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CITY OF ROCKFORD  
2025-2029  
ANALYSIS OF IMPEDIMENTS  
TO FAIR HOUSING CHOICE



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## Introduction and Executive Summary of the Analysis

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

Fair Housing Choice is defined federally as the ability of persons, regardless of race, color, religion, sex (including gender identity and sexual orientation), national origin, familial status, or disability, or similar income levels to have available to them the same housing choices. The State of Illinois adds the following protected classes to the list above: ancestry, retaliation, pregnancy, military, military discharge status, marital status, protective order status, sexual orientation, arrest record, age (40 and older), and source of income. According to Illinois Department of Human Rights, effective January 1, 2025, the Illinois Human Rights Act prohibits housing discrimination in real estate transactions based on reproductive health decisions.

In addition, additional affirmative steps must be taken to provide equal housing opportunities for individuals with disabilities, individuals with limited English proficiency, and individuals who identify as Lesbian, Gay, Bisexual, Transgender, and/or Queer/Questioning (LGBTQ).

This analysis focuses on examining data and community input in a way that allows the reader to understand the nuanced and complex relationships between the challenges many Rockford residents face and underscores the importance of exploring and addressing the interconnectedness of the issues that frustrate and overwhelm people in the community. This document is written in a way for community members to see that their voices were heard.

### Who Conducted

The City of Rockford conducted this analysis of impediments to fair housing choice, with staff from the Community and Economic Development department contributing to its creation.

The City of Rockford has now prepared this FY 2025-2029 Analysis of Impediments to Fair Housing Choice (AI) to coincide with the City's Five Year Consolidated Plan for FY 2025-2029 (Con Plan). The Analysis of Impediments was available for public comment from Wednesday, November 27, 2024, until Monday, December 30, 2024.

### Participants

Citizen participation, outreach and engagement was an important component of the update to the AI. Therefore, following the City's Citizen Participation Plan (included as an attachment in the Con Plan), the City held four (4) public hearings, two (2) during September 2024 and two (2) during December.

September Public Hearings were held on Wednesday, September 18, 2024, and Tuesday, September 24, 2024, both at 4 pm, at Crusader Community Health. Crusader is located at 1200 W State St, Rockford IL 61102 and is accessible to persons with disabilities. After a brief explanation of the Federal funding and

recent City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032, community members were given an opportunity to provide their opinion of local housing, homeless, economic development, and community needs. Handouts included an agenda, survey questions, the eligible uses of CDBG, HOME, and ESG, and contact information for written and/or oral comments. In addition, Sarah Leys, Deputy Director, who facilitated the Public Hearings explained how to submit comments, and asked participants to reach out and invite her to participate in meetings, one on one conversations, etc. to discuss the needs within the community.

December Public Hearings were held on Thursday, December 5, 2024, one at noon and one at 5:30 pm. Both were held at Crusader Community Health. City staff communicated details and requested comments on the proposed Five-Year Consolidated Plan, 2025 Annual Action Plan, and Analysis of Impediments to Fair Housing Choice.

City staff encouraged all to complete survey questions. These questions were not only answered one on one with staff members at the September public hearings, surveys were distributed through email distribution lists and were available on the City's website. In addition, survey questions were presented at planning focus group meetings and listening sessions held with a wide range of providers, citizens, advocacy groups, public and private agencies, and community leaders.

Planning Focus Group meetings and listening sessions were as follows:

- 9/12/2024 - Education and Disability Planning Focus Group Meeting
- 9/13/2024 - Health and Mental Health Planning Focus Group Meeting
- 9/18/2024 - Internal Planning Focus Group Meeting
- 9/19/2024 - Social Services Planning Focus Group Meeting
- 9/20/2024 - Internal Planning Focus Group Meeting
- 9/21/2024 - Neighborhood Planning Focus Group Meeting
- 9/24/2024 - Veteran and Senior Services Planning Focus Group Meeting
- 9/26/2024 - Economic Development Listening Session
- 9/27/2024 - Diverse Resident Supports Planning Focus Group Meeting and Economic Development Listening Session

For a full list of parties that the City consulted with and how the City consulted with them see section PR-10 Consultation of the Con Plan .

In addition, the City is a recipient of Technical Assistance (TA) from HUD from Thriving Communities program. As part of this TA, a Public Sector Work Group, consisting of Rockford Housing Authority and Region 1 Planning Council, met throughout the year to discuss housing issues and how to coordinate planning efforts and data collection. Additionally, a Community Based Organization Group met a couple times to talk about housing needs and how the City could look to address them. The organizations included were Rockford Area Habitat for Humanity, Zion Development Corporation, Illinois Realtors Government Affairs, representing NW Illinois Alliance of Realtors, I Bike Rockford, Studio GWA, Midland States Bank, YWCA of Northwestern Illinois, Harmony Realty Group LLC, Winnebago County Housing Authority, Rockford Apartment Association, Rockford Community Investment Fund, and RAMP Center for Independent Living.

## Methodology Used

City staff reviewed the following:

- 2040 Comprehensive Plan, City's Zoning Ordinance, land use policies and procedures
- City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032, Real estate and mortgage practices
- Prior years Analysis of Impediments and goals

The following data was analyzed:

- Percent Minority Population by Census Tract
- Percent Population Age 65+ by Census Tract
- Percent Owner-Occupied Housing Units by Census Tract
- Percent Renter-Occupied Housing Units by Census Tract
- Percent Low-Moderate Income by Census Block Group
- Percent Low-Moderate Income with over 50% Minority by Census Block Group
- Percent Renter-Occupied Housing Units by Census Tract (Complete with RHA ONLY Data)
- Section 8 Housing Site Locations
- Scattered Public Housing Site Locations
- Major Public Housing Site Locations

Both public sector and private sector policies that may be viewed as impediments were analyzed.

## Conclusions:

The City of Rockford's FY 2025-2029 Analysis of Impediments to Fair Housing Choice has identified the following impediments and actions to be taken to address these impediments:

- **Impediment 1: Fair Housing Education and Outreach.** There is a need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities and the disabled population who fear retaliation if they lodge a complaint.

**Goal:** The public in general and local officials will become knowledgeable and aware of the Fair Housing Act, related laws regulations, and requirements to affirmatively further fair housing in the City. In addition, the City will support fair housing testing, which will identify and investigate illegal housing discrimination.

## **Strategies:**

1-A: Promote Fair Housing awareness through media, seminars, testing, and training to provide educational opportunities for all persons to learn more about their rights under the Fair Housing Act and the Americans with Disabilities Act

1-B: Provide literature and informational material concerning fair housing issues, an individual's housing rights, and landlord's responsibilities to affirmatively further fair housing.

1-C: Promote housing choice so residents with the same financial means may choose to live anywhere in the City, using media and seminars to educate tenants and landlords on Section 8 vouchers and source of income discrimination.

1-D: Provide fair housing education and outreach to seniors and people with disabilities to address fear of reporting housing and code violations.

1-E: Promote and advocate for fair housing testing.

• **Impediment 2: Need for Decent, Safe, and Affordable Rental Housing.** The City of Rockford does not have a sufficient supply of rental housing that is decent, safe, and sound. In many cases, landlords often do not maintain their property to code standards which results in unsafe living conditions for tenants. However, the monthly cost of rent for apartments has steadily increased due to the limited supply of rental housing, despite the condition of the rental unit.

**Goal:** Increase the supply of affordable rental housing in the City of Rockford, through new construction, adaptive reuse of commercial and industrial buildings, preservation of existing structures with affordable unit set-asides, and the development of mixed-income buildings.

**Strategies:**

2-A: Support and advocate for both private developers and non-profit housing providers to develop and construct new affordable, mixed income, and middle income rental housing throughout the City of Rockford.

2-B: Support and advocate for both private developers and non-profit housing providers to develop and construct new affordable, mixed income, and middle income rental in vacant commercial and industrial structures.

2-C: Support and advocate for both private landlords and non-profit housing providers to rehabilitate existing housing units in the City to create decent, safe and sound rental housing that is affordable to lower income households.

• **Impediment 3: Lack of Affordable Homeownership Opportunities.** Referencing Census data, the population of Rockford has remained relatively stable between 2010 and 2020 decreasing by about 4,200 people or -3%. However, the population is projected to increase due to regional growth factors mainly related to current and planned job growth. Therefore, it is expected that the number of new dwelling units needed to handle this growth is between 3,200 and 9,100 units by the year 2032. Renter-occupied units have increased from 39.5 percent in 2010 to 45.8 percent in 2019. In contrast, owner-occupied units have decreased from 60.5 percent in 2010 to 54.2 percent in 2019.

Today the biggest issue facing affordable home ownership opportunities are availability and cost. In 10 years, the average price of a home in the Rockford area has more than doubled. An average home in Rockford would cost you just over \$88,000 in 2014 while in June of 2023 the same home on average would cost just over \$198,000. As of June 2024, the median price of a home in Rockford was \$155,377, a 17.9% increase from the previous year.

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

**Strategies:**

3-A: Support and advocate for both private developers and non-profit housing providers to develop and construct new affordable housing that is for-sale.

3-B: Support and advocate for the acquisition, rehabilitation and resale of existing housing units to become decent, safe and sound.

3-C: Support and provide funds for down payment assistance to lower-income households to become homeowners.

3-4: Support homebuyer education and training programs to improve homebuyer awareness and increase the opportunities for lower-income households to become homebuyers.

• **Impediment 4: Need for Accessible Housing Units That Are For-Sale or Rent.** There is a lack of accessible housing units in the City of Rockford. Most of the existing housing units do not have accessible features. The City's disabled population has grown to 32% of the total population.

**Goal:** Increase the number of accessible housing units through new construction and rehabilitation of existing housing units for disability needs.

**Strategies:**

4-A: Support home rehabilitation programs that financially assist seniors and people with disabilities to provide a safe and accessible home.

4-B: Support and encourage the development of accessible housing units in the City of Rockford.

4-C: Enforce the ADA and Fair Housing requirements for landlords to make "reasonable accommodations" to their rental properties so they become accessible to tenants with disabilities.

• **Impediment 5: Economic Issues that affect Fair Housing Choice.** There is a lack of economic opportunities in the City which prevent low-income households from improving their income and ability to live outside areas with concentrations of low-income households, which makes this a fair housing concern.

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

**Strategies:**

5-A: Support and enhance workforce development and skills training that result in a "livable wage" and increases job opportunities.

5-B: Continue to provide support, education, and technical assistance opportunities to minority, women owned and small businesses.

5-C: Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities.

5-D: Support and encourage efforts for improvements in public transportation options in the City to allow for employees to access housing of choice without worry of getting to work.

5-E: Support and encourage private and non-profit developers and businesses to provide assets (grocery stores, services, etc.) in low-to-moderate income neighborhoods.

## **Jurisdictional Background Data:**

In order to perform an analysis of fair housing, the demographic, income, employment and housing data were examined and combined with input from resident and stakeholder interviews, focus groups, and public meetings. A full Needs Analysis of the Rockford Housing Market is available in the 2025-2029 Consolidated Plan.

Rockford is a city in Winnebago County in the U.S. state of Illinois. Located on the banks of the Rock River, Rockford is the county seat of Winnebago County. Settled in the mid-1830s, the position of the City on the Rock River made its location strategic for industrial development. In the second half of the 19<sup>th</sup> century, Rockford was notable for its output of heavy machinery, hardware and tools; by the twentieth century, it was the second leading center of furniture manufacturing in the nation, and 94<sup>th</sup> largest city. During the second half of the 20<sup>th</sup> century, Rockford struggled alongside many Rust Belt cities. Since the late 1990s, efforts in economic diversification have led to growth of automotive, aerospace, and healthcare industries, as well as the undertaking of various tourism and downtown revitalization efforts. Nicknamed the Forest City, Rockford is presently known for various venues of cultural or historical significance, including Anderson Japanese Gardens, Klehm Arboretum, Tinker Swiss Cottage, the BMO Harris Bank Center, the Coronado Theatre, the Laurent House, and the Burpee Museum of Natural History.

## **Demographic Data**

<b>Demographics</b>	<b>Base Year: 2019</b>	<b>Most Recent Year: 2022</b>	<b>% Change</b>
Population	147,070	148,173	.75%
Households	59,551	61,242	2.8%
Median Income (Household)	\$44,252	\$50,744	14.7%

**Data Source:**

ACS DP05 Demographic & Housing Estimates, 2019 & 2022, 5-Year estimates (Population)

ACS DP02 Selected Housing Characteristics, 2019 & 2022, 5-year estimates (Households)

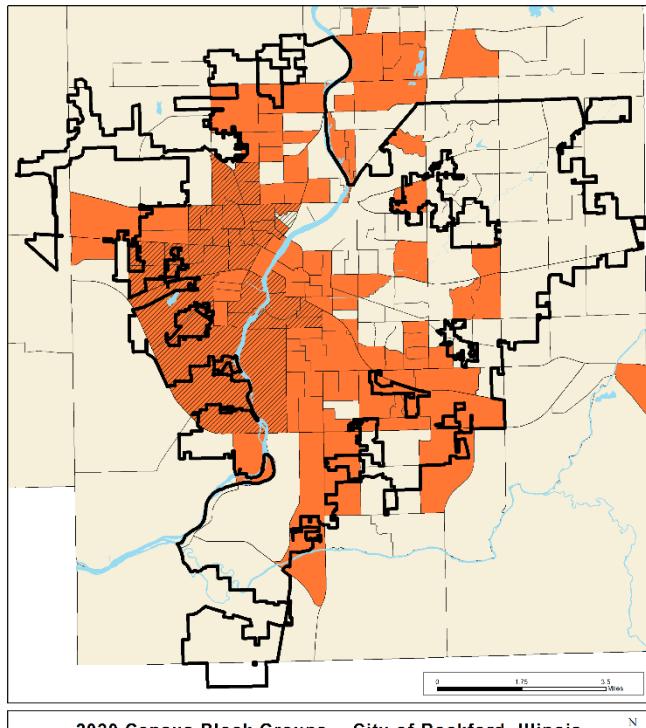
ACS S1901 Income in Past 12Mo., 2019 & 2022, 5-year estimate (Median Income)

<b>Demographics of Households</b>	<b>Number</b>	<b>Percentage of Total</b>
White	36,801	61%
Black or African-American	12,887	21%
American Indian or Alaska Native	369	1%
Asian	1,643	3%
Native Hawaiian or Other Pacific	11	0.02%
Some Other Race	4,223	7%
Two or More Races	4,256	7%

**Data Source:**

2020 Decennial Census

The City of Rockford has a population of 147,070 people, with 61% white and 21% Black or African-American. There are concentrations of racial or ethnic minorities that aligns with low-to-moderate income data. These concentrated areas are located to the west and south of the city center according to the data provided by HUD for years 2016-2020 ACS for the CDBG CHAS programs.



**2020 Census Block Groups - City of Rockford, Illinois**  
Showing Percent of Low-to-Moderate Income with 50% Minority Overlay

Percent Low-to-Moderate Income  
50.1% - 100%

Percent Minority Population  
51% - 84%

Map Produced: September 2024

The areas to the west and south of the city where there are the highest concentrations of low-income and minority populations reside are also some of the area's most in need of revitalization and investment. This area of the City contains a large portion of the oldest housing stock as well as many vacant and abandoned structures of all types and uses. There is very high percentage of renters, the lowest concentration of homeowners, much higher than average foreclosures, very high code violation and life safety housing condition concerns.

The City will need to consider how its investment in this area can bring housing choice and improvements to these areas, while creating wealth and housing opportunity for our minority populations.

The full size version of this map is on page 24.

The City of Rockford has a growing number of people 62 years of age and older. The income chart below can be also be used to understand how many senior households are in the City, and their income level. The City will need to address senior housing concerns, which include condition of units, availability of units, ability to age in place, and access to transportation and services.

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households	11,650	9,310	12,755	6,210	22,095
Small Family Households	3,900	3,175	4,390	2,340	9,570
Large Family Households	1,065	640	1,220	625	1,365
Household contains at least one person 62-74 years of age	1,880	1,685	3,070	1,095	6,190
Household contains at least one-person age 75 or older	1,030	1,845	1,960	760	2,565
Households with one or more children 6 years old or younger	2,745	1,640	1,890	1,130	1,645

**Data  
Source:**

2016-2020 CHAS

A total of 46,081 individuals have a disability, which is 32% of the population. In speaking with the community, the issues are similar to what was noted for senior population: need to address condition of units, availability of units, ability to access supportive services and transportation.

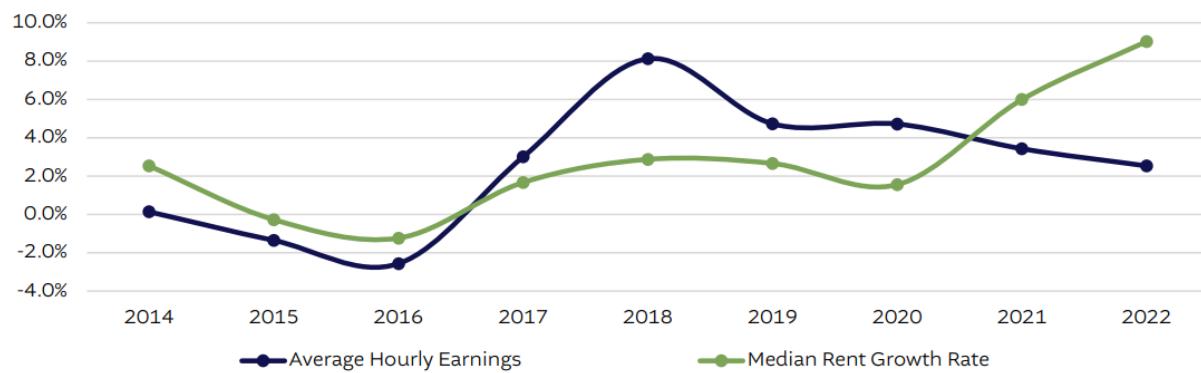
Disability by Type (all Ages)	Total	Percent of Population
With a hearing difficulty	5,722	4.0%
With a vision difficulty	4,268	2.9%
With a cognitive difficulty	9,466	7.0%
With an ambulatory difficulty	12,412	9.2%
With a self-care difficulty	4,395	3.3%
With an independent living difficulty	8,326	3.3%

Source: 2022 ACS 5-year estimate, S1810

### Income Data

In looking at the income chart above, 20,960 or 33.8% of Rockford's households are below 50% of the HUD Area Median Family Income. An additional 20.6% are moderate income, or between 51-80% of the Area Median Income. While the City of Rockford has seen some growth in wages in some sectors, a significant portion of our population is still lagging behind. This is especially frustrating when compared to the rising cost of rent, as illustrated in this chart from our City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032.

**Figure 5. Growth Rate Comparison of Median Rent and Average Hourly Earnings (2014-2022)**



Data Source: U.S. Bureau of Labor Statistics, State and Area Employment, Hours, and Earnings, Not Seasonally Adjusted, Total Private; American Community Survey 5-Year Estimates, Housing Characteristics; Redevelopment Resources.

Housing is becoming a larger portion of most household's expenses. While this is affecting all income groups, it is particularly challenging for those households who make 0-50% of Area Median income. Additionally, the following charts show how many households in each income group are living in housing units that have condition problems such as lack of complete kitchen facilities, lack of complete plumbing facilities, crowding (more than one person per room) and housing costs totally more than 30% of household income (cost burden).

The first thing to notice is that the lower your income, the more likely you are to have one or more housing problems. For instance, 74% of households making 50% of the Area Median

income or less have one or more housing problems. However, only 34% of households making more than 50% AMI have one or more housing problems. The condition of units being offered to very low and low income households needs to be addressed.

Another thing to note is that Black or African American households are disproportionately affected by housing problems if they are very low income (0-30%). In the City's interview with Prairie State Legal Services, they reported continuing to see race discrimination cases in Rockford for residents looking to rent. There appears to be a serious fair housing concern here, and it should be addressed in the City's strategies.

#### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Percent of Total	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,610		1,319	1,025
White	3,455	45%	704	405
Black / African American	3,000	39%	425	420
Asian	105	1%	40	50
American Indian, Alaska Native	4	-	0	0
Pacific Islander	0	0	0	0
Hispanic	899	12%	90	135

#### Disproportionally Greater Need 0 - 30% AMI

Data 2016-2020 CHAS  
Source:

#### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Percent of Total	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,890		2,350	0
White	3,055	52%	1,455	0
Black / African American	1,495	25%	424	0
Asian	165	3%	40	0
American Indian, Alaska Native	25	-	0	0
Pacific Islander	0	0	0	0
Hispanic	1,030	17%	380	0

#### Disproportionally Greater Need 30 - 50% AMI

Data 2016-2020 CHAS  
Source:

## 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Percent of Total	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,590		6,325	0
White	2,695	59%	3,535	0
Black / African American	1,099	24%	1,395	0
Asian	89	2%	150	0
American Indian, Alaska Native		0		
Pacific Islander	4	-	0	0
Hispanic	685	15%	1,049	0

### Disproportionally Greater Need 50 - 80% AMI

Data 2016-2020 CHAS  
Source:

## 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,495	5,420	0
White	1,020	3,440	0
Black / African American	245	800	0
Asian	25	190	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	175	870	0

### Disproportionally Greater Need 80 - 100% AMI

Data 2016-2020 CHAS  
Source:

When promoting and supporting housing development, the City and its partners need to address housing choice for very low and low income households.

Focusing in on one of the Housing Problems mentioned, the chart below shows the percentage of residents in different income groups that are paying more than 30% of their household income on housing costs (cost burden). A disproportionate number of Black or African American households that make more than 50% AMI are cost burdened. This relates back to the first graph in the Income Data section, showing how rent costs have outpaced wage increases.

Housing Cost Burden	<=30%	% Cost Burden	30-50%	% Cost Burden	>50%	% Cost Burden	No / negative income (not computed)
Jurisdiction as a whole	42,404		9,354		9,223		1,010
White	27,950	<b>66%</b>	5,335	<b>57%</b>	4,425	<b>58%</b>	430
Black / African American	7,080	<b>17%</b>	1,975	<b>21%</b>	3,370	<b>37%</b>	345
Asian	1,140	<b>3%</b>	190	<b>2%</b>	295	<b>3%</b>	70
American Indian, Alaska Native	4		10		0		0
Pacific Islander	0		4		4		0
Hispanic	5,490	<b>13%</b>	1,600	<b>17%</b>	870	<b>9%</b>	95
Other (including multiple races, non-Hispanic)	740	<b>2%</b>	240	<b>3%</b>	259	<b>3%</b>	70

#### Greater Need: Housing Cost Burdens AMI

Data Source: 2016-2020 CHAS Table 9 - Tenure (2) by Race (7) by Housing Cost Burden (4)

### Employment Data

The City of Rockford has traditionally had a higher unemployment rate than the rest of the state of Illinois. The rate fluctuates based on the shift hires or layoffs at major employers like Stelantis. The City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032 demonstrated that the City of Rockford has added employment opportunity over the last 5 years, so the City needs to continue to connect residents to job training and workforce development supports to keep improving the unemployment rate.

Labor Force	
Total Population in the Civilian Labor Force	69,481
Civilian Employed Population 16 years and over	63,217
Unemployment Rate for Ages 16 and Over	9.0%

Data Source: DP03, 2022 5-year estimate- Total Population and Civilian Employed, and S2301,- Unemployment Rate

Occupation by Sector	Estimate	Percent
Civilian employed population 16 years and over	<b>63,217</b>	
Management, business, science, and arts occupations	17,923	28.4%
Service occupations	12,365	19.6%
Sales and office occupations	13,176	20.8%
Natural resources, construction, and maintenance occupations	3,991	6.3%
Production, transportation, and material moving occupations	15,762	24.9%

Data Source: ACS DP03 Selected Economic Characteristics, 2022, 5-year estimate

Access to education and the ability to follow through with education goals contributes greatly to income development and housing choice. One concern about current Rockford employment data is the number of people without a high school degree. This affects their readiness for jobs that pay a 'living wage', potentially contributing to their housing cost burden.

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	5,860	699	4,394
High school graduate (includes equivalency)	14,202	1,813	6,231
Some college or Associate's degree	17,312	1,620	5,012
Bachelor's degree or higher	12,694	373	2,828

#### Educational Attainment by Employment Status (Population 25 to 64 years)

Data Source: ACS B23006 – 2022 5-Year Estimate Educational Attainment by Employment Status for Population 25-64 years old

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$26,257
High school graduate (includes equivalency)	\$28,827
Some college or Associate's degree	\$36,145
Bachelor's degree	\$56,017
Graduate or professional degree	\$72,643

#### Median Earnings in the Past 12 Months

Data Source: ACS S1501 - 2022 5-year Estimate- educational Attainment by Age 2022 Inflation Adjusted Dollars

Continuing to assist residents in achieving a high school degree and higher will help more residents move into moderate to middle income jobs. Creating more housing units could potentially stabilize rent rates, but increasing household income provides that household with choice and ability to sustain housing.

The City of Rockford made a huge investment in Rockford Promise, paying for tuition for qualifying high school graduates at either Northern Illinois University or Rockford University. The City should continue to creatively address job training and educational attainment goals.

## Housing Profile

A full housing analysis is in the 2025-2029 Consolidated Plan, and an excerpt is included here.

According to 2022 American Community Survey data there were a total of just under 68,000 housing units within the City of Rockford. However, this does not mean that all units were occupied. This could be to various reasons such as its currently being sold, or marketed to renters, it's currently being rehabbed, or the unit could be uninhabitable due to various conditions issues. Of these properties, approximately 3,200 are considered to be a vacant lot with no structure currently. Of the 67,890 identified housing units in the City 61,242 are occupied while 6,648 are vacant. This means that the percent of occupied housing units is just over 90% of the total available units that are livable. The majority of owner-occupied units are 3 or more bedrooms which is a total of 74% of all the units combined. However, the majority of renter-occupied housing units are only 2 bedrooms totaling 41% of all total renter-occupied housing units. This is a big difference when comparing the two. This could be partially attributed to family size and that married couples with children need more space and bedrooms to raise a family. The data for renters is also more evenly distributed between the number of bedrooms per unit.

### **All residential properties by number of units**

<b>Property Type</b>	<b>Number</b>	<b>%</b>
1-unit detached structure	40,797	60.1%
1-unit, attached structure	3,057	4.%
2-4 units	11,947	17.6%
5-19 units	6,382	9.4%
20 or more units	5,357	7.9%
Mobile Home, boat, RV, van, etc.	341	.5%
<b>Total</b>	<b>67,890</b>	<b>100%</b>

### **Residential Properties by Unit Number**

Data Source: ACS DP04, 2022 – 5Year Estimate

### **Unit Size by Tenure**

	<b>Owners</b>		<b>Renters</b>	
	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
No bedroom	67	0%	1,492	5.3%
1 bedroom	690	3%	6,874	24.5%
2 bedrooms	8,013	23%	11,621	41.4%
3 or more bedrooms	24,371	74%	8,114	28.9%
<b>Total</b>	<b>33,141</b>	<b>100%</b>	<b>28,101</b>	<b>100%</b>

### **Unit Size by Tenure**

Data Source: ACS B25042, 2022 – 5-year estimate

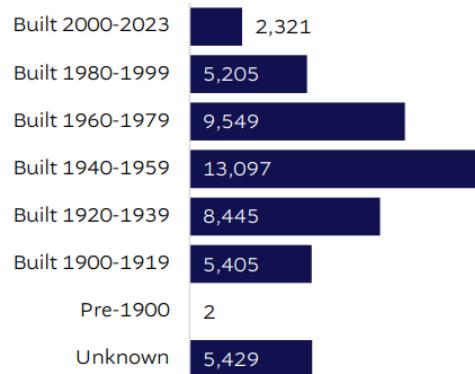
By 2032, the city's population is estimated to grow to 152,500-162,700 or 62,000-65,300 households in Rockford. Much of this growth is based on the naturally occurring historical growth trends as well as recent announcements by large employers in the region. Of the 44,024 residential parcels with residential structures built in known years, nearly 13,100 (30%) were built between 1940 and 1959. Conversely, since 2000, only 2,300 structures have been built. There are approximately 496 lots in existing subdivisions and infrastructure in place that could be developed immediately. Also, there are about 1,500 tax-delinquent properties in Rockford. The City of Rockford's combined owner-occupied and renter-occupied vacancy rate is estimated to be 9.9%. Redevelopment Resources (Housing Study Consultant) recommends an owner-occupancy vacancy rate of 1.5-2% and a rental vacancy rate of 3.5-6% for a combined vacancy rate of 5-8% based on best practices and household growth projections.

**Figure 3. Residential Properties by Use Type**

Vacant Residential Land	3,217
Condominium (Residential)	2,437
Comm Res (6+units)-Imp	577
Six Family Residence	81
Five Family Residence	40
Four Family Residence	748
Three Family Residence	193
Two Family Residence	3,300
Single Family Residence	38,860

Source: City of Rockford.

**Figure 4. Age of Housing Stock by Year Built**



Data Note: The chart is in 20-year increments with the exception of the top bar, which is 24. Source: City of Rockford.

The median price in 2023 (\$142,500) has more than doubled the median sales price in 2014 (\$65,000). Since 2013, the median rent in Rockford has risen 27.2% while average hourly wages of private sector employees have only risen 24.7%. Based on the data scraped from Apartments.com, of the 3,636 units in properties listed on the website, only 2.3% are available.

The areas to the west and south of the city where there the highest concentrations of low-income and minority populations reside are also some of the area's most in need of revitalization and investment. This area of the City contains a large portion of the oldest housing stock as well as many vacant and abandoned structures of all types and uses. There is very high percentage of renters, the lowest concentration of home-owners, much higher than average foreclosures, very high code violation and life safety housing condition concerns.

However, in more recent years this area has seen unprecedented investment and blight reduction efforts at the neighborhood levels. Rockford's largest and most expensive housing development project in its history is currently underway at the Coleman Yards Facility.

In addition, the City has concentrated blight reduction efforts specifically in these areas. Over 600 homes have been demolished that were to the point of no return in regards to rehabilitation efforts. These voids within the neighborhoods offer a real opportunity to redevelop these vacant residential lots in new single-family housing.

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	175	205	180	115	675	130	30	4	0	164
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	170	25	60	0	255	4	0	35	30	69
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	294	190	170	50	704	100	64	120	145	429
Housing cost burden greater than 50% of income (and none of the above problems)	5,135	895	115	15	6,160	1,350	505	200	55	2,110
Housing cost burden greater than 30% of income (and none of the above problems)	885	2,740	1,405	65	5,095	630	1,255	1,295	270	3,450

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	750	0	0	0	750	235	0	0	0	235

**Housing Problems Table**

Data 2016-2020 CHAS  
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	5,775	1,310	520	180	7,785	1,575	595	355	235	2,760
Having none of four housing problems	2,970	4,285	6,105	2,535	15,895	1,325	3,115	5,765	3,260	13,465
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

**Housing Problems 2**

Data 2016-2020 CHAS  
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	2,650	1,870	439	4,959	330	400	324	1,054
Large Related	705	175	25	905	175	44	19	238
Elderly	1,150	839	580	2,569	813	990	955	2,758
Other	2,065	990	585	3,640	890	340	205	1,435

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Total need by income	6,570	3,874	1,629	12,073	2,208	1,774	1,503	5,485

#### Cost Burden > 30%

Data 2016-2020 CHAS  
Source:

#### 4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	0	0	345	345	205	145	0	350
Large Related	0	0	25	25	175	20	0	195
Elderly	830	364	130	1,324	574	240	160	974
Other	0	1,840	335	2,175	495	0	0	495
Total need by income	830	2,204	835	3,869	1,449	405	160	2,014

#### Cost Burden > 50%

Data 2016-2020 CHAS  
Source:

#### 5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Single family households	415	184	194	35	828	104	34	90	165	393
Multiple, unrelated family households	8	10	25	10	53	0	30	60	10	100
Other, non-family households	30	25	25	0	80	0	0	0	0	0
Total need by income	453	219	244	45	961	104	64	150	175	493

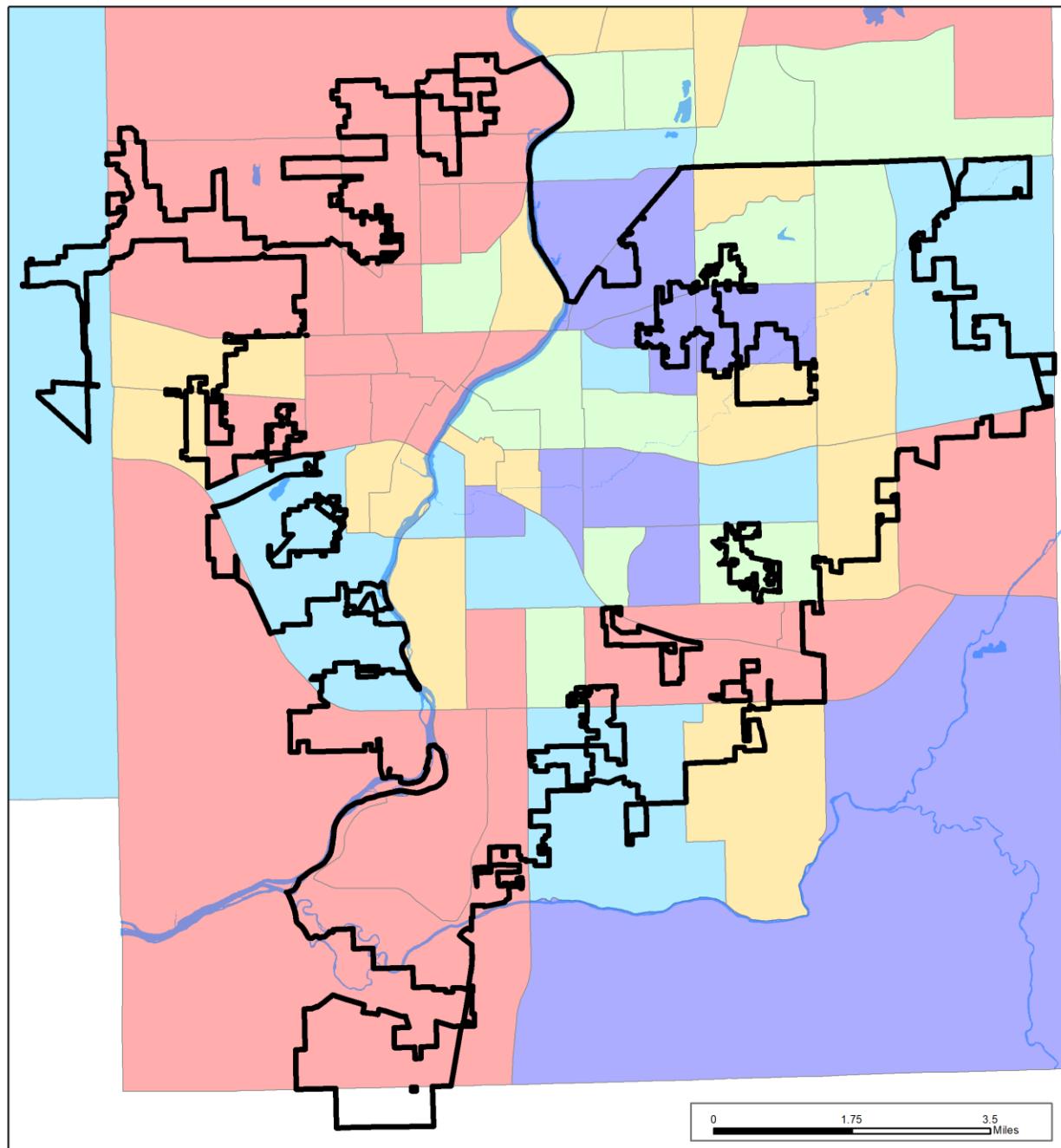
#### Crowding Information

Data 2016-2020 CHAS  
Source:

The following maps highlight and illustrate some of the important demographic and housing characteristics of the City of Rockford that are significant to this Plan:

- Population Density by Census Tract, Page 19.
- Percent Minority Population by Census Tract, Page 20.
- Percent Owner-Occupied Housing Units by Census Tract, Page 21.
- Percent Renter-Occupied Housing Units by Census Tract, Page 22.
- Percent Low-Moderate Income by Census Block Group, Page 23.
- Percent Low-Moderate Income with over 50% Minority by Census Block Group, Page 24.
- Section 8 Housing Site Locations, Page 25.
- Scattered Public Housing Site Locations, Page 26.
- Major Public Housing Site Locations Page 27.
- 20 Percent of More of Population Below Poverty Page 28.
- 2024 CDBG Low-to Moderate Income (LMI) Page 29

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## 2020 Census Tracts City of Rockford, Illinois

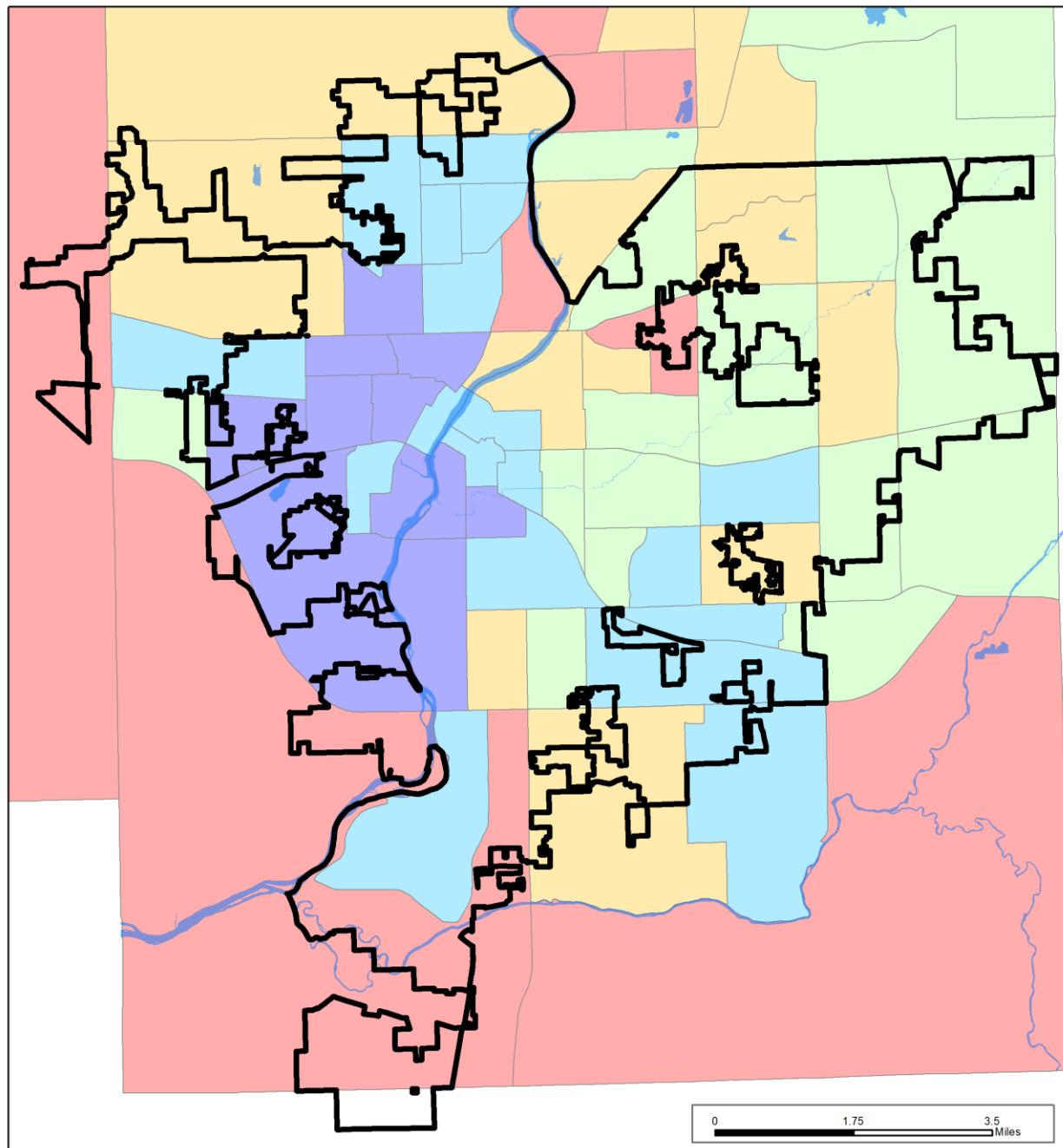
Showing Population Per Square Acre



- 0.004 - 1.324
- 1.325 - 4.096
- 4.097 - 6.186
- 6.187 - 10.847
- 10.848 - 18.181

Map Produced: November 2024





## 2020 Census Tracts City of Rockford, Illinois

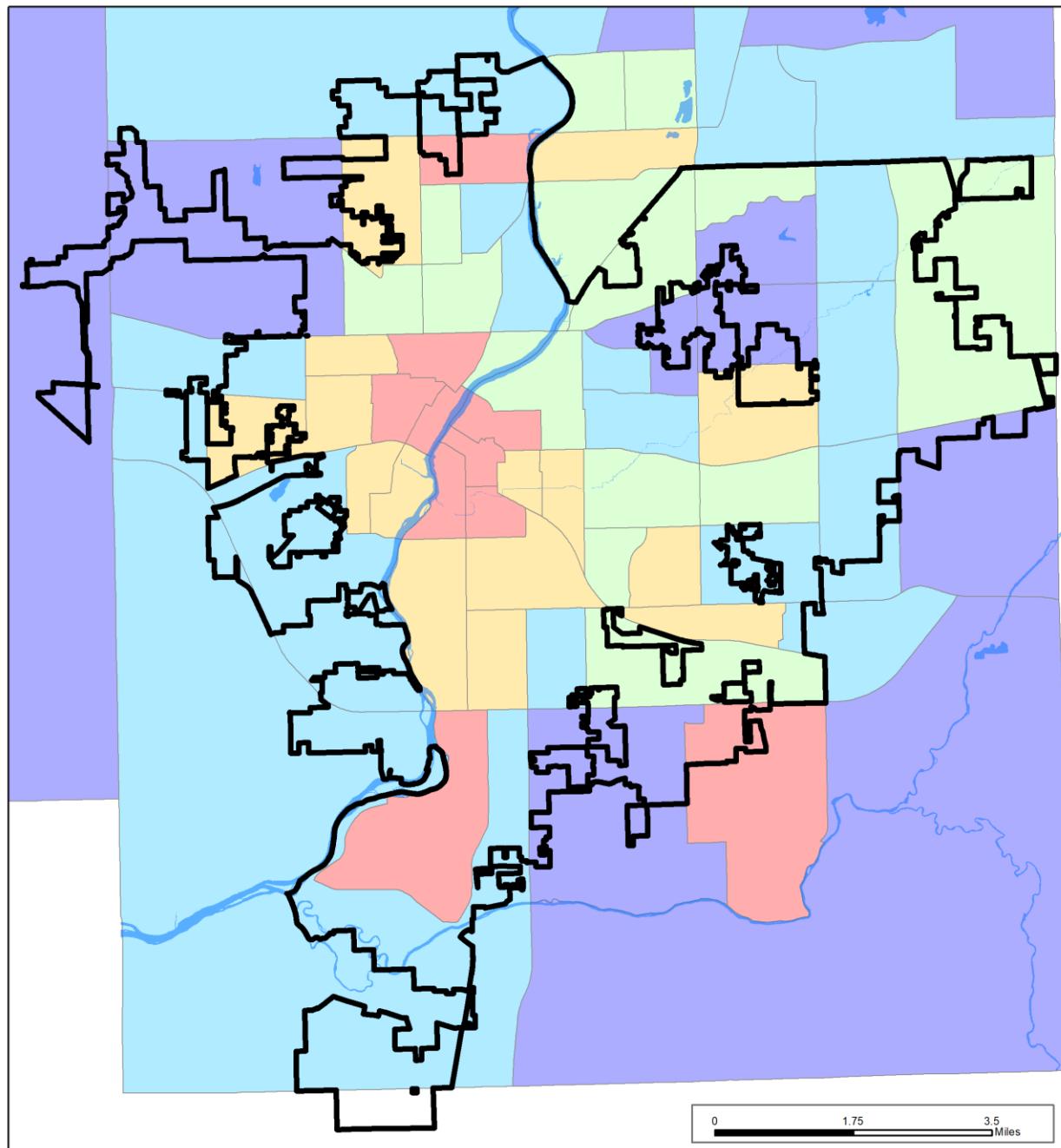
Showing Percent Minority



	0% - 9%		18% - 29%
	10% - 17%		30% - 50%
	51% - 84%		

Map Produced: November 2024





## 2020 Census Tracts City of Rockford, Illinois

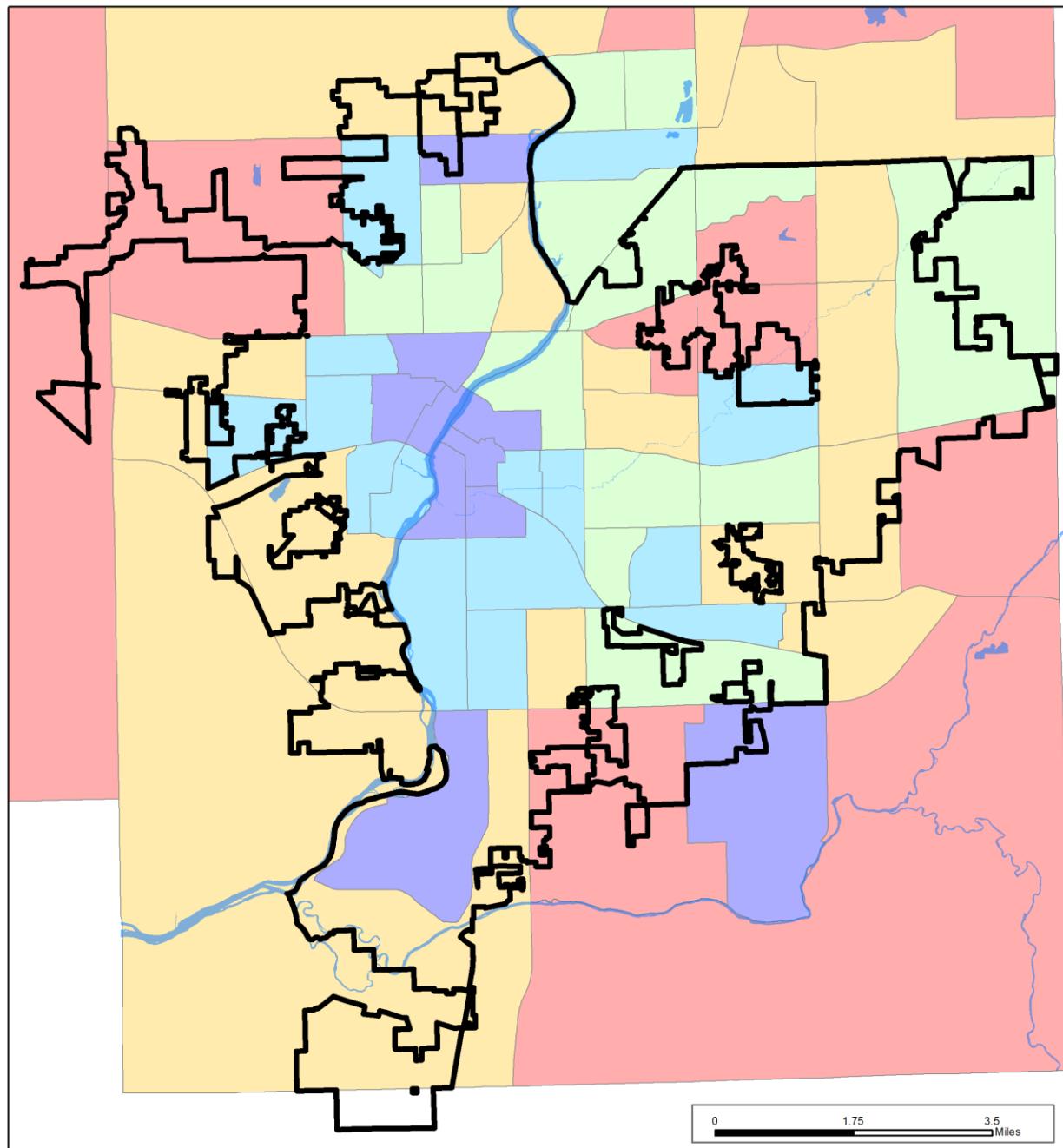
Showing Percent of Owner Occupied Housing Units



- 0% - 29%
- 30% - 51%
- 52% - 66%
- 67% - 81%
- 82% - 97%

Map Produced: November 2024





## 2020 Census Tracts City of Rockford, Illinois

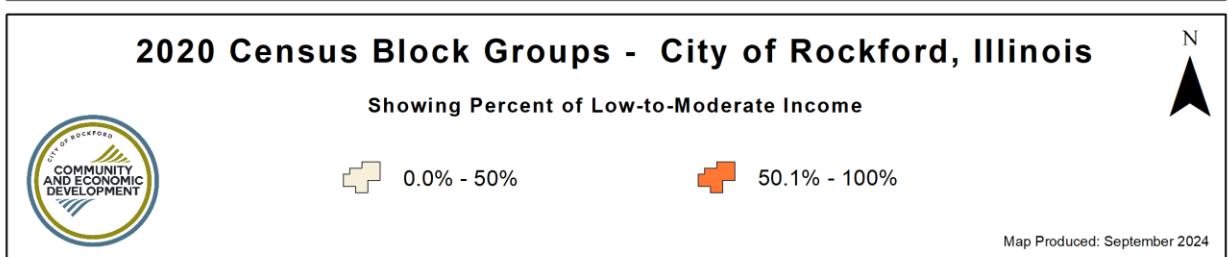
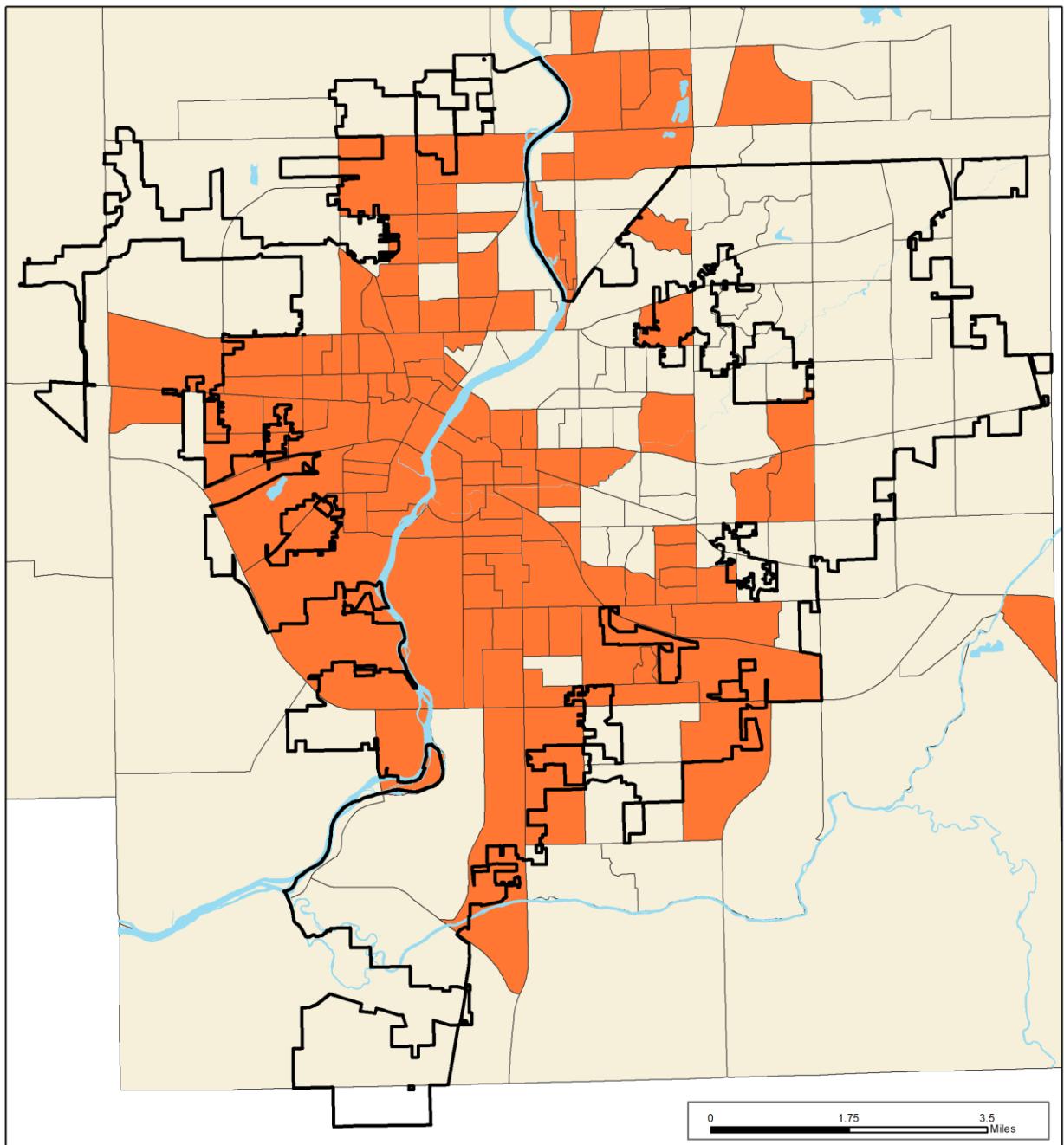
Showing Percent of Renter Occupied Housing Units

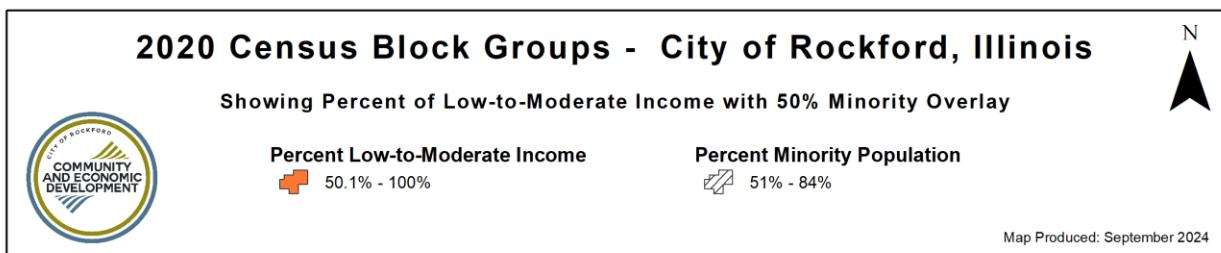
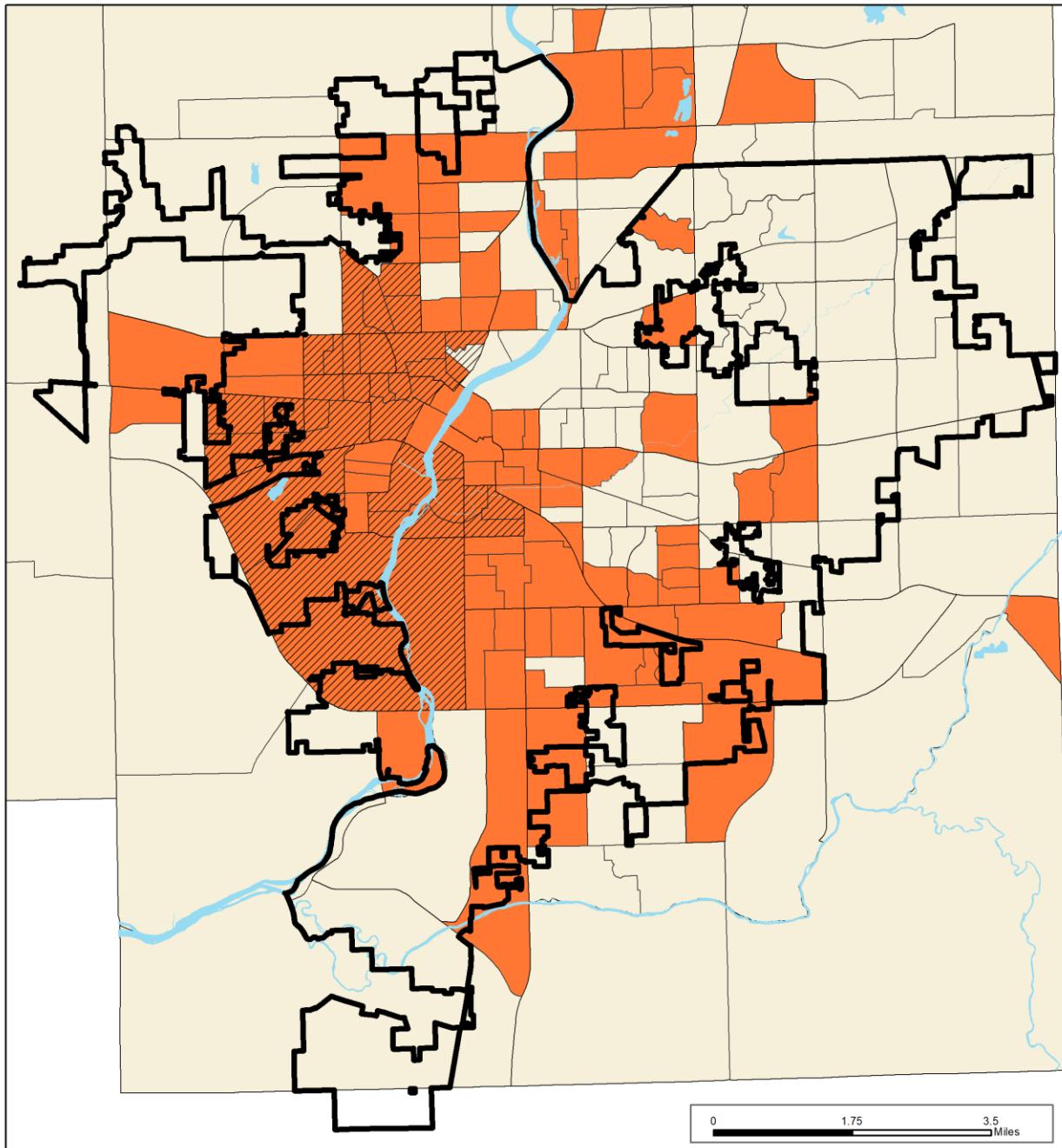


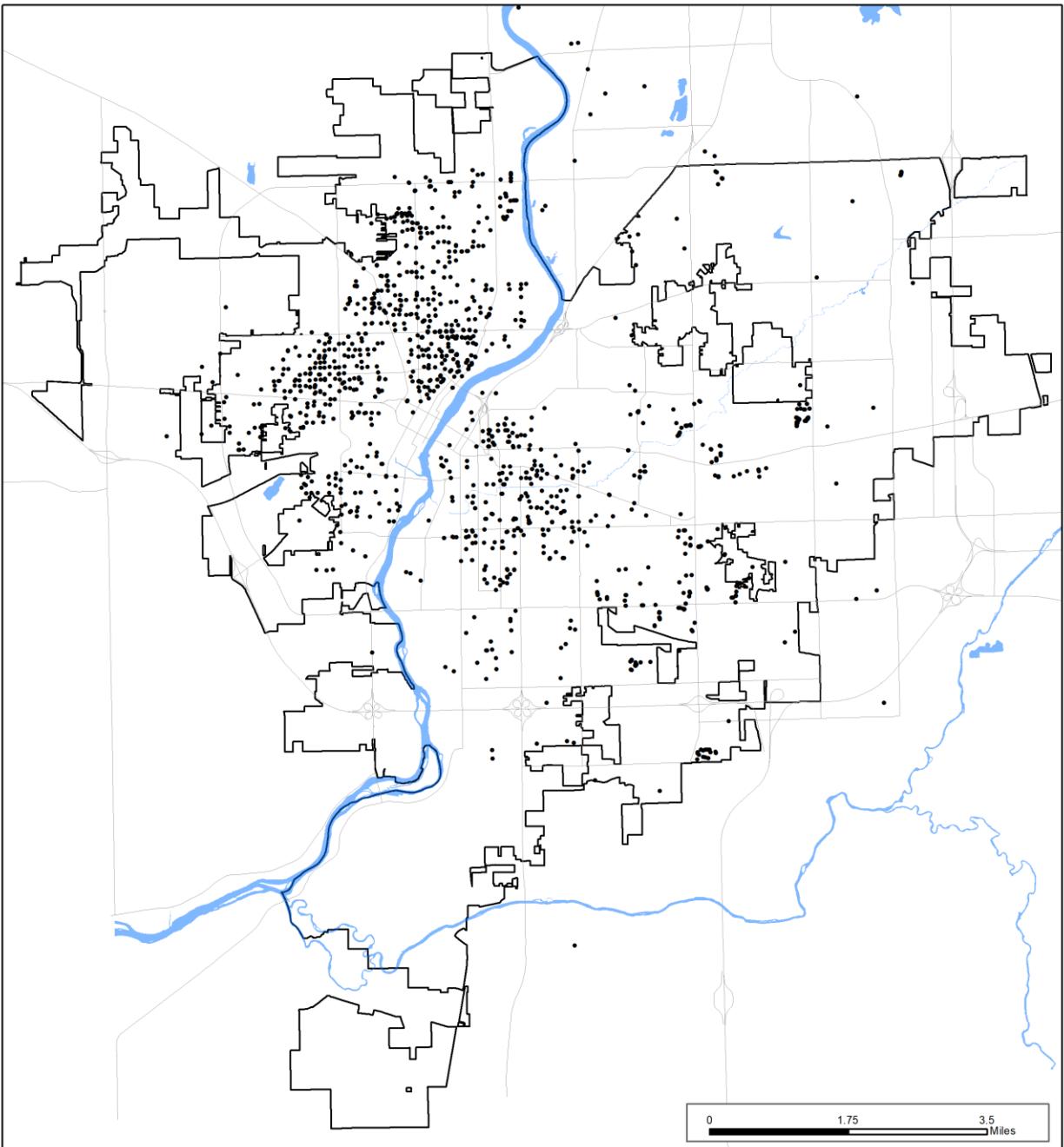
- + 0% - 29%
- + 30% - 51%
- + 52% - 66%
- + 67% - 81%
- + 82% - 97%

Map Produced: November 2024







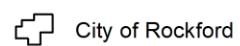


## Section 8 Housing Site Locations

Rockford Housing Authority (RHA)



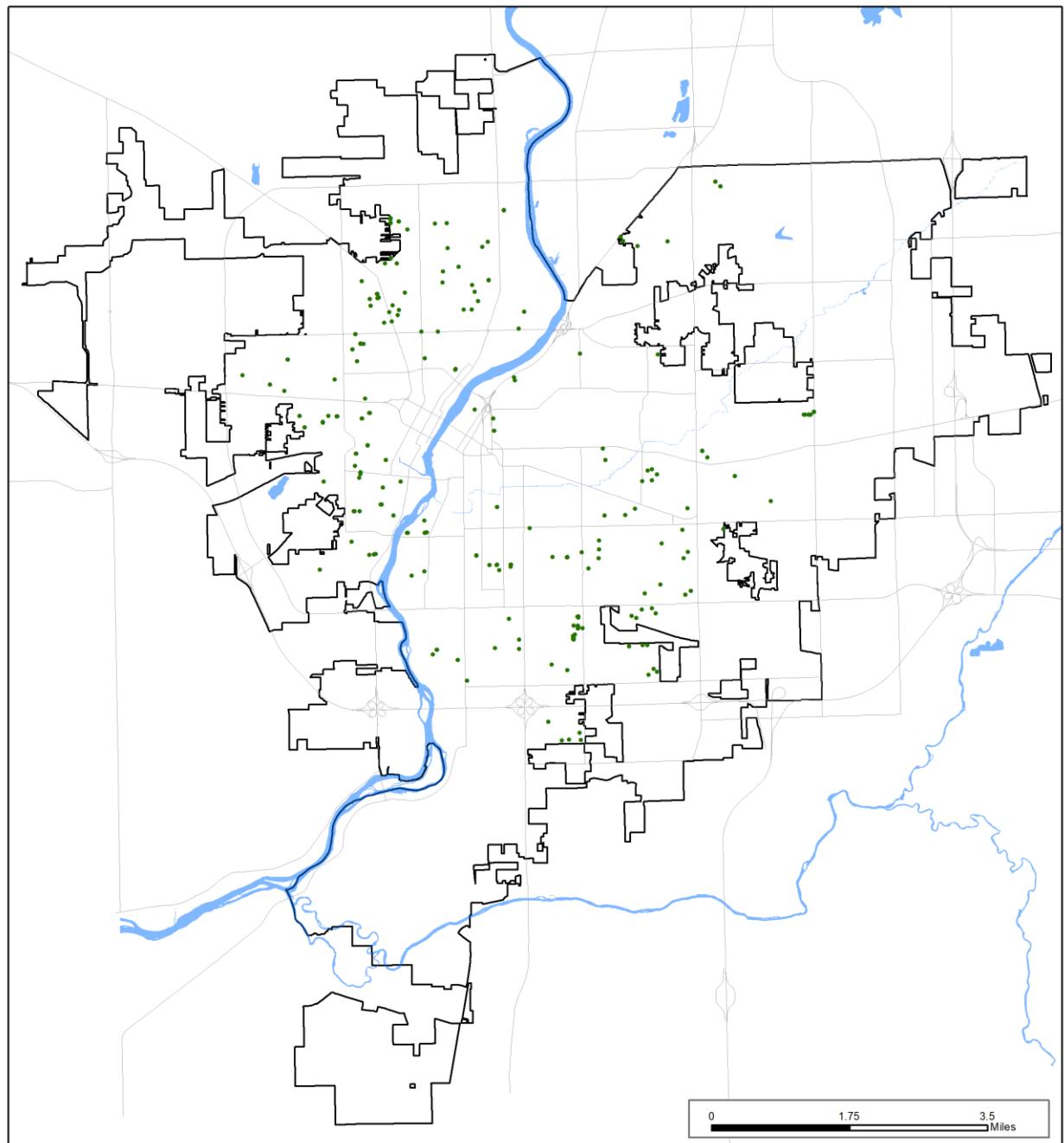
- Section 8 Site Locations



City of Rockford



Map Produced: November 2024



## Scattered Public Housing Site Locations

Rockford Housing Authority (RHA)

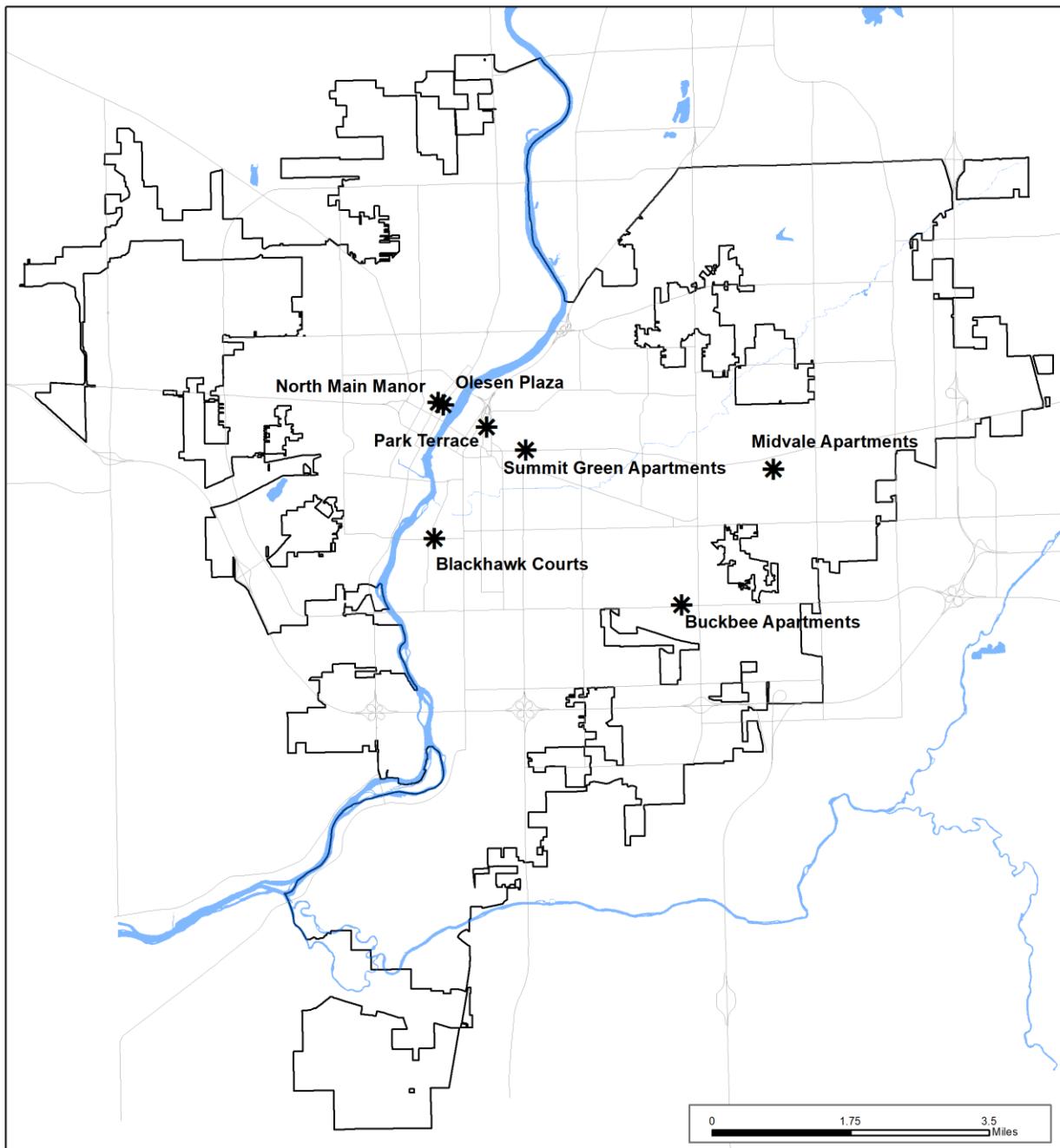


● Scattered Site Locations

✚ City of Rockford



Map Produced: November 2024



## Major Public Housing Site Locations

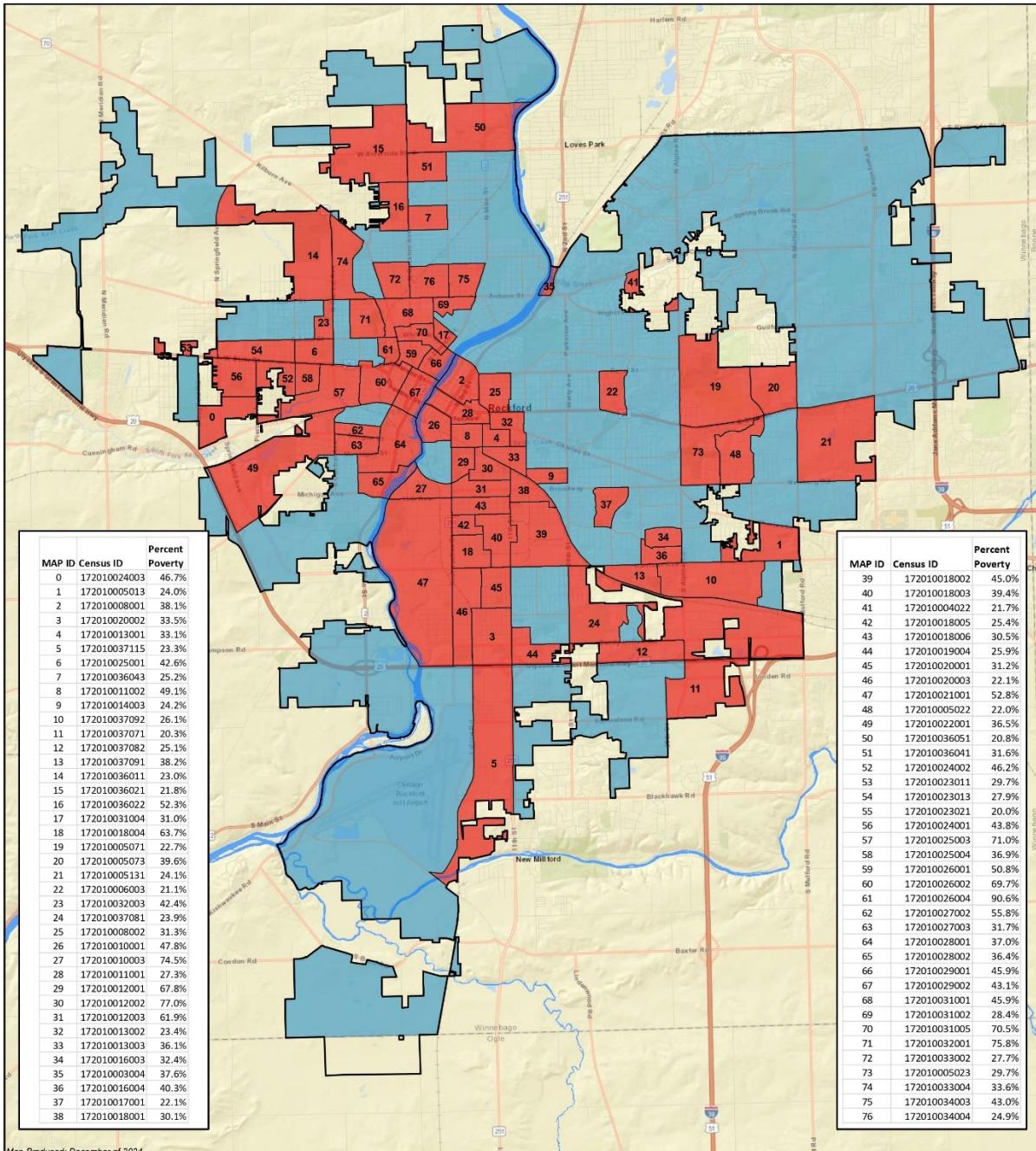
Rockford Housing Authority (RHA)



\* Major Site Locations

 City of Rockford

Map Produced: November 2024



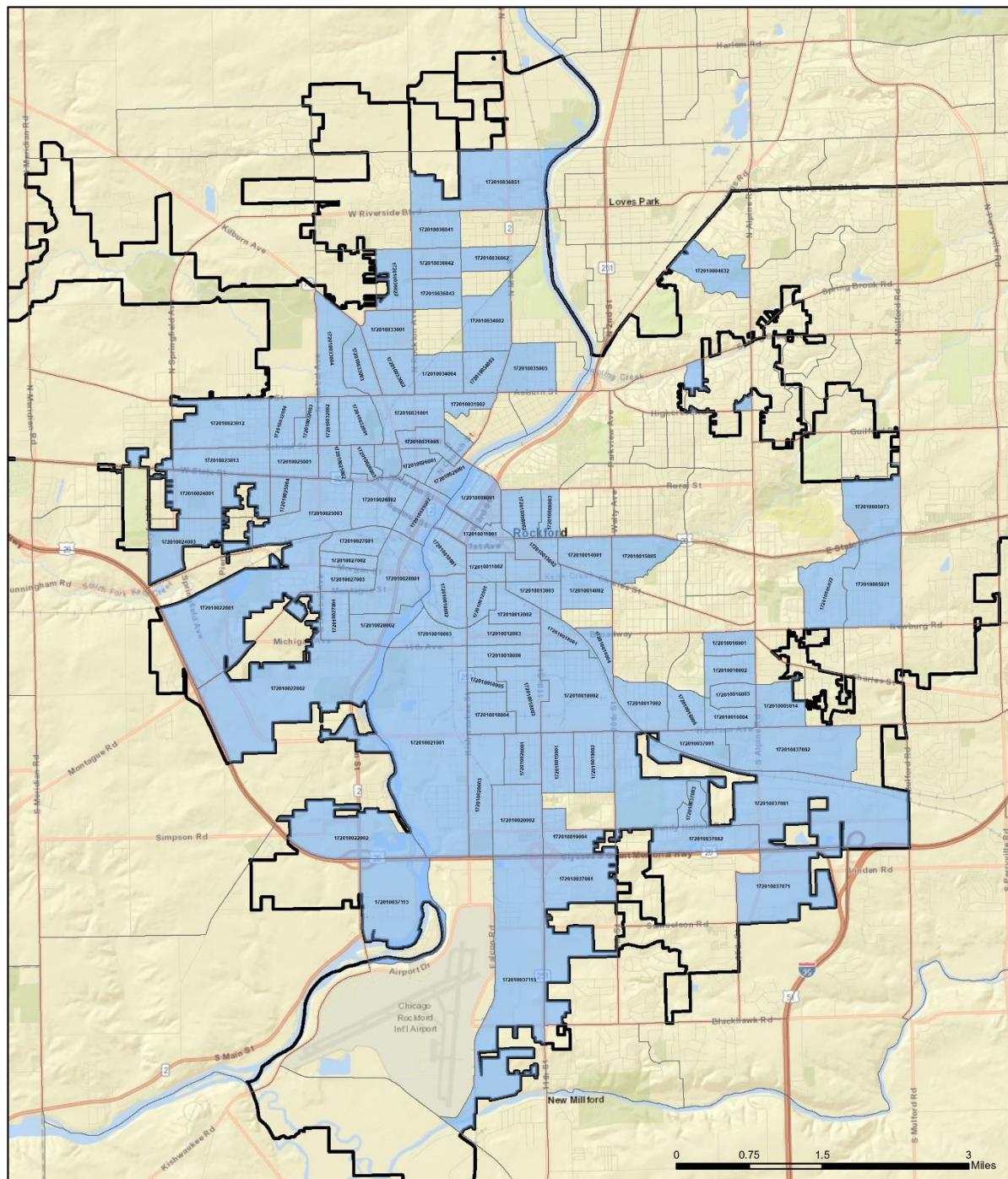
## 20 Percent or More of Population Below Poverty

2020 Decennial Census - ACS 5-year Estimates



THE DATA PROVIDED IN THIS MAP IS FOR INFORMATIONAL PURPOSES ONLY AND THE CITY OF ROCKFORD, ITS PARTNERS, AND AFFILIATES (COR) ASSUMES NO LEGAL RESPONSIBILITY FOR THE ACCURACY OF THE DATA. THE USER IS SOLELY RESPONSIBLE FOR DETERMINING FITNESS FOR THE USE OF THIS INFORMATION. COR ASSUMES NO LIABILITY FOR THE ACCURACY OF THE DATA OR RESPONSIBILITY FOR DIRECT, INDIRECT, SPECIAL, CONSEQUENTIAL, EXEMPLARY OR OTHER DAMAGES.

0 1/2 1 Miles



2024 CDBG Low-to-Moderate Income (LMI)

2016 - 2020 ACS Block Group Data



■ Low-to-Moderate Income  
 ■ Rockford Municipal Boundary



Map Produced on 6/21/2024

## Evaluation of Jurisdiction's Current Fair Housing Legal Status

### Fair Housing Complaints

#### **Community Relations Commission of the City of Rockford:**

City of Rockford Community Relations Commission

Mayor's Office | 425 E State St, Rockford, IL 61104

The City of Rockford's Community Relations Commission was created by the City of Rockford City Council. The ordinance was approved December 19, 2018 and the initial 11 members were appointed on July 30, 2019. According to the Ordinance, 2018-281-0, "It is the public policy of the City of Rockford to provide all of its citizens equal opportunity for education, employment, access to public conveniences and accommodations, and acquisition, through purchase or rental, of real property, including but not limited to housing, and to eliminate segregation and discrimination based on race, color, national origin, religion, sex (including pregnancy, childbirth, and related medical conditions, and harassment based upon sex), disability, age, genetic information, marital status, sexual orientation, citizenship status, military status, unfavorable military discharge, gender identity, or status as a survivor of domestic violence or human trafficking. It is further the policy of the City of Rockford to promote the full realization of equal opportunity through a positive and continuing approach with each department, division, agency, or internal component of the City, every contractor, subcontractor or bidder seeking contracts with the City, and every employer, property owner, and business owner in the community. It is further the policy of the City of Rockford to foster, encourage, and stimulate the improvement of relations among and between all citizens, and to provide all individuals with an equal opportunity to grow and participate to the best of their ability in the economic, educational, social, and cultural activities available in the community".

The primary functions of the Commission are as follows:

- Identify for the City Council programs or projects that will enhance relationships between city government and its residents;
- Study the nature and causes of prejudices in the City, its ordinances and policies and to make recommendations for improvements;
- Study the nature and extent of discriminatory housing, employment, and public accommodation practices in the City;
- Publish and disseminate reports, recommendations, and information derived from such studies;
- Conduct and promote such educational and other programs and may be necessary to carry out the functions of the Commission;
- Assist City departments in establishing and maintaining good community relations and to serve all segments of the community in an equitable and professional manner;
- Advise and consult with the Mayor and City Council on all matters involving racial, religious, sex, ethnic, disability or sexual orientation prejudice or discrimination and recommend such legislative action as it may deem appropriate;
- Periodically review, with the Human Resources Director and the Mayor or his designee, the City's diversity programs, as well as City contractors' compliance with all HUD requirements, and report the results of the review to the City Council;
- Provide education programs on community relations issues or practices of unlawful discrimination; conduct public meetings to aid in alleviating discrimination and bias, and as a

means of fostering positive community relations within the City; and issuing such publications as may assist it in the performance of its functions;

- Review the hiring, promoting, and contracting processes of the City and all its departments in furtherance of the policies and goals of this chapter;
- Request the Legal Director or his/her designee investigate possible discrimination which might come to the attention of the Commission with or without an individual complaint. Resulting class based investigations, after the Legal Director's fact-finding, may be issued as reports and be distributed throughout the community. The Commission may recommend informal mediation and recommendations to the Council for formal action, to end any discrimination it may find as a result of these investigations.
- The Commission will submit an annual report to the Mayor and Council concerning its activities and enforcement.

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

In 2024, the Community Relations Commission (CRC) held seven (7) public meetings to discuss housing issues in Rockford. They had panelists come to answer questions, with topics including homelessness, transitional housing, affordable rental, affordable homeownership, zoning, code regulations, and developer issues. The CRC will be writing its formal report to City Council in December, 2024, and presenting that for review in 2025. **That report will be included in the final draft.**

**Prairie State Legal:**

Winnebago Office | 303 N Main St, Suite 600, Rockford, IL 61101  
Phone: 815-965-2902

Prairie State Legal Services is an organization that offers free legal services for low income persons and those age 60 and over who have serious civil legal problems and need legal help to solve them. There are 12 office locations serving 13 counties in northern Illinois.

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

Of the over 14,000 cases handled in 2023 (the most recent Annual Report with data available), 44% were related to housing. The Majority of Prairie State Legal's clients are adults between the ages of 18 and 59. Of the clients with families, 14,000+ children received services. ([www.pslegal.org](http://www.pslegal.org)).

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

City staff met with Prairie State Legal representatives in an interview format for the writing of this analysis. Their concerns included that they continue to see a disproportionate amount of minority clients who face issues with rental housing. The condition of affordable rental units continues to be substandard, and the tenants are worried about eviction when they report issues.

Additionally, Prairie State has seen that property owners are finding ways to work around the newer Illinois laws on source of income discrimination. Property owners have started requiring a credit scores, and choosing a credit score threshold for the application. Application fees and background checks also seem to be inconsistently used with different applicants, and is worth investigation.

Prairie State asked that the City's plans include increasing the number of available affordable units and rehabbing current affordable units, including the Rockford Housing Authority's properties; supporting direct landlord and renter relationship training and education on rights; and developing properties that address physical disability needs and are close to qualify of life opportunities such as retail and services.

**Illinois Human Rights Commission:**

James R. Thompson Center | 100 W Randolph St, Suite 5-100, Chicago, IL 60601  
Phone: 312-814-6269

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

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

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

The Department of Human Rights publishes an annual summary of docketed cases filed during the Fiscal Year (July 1-June 30). Table IV-1 below illustrates the trends for new complaints that were docketed and conciliated for the State of Illinois from 2022 to 2023.

#### Fair Housing Inquiries, Charges Filed, and Completed Investigations

Processing of Housing Inquiries & Charges	FY 2022	FY 2023
Inquiries:	2,581	3,812
Charges Filed (Housing)	310	323
Completed Investigations	237	275
Completed within 100 days	55	51
Average Time to Complete Investigation (in days)	207	272

#### **Fair Housing & Equal Opportunity (HUD):**

Chicago HUD Regional Office

Ralph Metcalfe Federal Building | 77 W Jackson Blvd, Chicago, IL 60604

Phone: 312-913-8429

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

The FHEO published cases for the State of Illinois, and the cases filed from 2000-2019 include:

- 91 cases filed on a Race Basis
- 3 cases filed with a Color Basis
- 40 cases filed with a National Origin Basis
- 60 cases filed with a Disability Basis
- 45 cases filed with a Familial Status Basis
- 12 cases filed with a Religion Basis
- 18 cases filed with a Sex Basis
- 7 cases filed with a retaliation Basis
- 232 Total Cases

#### Reasons for any trends or patterns

The limited availability of housing units and rising rent and interest costs are creating potential fair housing issues in the City of Rockford. Maintaining a healthy vacancy rate promotes competition, which incentivizes landlords to keep rent lower and to keep their properties attractive and livable. It promotes choice, which allows residents to choose what unit works for their job and family life. The rising costs associated with housing mean that renters end up cost burdened from rent, and homeowners end up cost burden from a high mortgage payment and maintenance costs. Anytime multiple applications come in for a rental or purchase, there is potential for bias to favor a certain income or race. The City of Rockford needs to address fair housing education and development needs.

Another trend is lack of understanding and general confusion over the systems that are meant to help. Renters and landlords need to understand their rights and how to work through tenancy issues. Homebuyers need to understand financing, and what they can and cannot expect in a transaction.

Homeowners need to understand maintenance and code ordinances, so that they can plan for upcoming improvements. The City needs to increase education opportunities for fair housing.

## **Identification of Impediments to Fair Housing Choice**

### Previous Plan Review

The City of Rockford's previous Analysis of Impediments to Fair Housing included the following impediments and activity under each impediment:

- **Impediment 1: Fair Housing Education and Outreach.** There is a need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities and the disabled population who fear retaliation if they lodge a complaint.

*The City of Rockford worked under our strategies for this goal, continuing to distribute literature and post information about fair housing issues, an individual's rights, landlord's responsibilities, and how to report issues. Additionally, the housing rehabilitation programs and homebuyer down payment programs worked with residents to choose and/or stabilize their housing in all parts of the City, contributing to housing choice.*

*The City added slides to their public hearing presentations so that Fair Housing information was given at all presentations on entitlement funds and residents were told how to report any issues. Recordings of these presentations were made available during all comment periods.*

*In 2022, City staff spent time in six focus areas identified as having higher rates of crime and lacking connection to resource. Staff went door-to-door to gauge the needs of residents and make referrals to social services, and a resource fair was held in five of the six areas. In 2023, the City combined two of the focus areas and expanded two of the others, again going door-to-door to offer resources and support and inviting residents to connect directly with City staff during mobile office hours held semi-monthly in each of the three areas. In 2024, door-to-door efforts invited residents to engage in conversation with City staff over coffee and donuts at a monthly gathering in each of the three remaining focus areas.*

*Moving forward, the City needs to schedule media and marketing outreach that gets more information on fair housing out to the residents. In particular, the City will focus outreach on source of income discrimination information and renter's rights. Direct outreach will be expanded to adapt to what was learned in prior outreach efforts: making connection with residents is most effective when staff spends time right in each neighborhood, knocking directly on residents' doors.*

- **Impediment 2: Need for Decent, Safe, and Affordable Rental Housing.** The City of Rockford does not have a sufficient supply of rental housing that is decent, safe, and sound. In many cases, landlords often do not maintain their property to code standards which results in unsafe living conditions for tenants. However, the monthly cost of rent for apartments has steadily increased due to the limited supply of rental housing, despite the condition of the rental unit.

*The City worked diligently with developers to preserve and create rental housing. Rental projects worked on with funding from the City:*

- *Longwood Gardens, 64 units, affordable*

- *Lafayette Apartments, 54 units, affordable*
- *Colman Yards Phase 1-A, 196 units, market rate*

*In the past two years, City Council approved the development of an additional 1,300 units of rental housing (included Colman Yards), and our staff is continuing to work through more plan proposals. This uptick in development has been incentivized by a permit and water connection fee waiver program for all new construction, plus the rebate of up to 3 years of property taxes.*

*The City continued to use CDBG funding for homeowner rehabilitation, and secured two funding grants from the Illinois Housing Development Authority (IHDA) to also complete homeowner rehab. The City also granted American Rescue Plan Act funding to our local Habitat for Humanity, so that they could run a Critical Home Repair program. The City's Health and Human Services Department continued to complete weatherization home repairs, and ran an emergency furnace and water heater program. The City's Code Enforcement Inspectors continue to work in assigned quadrants around the full City. Their focus is to education and bring properties into compliance. When a property owner is not cooperating, a case is started and compliance actions such as fines and hearings are taken. The City has a committee of internal staff members from Code, Building, Zoning, Legal, Fire and Police that meet twice a month to go over any longer term issues on properties, so that compliance can be achieved the best way.*

*Moving forward, the City will continue to work with developers to build more housing in Rockford. When available, the City will offer incentives and funding through Federal grant programs like HOME Investment Partnerships Program and Community Development Block Grant that encourage mixed use and affordable developments.*

• **Impediment 3: Lack of Affordable Homeownership Opportunities.** The population of Rockford has decreased since the 2010 U.S. Census and the percentage of share of renters has increased from 39%-46%. In some areas, the share of renters is as high as 70% or more. Home values and access to traditional mortgage financing have decreased since the recession, partly due to significantly higher credit standards and the age of Rockford's housing stock. Homes within an affordable price range require rehabilitation, which limits the availability of mortgage financing programs for lower income households.

*In the past, City Staff relied heavily upon the ability to refer residents to HomeStart for housing support including counseling, education, and connection to financial resources during the Covid-19 pandemic; however, Homestart has since ceased operations.*

*The City of Rockford has offered a Home Buyer Assistance program which provided assistance of up to \$14,999 to eligible home buyers, most recently in 2022. This program, or one similar, may be offered again in future.*

*A new tool created by the City in the last five (5) years was the Rockford Community Investment Fund (RCIF), a Community Development Finance Institute. RCIF's construction loan has helped over 200 properties get rehabbed and put back into the market as viable housing.*

*The Lease Purchase program has not yet been explored but will be considered in future.*

*Habitat for Humanity has in recent years been the sole builder of affordable new single family construction and has developed a Critical Home Repair program for low income residents; however, the*

*City will need to monitor Habitat's capacity and develop new partnerships as needed to fill any gaps identified.*

*Moving forward, the City will work with Zion Development Corporation to offer homebuyer and homeowner classes. The City will continue to offer homeownership assistance, support the CDFI's programs, and work with Habitat to address critical repair needs. The City also will look to issue an Request For Proposal for housing development to provide more inventory and options to first time homebuyers.*

• **Impediment 4: Need for Accessible Housing Units That Are For-Sale or Rent.** There is a lack of accessible housing units in the City of Rockford. Most of the existing housing units do not have accessible features. The City's disabled population has grown to 17.6% of the total population, and residents age 65 and older comprise 17.4% of the total, 38% of whom identify as having a disability.

*With a continually growing disabled population and projected continual increase in percentage of residents considered elderly, the need for building new accessible housing and rehabbing older housing stock to make it accessible continues to increase. Additionally, community input conveys a significant need for case management, mental health care, and other ongoing supports for residents, especially those with disabilities, compelling new ways of thinking about development that incorporate supportive services on site.*

*The City worked with RAMP CIL to offer accessibility modifications to client's homes. Fifteen (15) households were assisted using Federal funding. The City also received funding from the Illinois Housing Development Authority under the Home Repair and Accessibility Program, and have helped three (3) households so far with their accessibility needs.*

*The City will investigate ways to encourage and support development of accessible housing units, including pursuing partnerships to provide supportive services on-site for residents.*

*The City will continue to enforce the ADA and Fair Housing requirements for landlords to make reasonable accommodations to their rental properties so they become accessible to tenants with disabilities.*

• **Impediment 5: Economic Issues that affect Fair Housing Choice.** There is a lack of economic opportunities in the City which prevent low-income households from improving their income and ability to live outside areas with concentrations of low-income households, which makes this a fair housing concern.

*The City of Rockford encourages Minority Business Enterprises (MBE) and Women Business Enterprises (WBE) with several different initiatives. First, the City keeps an MBE and WBE list of contractors, and supplies them with bids for contract work for the City. The City reports MBE and WBE transactions federally, and also deliver a report to the Community Relations Community. The most recent report was given on November 14, and the City has increased spending from \$9,832,844 in 2020 to \$16,922,256 in 2023. Additionally, the City funded operations and a new office for Think Big, a non-profit that coaches MBE and WBE small business owners. Last, the City hosts a weekly meeting called Business First, where entrepreneurs can come to talk about their business proposal and get input from City staff to help it move forward.*

*The Mayor of the City of Rockford is on the Board of Directors for The Workforce Connection, a job training non-profit in Rockford. The Workforce Connection helps clients complete their GED and resume,*

*and connects them to educational opportunities that include certifications and advanced degrees. Another addition to our workforce development is The Excel Center. Goodwill Industries of Northern Illinois is opening the Excel Center this spring to offer a certified high school diploma to adults, while also offering supportive services such as childcare.*

*The City was working with the Rockford Area Economic Development Council to execute Business Retention and Expansion and Business Attraction strategies. That organization is now housed in the Greater Rockford Chamber of Commerce, and the City will continue to be open to all inquiries.*

*Rockford Mass Transit District (RMTD) recently began the expansion of its downtown bus terminal project, which the City helped get approved. The City is also working with RMTD on the Complete Streets project which will create a multi-model path and electric bus shuttle system in downtown Rockford. This will connect more residents to downtown jobs and services.*

*The City's Community & Economic Development Department offers small business matched funding programs, assisting business with improvements. The City has offered the Tax Increment Financing (TIF) 50/50 Program, the Business Growth Program (CDBG funds), and most recently, the Commercial Corridor Property Revitalization Program.*

*Moving forward, the City will continue to work aggressively to increase job opportunity, and support all of these programs that train employees and empower small business owners.*

The City has evaluated the progress above, and met with partners to discuss what still needs to be accomplished. This analysis will conclude that the City will continue to focus on these impediments and momentum created for the next (five) 5 year consolidated plan period, while adjusting strategies to meet any new needs identified.

## Public Sector

Part of the Analysis of Impediments is to examine the public policies of the jurisdiction and the impact on fair housing choice. The City of Rockford controls land use and development through the comprehensive plan, zoning regulations, subdivision regulations, and other laws and ordinances passed by the local governing body. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and the various residential uses in the community. Therefore, local policies and policy makers determine the community's commitment to fair housing.

### A. CDBG, HOME and ESG Programs

The following goals have been identified for the period of FY2025-2029

### **Housing Strategy (High Priority)**

**Priority Need:** There is a need to increase the amount of decent, safe, and sanitary housing that is affordable for homebuyers, homeowners, and renters. The City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032 identified an estimated demand for housing over the next ten years to be between 3,200 and 9,100 units.

**Objective:** Improve, preserve, and expand the supply of housing for low- and moderate-income households that is decent, safe, and sanitary. This includes, but is not limited to, creating Planned Unit

Developments that encompass all housing levels, the construction of new single-family housing and duplexes within existing unbuilt subdivisions, and the rehabilitation of existing properties that not only extends the useful life of units, but makes them accessible for persons with disabilities, and more energy efficient, and by creating wealth through homeownership.

**1. Housing New Construction** – Increase the number of housing units in the City for owners and renters through new construction. This includes, but is not limited to, costs associated with acquisition, disposition, clearance, demolition, infrastructure, and new construction of residential housing.

**2. Preservation of Housing** – Preserve existing housing units in the City for owners and renters. This includes, but is not limited to, costs associated with acquisition, disposition, clearance, demolition, infrastructure, and the rehabilitation of residential housing.

**3. Community Housing Development Organization (CHDO) Support & Development:** Support CHDO's with operating dollars and development funds. This meets the HOME program 15% minimum set aside requirement for affordable housing. Funds would be used for the development of decent, safe, and sanitary housing for owners and renters. This includes, but is not limited to, costs associated with acquisition, new construction, reconstruction, and the rehabilitation of residential housing. In addition, eligible homebuyers purchasing any of the newly developed units may receive homebuyer assistance such as down payment, etc.

**4. Homeownership** – Create wealth through homeownership. Assistance includes, but is not limited to direct subsidies for down payment, closing costs, housing counseling fees, interest subsidies, etc.

**5. Fair Housing** – Promote fair housing choice through education, testing, training, and outreach in the City of Rockford.

**6. Project Delivery** – Support housing through project delivery, the comprehensive process of carrying out and completing housing units.

#### **Homeless Strategy (High Priority)**

**Priority Need:** There is a need for support services and housing opportunities for homeless persons and persons or families at-risk of becoming homeless.

**Objective:** Improve the living conditions and support services available for homeless persons, families, and those who are at risk of becoming homeless. The City will continue to work directly with fire and police to stay in touch with, monitor, and aid those who lack housing, or the means to obtain housing within the City. This includes, but is not limited to, rapid re-housing, homeless prevention, and condemnation relocation.

#### **Goal:**

**1. To Reach Functional Zero for Families, Youth, and Single Adults:** Supplement the Continuum of Care's efforts by identifying and engaging people at risk of and experiencing homelessness, intervening to prevent the loss of housing and divert people from entering the homelessness services system, and providing immediate access to shelter and crisis services. This includes, but is not limited to, efforts related to street outreach, emergency shelter, homeless prevention, rapid re-housing, operating, supporting the Homeless Management Information System (HMIS), and administration.

## **Community Development Strategy (High Priority)**

**Priority Need:** There is a need to improve public facilities, such as parks, playgrounds, recreational areas, and trails. Improvements are needed on infrastructure such as bike trails, shared-use paths, roads, various transportation facilities and sidewalks, including ADA curb cuts. Flood mitigation is needed on roadways and neighborhoods. In addition, there is a need for improved access to public transit.

**Objective:** Improve the community facilities, infrastructure, public services, public safety, and transportation, along with the elimination of blighting influences in the city of Rockford.

Goals:

- 1. Non-Housing Community Development Needs** – Improve public facilities, infrastructure, and public safety. This includes, but is not limited to, rehabilitation, reconstruction, and new construction of community spaces and infrastructure such as streets, sidewalks, bridges, curbs, storm water & sanitary sewer, accessibility improvements, the removal of architectural barriers, community policing and ability to respond to emergencies in the City, etc.
- 2. Public Services** – Supplement public services (including labor, supplies, and materials) for low to moderate-income persons, including persons with other special needs. This includes, but is not limited to adding new services or making a quantifiable increase in the level of existing services for services such as employment, crime prevention, childcare, health, drug abuse, education, fair housing counseling, energy conservation, welfare, or recreational needs.
- 3. Clearance/Demolition** – Remove and eliminate slum and blighting conditions through demolition of vacant, abandoned, and dilapidated structures.

## **Economic Development Strategy (High Priority)**

**Priority Need:** There is a need to have efficient business development, expansion, diversification, job growth, and innovation. In addition, there is a need to support sustainable and equitable economic development.

**Objective:** Improve and expand economic opportunities in the City for low- and moderate-income persons through investing in businesses and properties (commercial and industrial) throughout Rockford.

Goals:

- 1. Business Support** – Provide financial support to start and/or grow businesses.
- 2. Property Development** – Develop new and existing commercial and industrial properties through means such as acquisition, disposition, clearance, demolition, remediation, preservation, renovation, etc.

## **Administration, Planning, and Management Strategy (High Priority)**

**Priority Need:** There is a need for planning, administration, management, and oversight of Federally funded programming.

**Objective:** Provide sound and professional planning, administration, oversight and management of Federal, State, and local funded programs and activities.

**Goals:**

**1. Overall Coordination** – Provide program management and oversight for the successful administration of Federal programming, including planning services for special studies, annual action plans, five-year consolidated plans, substantial amendments, consolidated annual performance and evaluation reports (CAPER), environmental reviews and clearances, fair housing, and compliance with all Federal, State, and local laws and regulations.

**B. Other Funds**

In addition to CDBG, HOME, and ESG funds, the following other public resources have been received by agencies in the city of Rockford:

Illinois Housing Development Authority program funds

United States Environmental Protection Agency – Brownfields Assessment Grants

United States Environmental Protection Agency – Clean-up funds

United States Environmental Protection Agency – Supplemental Revolving Loan Fund

Community Services Block Grant

Continuum of Care Grant

Illinois Home Weatherization Assistance Program

Healthy Homes HUD funding

Low Income Housing Tax Credits

Historic Tax Credits

U.S. Treasury CDFI funding

**C. Planning, Zoning and Building Codes**

Zoning for the City of Rockford is codified in Part 2 of the Zoning Ordinance of the City of Rockford, Illinois. The Zoning Ordinance divides the City into four (4) base zoning districts. Each zoning district contains permitted and conditional land uses, along with associated development standards.

As part of the Thriving Communities Technical Assistance from HUD, City staff have met with the Public Sector Working Group and Community Based Organization Group to understand if current zoning is prohibiting needed affordable development. It was determined that current zoning flexibilities meet the needs of the developers working on current and future projects. For a few recent developers, staff assisted the developer in successfully seeking a Special Use Permit for developments to ensure that housing could move forward on formerly commercial or industrial build sites.

City staff will continue to work with the technical assistance to determine if neighborhood specific overlays and/or zoning updates will be needed as City staff continues to meet with developers and residents.

**D. Public Housing**

Rockford Housing Authority operates exclusively within the City limits of Rockford. RHA has a 5-Year Strategic Plan 2023-2028. Their description of their plan is as follows:

The Plan, "Moving Forward Together," consists of Seventeen Goals, seventeen strategic and foundational objectives, and Twenty-one initiatives, all aimed at creating a positive impact for residents and the community. The Plan focuses on redefining resident success and prioritizes redevelopment, workforce education, partnerships, and external engagement in affordable housing. The RHA aims to be efficient and effective in achieving these objectives. The agency recognizes that its people, including residents, staff, partners, parents, families, friends, and community members, are the driving force behind its success and pursuit of excellence.

The full plan can be found here: <https://rockfordha.org/rha-5-year-strategic-plan/>

RHA participates in the City's Public Sector Working Group. In various meetings, RHA has indicated that they need more landlords to work with their voucher programs, and are currently offering incentives that are expensive to fund. RHA offers tenant training and landlord training, and feels that they could expand this program to address more fair housing issues in the community. RHA is also working to hire experienced development staff so that they and their non-profit (Bridges) can develop more rental units for Rockford.

Year to year, RHA has continued to have a long waiting list for their programs, which again points to the needs for more units and housing opportunity. From the City of Rockford listening sessions, residents indicated that the rules and expectations of RHA residents do not honor their right to live autonomously, which residents indicated is a potential fair housing conversation.

#### E. Comprehensive Plan

The City's 2040 Comprehensive Plan was updated in 2024, and starts with the following vision statement:

The residents of Rockford envision a future city that celebrates cultural diversity, has thriving downtown events and art attractions, builds on its strong history of economic opportunities through continued improvements in the education systems, and a mission to deliver outstanding public services to improve the safety and health of the community as a whole. Such planning will take the cooperation and teamwork of both new and seasoned leaders to identify and advance both existing and future opportunities for increased economic growth and transportation improvements that benefit the City of Rockford, making it a more desirable place to live for all.

The plan outlines the City's goals and strategies for land use planning; transportation and mobility; economic development; education; housing and livability; community infrastructure; park, recreation and open spaces; and environmental and natural resources. The full plan can be viewed on the City of Rockford website at: <https://rockfordil.gov/313/2040-Plan>.

The work of this plan, including the community input elements, were used in the direction set for this Analysis and the 2025-2029 Consolidated Plan.

## F. Transportation

The Rockford Mass Transport District (RMTD) completed a Comprehensive Mobility Analysis and Implementation plan in 2022. The full plan can be found on the RMTD website at:

[https://static1.squarespace.com/static/54f7d1eee4b056cf8def292a/t/627a6b55f00d835e2ba746ed/1652190041558/RMTD+Final+Report\\_2-21-22.pdf](https://static1.squarespace.com/static/54f7d1eee4b056cf8def292a/t/627a6b55f00d835e2ba746ed/1652190041558/RMTD+Final+Report_2-21-22.pdf)

The RMTD Comprehensive Mobility Analysis is a multi-faceted plan that combines the immediate nature of a typical Comprehensive Operations Analysis (COA) with the long-term visioning of a Transit Development Plan. It provides a roadmap for the development of public transit services in the Rockford region over the next five to ten years.

The first two phases will substantially improve morning and evening service span. These phases are already approved for implementation, and together they increase annual operating costs by about \$1.3m. They help address the goal of improved span to support all-day travel patterns. The third phase invests another approximately \$2.1m annually in improved frequency on several routes that have strong performance and could support 30 minute frequency. This will improve the customer experience and reduce wait times. Phase 3's improvements fit within the existing RMTD route structure, thereby minimizing disruption during implementation. Finally, the fourth phase is more ambitious, seeking to realign the route network itself to address structural issues identified as part of the Existing Conditions Assessment. It would create new routes on Rockton, Broadway, East Riverside, and Harrison, while consolidating some other routes. It adds \$1.3m annually beyond the Phase 3 costs, and will address a broader set of goals including service directness, network coordination, and improved travel times.

This is Rockford's only method of public transportation, and is an essential service for access to quality housing and good jobs. The City will need to work closely with RMTD as it develops housing so that transportation is a benefit at all new units.

From the City of Rockford community listening sessions, the issue faced most often is the amount of time it takes to use RMTD and get to all needed stops. It is not easy to get to daycare, your child's school, work and the grocery store without spending an infeasible amount of time on the bus.

## G. Education

The Rockford Public School District 205's (RPS205)Mission is to collaboratively engage all students in a world class education. RPS205 strategic plan goals are as follows:

### 1. Growth & Achievement

Strategy 1: Curriculum Alignment

Strategy 2: Differentiated Instruction

### 2. Engaging Partnerships

Strategy 3: Customer Service

### 3. Optimal Climate

Strategy 4: Social Emotional Health & Skills

## Strategy 5: Facilities & Technology

### 4. Quality Staff

Strategy 6: Internal Trust & Relationships

Strategy 7: Recruit & Develop

Strategy 8: Monitor, Track & Report

### 5. Fiscal & Operational Stewardship

Strategy 9: Resource Allocation

RPS205 staff participated in several stages of the development of City planning documents. The superintendent and human resources staff participated in the City of Rockford, IL 2023-2032 Housing Needs Assessment and Market Study, and talked about the links between stable housing and educational achievement. RPS205 tracked over 2,000 students that were “couch surfing” in order to have a place to stay, and indicated that more affordable housing needed to be developed so that these families could stay engaged at consistent schools.

RPS205 staff also spoke from a hiring perspective, and how the lack of housing options makes it hard to attract teachers. Not having a full staff in many buildings has also affected student success, and the district has worked to secure housing incentives to improve recruitment.

Parent liaisons brought more perspective on the needs of families they serve. It is estimated that 1 in 5 students do not live with parents and have other guardians. They also talked about the condition of the housing that students are living in, often unlivable. Students are often the ones running the household, which could mean the house is not being cared for as it should be. Families are facing many evictions, which contributes to a high amount of school transfers. Housing instability negatively impacts extended families that attempt to house family members, causing vicarious trauma, financial pressures, and more.

## H. Section 3

HUD's definition of Section 3 is:

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

The City of Rockford includes Section 3 information in its bid-package, and contractors must sign that they “will abide by and include in all subcontracts the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended.” There are then corresponding reporting forms for total hours worked, total hours worked by Section 3 employees, and Section 3 Business Utilization. This form is checked by the City’s Contract and Grant Compliance Office to ensure that it was indeed filled out and signed by contractors submitting bids and requests for payments.

The City of Rockford has reported the following efforts to ensure access to employment for low- and very low-income persons:

- The City's Health and Human Services division hosts one to two job fairs throughout the year, and regularly promotes connections to assist in seeking employment, such as resume help, preparing for interviews, finding job opportunities, and job placement services. Additionally, these case managers also work to connect residents with supportive services that can provide direct services or referrals. The City funds The Workforce Connection as a key partner in this work, and the Mayor serves as the Chair of the Elected Officials on the Board of Directors for the organization.
- In November of 2023, the City partnered with several community agencies to host our annual Government Purchasing Expo. This year's event focused also on startup and low-income business owners by providing various in-person resources to better equip businesses for submitting bids on government projects. Over thirty local agencies attended to provide technical assistance and resources ranging from permits and zoning requirements to legal resources and the construction trades. Over one hundred people attended the event and were able to be connected to these valuable resources.
- The City continues with its Business First Initiative, which provides aspiring entrepreneurs as well as new business owners with valuable knowledge about the legalities of owning a business. Over the course of 2023, aspiring and current business owners attended these meetings to learn about obtaining the correct permits, zoning requirements, and the health and safety matters related to owning a business. Additionally, as needed, referrals were made to the local Small Business Development Center (SBDC) and the Rockford Local Development Center (RLDC) for technical assistance. City staff attended various speaking engagements to promote Business First for aspiring entrepreneurs.
- The City has continued a strong partnership with the local organization, Think Big. This partnership focuses on Women and Minority Owned businesses, many of which qualify as Section 3 businesses. During 2023, this initiative held five classes that taught the basics of owning a business. Staff from the City taught the marketing portion of each series.
- On January 30, 2025, the City will be partnering with the above named partners and the Chicago HUD Field Office to host "Tightening Tool Belts: Building Connections and Increasing Compliance." The four hour workshop for contractors will educate them on Section 3 and work with them to understand compliance.

## Private Sector

### A. Real Estate Practices

The NorthWest Illinois Alliance of Realtors is a regionally based professional association whose members are governed by the National Association of Realtors (NAR) Code of Ethics, dedicated to fulfilling the member needs by providing public advocacy, technology, education and knowledge to enhance performance. Members of the Association are obligated to conduct themselves and their businesses in accordance with the Association's rules and regulations, Constitution and bylaws, as well as the Multiple Listing Service (MLS) rules and the Bylaws and Constitution of the NorthWest Illinois Alliance of Realtors and NAR. This Code of Ethics obligates

its members to maintain professional standards including efforts to affirmatively further fair housing.

Each year, the Illinois Association of Realtors recognizes the significance of the anniversary of the 1968 Fair Housing Act and reconfirms the Association's commitment to uphold fair housing laws as well as the commitment to offer equal professional service to all Illinois citizens in their search for real property. The Local, State and National Associations of REALTORS® have dedicated pages to Fair Housing. The NorthWest Illinois Alliance of REALTORS® has brochures, videos, policy studies, infographics, and other educational materials for members.

<https://northwestillinoisalliance.realtor/fair-housing/>

The Government Affairs Director from the Illinois REALTORS® that represents the NorthWest Illinois Alliance of REALTORS® was interviewed for this report. The Director mentioned that the lack of housing inventory and choice is a fair housing issue. Residents cannot choose to leave a bad situation, or try to move closer to work or school, because there are not affordable units available. When an affordable house comes on the market, it sells very quickly and for over asking price. It was also noted that financing a house can be hard to understand, and that more education is needed. The REALTORS® felt strongly about zoning code flexibility, and encouraged the City to open up discussions that would include more "gentle density".

#### B. Private Financing

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The HMDA data for the Rockford Metropolitan Statistical Area (MSA) is included in - summary reports from the National Community Reinvestment Coalition (NCRC). The reports show that most lenders in the area are extending credit to low-to-moderate income households, when compared to the percentage of loans to middle income households. However, it appears that Black or African-American and Hispanic households are paying higher interest rates and have higher closing costs. This is most likely because they are not receiving conventional loans, and instead of using Federal Housing Administration (FHA) loans. See Appendix A for the full report from NCRC.

Mortgage lenders that participated in our meetings indicated that credit can be harder to get from investors now, and that buyers have to be financially educated to make sure they are ready. They are said that while owning a home in Rockford can be more cost effective than renting, homebuyers are not ready to take on the property maintenance and rehab that many properties need. They suggested the City focus on acquisition/rehab programming to help first time homebuyers find properties that they can sustain.

### Citizen Participation

Citizen participation, outreach and engagement was an important component of the update to the 2025-2029 Consolidated Plan. Therefore, following the City's Citizen Participation Plan (included as an attachment), the City held four (4) public hearings, two (2) during September 2024 and two (2) during

December. The City exceeded the required thirty (30) day comment period by having all of the drafts available for review and comment from Wednesday, November 27, 2024 through Monday, December 30, 2024.

September Public Hearings were held on Wednesday, September 18, 2024 and Tuesday, September 24, 2024, both at 4 pm, at Crusader Community Health. Crusader is located at 1200 W State St, Rockford IL 61102 and is accessible to persons with disabilities. After a brief explanation of the Federal funding and recent City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032, community members were given an opportunity to provide their opinion of local housing, homeless, economic development, and community needs. Handouts included an agenda, survey questions, the eligible uses of CDBG, HOME, and ESG, and contact information for written and/or oral comments. In addition, Sarah Leys, Deputy Director, who facilitated the Public Hearings explained how to submit comments, and asked participants to reach out and invite her to participate in meetings, one on one conversations, etc. to discuss the needs within the community.

December Public Hearings were held on Thursday, December 5, 2024, one at noon and one at 5:30 pm. Both were held at Crusader Community Health. City staff plan to communicate details and request comments on the proposed Five-Year Consolidated Plan, 2025-2029 Annual Action Plan, and Analysis of Impediments to Fair Housing Choice.

City staff encouraged all to complete survey questions. These questions were not only answered one on one with staff members at the September public hearings, surveys were distributed through email distribution lists and were available on the City's website. In addition, survey questions were presented at planning focus group meetings and listening sessions held with a wide range of providers, citizens, advocacy groups, public and private agencies, and community leaders.

Planning Focus Group meetings and listening sessions were as follows:

- 9/12/2024 - Education and Disability Planning Focus Group Meeting
- 9/13/2024 - Health and Mental Health Planning Focus Group Meeting
- 9/18/2024 - Internal Planning Focus Group Meeting
- 9/19/2024 - Social Services Planning Focus Group Meeting
- 9/20/2024 - Internal Planning Focus Group Meeting
- 9/21/2024 - Neighborhood Planning Focus Group Meeting
- 9/24/2024 - Veteran and Senior Services Planning Focus Group Meeting
- 9/26/2024 - Economic Development Listening Session
- 9/27/2024 - Diverse Resident Supports Planning Focus Group Meeting and Economic Development Listening Session

The organizations that participated and their comments are as follows:

#### **EDUCATION AND DISABILITY FOCUS GROUP**

##### **Rock Valley College**

Significant lack of accessible, affordable housing; requirements for receiving support prevent access to programs; lack of understanding/education for those seeking accommodations. Barriers “pile on.”

### **RAMP Center for Independent Living**

Majority of clients served do not have physical disability but instead have emotional and intellectual disabilities, creating more barriers to access and a lot of transience. Wait lists for supportive services are years long, so children without services are missing school. Parents lose jobs as a result of children's needs, putting housing at risk. Repeated trauma increases issues.

### **Birth to Five Illinois**

Regional needs assessment found transportation is a top need; without it, parents cannot hold down a job while also getting children to school when they are a distance from each other. Divergent needs between parents and children create a "multi-level mess."

### **Rockford Public School District 205 (RPS205) Family and Community Engagement**

Estimates 20% of students do not live with parents resulting in significant instability. Much housing for RPS students is unlivable or families are evicted, while some students are running their households, creating more instability in education. Reliance on community to provide support to families, but competition for funding causes division and those supports are not there like they used to be.

### **RPS205 Bilingual Spanish Family Support**

Housing instability impacts extended family and creates vicarious trauma. Families are unable to take in unhoused family members or else risk bringing stress and trauma into their homes.

### **National Youth Advocate Program**

Support programs (skill building) for youth are insufficient; parents need similar support. Trauma and stress create untenable situations where parents cannot handle the youth and actually want them to return to Juvenile Justice to give parents a break. Children acting as heads of households prevents them from accessing supportive programming and/or attending school. Blight is rampant; housing unavailable for those who need it.

## **HEALTH AND MENTAL HEALTH FOCUS GROUP**

### **Tommy Corral Memorial Foundation**

Young adults struggling with mental health issues get kicked out of their homes. Rockford's only local shelter is not inclusive for LGBTQ+ folks and feels traumatic to others. Psychologically supportive services are needed for folks to create the mindset necessary to get and stay housed. We need true collaboration between providers across the community.

### **Stepping Stones**

Trying to provide more housing for folks who need a second chance, but zoning regulations create barriers and reduce financial feasibility of building. Resident bias against low income folks inhibits development of affordable housing.

### **Crisis Co-Response Team/Mobile Integrated Health**

Efforts to house homeless folks have not been able to fill the housing insecurity gap, much of which is related to a lack of mental health services available and issues within the system – a

failure to address root causes. There is need for an additional shelter in Rockford that is publicly funded and thus subject to regulations which prohibit discrimination.

#### **Rockford Regional Health Council**

The psychology of being homeless varies significantly from the psychology of home ownership. Unhoused folks need psychological support.

#### **Rosecrance**

Great need for emergency housing for larger families with 6-8 children. Even when hotel vouchers are available, it is merely a band-aid. Local Continuum of Care is collaborating more effectively lately, though it is still a challenge to work with folks who choose to be unhoused.

#### **National Alliance on Mental Illness (NAMI) Northern Illinois**

Systemic issues create a vicious cycle that prevents getting people housed; personal challenges exacerbate the issues. Supervised, supportive housing works!

#### **INTERNAL PLANNING FOCUS GROUP MEETING**

##### **Mayor's Office of Domestic and Community Violence**

One of the major reasons victims stay with their abusers is a lack of crisis housing. Federal requirements to qualify for supportive funds prevent obtaining. Survivor trauma prohibits placement in a regular shelter. Need safe, affordable housing with supportive, holistic services, similar to Mary Parish Center in Nashville.

##### **Health and Human Services Community Services Division**

Local housing authorities have razed buildings; now people who must be relocated compete with others in need to find affordable housing. This is a significant segment of our population. Due to such competition for housing, landlords have raised rent and other requirements significantly, creating greater barriers. Need to incentivize students going into mental health fields.

##### **Community and Economic Development Neighborhood Standards/Blight Reduction**

Buildings become unsafe and must be condemned, but there is nowhere for those residents to go and some will remain in the unsafe home in awful living conditions. People being released from incarceration are sent here by Department of Corrections, competing for housing and services. Hoarding creates additional challenges. If mental health issues are not addressed, creates a vicious cycle.

##### **Community and Economic Development Neighborhood Division**

Local Housing Authority offers 125% of fair market rent in order to get landlords to accept their vouchers, driving up rent in general. Challenge of creating effective systems when City does not have capacity; need an external organization to step up and develop/own certain programming. Even if we were to have a large infusion of cash, it would be needed to fund more supportive services rather than a facility.

##### **Fire Department Mobile Integrated Health**

People who need support but do not have a case manager struggle to maintain placement in housing without help until they are able to stand on their own two feet. Also need more mental

health follow through. Developmental disability can disqualify people. We also have people being sent to Rockford from Elgin and McHenry mental health facilities but with the shelter full, they end up with nowhere to go. Individual autonomy means many people refuse medication and other mental health support. Even if there were funding for a facility, staff shortage in mental health prevents successful implementation.

#### **Community and Economic Development Zoning**

City council can stand in the way of needed developments, so staff needs to work with council members to create understanding.

#### **SOCIAL SERVICES FOCUS GROUP**

##### **Northern Illinois Food Bank**

Language barriers prevent residents from reaching out for help. Services are not located in the areas in which people most need them.

##### **Winnebago County 17<sup>th</sup> Judicial Circuit Court Family Violence Coordinating Council**

Survivors afraid to leave domestic violence situations because they have nowhere to go. Difficult to access housing with a criminal record, and even survivors often have a criminal history. Situations are always highly complex. People don't trust in systems, but that is how our supports are set up. Some private support, such as from churches, can be conditional or just disappear. The development of life skills is crucial as well as healing from trauma. Money for housing is not enough; need education as well. Supports are needed beyond the traditional 8 to 5.

##### **Remedies Renewing Lives**

Survivors staying in shelter much longer than once did (months at a time) due to lack of housing. Language barriers and high numbers of children in families can create barriers even when Remedies finds prospective housing. Evictions are a big issue as well since following legal process to break lease is not timely. Fully supportive transitional housing program does not have near enough capacity. There is reluctance and fear among landlords regarding renting to survivors. Transportation is a significant issue. Trying to get a better job through education can be difficult when it overlaps with current work hours.

##### **Goodwill Industries of Northern Illinois Pathway Home program**

So many issues add up to create insurmountable barriers: backgrounds, waitlists, application fees and processes, credit score, evictions, literacy, insufficient documentation, substance/alcohol abuse, mental illness. Returning to same home after incarceration puts people right back in the fray, but they have no other housing options. All of the issues are complex and nuanced. Transportation is especially an issue for nontraditional work hours.

#### **Mile Square LP Johnson Center**

Issues with taking medication prevents mental stability; patients unable to remain on path to achieve their goals. Too often run out of options and hit dead ends in pursuit of offering assistance to folks.

#### **Illinois Department of Children and Family Services (DCFS) Resource and Recruitment Services**

Spanish speakers often unaware that they have rights as renters. There is inadequate food access, including proximity to grocery stores as well as food prices. There are always waitlists when referring people for service. People lose their benefits due to background checks and abusive partners. Need shelters that can house larger families, especially since the trend is for families to stay much longer. Even when support programs are offered, people refuse them. It can be scary and dangerous for personnel to go into these homes.

#### **INTERNAL PLANNING FOCUS GROUP 9/20/2024**

##### **Family Peace Center**

Health and Human Services is overwhelmed with the need for housing placement. Affordable housing is extremely difficult to find. Even when receive financial assistance from the City, finding a place to rent is a challenge, especially with an eviction on their record. People do not know their rights and are taken advantage of. Prairie State Legal is not able to help as much as is needed. Need more transitional housing. Shelters are full; survivors need independent space with direct case management. Relationship and trust building is key. Successful folks are those who have had long-term support – sometimes years. Homelessness prevention is also needed.

##### **Rockford Police Department**

Significant need for managed housing units, including for crisis housing and for unhoused individuals who don't want to be housed. Especially important to address the mental health crisis and to connect people to resources. Pets are an important issue! Need housing that accepts them. Mental health facilities can be helpful, but in the past those who have gotten out of one could become even more violent since they were so heavily medicated while in treatment.

#### **LEWIS LEMON NEIGHBORHOOD RESIDENT FOCUS GROUP**

Barriers to fair housing often related to criminal record, employment, credit scores. It becomes a vicious cycle. Landlords use intimidation to avoid following processes and do not seem to be held accountable, but people believe they have no choice but to accept poor living conditions. Many live out of state and are not invested in our community. Rules that do not align with people's lifestyles can lead to eviction. Young mothers are at risk, needing housing as well as trusted adult to help raise their children while supporting their continued growth as well. Gun violence/deaths are a constant issue.

#### **LINCOLNWOOD ESTATES NEIGHBORHOOD PLANNING FOCUS GROUP**

Childcare is needed in proximity to home or jobs; need availability for all shifts. Strong neighborhood associations should receive funds to connect residents to services through relationship building, including a need for greater re-entry support and fatherhood programs. This would help with the current lack of awareness/communication that prevents residents from connecting to services. More first-time homebuyer and housing rehab programs needed;

programs currently offered are too limited, including lack of psychological/emotional accessibility.

## **VETERAN AND SENIOR SERVICES FOCUS GROUP**

### **Veterans Drop-In Center**

Veterans are older than the general population. Vietnam Vets are the ones needing most services right now. Rockford does not have a lot of in-home services for vets, which could help prevent them from going to a facility. And there is not assistance for those getting close to eviction. Substance abuse impacts maintaining housing when money goes to addiction instead of rent. People on the street have no options with the shelter full, plus service dogs are not allowed in.

### **Department of Veteran Affairs (VA)**

VA has been able to incentivize landlords to take a chance on vets who are often difficult to house – relationship between VA and landlords helps with communication and finding support before eviction process is begun. More patience and flexibility is needed to house such vets. Hard to find housing with voucher limits on rent. Extremely helpful when vets are offered on-site services and support. Difficult for them to navigate turnover in support positions; they need a trusting relationship in order to access services. Traditionally we dislike “slumlords” but they are ones who will put up with rough behavior and damage caused, so VA relies on them to provide housing for vets who are otherwise unable to be housed. Mental health and behaviors cause many vets to burn bridges with family. Not enough services exist to support such tough cases. Bedbug infestations are also an issue but often unreported due to fear of impact on housing. Money exists to help pay certain deposits, but not pet deposits.

### **University of Wisconsin Health (UW Health) Home Health Care in Northern Illinois**

Significant issue with older housing in Rockford not being ADA accessible, which causes many seniors to be stuck in their homes. Concerns about money prevent people from getting supportive in-home services or moving into a supportive housing environment.

## **ECONOMIC DEVELOPMENT LISTENING SESSIONS**

### **Accelerating Creatives & Entrepreneurs (ACE)**

Need to market support agencies so aspiring entrepreneurs know that agencies exist. 3 D printers are a concern to businesses. Funding needs to be made simple. For the livelihood of Rockford businesses, community members need to have disposable income to spend.

### **Rock Valley College Small Business Development Center**

Provide supports in multiple languages such as Arab, Spanish, English and Swahili and forms such as recordings and videos. Provide funding for long-term programming, lenders speaking multiple languages, and collaborative projects. Access to funding is impactful to the livelihood of Rockford businesses.

### **Rockford Local Development Corporation**

The City promoting the development, redevelopment, and revitalization of vacant & underutilized sites is imperative to succeeding at job creation, retention, and job training goals. Redeveloping can help bring in manufacturers looking to expand with government capital

programs. The City needs to coordinate with local partners, state officials and representatives in Congress to create this network/feed-back loop of enticing redevelopment in vacant sites, improving the curb appeals and perception of Rockford, which will bring in developers, ultimately leading to well paying, union or skilled labor, and more money being spent in local businesses. Currently there are language, education, and financial barriers. Continue consulting, training, and coaching. Continue investing in the children to improve education outcomes and incentivize higher education (whether through trades, apprenticeships, associates degrees, or 4-year college degrees). Invest in more infrastructure projects on the West side of the river to improve the perception of neighborhoods, improve property values, hopefully breaking stigma that keeps restaurants and highest-earners reserved to businesses east of Alpine. Increase capital investment on revolving loan funds, including funds for green energy projects.

#### **Rockford Regional Hispanic Chamber of Commerce**

One of the biggest barriers is limited access to mentorship and business guidance, especially for underserved groups like the Latino community, which has steady growth but lacks sufficient resources. Need to provide targeted technical assistance, with a focus on emerging markets. Shift the regional mindset from solely bringing manufacturing to embracing diversification, including the integration of AI and emerging technologies. There is a lack of stable workforce, increase of overhead expenses, and lack of funding opportunities for small businesses.

#### **SWIFTT Community**

Need workforce development and resources that are easily accessible. Use videos/tutorials of guidelines for services. Funding is a barrier to businesses. Need long-term consistent programming, for all stages of a business.

#### **DIVERSE RESIDENT SUPPORTS FOCUS GROUP**

##### **Brooke Road United Methodist Church**

Need for mental health care. Barriers to utilizing the shelter, including being banned. Sees lots of multi-generational housing, with challenges that prevent kids from being in school. Tenants need to be educated on their rights.

##### **Rockford Regional Hispanic Chamber of Commerce**

Crime and business challenges have a great impact. Latino residents are uncertain of where to turn for help, so they need Latino leaders to act as go-between. And the Latino community does not complain until something has already happened.

##### **Retired Teacher / Community Advocate**

Insecure housing and student mobility negatively impact academic success. The City does not seem to be addressing the housing problems, and the community is not calling it out.

Underlying issues are not being addressed. Outside investors are a problem. Should talk about cooperative housing and providing support through historic tax credits and such. Why doesn't the City of Rockford want to own housing?

##### **Liam Foundation**

Members of the LGBTQ+ community have had to travel elsewhere to get services. They are discriminated against at the local shelter, so getting housing can be humiliating, plus it requires wraparound services. We need crisis and transitional housing, with a shelter that is fully inclusive of folks with disabilities, men with children, families.

#### **Stateline Real Estate LLC**

Families can be evicted due to situations they can't control, such as behavior disorders in children for which they have no support. Leases are overwhelming and tenants don't understand everything. Insurance has increased for property owners, so rent has gone up. Low paying jobs don't cover high rents. People do not know that they need to report issues, which can result in damage to building and trigger evictions. Migrants cannot be housed because they cannot be background checked. Mental health issues impact renter stability, but emotional support animals are not easy to take in since animals can cause so much damage. When people have not experienced living better, they do not understand upkeep and can be negligent, but folks on Section 8 cannot be inspected more than every 6 months, so issues can get out of control before they are recognized. Legal constraints prevent meeting the needs of some people; great challenge to balance the needs of the landlord with the needs of the tenants.

#### **House of God Church**

Cultural differences can create a gap in understanding, leading to behaviors that are problematic. Education is needed. Residents need additional housing options, and churches can help fill that gap. So many have issues such as break ins for those who live in affordable housing.

#### **Catholic Charities Refugee Resettlement Program**

Need landlords who are willing to ready an apartment and hold it without a lease pre-signed, but tenants must sign their own, and often refugees' date of arrival is unpredictable. Some organizations can take on the liability of signing the lease, but Catholic Charities cannot. Refugees may not know how to use things in the home. Others are in shock at having to live on the limited resources they are provided when they lived a better life in their home country. Communication is problematic and prevents them from getting the support they need. Landlords take advantage by charging high rents. Transportation is a significant issue, which impacts employment, which is extremely difficult to obtain as it is. Waiting list for ESL classes at Rock Valley College, and language barriers create more issues.

The City is a recipient of Technical Assistance from HUD from Thriving Communities program. As part of this TA, a Public Sector Work Group, consisting of Rockford Housing Authority and Region 1 Planning Council, met throughout the year to discuss housing issues and how to coordinate our planning efforts and data collection. Additionally, a Community Based Organization Group met a couple times to talk about housing needs and how the City could look to address them. Those organizations are Rockford Area Habitat for Humanity, Zion Development, Illinois REALTORS ©, ©, I Bike Rockford, Studio GWA, Midland States Bank, YWCA of Northwest Illinois, Harmony Realtors, Winnebago County Housing Authority, Rockford Apartment Association, Rockford Community Investment Fund, and RAMP CIL.

#### **Public Hearing Survey Results:**

Question	Options/Results
<p>If an organization accepts federal funding, they have to work with all protected classes in the services they provide. If an organization is privately funded, they can limit their services to certain populations and do not have to serve all protected classes. Knowing that Rockford has a mix of privately and federally funded programs, which of the protected classes (listed below) do you believe needs more resources and services made available to it, in order to adequately address current needs? CHOOSE THREE (3)</p>	<p>Source of Income- 18%      Race – 17%      Age – 16%      Familial Status – 11%      Disability – 9%      Color – 7%      National origin/Home Country- 6%      Sex – 4%      Protective Order Status – 4%      Ancestry – 3%      Military – 2%      Military Discharge Status – 2%      Religion – 1%      Sexual Orientation – 0%</p>
<p>When thinking about what our residents understand about their rights and responsibilities, what free education would you like to see available to our Rockford residents? CHOOSE THREE (3)</p>	<p>Homeowner maintenance – 18%      The home buying process – 16%      Debt reduction – 14%      Credit repair – 13%      Financial Literacy – 12%      Renters' Rights – 10%      Homeowner investment protection – 8%      Eviction Protection – 5%      Estate planning for families – 4%</p>
<p>The Northern Illinois Homeless Coalition has been working as a Built for Zero community, and works with populations to achieve “functional zero” for differing homeless populations. Having already met their benchmarks for veterans and chronically homeless folks, they are now setting goals for youth, singles and families. Knowing this priority, which of these three populations would you want them to prioritize in developing new housing options? CHOOSE ONE (1)</p>	<p>Families – 54%      Singles – 25%      Youth – 21%</p>
<p>Are there other services you would like to see for the population you choose above? Please write your answer on a sticky note.</p>	<ul style="list-style-type: none"> <li>• Foster Care, youth aging out</li> <li>• Echo the aging out of foster care</li> <li>• Mental health, substance abuse treatment</li> <li>• Financial literacy</li> <li>• Hand on job skills training</li> <li>• Programs for migrants</li> <li>• Childcare, healthy food options, parental monitoring</li> <li>• Community involvement initiatives, pride and cultural consistency</li> <li>• Supportive housing with 24 hour supervision</li> <li>• Case management for new arrivals</li> </ul>

	<ul style="list-style-type: none"> <li>•Time and connection together and with your neighbors</li> </ul>
When building new housing, what audience would you prioritize? CHOOSE TWO (2)	First-time homebuyers – 25% Families – 22% People with low credit scores – 15% Seniors – 14% People with disabilities – 10% Supportive Housing for Homeless – 9% People using Section 8 Housing Choice Vouchers – 5%
Which of the following community services do you think should be prioritized for our community? CHOOSE TWO (2)	Mental Health Services – 26% Children/Youth Services – 17% Senior Services – 11% Healthcare Services – 9% Financial Crisis Services – 9% Services for People with Disabilities – 8% Services for People with Justice System Experience- 7% Services for victims of domestic violence – 5% Substance Abuse Services – 3% Shelters – 2% Services for Immigrants, Refugees and Non-English Speakers – 2%
Which of the business and job opportunity issues below do you think needs to be prioritized? CHOOSE ONE (1)	Support for Businesses that Serve Community Needs – 37% Increase Access to Small Business Grants or Loans – 24% Job Readiness and Retention – 19% Coaching and Technical Advice for Small Businesses – 10% Commercial Building Rehabilitation – 10%
Of these potential funding categories, which would you say are the top priorities? CHOOSE THREE (3)	Housing Rehabilitation – 23% Housing Development – 20% Community Improvements – streets – 18% Economic Development – 15% Supportive funding for non-profits – 12% Community Improvements – blight removal – 8% ADA improvements to Public Buildings – 4%

## **Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction**

It is clear from the Analysis that the City of Rockford and its Public and Private partners care about the fair housing issues faced by our residents. There is a network of organizations that bring services to the community who are advocating for resources and improvements, and willing to continue to do so. The City of Rockford initiated many great programs over the last four years, and has taken seriously its responsibility to think creatively about how to address housing needs in our area.

Throughout this documents, notes were made about what activities need to happen in the next five years to improve our Fair Housing Programs and Activities. These notes include:

- Invest in the west and south side of the City to bring housing choice and improvements to these areas,
- Create housing opportunity for our minority populations currently facing discrimination
- Address senior and people with disabilities' housing concerns which include condition of units, availability of units, and ability to access services and transportation.
- Address housing needs of very low and low income households who are experiencing one or more Housing Problems.
- Continue to connect residents to job training and workforce development programs to improve our unemployment rate.
- Continue to creatively address educational attainment goals
- Investigate race discrimination issues in the rental community
- Increase the number of affordable units and rehab current affordable units, including RHA properties
- Support direct training to landlords and renters on rights and responsibilities
- Support financial literacy and homebuyer education
- Determine if any zoning adjustments need to be made for more affordable housing production, including opportunity to increase density
- Align development with transportation improvements from RMTD
- Work with Rockford Public School district to understand needs of students that are not stably housed or needs of students who are running their household so that we can address any education or fair housing issues
- Operate with the understanding that the lack of inventory and housing choice is a fair housing issue
- Increase opportunity for acquisition/rehab funding to help first-time homebuyers find properties they can sustain
- Consistent case management that continues over longer periods of time would help those with mental health and disabilities stay housed
- Develop an inclusive emergency shelter that also allows service animals

## Conclusions and Recommendations

The City of Rockford's FY 2025-2029 Analysis of Impediments to Fair Housing Choice has identified the following impediments and actions to be taken to address these impediments:

- **Impediment 1: Fair Housing Education and Outreach.** There is a need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities and the disabled population who fear retaliation if they lodge a complaint.

**Goal:** The public in general and local officials will become knowledgeable and aware of the Fair Housing Act, related laws regulations, and requirements to affirmatively further fair housing in the City. In addition, the City will support fair housing testing, which will identify and investigate illegal housing discrimination.

### Strategies:

1-A: Promote Fair Housing awareness through media, seminars, testing, and training to provide educational opportunities for all persons to learn more about their rights under the Fair Housing Act and the Americans with Disabilities Act

1-B: Provide literature and informational material concerning fair housing issues, an individual's housing rights, and landlord's responsibilities to affirmatively further fair housing.

1-C: Promote housing choice so residents with the same financial means may choose to live anywhere in the City, using media and seminars to educate tenants and landlords on Section 8 vouchers and source of income discrimination.

1-D: Provide fair housing education and outreach to seniors and people with disabilities to address fear of reporting housing and code violations.

1-E: Promote and advocate for fair housing testing.

- **Impediment 2: Need for Decent, Safe, and Affordable Rental Housing.** The City of Rockford does not have a sufficient supply of rental housing that is decent, safe, and sound. In many cases, landlords often do not maintain their property to code standards which results in unsafe living conditions for tenants. However, the monthly cost of rent for apartments has steadily increased due to the limited supply of rental housing, despite the condition of the rental unit.

**Goal:** Increase the supply of affordable rental housing in the City of Rockford, through new construction, adaptive reuse of commercial and industrial buildings, preservation of existing structures with affordable unit set-asides, and the development of mixed-income buildings.

### Strategies:

2-A: Support and advocate for both private developers and non-profit housing providers to develop and construct new affordable, mixed income, and middle income rental housing throughout the City of Rockford.

2-B: Support and advocate for both private developers and non-profit housing providers to develop and construct new affordable, mixed income, and middle income rental in vacant commercial and industrial structures.

2-C: Support and advocate for both private landlords and non-profit housing providers to rehabilitate existing housing units in the City to create decent, safe and sound rental housing that is affordable to lower income households.

• **Impediment 3: Lack of Affordable Homeownership Opportunities.** Referencing Census data, the population of Rockford has remained relatively stable between 2010 and 2020 decreasing by about 4,200 people or -3%. However, the population is projected to increase due to regional growth factors mainly related to current and planned job growth. Therefore, it is expected that the number of new dwelling units needed to handle this growth is between 3,200 and 9,100 units by the year 2032. Renter-occupied units have increased from 39.5 percent in 2010 to 45.8 percent in 2019. In contrast, owner-occupied units have decreased from 60.5 percent in 2010 to 54.2 percent in 2019.

Today the biggest issue facing affordable home ownership opportunities are availability and cost. In 10 years, the average price of a home in the Rockford area has more than doubled. An average home in Rockford would cost you just over \$88,000 in 2014 while in June of 2023 the same home on average would cost just over \$198,000. As of June 2024, the median price of a home in Rockford was \$155,377, a 17.9% increase from the previous year.

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

**Strategies:**

3-A: Support and advocate for both private developers and non-profit housing providers to develop and construct new affordable housing that is for-sale

3-B: Support and advocate for the acquisition, rehabilitation and resale of existing housing unites to become decent, safe and sound.

3-C: Support and provide funds for down payment assistance to lower-income households to become homeowners

3-4: Support homebuyer education and training programs to improve homebuyer awareness and increase the opportunities for lower-income households to become homebuyers.

• **Impediment 4: Need for Accessible Housing Units That Are For-Sale or Rent.** There is a lack of accessible housing units in the City of Rockford. Most of the existing housing units do not have accessible features. The City's disabled population has grown to 15.5% of the total population.

**Goal:** Increase the number of accessible housing units through new construction and rehabilitation of existing housing units for disability needs.

**Strategies:**

4-A: Support home rehabilitation programs that financially assist seniors and people with disabilities to provide a safe and accessible home.

4-B: Support and encourage the development of accessible housing units in the City of Rockford.

4-C: Enforce the ADA and Fair Housing requirements for landlords to make “reasonable accommodations” to their rental properties so they become accessible to tenants with disabilities.

• **Impediment 5: Economic Issues that affect Fair Housing Choice.** There is a lack of economic opportunities in the City which prevent low-income households from improving their income and ability to live outside areas with concentrations of low-income households, which makes this a fair housing concern.

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

**Strategies:**

5-A: Support and enhance workforce development and skills training that result in a “livable wage” and increases job opportunities.

5-B: Continue to provide support, education, and technical assistance opportunities to minority, women owned and small businesses.

5-C: Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities.

5-D: Support and encourage efforts for improvements in public transportation options in the City to allow for employees to access housing of choice without worry of getting to work.

5-E: Support and encourage private and non-profit developers and businesses to provide assets (grocery stores, services, etc.) in low-to-moderate income neighborhoods.

## Approval

The City of Rockford approved the FY 2025-2029 Analysis of Impediments to Fair Housing Choice at its regular City Council meeting on \_\_\_\_\_, 2025.

## Appendix A

### Fair Lending Report from the National Community Reinvestment Coalition

DRAFT

# FAIR LENDING TOOL

DEVELOPED BY THE NCRC RESEARCH TEAM

CHOOSE METRO OR STATES & COUNTIES THEN PRESS "NEXT"

Metro  
Rockford, IL

State  
Illinois

County  
All

NEXT PAGE

## INSTRUCTIONS:

- Choose a metro area, state, or county combination on this page. These choices will determine what information you see on the following pages.
- Click the arrow labeled "next page" to advance to the table of contents.
- On each page of this report, buttons are at the top to control moving forward to the next page, going back to a previous page, or returning to the table of contents.

*Hover your cursor over data throughout this report for more detailed information.*

# Demographic Profile



Source: U.S. Census 2015 5-Year American Community Survey  
 Hispanic people may be of any race. Other races are all non-Hispanic.

**Majority Minority:** A neighborhood where less than 50% of the population is a non-Hispanic White.  
**Low or moderate income:** A neighborhood where the median family income (MFI) is 80% or less of the MFI in that metro area.

**344K**

PEOPLE

**83**

NEIGHBORHOODS

**\$63,600**

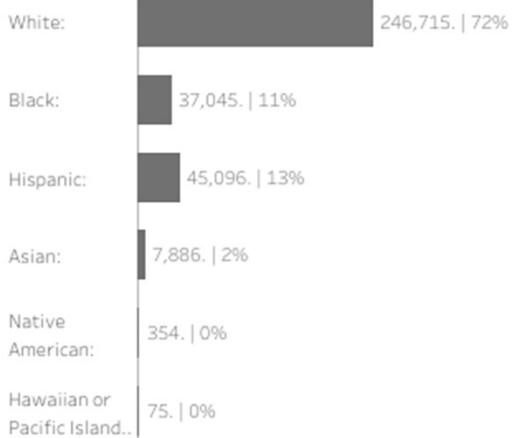
MEDIAN FAMILY INCOME

**\$50,880**

LMI INCOME THRESHOLD

## AREA POPULATION

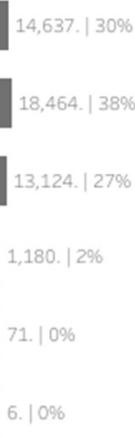
344,290



## DEMOGRAPHICS BY NEIGHBORHOOD RACE

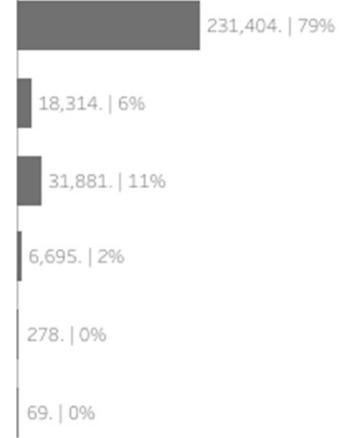
### MAJORITY MINORITY

49,014



### MAJORITY WHITE

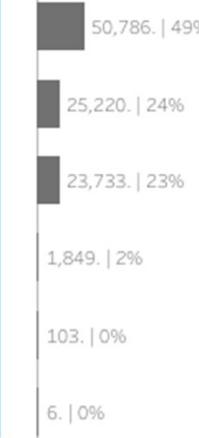
294,175



## DEMOGRAPHICS BY NEIGHBORHOOD INCOME

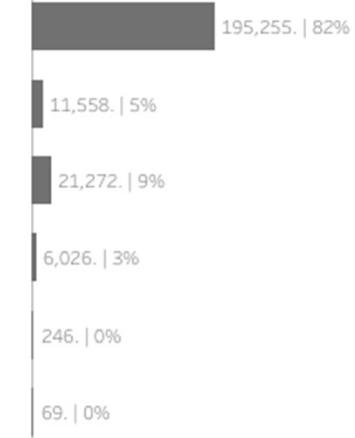
### LOW OR MODERATE

104,404



### MIDDLE OR UPPER

238,785



# Neighborhood Lending 2018-2020



Hover over the data below for more information.

These charts compare mortgage lending with the percent of the population that lives in LMI or majority-minority neighborhoods.

**Home Purchase** - A loan used to purchase a property.

**Refinance** - A loan used to refinance a property.

**Cash Out Refi** - A refinance loan that allows the borrower to access equity in the form of cash.

**Home Improvement** - A second mortgage used to finance repairs or upgrades to the property.

**Home Equity** - A second mortgage used to finance activities others than home repairs.

**Neighborhood**: Census Tract

## LMI NEIGHBORHOOD POPULATION

**104K**  
TOTAL PERSONS

**24K**  
TOTAL FAMILIES

**27%**  
PERCENT OF FAMILIES

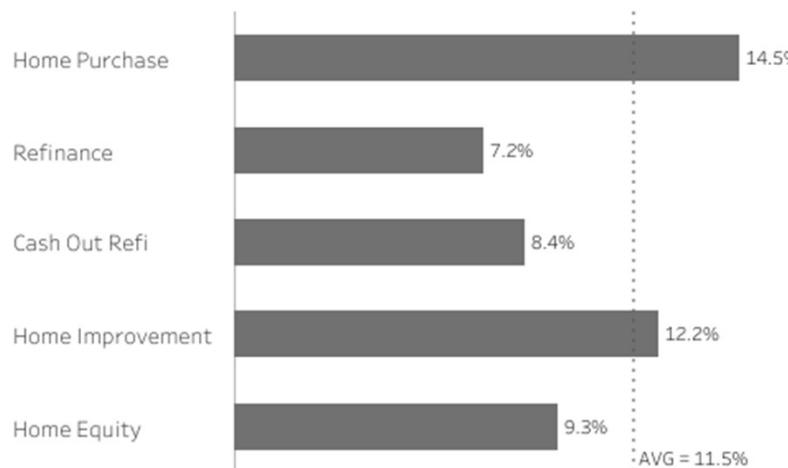
## MAJORITY MINORITY NEIGHBORHOOD POPULATION

**49K**  
TOTAL PERSONS

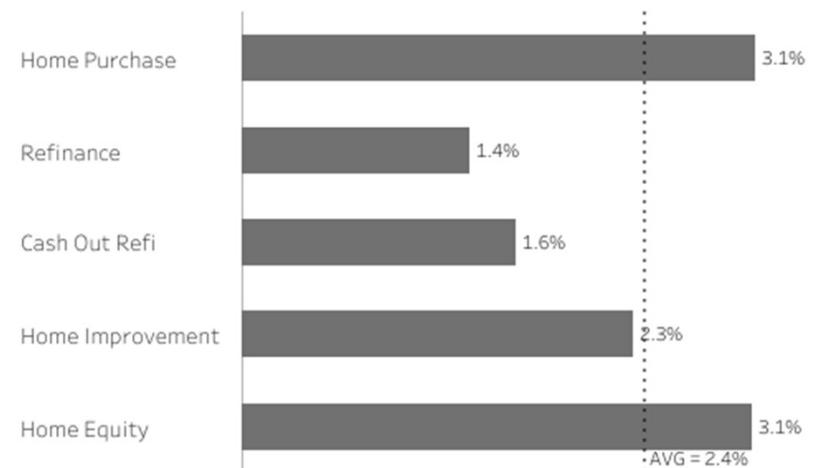
**11K**  
TOTAL FAMILIES

**13%**  
PERCENT OF FAMILIES

### PERCENT OF LOANS IN LMI NEIGHBORHOODS



### PERCENT OF LOANS MAJORITY MINORITY NEIGHBORHOODS



# Mortgage Overview



Total number of loans (and percentage as a share of all loans) by year and purpose.

**Home Purchase** - A loan used to purchase a property.

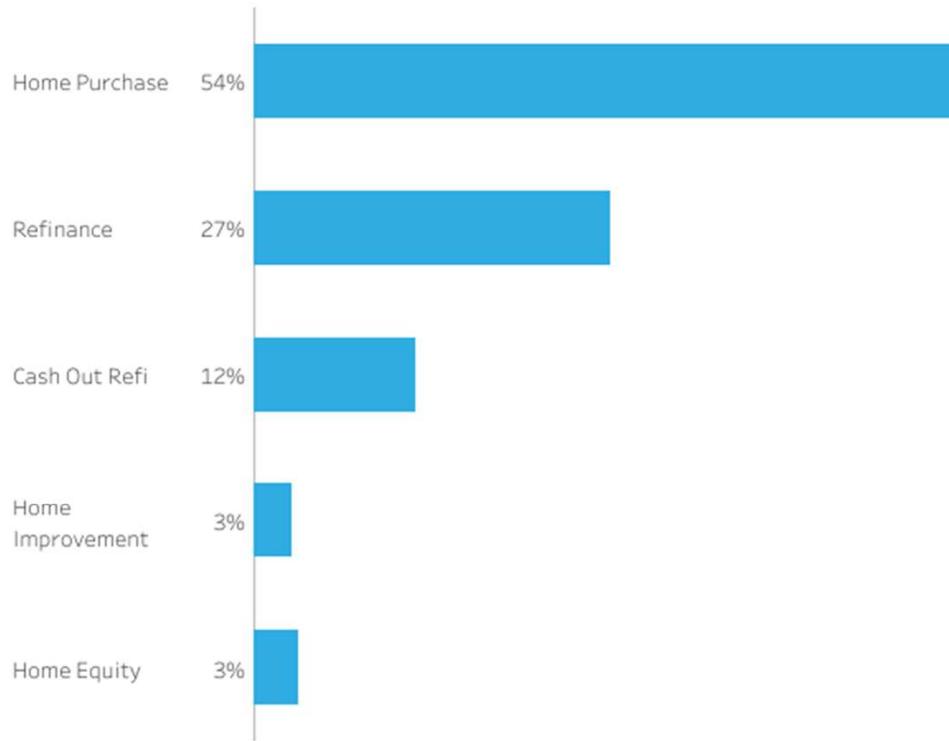
**Refinance** - A loan used to refinance a property.

**Cash Out Refi** - A refinance loan that allows the borrower to access equity in the form of cash.

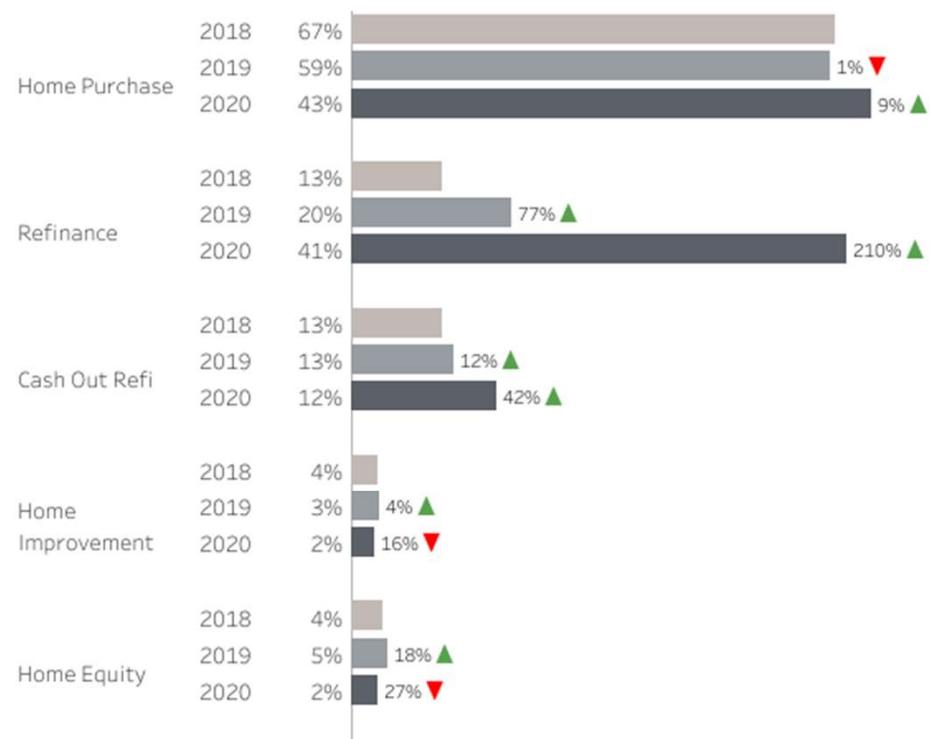
**Home Improvement** - A second mortgage used to finance repairs or upgrades to the property.

**Home Equity** - A second mortgage used to finance activities others than home repairs.

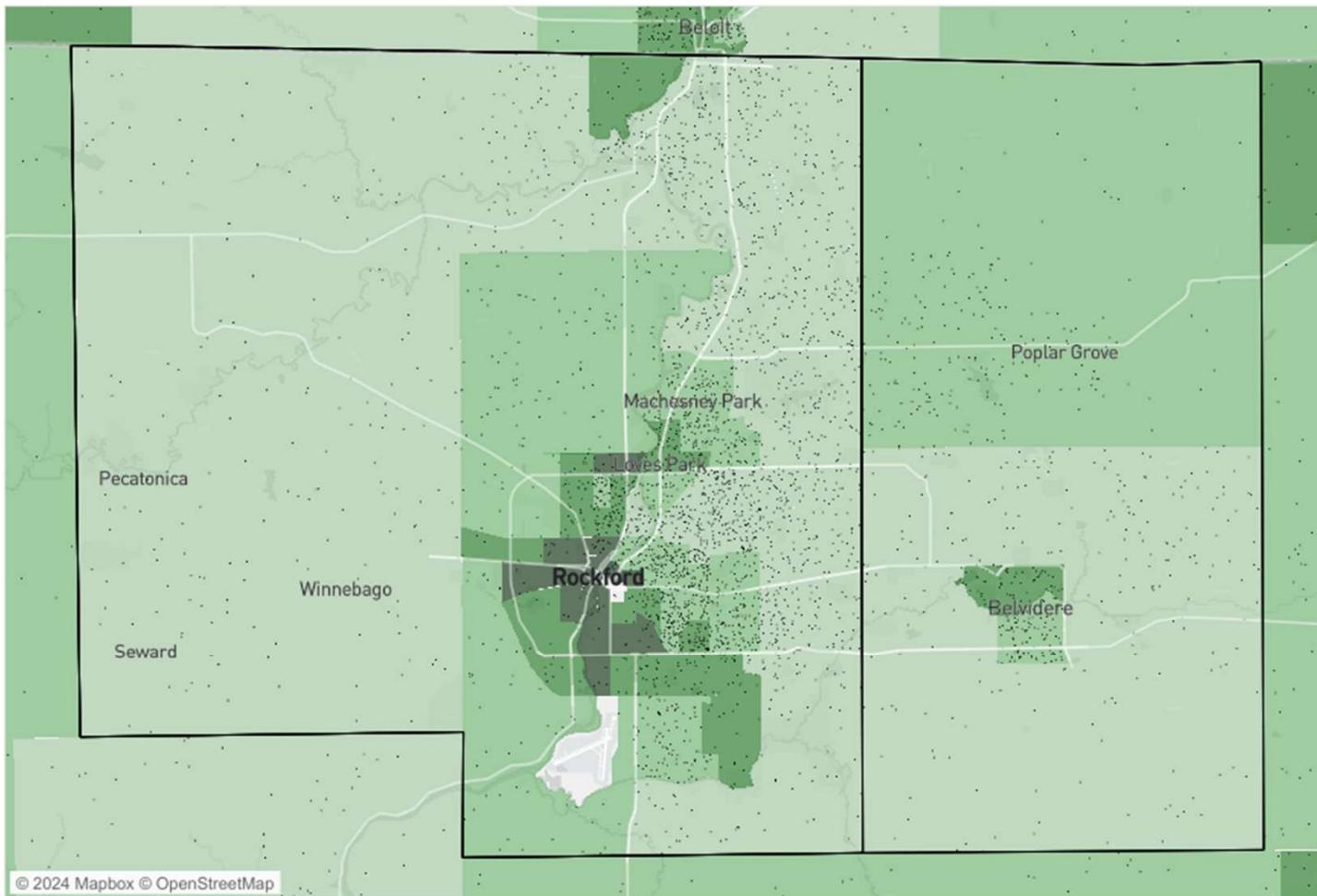
**TOTAL LENDING (2018 - 2020)**



**YEARLY COMPARISON**



# Mortgages by Neighborhood Income

[Lending by Race](#)

Home Purchase Lending 2018-2020

**Map instructions:** This map shows mortgage loans at the census tract level compared with the median family income for each census tract.

Each dot is randomly placed within the census tract, and represents a single home purchase mortgage loan origination.

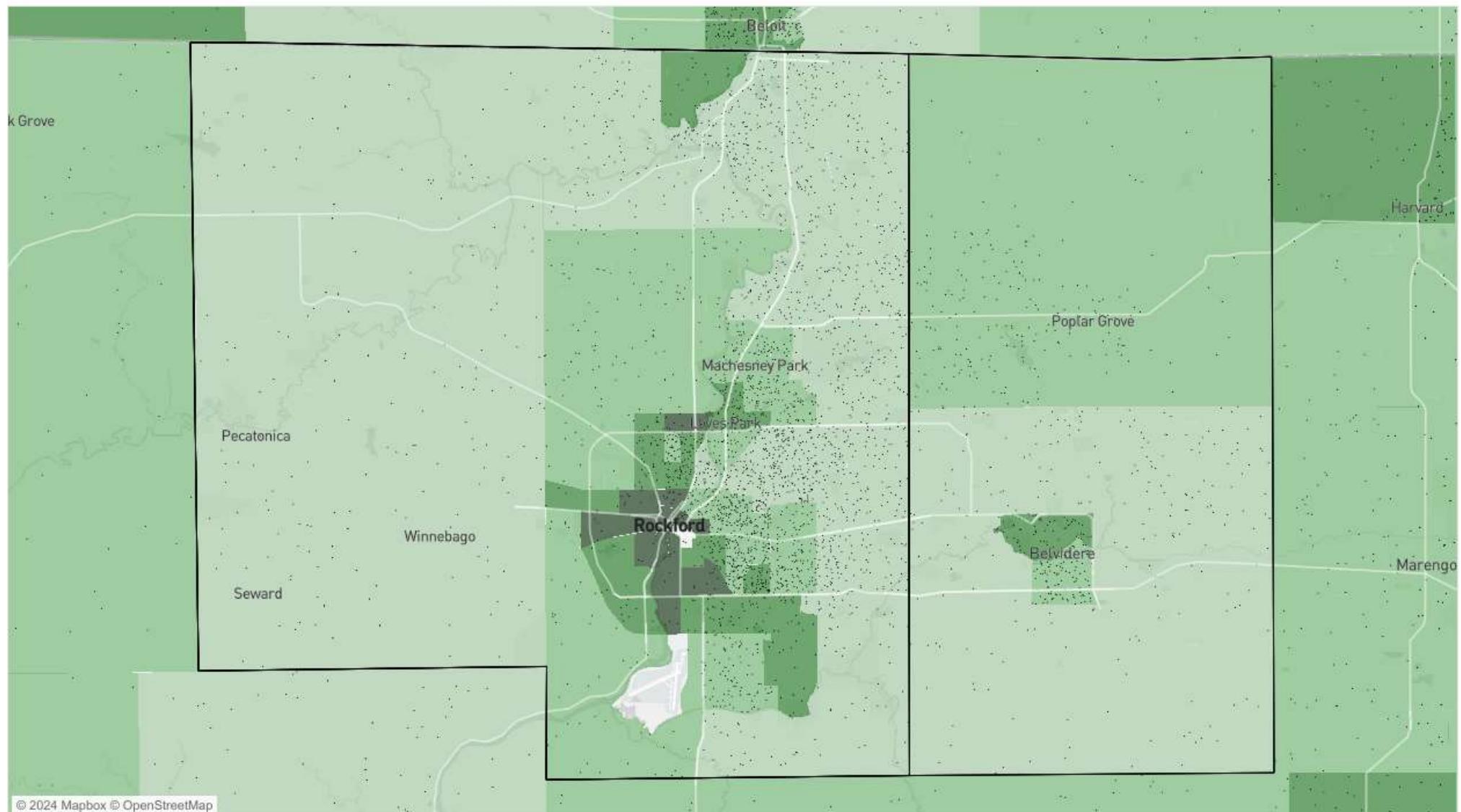
Use the map controls in the upper left corner to move the map and zoom in or out. Or use your mouse to control the map.

Zoom in to learn more about an area.

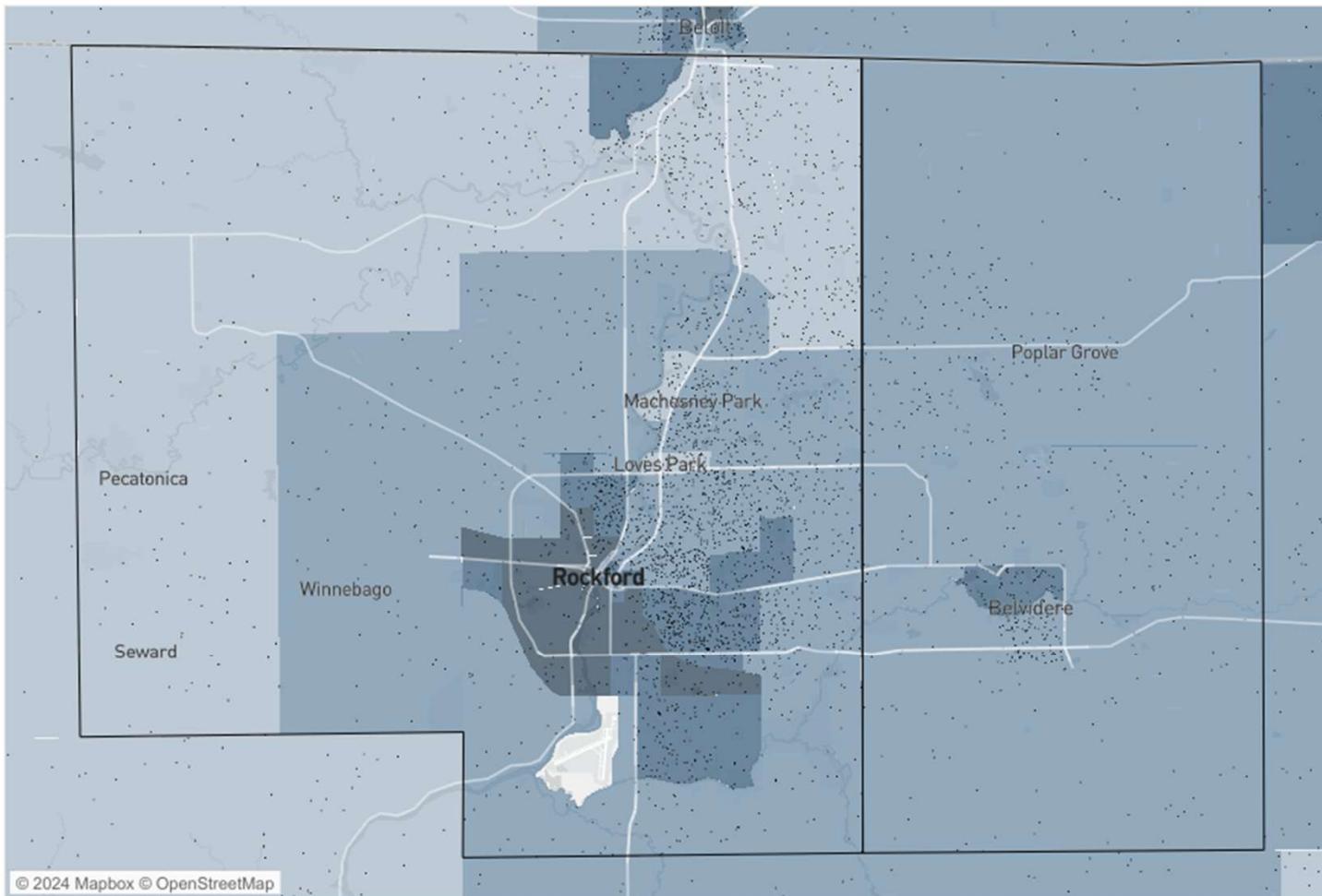
## Neighborhood Income Level

Low-Income	
Moderate-Income	
Middle-Income	
Upper-Income	

## Income HMDA



# Mortgages by Neighborhood Race

[Lending by Income](#)

Home Purchase Lending 2018-2020

**Map instructions:** This map shows mortgage loans at the census tract level compared with the percentage of minority residents in each census tract.

Each dot is randomly placed within the census tract, and represents a single home purchase mortgage loan origination.

Use the map controls in the upper left corner to move the map and zoom in or out. Or use your mouse to control the map.

Zoom in to learn more about an area.

## Neighborhood Minority Population

< 10%	
10.01 - 25%	
25.01 - 50%	
50.01 - 100%	

# Top Mortgage Lenders 2018-2020

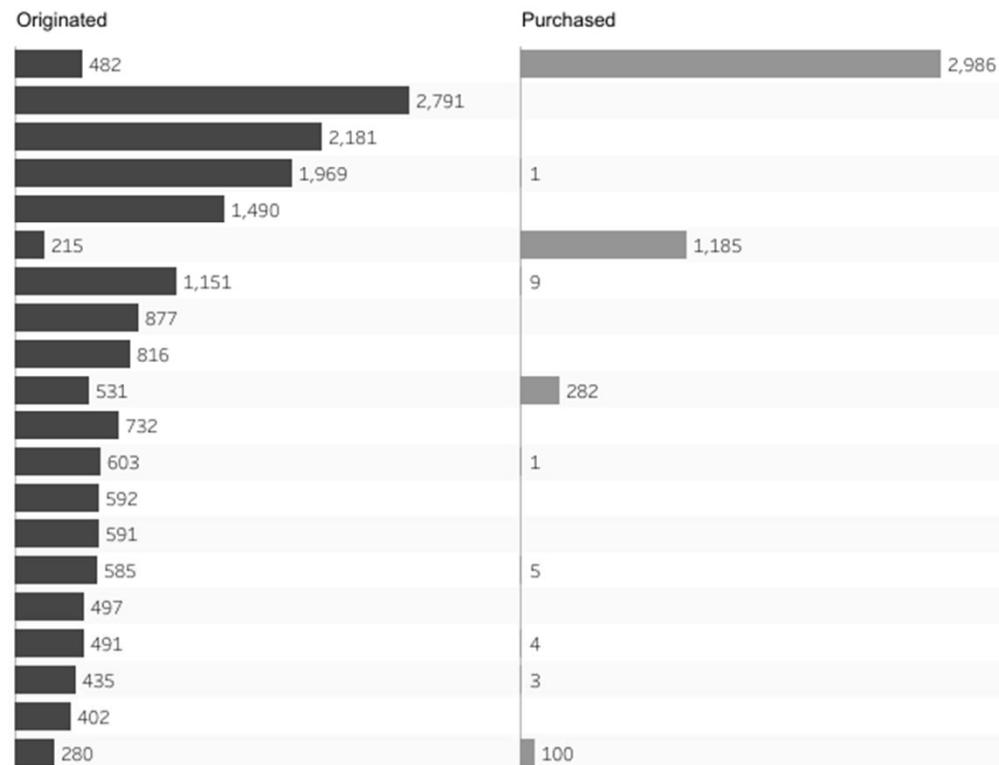
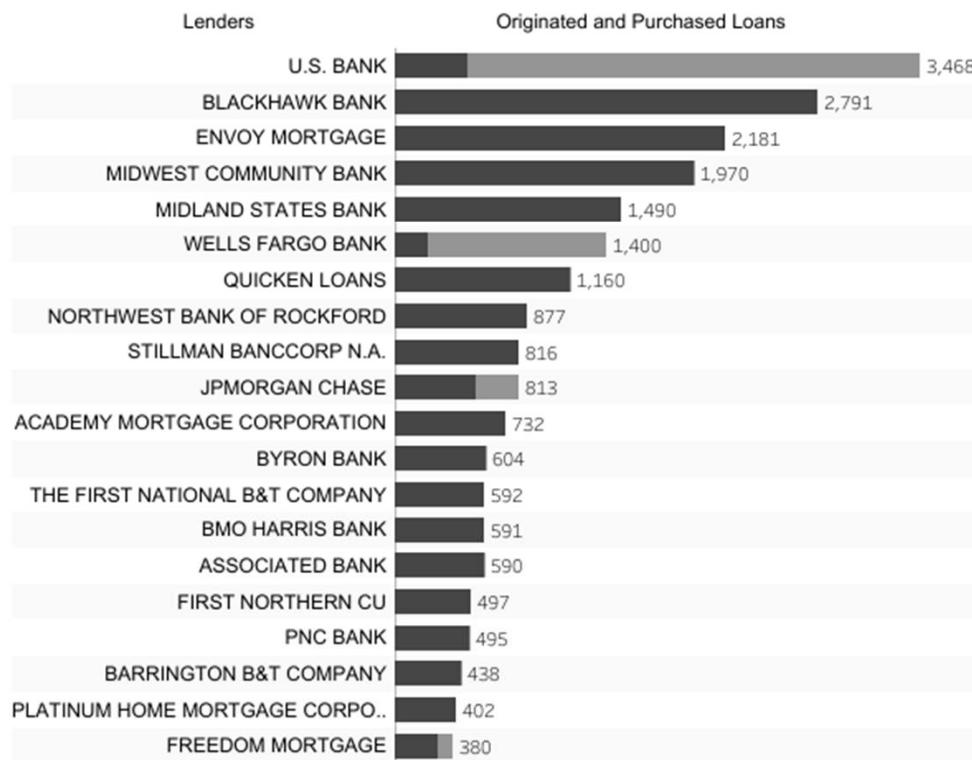

 Loan Purpose  
 All

 Lender Type  
 All

**Originated:** Loan made by a bank, mortgage company, or credit union.

**Purchased:** Loan made by a third party and purchased by a bank, mortgage company, or credit union.

Purchased loans make up a large portion of the loans reported by some lenders. Lenders also can remove some information from the records of loans they have purchased, including the borrower's income and race. This report focuses on originations.



# Top Mortgage Originators 2018-2020


 Loan Purpose  
All

 Lender Type  
All

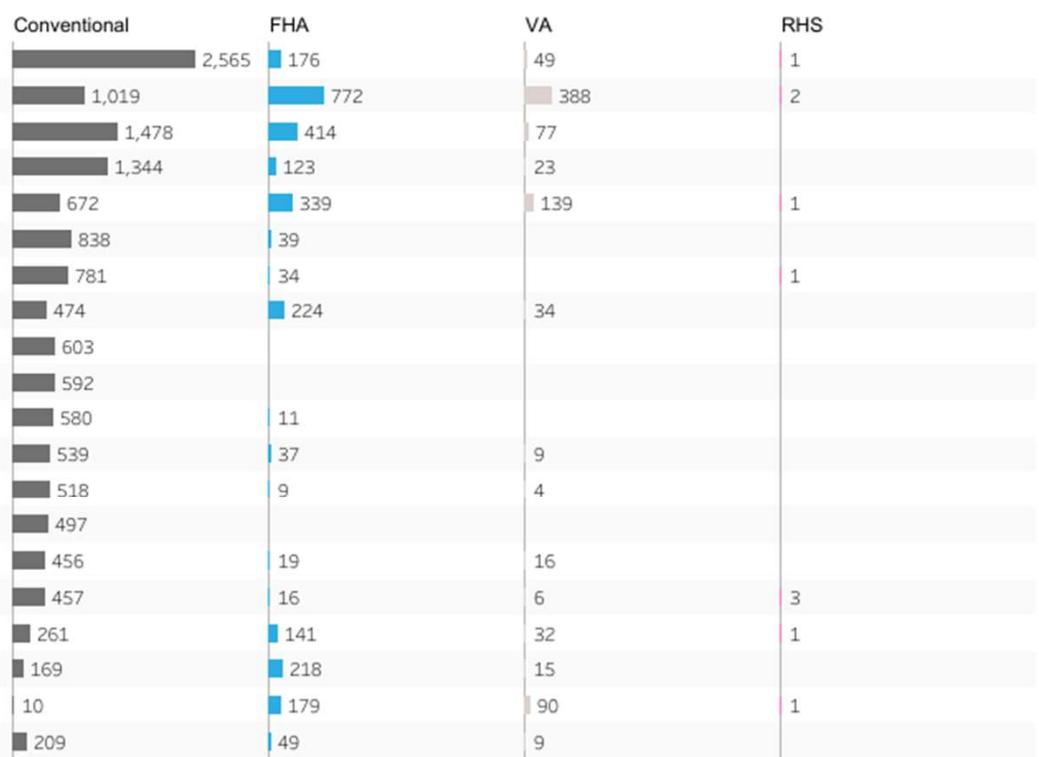
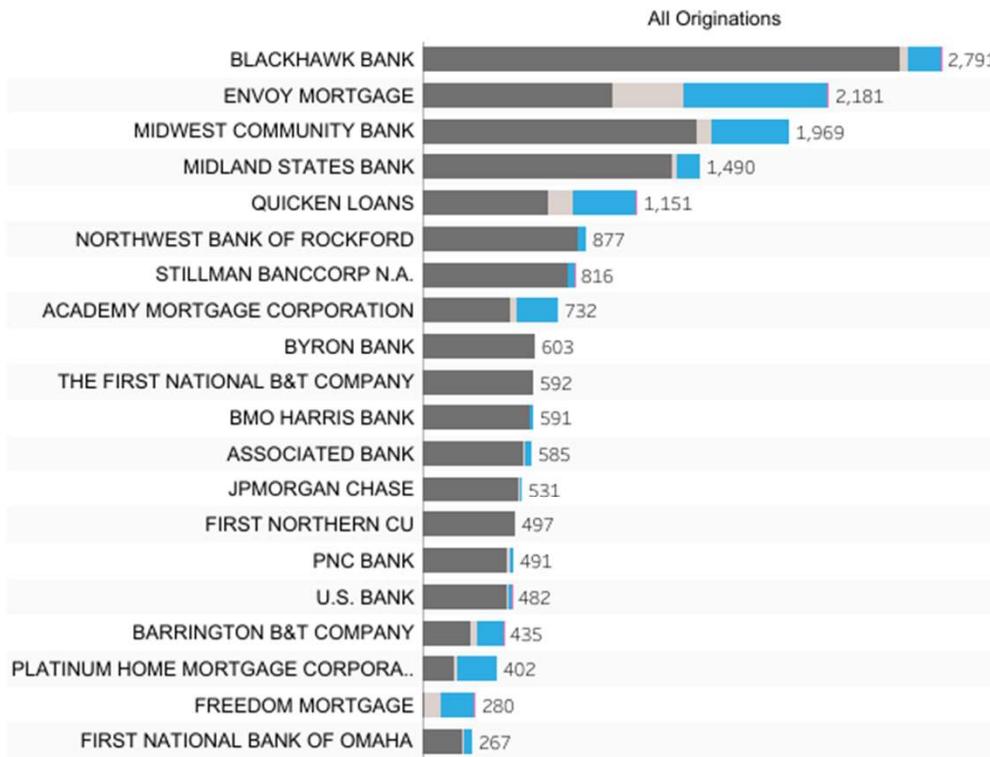
**Conventional:** Mortgage loan made by a bank, mortgage company or credit union.

**Federal Housing Administration (FHA):** Mortgage loan insured by the Department of Housing and Urban Development (HUD).

**Veteran's Affairs (VA):** Mortgage loan insured by the Department of Veteran's Affairs.

**Rural Housing Service (RHS):** Mortgage loan insured by the U.S. Department of Agriculture.

Federal Housing Administration (FHA), Veteran's Affairs (VA), and Rural Housing Service (RHS) loans are backed by insurance from the government. Banks generally make fewer government-backed loans than mortgage companies. These loans are critical for low and moderate-income and minority borrowers. Still, they often incur higher closing fees than conventional loans.



# Mortgage Originators by Race 2018-2020

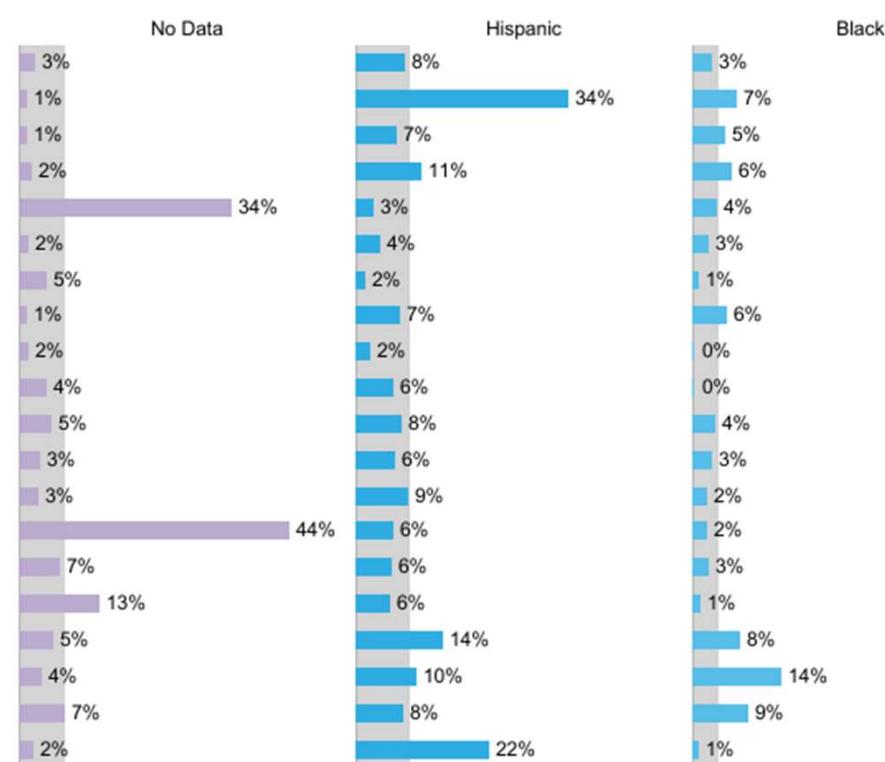
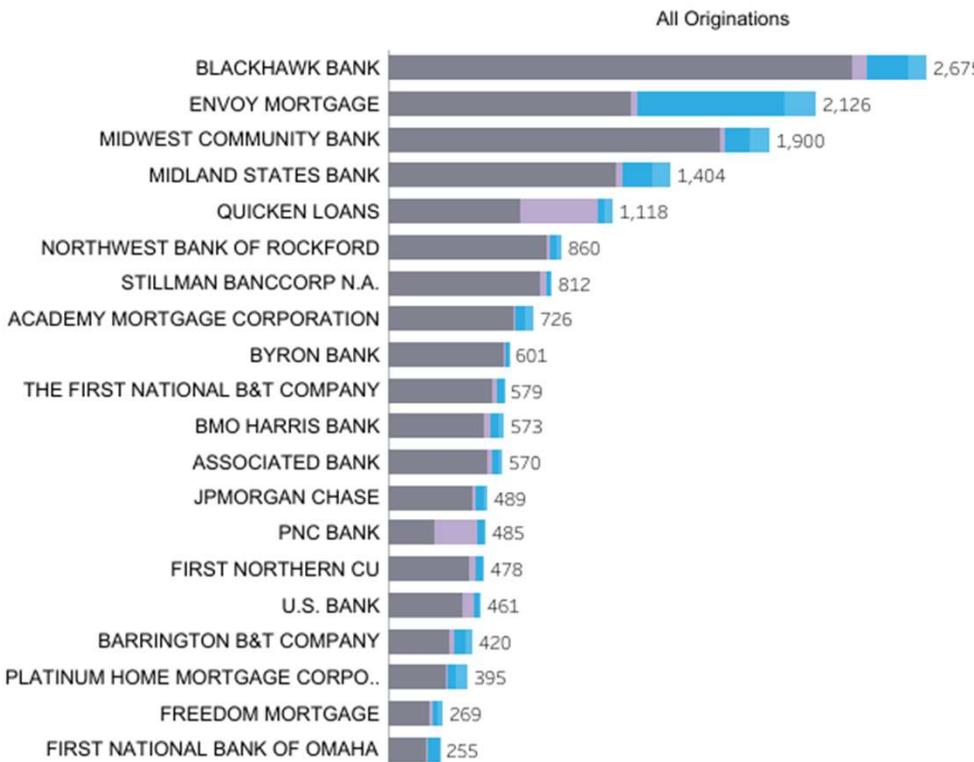

 Loan Purpose  
 All

 Lender Type  
 All

**Race:** Race or ethnicity reported by the lender based on borrower input or visual observation.

**No Data:** No race or ethnicity data was reported by the lender. Lenders are required to indicate a race or ethnicity based on visual observation or last name if the applicant does not provide this information. Applications that are initiated online do not require this.

This chart compares the percentage of originations to different racial groups. Groups with less than 1% of the share of the market are excluded. Shading indicates the average for these lenders.

**Borrower Income**


# Mortgage Originators by Income 2018-2020



Loan Purpose  
All  
Lender Type  
All

Income: Expressed as a percent of the area median family income (AMI).

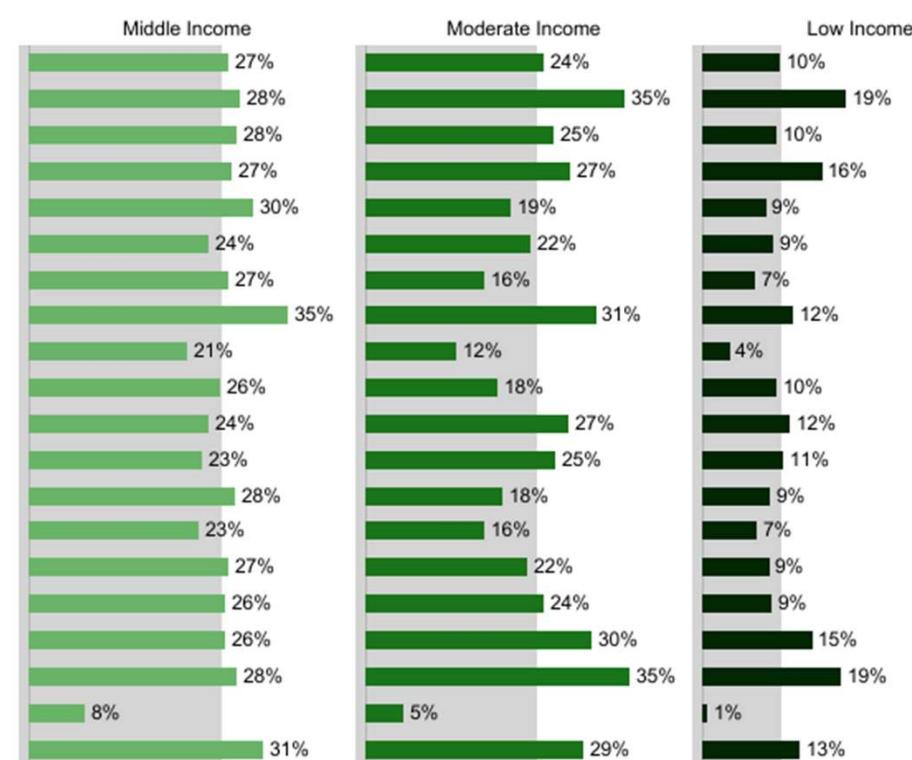
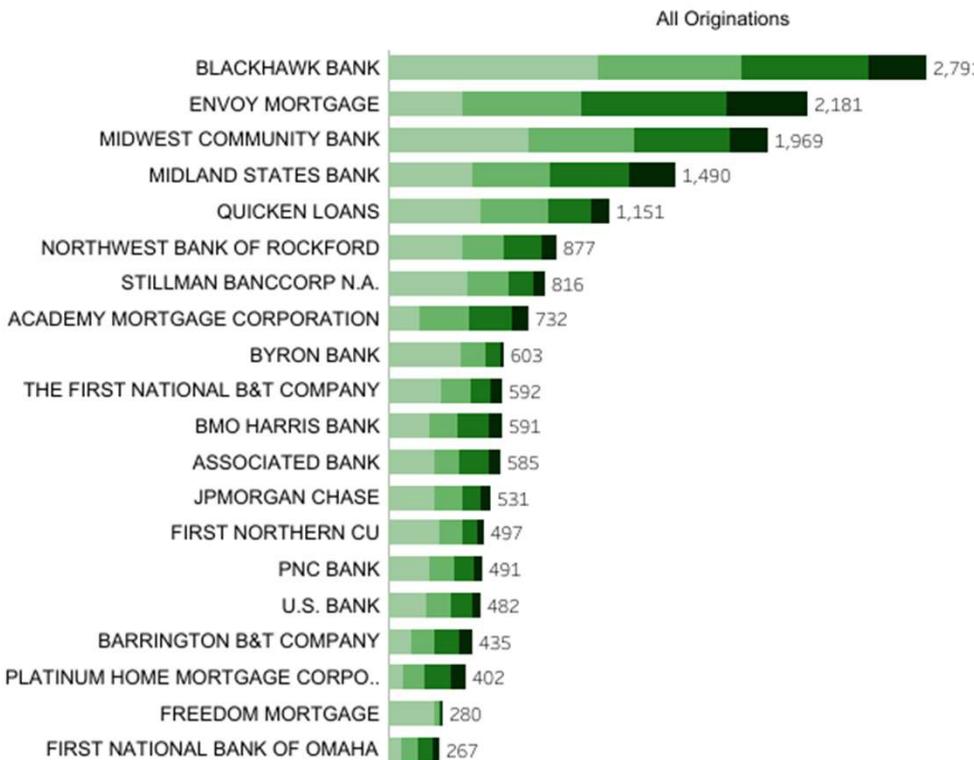
Middle: 120% or less of AMI

Moderate: 80% or less of AMI

Low: 50% or less of AMI

This chart compares the percentage of loans to different income groups by the top twenty lenders in the area.

**Borrower Race**



# Interest Rate and Closing Costs 2018-2020



Loan Purpose  
All

Lender Type  
All

**Conventional:** Mortgage loan made by a bank, mortgage company or credit union.

**Federal Housing Administration (FHA):** Mortgage loan insured by the Department of Housing and Urban Development (HUD).

**Veteran's Affairs (VA):** Mortgage loan insured by the Department of Veteran's Affairs.

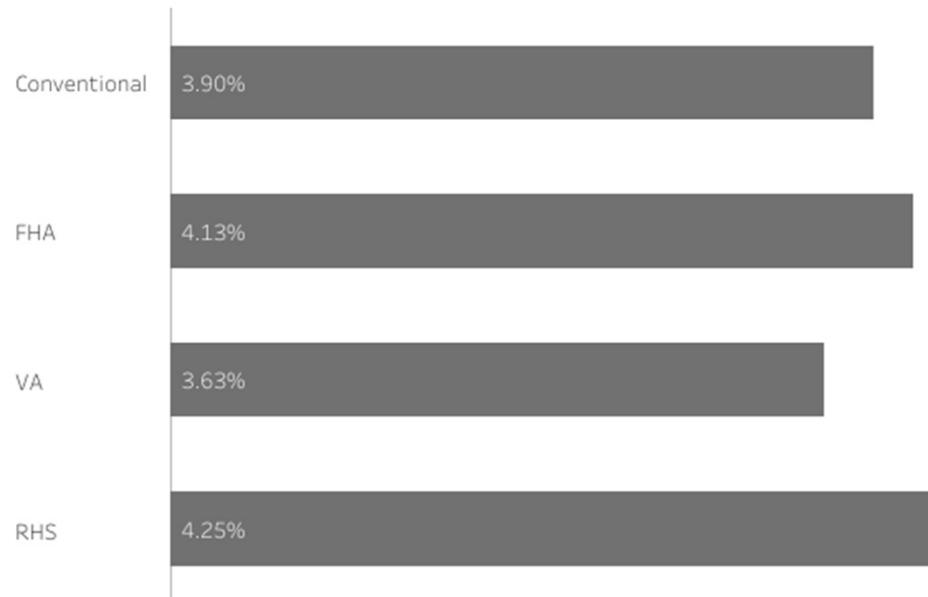
**Rural Housing Service (RHS):** Mortgage loan insured by the U.S. Department of Agriculture.

The two primary ways to measure the cost of a mortgage are the interest rate and closing costs.

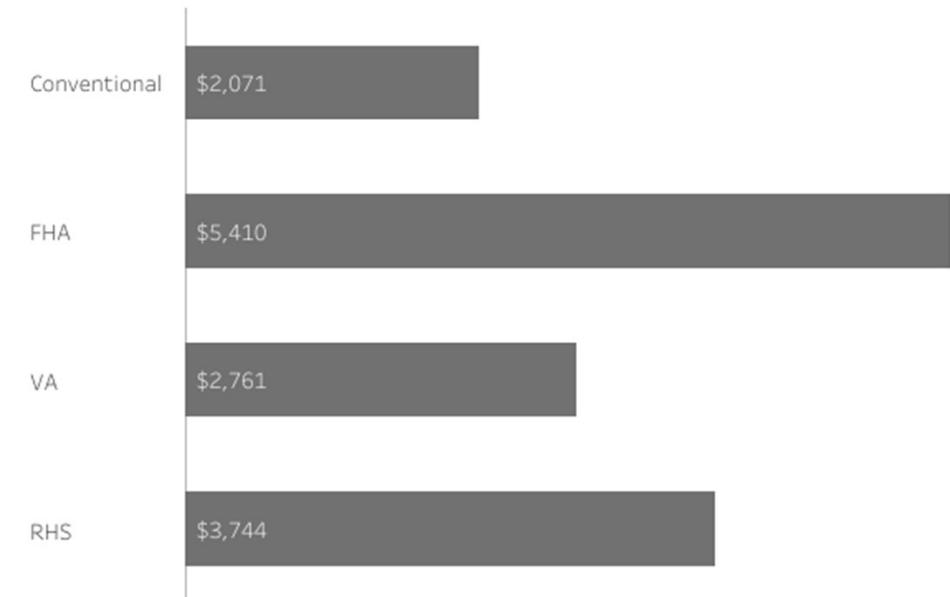
The closing costs are fees, including all of the borrower paid expenses required to close on the loan, including origination charges, appraisal, and credit report fees.

Government insured loans often require additional fees, such as a mortgage insurance premium (MIP), to be paid as a part of the closing costs. All figures are medians.

## INTEREST RATES



## CLOSING COSTS



# Government Insured Lending


 Loan Purpose  
 All

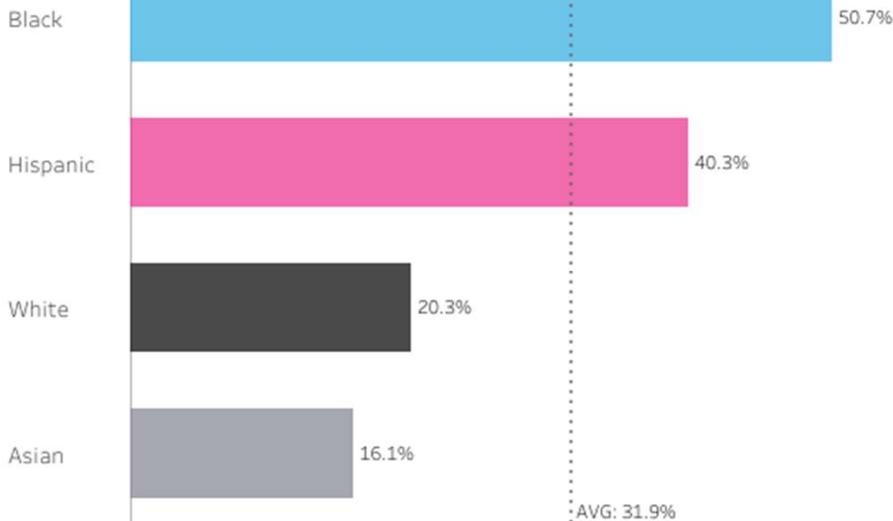
 Lender Type  
 All

These charts show how many borrowers for each racial group rely on government insured loan programs for their mortgages as well as the interest rate and closing costs paid for by those borrowers. These closing costs include origination fees, discount points, lender credits and other fees that are paid at the closing table.

**Instructions:** Use the button on the right to see more detail about Asian, Hispanic, and Hawaiian or Pacific Islander communities in this area.

Detailed Race

PERCENT OF LOANS WITH GOVERNMENT INSURANCE



MEDIAN INTEREST RATE VS CLOSING COST BY RACE



# Government Insured Lending


 Loan Purpose  
 All

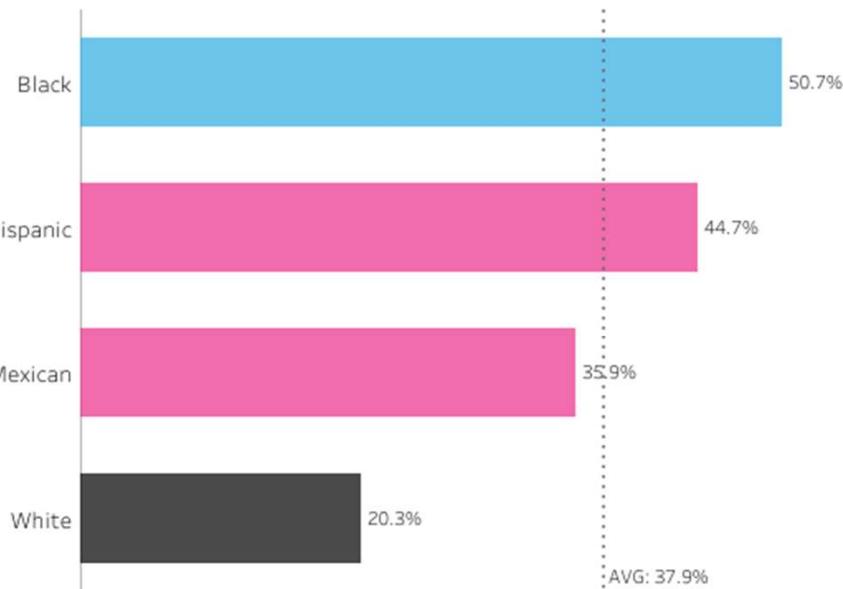
 Lender Type  
 All

[Revert to Original](#)

These charts show how many borrowers for each racial group rely on government insured loan programs for their mortgages as well as the interest rate and closing costs paid for by those borrowers. These closing costs include origination fees, discount points, lender credits and other fees that are paid at the closing table.

**Instructions:** Hispanic, Asian, and Hawaiian or Pacific Islanders are asked to provide more information on their specific place of origin. About 60% of these applicants choose to do so. Groups that represent less than 1% of the mortgage lending in this area are excluded.

PERCENT OF LOANS WITH GOVERNMENT INSURANCE BY DETAILED RACE



MEDIAN INTEREST RATE VS CLOSING COST BY DETAILED RACE



# Denial Rates & Reasons



Loan Purpose  
All

Lender Type  
All

**7,941**

TOTAL APPLICATIONS

**1,817**

DENIALS

**22.9%**

OVERALL DENIAL RATE

**20.8%**

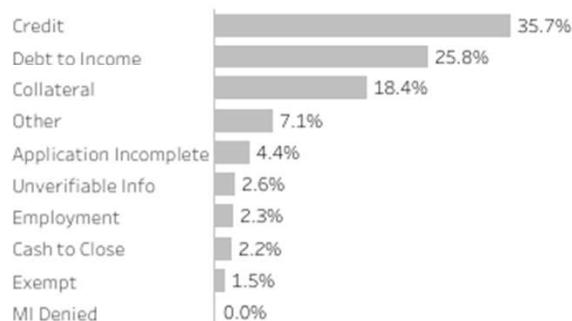
WHITE DENIAL RATE

## OVERALL DENIAL RATE BY RACE

Top lender denials compared with white applicants



## DENIAL REASONS



## Denial Rates and Ratio Compared with White Applicants

Red arrows indicate a denial ratio at least twice as high as the white denial rate. Green arrows indicate a similar denial rate as white applicants.

	White	Black	Hispanic	No Data
BLACKHAWK BANK	6%	12% 2.0 <span style="color:red">▲</span>	10% 1.7 <span style="color:orange">▬</span>	8% 1.3 <span style="color:orange">▬</span>
ENVOY MORTGAGE	5%	7% 1.4 <span style="color:orange">▬</span>	6% 1.2 <span style="color:orange">▬</span>	8% 1.6 <span style="color:orange">▬</span>
MIDWEST COMMUNITY BANK	3%	8% 2.6 <span style="color:red">▲</span>	6% 2.2 <span style="color:red">▲</span>	3% 0.9 <span style="color:green">▼</span>
MIDLAND STATES BANK	12%	16% 1.3 <span style="color:orange">▬</span>	17% 1.4 <span style="color:orange">▬</span>	17% 1.4 <span style="color:orange">▬</span>
QUICKEN LOANS	20%	26% 1.3 <span style="color:orange">▬</span>	33% 1.7 <span style="color:orange">▬</span>	20% 1.0 <span style="color:orange">▬</span>
NORTHWEST BANK OF ROCKFOR..	9%	10% 1.2 <span style="color:orange">▬</span>	19% 2.2 <span style="color:red">▲</span>	24% 2.8 <span style="color:red">▲</span>
STILLMAN BANCCORP N.A.	5%	9% 1.8 <span style="color:orange">▬</span>	16% 3.1 <span style="color:red">▲</span>	18% 3.5 <span style="color:red">▲</span>
ACADEMY MORTGAGE CORPORA..	3%	12% 4.4 <span style="color:red">▲</span>	2% 0.6 <span style="color:green">▼</span>	0% 0.0 <span style="color:green">▼</span>
BYRON BANK	7%	33% 4.9 <span style="color:red">▲</span>	16% 2.3 <span style="color:red">▲</span>	19% 2.8 <span style="color:red">▲</span>
THE FIRST NATIONAL B&T COMP..	9%	25% 2.8 <span style="color:red">▲</span>	18% 2.0 <span style="color:red">▲</span>	9% 1.0 <span style="color:orange">▬</span>
BMO HARRIS BANK	31%	52% 1.7 <span style="color:orange">▬</span>	58% 1.9 <span style="color:orange">▬</span>	26% 0.8 <span style="color:green">▼</span>
ASSOCIATED BANK	22%	48% 2.2 <span style="color:red">▲</span>	44% 2.0 <span style="color:red">▲</span>	37% 1.7 <span style="color:orange">▬</span>
JPMORGAN CHASE	22%	38% 1.7 <span style="color:orange">▬</span>	43% 1.9 <span style="color:orange">▬</span>	24% 1.1 <span style="color:orange">▬</span>
PNC BANK	20%	38% 1.9 <span style="color:orange">▬</span>	33% 1.7 <span style="color:orange">▬</span>	11% 0.5 <span style="color:green">▼</span>
FIRST NORTHERN CU	4%	24% 5.9 <span style="color:red">▲</span>	12% 3.0 <span style="color:red">▲</span>	10% 2.5 <span style="color:red">▲</span>
U.S. BANK	37%	67% 1.8 <span style="color:orange">▬</span>	52% 1.4 <span style="color:orange">▬</span>	30% 0.8 <span style="color:green">▼</span>
BARRINGTON B&T COMPANY	4%	13% 3.2 <span style="color:red">▲</span>	1% 0.3 <span style="color:green">▼</span>	14% 3.4 <span style="color:red">▲</span>
PLATINUM HOME MORTGAGE CO..	2%	6% 2.8 <span style="color:red">▲</span>	0% 0.0 <span style="color:green">▼</span>	5% 2.3 <span style="color:red">▲</span>
FREEDOM MORTGAGE	7%	18% 2.7 <span style="color:red">▲</span>	7% 1.0 <span style="color:green">▼</span>	17% 2.6 <span style="color:red">▲</span>
FIRST NATIONAL BANK OF OMAHA	8%	40% 5.1 <span style="color:red">▲</span>	12% 1.5 <span style="color:orange">▬</span>	0% 0.0 <span style="color:green">▼</span>

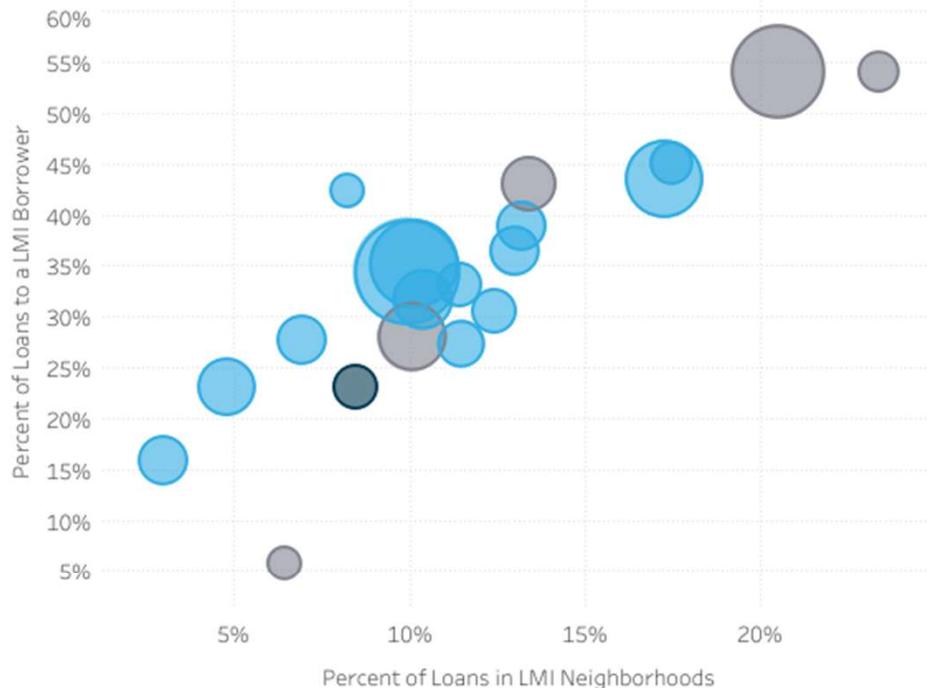
# Top Lenders by Performance



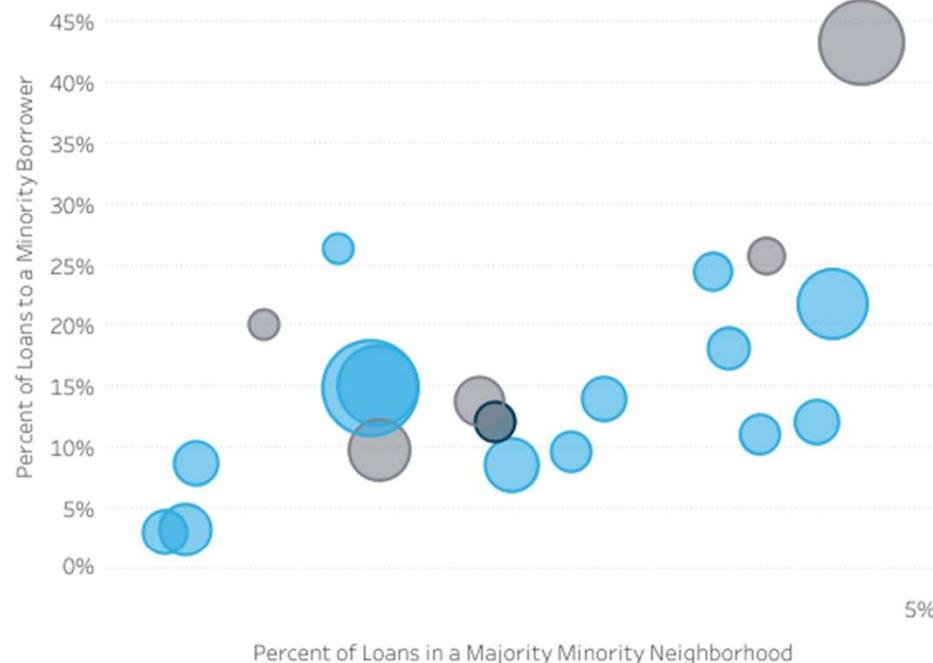
Loan Purpose  
All  
Lender Type  
All

No items highlighted

## LENDING TO LMI BORROWERS OR IN LMI NEIGHBORHOODS



## LENDING TO MINORITY BORROWERS OR IN MINORITY NEIGHBORHOODS



BANK OR AFFILIATE  
CREDIT UNION  
MORTGAGE COMPANY



**27% OF FAMILIES LIVE IN LOW OR MODERATE INCOME NEIGHBORHOODS**

**28% OF PEOPLE IN THIS AREA ARE MINORITIES OR PEOPLE OF COLOR**

**13% OF FAMILIES LIVE IN MAJORITY MINORITY NEIGHBORHOODS**