, por favor especifique:		0
answ	ered question	3

skipped question 1

13. Si ha experimentado discriminación en la vivienda, ¿hizo alguno de los siguientes?

Answer Options	Response Percent	Response Count
Contacto a un abogado	0.0%	0
Contacto una agencia de vivienda o agencia	0.0%	0
Contactó el gobierno local	0.0%	0
Contactó Cuidad de Chicago	0.0%	0
Contactó el Departamento de vivienda y	0.0%	0
Prefiero no contestar	100.0%	1
Otro, por favor especifique:		1
		4

answered question 1 skipped question 3

Otro, por favor especifique:

1 nada, busque renta en otro lugar

14. Si usted no tomó ninguna acción con respecto a la discriminación en la vivienda, por qué no? (Seleccione todas las que apliquen.)

Answer Options	Response Percent	Response Count
No tenía tiempo	33.3%	1
No sabía dónde reportar la información	33.3%	1
Miedo a retaliación	33.3%	1
No haría ninguna diferencia	33.3%	1
Más fácil de encontrar/vender/alquilar la	66.7%	2
No querría vivir /alquilar o comprar cerca de la	66.7%	2
No creo que sería capaz de demostrar la	66.7%	2
Cuesta demasiado para perseguir	33.3%	1
Discriminación no era tan grave	33.3%	1
Prefiero no contestar	0.0%	0
Otro, por favor especifique:		0
ansv	vered question	3
ski	pped question	1

15. Alguna vez alguien te ha dado información sobre derechos en la
viviendas?

Answer Options	Response Percent	Response Count
Sí	33.3%	1
No	33.3%	1
No recuerdo/No estoy seguro(a)	33.3%	1
Prefiero no contestar	0.0%	0
	answered question	3

answered question 3 skipped question 1

16. Se identifica como:

Answer Options	Response Percent	Response Count
Mujer	66.7%	2
Hombre	33.3%	1
Prefiere no contestar	0.0%	0
	answered question	3
	skipped question	6.7% 2 3.3% 1 0.0% 0

17. ¿Cuál es su edad actual?

Answer Options	Response Percent	Response Count	
18 años de edad o menos	0.0%	0	
19-29 años	0.0%	0	
30-39 años	33.3%	1	
40-49 años de edad	0.0%	0	
50-59 años	66.7%	2	
60-69 años	0.0%	0	
70-79 años de edad	0.0%	0	
80 años de edad y mayores	0.0%	0	
Prefiero no contestar	0.0%	0	
	answered question	3	

answered question skipped question

18. ¿Cuál es su estado civil?

Answer Options	Response Percent	Response Count
Nunca casado	33.3%	1
Casado	33.3%	1
Unión civil	0.0%	0
Viudo(a)	33.3%	1
Divorciado/separado	0.0%	0
Prefiero no contestar	0.0%	0
	answered question	3
	skipped question	1

19. Se identifica usted como miembro de cualquiera de los siguientes grupos (Seleccione todas las que apliquen.)

Answer Options	Response Percent	Response Count
Afro-Americano-Negro	0.0%	0
Americano/Negro	0.0%	0
Indiana americano o Nativo de Alaska	0.0%	0
Asiático	0.0%	0
Nativo americano u otros isleños del Pacífico	0.0%	0
Blanco	0.0%	0
Hispano/Latino	100.0%	3
Otro grupo étnico/racial	0.0%	0
Gay, lesbianas, bisexuales o transexuales	66.7%	2
Nacido fuera de E.U.	0.0%	0
Una persona con una discapacidad	0.0%	0
Un activo, jubilado, o miembros descargado de	0.0%	0
answ	ered question	3
skir	ned question	1

20. ¿Algún miembro de su hogar se identifican como miembro de cualquiera de los siguientes grupos? (Seleccione todas las que

Answer Options	Response Percent	Response Count
Afro-Americano-Negro	0.0%	0
Americano/Negro	50.0%	1
Indiana americano o Nativo de Alaska	0.0%	0
Asiático	0.0%	0
Nativo americano u otros isleños del Pacífico	0.0%	0
Blanco	0.0%	0
Hispano/Latino	100.0%	2
Otro grupo étnico/racial	0.0%	0
Gay, lesbianas, bisexuales o transexuales	100.0%	2
Nacido fuera de E.U.	50.0%	1
Una persona con una discapacidad	0.0%	0
Un activo, jubilado, o miembros descargado de	0.0%	0
answ	ered question	2
	ped question	2

21. ¿Hay algo más que le gustaría saber s temas? (Escrito de respuesta opcional.)	obre estos	
Answer Options	Response Count	
	1	
answered question	1	
skipped question	3	

Response Text

THIS WAS AN EXPLORATORY SURVEY COMPLETION. PLEASE DO NOT TALLY IN YOUR RESULTS. FIRST, THANK YOU FOR THE CREATION (AND TRANSLATION) OF THIS SURVEY TOOL. I RESPECTFULLY PROVIDE THE FOLLOWING OBSERVATIONS:

1. Some folks may not be familiar with neighborhoods by their names (ie South Lawndale="26th street"; lower west side=Pilsen or "18th street", etc...). I know that these are formal neighborhood names but folks may get stumped and not continue with the survey. 2. The translation is ok but could've been better. 3. When asked what neighborhoods you want to live in you could only check one, even though it says you can check more than one. 4. Some concepts may be foreign to some folks. Discrimination may be subtle. Some folks (for cultural reasons) may not be able (or willing) to label something as discrimination. 5. If you are not already doing so, you may want to consider focus groups. Online surveys may not be getting to the people you want to poll or may be conceptually challenging (What's a survey? How does it benefit me? etc...) You may want to partner with some groups and even walk through the survey in group fashion (Bring some iPads) A non-profit? A church? WIC office? Etc... I'm happy to provide additional feedback or expand on any of my points. PERSONAL INFORMATION REDACTED.

REAL ESTATE SURVEY

City of Chicago Analysis of Impediments Real Estate Surve	City	of Chicago A	Analysis of	Impediments	Real E	state Surve
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The City of Chicago has hired Applied Real Estate Analysis (AREA), Inc., to conduct a housing study for communities across Chicago. As part of the study, the City would like to have a stronger understanding of any potential challenges faced by residents (or potential residents) in finding housing in the city of Chicago. We are asking members of the Chicago real estate industry to provide their input regarding fair housing choice in the city.

If you are a Realtor®, other sales agent, rental agent, lender, property owner or manager, insurance broker, appraiser, real estate market analyst, or otherwise active in the Chicago residential market, please complete this survey. In addition, if you would like to respond to the survey of Chicago residents regarding your personal experiences or the experiences of family or friends with fair housing issues in the city, please also complete the Survey of Chicago Residents, which is available on this website.

This is not a test, and there is no such thing as a wrong answer. You do not have to answer any question with which you feel uncomfortable. There will be an opportunity at the end of the survey to provide additional comments if you feel they were not addressed in the survey. Your response is confidential.

1. Please select your primary professional function as it relates to the residential real

estate industry. Residential real estate agent/broker Appraiser Property manager Property owner/investor Residential developer Banker Mortgage broker Other profession in the financial industry Insurer Consultant Lawyer/attorney Housing counselor or educator Non-profit housing provider Housing rights professional

Other (please specify)

City of Chicago Analysis of Impediments Real Estate Survey
2. How many years have you been involved in the residential real estate industry?
Less than 1 year
1–5 years
6-10 years
11–15 years
16–19 years
20 or more years

City of Chicago Analysis of Impediments Real Estate Survey 3. Which of the following communities does your business serve in Chicago? (You may select more than one.) Fuller Park North Lawndale Albany Park Archer Heights Gage Park North Park Norwood Park Armour Square Garfield Ridge Grand Boulevard Oakland Ashburn Greater Grand Crossing O'Hare Auburn Gresham Austin Hegewisch Portage Park Avalon Park Pullman Hermosa Avondale Humboldt Park Riverdale Avondale Gardens Hyde Park Rogers Park Belmont Cragin Irving Park Roseland South Chicago Beverly Jefferson Park Bridgeport Kenwood South Deering Brighton Park Lake View South Lawndale Burnside Lincoln Park South Shore Calumet Heights Lincoln Square The Loop Logan Square Chatham Uptown Chicago Lawn Lower West Side Washington Heights Washington Park Clearing McKinley Park Montclare West Elston Douglas West Englewood Dunning Morgan Park East Garfield Park Mount Greenwood West Garfield Park Near North Side East Side West Lawn Near South Side West Pullman Edgewater Edison Park Near West Side West Ridge Englewood West Town Forest Glen North Center Woodlawn

Other (please specify)

4. Have you ever attended a training/class/information session focused exclusively or primarily on housing rights? O Yes O No Prefer not to answer 5. When did the most recent training/class/information session occur? Less than 1 year ago 1-5 years ago 6-10 years ago 11-15 years ago 16-19 years ago () 20 or more years ago Prefer not to answer 6. In general, how would you rate your industry's understanding of fair housing laws and best practices? Very strong Somewhat strong Somewhat poor Very poor O Don't know Prefer not to answer

City of Chicago Analysis of Impediments Real Estate Survey

City of Chicago Analysis of Impediments Real Estate Survey
7. In general, how would you rate your city of Chicago clients' understanding of their
housing rights under fair housing laws?
Very strong
Strong
Somewhat strong
Somewhat poor
Poor
Very poor
Don't know
Prefer not to answer

L

8. Have you had any clients who have raised a housing discrimination complaint? The complaint could have been raised against anyone or any entity. O No Prefer not to answer 9. Did the client take any action to report or address this claim? O N∘ O Don't know Prefer not to answer 10. In your opinion, is housing discrimination common in the city of Chicago? Yes, it is extremely common Yes, it is somewhat common No, it is not at all common No opinion/don't know

City of Chicago Analysis of Impediments Real Estate Survey

ty of Chicago A	Analysis of	ımpeaı	ments Real	Estate S	Survey			
11. Please indicate how strongly you agree or disagree with the following statements. In your response, please focus exclusively on the city of Chicago.								
	Strongly Agree	Agree	Neutral/Neither agree nor disagree	Disagree	Strongly Disagree	No Opinion		
Real estate industry professionals are undertaking more activities o encourage equal access o housing	0	0	0	0	0	0		
inancial industry rofessionals are ndertaking more activities o encourage equal access o housing	0	0	0	0	0	0		
ocal government officials are undertaking more activities to encourage equal access to housing	Ο	0	0	0	0	0		
State of Illinois government officials are undertaking more activities to encourage equal access to nousing	0	0	0	0	0	0		
Federal government officials are undertaking nore activities to encourage equal access to nousing	0	0	0	0	0	0		

City of Chicago Analysis of Impediments Real Estate Survey

12. We would now like to ask you some questions regarding the ability to access housing by all persons regardless of their race, religion, marital status, or other characteristics.

Unequal access to housing is known as an "impediment". Impediments include any actions, lack of actions, decisions, or lack of a decision made because of a person's race, color, sex, age, religion, disability, national origin, ancestry, sexual orientation, marital status, parental status, military discharge status, source of income, gender identity, or housing status.

Please rate whether or not you think any of the following are impediments or barriers to equal housing access in Chicago.

and the second s	Very Strong Barrier	Strong Barrier	Somewhat of a Barrier	Minor Barrier	Not a Barrier	Do not know/ No Opinion
Lack of awareness of housing rights by residents	0	0	0	0	0	O
Lack of awareness of housing rights by real estate agents	, 0	0	0	0	0	0
Lack of awareness of housing rights by landlords and property managers	0	0	0	0	0	0
Lack of awareness of housing rights by banks and mortgage companies	0	0	0	0	0	0
Lack of awareness of housing rights by property insurance companies	0	0	0	0	0	0
Lack of awareness of housing rights by appraisers	0	0	0	0	0	0
Lack of awareness of housing rights by local government staff	0	0	0	0	0	0
Land use, zoning laws, and building codes that make developing housing difficult and/or expensive	\circ	0	0	0	0	0
Prevalent "fear of others" by Chicagoans, including NIMBYism	0	0	0	0	0	0
People being denied mortgages at a higher rate because of their background		0	0	0	0	0
Jobs, housing, and transit are not located near each	0	0	0	0	0	0

City of Chicago Ar	nalysis c	of Impedim	nents Rea	l Estate S	urvey	
other The housing crisis and recession have impacted	0	0	0	0	0	0
minorities more than others The housing crisis and recession have impacted renters more than owners	0	0	0	0	0	0
The housing crisis and recession have impacted lower income households more than higher income households	0	0	0	0	0	0
Certain City of Chicago policies and procedures do not encourage equal access to housing	0	0	0	0	0	0
An insufficient supply of affordable housing in Chicago	0	0	0	0	0	0
There are highly segregated communities in Chicago	0	0	0	0	0	0

City of Chicago Analysis of Impediments Real Estate Survey 13. Do you identify yourself as: () Female Prefer not to answer 14. What is your current age? 18 years of age and younger 19-29 years old 30-39 years old () 40-49 years old 50-59 years old 60-69 years old 70-79 years old 80 years of age and older Prefer not to answer 15. Do you identify yourself as a member of any of the following groups? (Select all that apply.) African-American/Black American Indian/Alaskan Native Native American or Other Pacific Islander White Hispanic/Latino Other racial/ethnic group Gay, lesbian, bisexual, or transgendered Born outside of the United States A person with a disability An active, retired, or discharged member of the armed forces 16. Do you have any additional comments on access to housing that you would like to share? If so, please list below.

City of Chicago Analysis of Impediments Real Estate Survey Responses

1. Please select your primary professional function as it rela	tes to the
residential real estate industry.	

residential real estate industry.		
Answer Options	Response Percent	Response Count
Residential real estate agent/broker	7.3%	6
Appraiser	0.0%	0
Property manager	11.0%	9
Property owner/investor	11.0%	9
Residential developer	6.1%	5
Banker	0.0%	0
Mortgage broker	0.0%	0
Other profession in the financial industry	2.4%	2
Insurer	1.2%	1
Consultant	3.7%	3
Lawyer/attorney	4.9%	4
Housing counselor or educator	17.1%	14
Non-profit housing provider	43.9%	36
Housing rights professional	7.3%	6
Other (please specify)		9
	answered question	82
	skipped question	8

Other (please specify)

- 1 Government Public Housing Programs
- 2 real estate market analyst
- 3 Homeless services provider
- 4 urban planner
- 5 Advocate and ccapacity builder
- 6 real estate association
- 7 Trade Association
- 8 Advocate
- 9 Historic Chicago Bungalow Assn. homeowner education and outreach

2. How many years have you been involved in the residential real estate industry?

Answer Options	Response Percent	Response Count
Less than 1 year	3.3%	3
1-5 years	16.7%	15
6-10 years	14.4%	13
11-15 years	20.0%	18
16-19 years	8.9%	8
20 or more years	36.7%	33
-	answered question	90
	skipped question	0

3. Which of the following communities does your business serve in Chicago? (You may select more than one.)

Answer Options	Response Percent	Response Count
Albany Park	24.7%	18
Archer Heights	12.3%	9
Armour Square	9.6%	7
Ashburn	15.1%	11
Auburn Gresham	21.9%	16
Austin	20.5%	15
Avalon Park	13.7%	10
Avondale	17.8%	13
Avondale Gardens	9.6%	7
Belmont Cragin	20.5%	15
Beverly	15.1%	11
Bridgeport	15.1%	11
Brighton Park	9.6%	7
Burnside	11.0%	8
Calumet Heights	13.7%	10
Chatham	24.7%	18
Chicago Lawn	17.8%	13
Clearing	11.0%	8
Douglas	15.1%	11
Dunning	11.0%	8
East Garfield Park	26.0%	19
East Side	13.7%	10
Edgewater	31.5%	23
Edison Park	11.0%	8
Englewood	32.9%	24
Forest Glen	11.0%	8
Fuller Park	12.3%	9
		8
Gage Park	11.0%	8
Garfield Ridge	11.0%	
Grand Boulevard	15.1%	11
Greater Grand Crossing	23.3%	17
Hegewisch	11.0%	8
Hermosa	17.8%	13
Humboldt Park	32.9%	24
Hyde Park	21.9%	16
Irving Park	20.5%	15
Jefferson Park	16.4%	12
Kenwood	16.4%	12
Lake View	27.4%	20
Lincoln Park	16.4%	12
Lincoln Square	19.2%	14
Logan Square	24.7%	18
Lower West Side	16.4%	12
McKinley Park	12.3%	9
Montclare	12.3%	9
Morgan Park	13.7%	10
Mount Greenwood	11.0%	8
Near North Side	30.1%	22

3. Wh	nich of the following communities do	es your busines	s serve in	
		Response	Response	
Allsw	er Options	Percent	Count	
	South Side	23.3%	17	
	WestSide	23.3%	17	
New 0	•	15.1%	11	
	Center	11.0%	8	
	Lawndale	26.0%	19	
North		13.7%	10	
	ood Park	9.6%	7	
Oakla	-	8.2%	6	
O'Har		6.8%	5	
	ge Park	13.7%	10	
Pullma		15.1%	11	
River		9.6%	7	
	rs Park	37.0%	27	
Rose		16.4%	12	
	Chicago	19.2%	14	
	Deering	17.8%	13	
	Lawndale	15.1%	11	
	Shore	27.4%	20	
The L	<u> </u>	16.4%	12	
Uptov		31.5%	23	
	ington Heights	13.7%	10	
	ington Park	23.3%	17	
	Elston	11.0%	8	
	Englewood	23.3%	17	
	Garfield Park	21.9%	16	
West	-	15.1%	11	
	Pullman	20.5%	15	
	Ridge	23.3%	17	
West		16.4%	12	
Wood	-	27.4%	20	
Other	(please specify)		20	
		wered question	73	
	SK	ripped question	17	
	Other (please specify)			
1	Citywide			
	suburbs			
	The entire city			
	City-Wide: We place formerly homeless	clients into SROs ir	n all areas of the	
1	City			
	All comunity areas. Our agency offers scattered site housing	all over the site		
	Bronzville	g an over the city.		
	The Chicago Metropolitan Area			
	Ward 27			
	All 77			
	all of the above			
	all of the above			
	Entire City of Chicago - all community areas			
	4 Chicago land area			
	15 city, suburbs and other sites not within IL 16 all			
	Lake County The Lake Side Development Project			
	The Lakeside Development Project			
	City-wide			
20	All of Chicago and Suburban Cook Cour	ıty		

4. Have you ever attended a training/class/information session focused exclusively or primarily on housing rights?

Answer Options	Response Percent	Response Count
Yes	77.4%	65
No	20.2%	17
Prefer not to answer	2.4%	2
	anawarad ayaatian	0.4

answered question 84 skipped question 6

5. When did the most recent training/class/information session occur?

Answer Options	Response Percent	Response Count
Less than 1 year ago	40.0%	30
15 years ago	44.0%	33
610 years ago	2.7%	2
1115 years ago	0.0%	0
1619 years ago	0.0%	0
20 or more years ago	0.0%	0
Prefer not to answer	13.3%	10
	answered question	75
	skipped question	15

6. In general, how would you rate your industry's understanding of fair housing laws and best practices?

Answer Options	Response Percent	Response Count
Very strong	27.4%	23
Strong	26.2%	22
Somewhatstrong	14.3%	12
Somewhatpoor	14.3%	12
Poor	9.5%	8
Very poor	3.6%	3
Don't know	2.4%	2
Prefer not to answer	2.4%	2
	answered question	84

skipped question

6

7. In general, how would you rate your city of Chicago clients' understanding of their housing rights under fair housing laws?

Answer Options	Response Percent	Response Count
Very strong	2.4%	2
Strong	7.1%	6
Somewhatstrong	23.8%	20
Somewhatpoor	32.1%	27
Poor	17.9%	15
Very poor	11.9%	10
Don't know	4.8%	4
Prefer not to answer	0.0%	0
	answered question	84
	skipped question	6

8. Have you had any clients who have raised a housing discrimination complaint? The complaint could have been raised against anyone or

Answer Options	Response Percent	Response Count
Yes	41.8%	33
No	51.9%	41
Prefer not to answer	6.3%	5
	answered question	79
	skipped question	11

9. Did the client take any action to report or address this claim?

Answer Options	Response Percent	Response Count
Yes	38.4%	28
No	32.9%	24
Don't know	20.5%	15
Prefer not to answer	8.2%	6
	answered question	73
	skipped question	17

10. In your opinion, is housing discrimination common in the city of Chicago?

Answer Options	Response Percent	Response Count
Yes, it is extremely common	35.0%	28
Yes, it is somewhat common	41.3%	33
No, it is not at all common	13.8%	11
No opinion/don't know	10.0%	8
	answered question	80
	skipped question	10

11. Please indicate how strongly you agree or disagree with the following statements. In your response, please focus exclusively on the city of Chicago.

Answer Options	Strongly Agree	Agree	Neutral/Neither agree nor disagree	Disagree	Strongly Disagree	No Opinion	Rating Average	Response Count
Real estate industry professionals are	7	18	22	20	10	2	3.18	79
Financial industry professionals are	1	17	22	22	15	2	3.49	79
Local government officials are undertaking	4	32	19	12	12	1	2.99	80
State of Illinois government officials are	2	25	23	16	11	3	3.23	80
Federal government officials are undertaking	6	37	14	9	11	3	2.89	80
answered question			80					
						skip	ped question	10

12. We would now like to ask you some questions regarding the ability to access housing by all persons regardless of their race, religion, marital status, or other characteristics. Unequal access to housing is known as an "impediment". Impediments include any actions, lack of actions, decisions, or lack of a

Answer Options	Very Strong Barrier	Strong Barrier	Somewhat of a Barrier	Minor Barrier	Not a Barrier	Do not know/ No Opinion	Rating Average	Response Count
Lack of awareness of housing rights by	22	18	24	7	3	1	2.39	75
Lack of awareness of housing rights by real	5	21	24	6	14	5	3.24	75
Lack of awareness of housing rights by	24	20	14	10	7	0	2.41	75
Lack of awareness of housing rights by banks	12	16	19	8	10	10	3.24	75
Lack of awareness of housing rights by	7	18	15	9	11	15	3.59	75
Lack of awareness of housing rights by	7	15	14	6	13	19	3.81	74
Lack of awareness of housing rights by local	9	21	16	13	13	3	3.12	75
Land use, zoning laws, and building codes that	20	26	13	6	4	5	2.50	74
Prevalent "fear of others" by Chicagoans,	28	23	12	4	3	5	2.28	75
People being denied mortgages at a higher	25	16	13	3	5	11	2.73	73
Jobs, housing, and transit are not located near	20	23	21	7	1	3	2.40	75
The housing crisis and recession have	33	22	15	3	1	1	1.93	75
The housing crisis and recession have	22	21	16	7	4	4	2.49	74
The housing crisis and recession have	38	22	12	1	1	1	1.77	75
Certain City of Chicago policies and	24	17	16	3	9	6	2.65	75
An insufficient supply of affordable housing in	55	10	6	3	0	0	1.42	74
There are highly segregated communities in	46	15	9	2	3	0	1.68	75
						answ	ered auestion	75

15

skipped question

13. Do you identify yourself	as:	
Answer Options	Response Percent	Response Count
Female	58.1%	43
Male	35.1%	26
Prefer not to answer	6.8%	5
	answered question	74
	skipped question	16

14. What is your current age?

Answer Options	Response Percent	Response Count
18 years of age and younger	0.0%	0
19-29 years old	6.8%	5
30-39 years old	13.5%	10
40-49 years old	29.7%	22
50-59 years old	27.0%	20
60-69 years old	16.2%	12
70-79 years old	5.4%	4
80 years of age and older	0.0%	0
Prefer not to answer	1.4%	1
	answered question	74
	skipped question	16

15. Do you identify yourself as a member of any of the following groups? (Select all that apply.)

Answer Options	Response Percent	Response Count
African-American/Black	39.4%	28
American Indian/Alaskan Native	0.0%	0
Asian	2.8%	2
Native American or Other Pacific Islander	1.4%	1
White	50.7%	36
Hispanic/Latino	14.1%	10
Other racial/ethnic group	5.6%	4
Gay, lesbian, bisexual, or transgendered	9.9%	7
Born outside of the United States	2.8%	2
A person with a disability	1.4%	1
An active, retired, or discharged member of the	4.2%	3
answ	ered question	71

skipped question 19

16. Do you have any additional comments on access to housing that you would like to share? If so, please

Answer Options	Response Count	
	23	
answered question	23	
skipped question	67	

Response Text

- 1 Criminal Background is a major barrier to housing in Chicago.
- 2 interesting survey.
- 3 Stagnant waged along with the lack of living wages and credibility are the biggest contributors to housing inequality. I don't know that knowing fair housing rights, yet being otherwise unequipped to be seated at tables that include mainstream mortgage brokers and property management firms is of any use to anyone seeking housing.
- The strongest barrier to access to housing in the diminishing supply of low-income housing: This needs to be a priority initiative by the City regarding designating new/renovated structures for low-income housing using grants and other incentives.
- 5 None
- The City needs to flesh out a housing plan that truly addresses hsg barriers for low/moderate income renters and marshall resources accordingly.
- 7 No
- 8 recently Chicago City Council passed an afforcable Housing Ordinance, this was crucial to low and moderate income families/individuals with a need for an affordable unit. This bill was introduced to City Council prior to allowing for input from the City's Delegate Agencies who provide information on affordable housing. There is much concern about a lack of oversight for new developments with set asides for low to mod invidicuals/families. A round table was held, after a committee had been formed and shape the ordinance, it was therefore a moot point to bring in housing professionals/City Delegate Agencies for comment as the bill was already in Council, needless to say, it passed and developers can now opt out of providing set aside units by paying a very small amount to the city and that developer would be exempt from having to build or provide set asides. this is a huge impediment to fair affordable housing. Yes we have laws on the books, obiviously there not sufficient as minorities and people of color have been discriminated against with the laws.....oversight of the new developers is a need to negate the developer's action of impeding access to fair housing.
- 9 Self-esteem of renters is a big barrier to integrating housing
- 10 Additional resources are required
- 11 Rental Prices in Chicago haven gotten OUT OF CONTROL, now even people with good jobs are having problems accessing affordable housing:
- 12 I have had many middle income buyers that would be interested in owner occupancy grants in distressed neighborhoods but make just a little too much money
- The City of Chicago needs to engage real estate professionals in underserved communities for consultation and insigt into challenges the directly impact them daily
- 14 There is not enough affordable housing in the Chicago area.
- 15 CHA needs to give out more vouchers.
- I own a small 3 flat that I have rented for 20 years. I believe Chicago is very close to Affordabel Housign Crisis. I do NOT understand why ANY for profit devleopers would receive ANY tax creditr funding. Time and Time again we see that they "buy out" the credit. "Thank you for subsidizing my investment and now neighborhood has "cahnged I will no longer make units available for low income people. Also why do developers who get city money allowed to pay \$50,000 vs set asides for low income housing. NO governemtn money should be used for ANY for profit developers.
- 17 CHA fair housing activities are not enough. The city of Chicago should review its own policies on the locations of investments, etc. Just because the redevelopment of a foreclosed building in Englewood would positively impact the neighborhood, it doesn't off residents access to housing in areas of opportunity/access to jobs, grocery stores, childcare slots, etc. Consideration should be given to the families as well as the community(ies).
- 18 Judges in eviction court who do not understand tenants rights. Loopholes in the RLTO that allow landlords to evict tenants who have accessed their rights under the law.
- 19 WE need to address drastic shortage of affordable housing
- 20 In my opinion, alot of neighborhood problems can be resolved with strictor laws on absentee landlords who reside outside the state. They don't have the vested interest they should and as a result should be pay a levy as a non-resident and we need to revise laws reguarding boarded up properties and have an excelerated imminate domain policy for non-residents just to name a few.
- 21 This is a collective response of a non-profit housing agency.
- 22 People should not be driven from their neighborhoods die to gentrification.
- 23 I work with individuals in supportive housing programs. When seeking apartments we are often told that property managers or landlords, "don't work with programs." I think this would fall under "source of income" discrimination. The largest barrier to folks using subsidy programs is a lack of apartments at HUD mandated FMR in desirable areas, and landlords willing to work with programs.

芝加哥居民障碍调查分析 - Chinese Real Estate Survey Responses

1. 请选择您跟住宅房地产业有关的主要职业功能。

Answer Options	Response Percent	Response Count
住宅房地 产代理人/中介人	100.0%	1
估价 员	0.0%	0
物 业管理人员	0.0%	0
物 业持有人/投资者	0.0%	0
住宅 发展商	0.0%	0
银行家	0.0%	0
房屋抵押 贷款中介人	0.0%	0
金融业其他专业人员	0.0%	0
保险人员	0.0%	0
顾问	0.0%	0
律 师	0.0%	0
房屋 辅导员或教育人员	0.0%	0
不牟利住房提供者	0.0%	0
住房 权益专业人员	0.0%	0
其他, 请解释		0
	answered question	-

2. 您从事住宅房地产业有多少年? 少于一年

Answer Options	Response Percent	Response Count
1-5 年	100.0%	1
6-10 年	0.0%	0
11-15 年	0.0%	0
16-19 年	0.0%	0
20 年或以上	0.0%	0
	answered question	1
	skipped auestion	0

skipped question

0

3. 您在芝加哥以下哪些社区有业务(您可以选择多于一个)? Response Response **Answer Options** Percent Count Albany Park 0.0% 0 0 Archer Heights 0.0% Armour Square 0 0.0% Ashburn 0.0% 0 Auburn Gresham 0.0% 0 Austin 0.0% 0 Avalon Park 0.0% 0 Avondale 0 0.0% Avondale Gardens 0.0% 0 Belmont Cragin 0.0% 0 Beverly 0.0% 0 0 Bridgeport 0.0% **Brighton Park** 0.0% 0 Burnside 0.0% 0 Calumet Heights 0.0% 0 Chatham 0.0% 0 Chicago Lawn 0.0% 0 Clearing 0.0% 0 0 Douglas 0.0% **Dunning** 0.0% 0 East Garfield Park 0.0% 0 0 East Side 0.0% Edgewater 0.0% 0 Edison Park 0.0% 0 Englewood 0.0% 0 Forest Glen 0.0% 0 Fuller Park 0.0% 0 Gage Park 0.0% 0 Garfield Ridge 0.0% 0 Grand Boulevard 0.0% 0 Greater Grand Crossing 0 0.0% Hegewisch 0.0% 0 Hermosa 0.0% 0 Humboldt Park 0.0% 0 0 Hyde Park 0.0% Irving Park 0.0% 0 Jefferson Park 0 0.0% Kenwood 0.0% 0 Lake View 0.0% 0 Lincoln Park 0.0% 0

0.0%

0

Lincoln Square

3. 您在芝加哥以下哪些社区有业务(您可以选择多于一个)?

Answer Options	Response	Response
•	Percent	Count
Logan Square	0.0%	0
Lower West Side	0.0%	0
McKinley Park	0.0%	0
Montclare	0.0%	0
Morgan Park	0.0%	0
Mount Greenwood	0.0%	0
Near North Side	0.0%	0
Near South Side	0.0%	0
Near West Side	0.0%	0
New City	0.0%	0
North Center	0.0%	0
North Lawndale	0.0%	0
North Park	0.0%	0
Norwood Park	0.0%	0
Oakland	0.0%	0
O'Hare	0.0%	0
Portage Park	0.0%	0
Pullman	0.0%	0
Riverdale	0.0%	0
Rogers Park	0.0%	0
Roseland	0.0%	0
South Chicago	0.0%	0
South Deering	0.0%	0
South Lawndale	0.0%	0
South Shore	0.0%	0
The Loop	0.0%	0
Uptown	0.0%	0
Washington Heights	0.0%	0
Washington Park	0.0%	0
West Elsdon	0.0%	0
West Englewood	0.0%	0
West Garfield Park	0.0%	0
West Lawn	0.0%	0
West Pullman	0.0%	0
West Ridge	0.0%	0
WestTown	0.0%	0
Woodlawn	0.0%	0
其他 ,请解释	21370	0
	answered question	0

4. 您有没有上过专门集中讨论或主要关于住房权益的训练/课堂/信息课?

skipped question

Answer Options	Response Percent	Response Count
有	0.0%	0
沒有	0.0%	0
不回答	0.0%	0
	answered question	0
	skinned auestion	1

5. 最近的训练/课堂/信息课是在何时?

Answer Options	Response Percent	Response Count
少于一年	0.0%	0
1-5 年	0.0%	0
6-10 年	0.0%	0
11-15 年	0.0%	0
16-19 年	0.0%	0
20 年或以上	0.0%	0
不回答	0.0%	0
	answered question	0
	skipped question	1

6.一般而言, 您如何评价您业界对公平住房法例及最佳实践的瞭解程度?

Answer Options	Response Percent	Response Count
十分強	0.0%	0
強	0.0%	0
有点強	0.0%	0
有点差	0.0%	0
差	0.0%	0
十分差	0.0%	0
不知道	0.0%	0
不回答	0.0%	0
	answered question	0
	skipped question	1

7.

一般而言, 您如何评价您的芝加哥客戶对公平住房法例及最佳实践的瞭解程度

Answer Options	Response Percent	Response Count
十分強	0.0%	0
強	0.0%	0
有点強	0.0%	0
有点差	0.0%	0
差	0.0%	0
十分差	0.0%	0
不知道	0.0%	0
不响答	0.0%	0
	answered question	0
	skipped question	1

skipped question

您有没有客户提出过住房歧视的投诉?有关投诉有可能是针对任何人或实体。

Answer Options	Response Percent	Response Count
有	0.0%	0
沒有	0.0%	0
不回答	0.0%	0
	answered question	0
	skipped question	1

9. 该客户有没有采取任动去报告或解决这个投诉?

Answer Options	Response Percent	Response Count
有	0.0%	0
沒有	0.0%	0
不知道	0.0%	0
不响答	0.0%	0
		_

answered question 0 skipped question 1

10. 根据您的意见,芝加哥市的住房歧视是否很普遍?

Answer Options	Response Percent	Response Count
是, 极之普遍	0.0%	0
是,有点普遍	0.0%	0
不是,完全不普遍	0.0%	0
没有意 见/不知道	0.0%	0
	answered question	0
	skinned auestion	1

11. 请表明您对以下声明有多同意或多不同意。在您的回应中,请专注于芝加哥市。

Answer Options	十分同意	同意	中立/ 既非同意也並非不同	不同意	十分不同意	没有意见	Rating Average	Response Count
房地产专业人员正采取更多行动去鼓励均等的住房	0	0	0	0	0	0	0.00	0
金融专业人员正采取更多行动去鼓励均等的住房机	0	0	0	0	0	0	0.00	0
地方政府官员正采取更多行动去鼓励均等的住房机	0	0	0	0	0	0	0.00	0
伊利诺伊州政府官员正采取更多行动去鼓励均等的	0	0	0	0	0	0	0.00	0
联邦政府官员正采取更多行动去鼓励均等的住房机	0	0	0	0	0	0	0.00	0
								0

answered question 0 skipped question 1

12.

我们现在想问您一些有关不管其种族、宗教、婚姻状况或其他特性等所有人入住房屋的能力的问题。不均等住房机会又称「障碍」。障碍包括因某人的种族、肤色、

Answer Options	极大障碍	大障碍	有点障碍	小障碍	不是障碍	不知道/没有 意见	Rating Average	Response Count
居民 对住房权益缺乏意识	0	0	0	0	0	0	0.00	0
房地 产代理人员对住房权益缺乏意识	0	0	0	0	0	0	0.00	0
房东及物业管理人员对住房权益缺乏意识	0	0	0	0	0	0	0.00	0
银行及抵押贷款公司对住房权益缺乏意识	0	0	0	0	0	0	0.00	0
物业保险公司对住房权益缺乏意识	0	0	0	0	0	0	0.00	0
估价人 员对住房权益缺乏意识	0	0	0	0	0	0	0.00	0
地方政府官 员对住房权益缺乏意识	0	0	0	0	0	0	0.00	0
土地用途,分区法及建筑法 规使发展住房变得困难	0	0	0	0	0	0	0.00	0
芝加哥人流行的「恐惧 别人」,包括邻避症候群	0	0	0	0	0	0	0.00	0
人们因其背景而遭拒绝抵押贷款的比率较高	0	0	0	0	0	0	0.00	0
工作,住房及交通互不靠近	0	0	0	0	0	0	0.00	0
房屋危机及衰退对少数族裔的冲击较其他人大	0	0	0	0	0	0	0.00	0
房屋危机及衰退对租客的冲击较物业持有人大	0	0	0	0	0	0	0.00	0
房屋危机及衰退对低收入住户的冲击较高收入住户	0	0	0	0	0	0	0.00	0
芝加哥市若干政策及程序并不鼓励均等住房机会	0	0	0	0	0	0	0.00	0
芝加哥可 负担房屋供应不足	0	0	0	0	0	0	0.00	0
芝加哥有高度隔离的社区	0	0	0	0	0	0	0.00	0
						answe	ered question	C

answered question skipped question

13. 您会把自已识別為	3. 您会把自	已识别為	:
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Answer Options	Response Percent	Response Count
女性	0.0%	0
男性	0.0%	0
不回答	0.0%	0
	answered question	0
	skinned question	1

14. 您目前的年龄是?

Answer Options	Response Percent	Response Count
18岁及以下	0.0%	0
19-29 岁	0.0%	0
30-39 岁	0.0%	0
40-49 岁	0.0%	0
50-59 岁	0.0%	0
60-69 岁	0.0%	0
70-79 岁	0.0%	0
80岁及以上	0.0%	0
不回答	0.0%	0
	answered question	0
	skinned auestion	1

15. 您会把自已识别为以下任何组别的成员(请选择所有适用的)

Answer Options	Response Percent	Response Count
非裔美国人/黑人	0.0%	0
美洲印第安人/阿拉斯加原居民	0.0%	0
亞裔	0.0%	0
美洲原居民或其他太平洋岛居民	0.0%	0
白人	0.0%	0
西班牙裔/拉丁美洲人	0.0%	0
其他种族/民族	0.0%	0
男同性恋、女同性恋、双性恋或变性人	0.0%	0
在美国以外出生	0.0%	0
残障人士	0.0%	0
武装部队现役、退休或退役人员	0.0%	0
	answered question	0

answered question 0
skipped question 1

16.

您有没有任何关于住房机会的额外意见想分享?如有,请在下

Answer Options	Response Count	
	0	
answered question	0	
skipped question	1	