



VILLAGE OF SCHAUMBURG

Analysis of Impediments To Fair Housing Choice

Village of Schaumburg, Illinois

January 2015

**Prepared for
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I. INTRODUCTION

Analysis of Impediments Background

The Analysis of Impediments to Fair Housing Choice (AI) is a U.S. Department of Housing and Urban Development (HUD) mandated review of potential obstacles to fair housing choice in the public and private sector. The AI is required for the Village of Schaumburg, as all HUD grant entitlement jurisdictions, by federal regulatory requirements at 24 CFR 91.255(a)(1); 91.325(a)(1); and 91.425(a)(1)(I).

The AI involves:

- A review of the Village's demographic, economic, and housing characteristics;
- A review of the Village's laws, regulations and administrative policies, procedures and practices;
- An assessment of how those laws, policies and practices affect the location availability and accessibility of housing; and
- An assessment of conditions, both public and private, affecting fair housing choices for all protected classes.

According to HUD, impediments to fair housing choice are:

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

Although the AI itself is not directly approved or denied by HUD, its submission is a required component of the Village's Community Development Block Grant (CDBG) Consolidated Plan. HUD states that the purpose of the AI is to:

- serve as the substantive, logical basis for fair housing planning;
- provide essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates; and
- assist in building public support for fair housing efforts both within an entitlement jurisdiction's boundaries and beyond.

To most accurately evaluate current fair housing conditions within the Village of Schaumburg, the AI includes a review of demographic and housing market data, pertinent legislation, regulations affecting fair housing, public education and outreach efforts, and a community fair housing survey. The AI allows the Village to identify any existing impediments or barriers to fair housing choice and to develop an action plan containing strategies to reduce such barriers. The results of the analysis are contained in this report. In order to increase readability, a list of the meaning of acronyms used in the report is provided as Appendix #6.

Fair Housing Act

The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender, familial status, and disability. The Fair Housing Act covers most types of housing including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Section 100.10 of the Act provides for Exemptions, which are summarized in the following paragraph. Excluded from the Act are owner-occupied buildings with no more than four units including small owner occupied rental buildings, single family housing sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for the elderly. The Illinois Human Rights Act (Section 1-102) also prohibits discrimination in housing based upon ancestry, age, military status, order of protection status, unfavorable discharge from military services, marital status, and sexual orientation in connection with real estate transactions and access to financial credit. Additionally, in May 2013, Cook County adopted Ordinance 13-O-26 which made source of income a protected class by extending source of income protection to housing choice voucher holders. According to the Department of Human Rights 2009 State of Illinois Analysis of Fair Housing Impediments, the Human Rights Act is substantially equivalent to the federal law.

Who Conducted the AI

The Village of Schaumburg's 2013 Analysis of Impediments to Fair Housing Choice was conducted by ASK Development Solutions, Inc. (ASK), a consulting firm working on behalf of the Village of Schaumburg.

Participants in the AI

The Village of Schaumburg AI included input from many Village officials, citizens, non-profit agencies, lending institutions, and professionals from the housing and community development industry with particular emphasis on fair housing agencies. ASK conducted interviews with key individuals from Village staff, non-profits, the U.S. Department of Housing and Urban Development (HUD), and housing providers to collect additional information about fair housing practices and impediments in the Village.

ASK developed fair housing surveys for citizens, housing service providers, realtors, and lending institutions. These surveys were utilized to gather information from housing consumers and from various sectors of the housing industry about their experiences and perceptions of housing discrimination and their opinions on the fair housing laws and services. Paper copies of surveys were available at key community locations, including the Schaumburg Township District Library, Schaumburg Township, Schaumburg Park District and Village Hall. A fair housing survey link was posted on the Village website, and flyers with the survey links were distributed to churches, banks, realtors, multi-family unit properties, and schools/universities.

Public meetings were advertised in the Daily Herald. The public meetings were conducted to solicit input on fair housing discrimination and impediments to fair housing from the Village, various industry representatives and service providers, and residents. Additional information was gathered via meeting, teleconference and email correspondence with nonprofit and advocacy groups. Staff of the Village's Community Development Department actively participated in development of the AI. Copies of the ads and meeting notices are attached as Appendix #4.

Planning and Research Methodology

The consultant's (ASK's) methodology in undertaking the 2014 Village of Schaumburg AI was based on the recommended methodology in the *Fair Housing Planning Guide Vol. 1* (HUD Office of Fair Housing and Equal Opportunity), experience conducting AIs for other cities, and the desires of the Village as explained by the Community Development Department. The scope of work consisted of the following tasks:

Task 1 - Project Launch

ASK met with the project managers from the Village to refine work tasks and the project schedule, establish reporting relationships and review expectations of the project. ASK collected relevant data, identified potential candidates for key person interviews, and discussed the public participation components of the study. ASK then began creation of the survey questions.

Task 2 - Community Data Review

ASK reviewed existing demographic, economic, employment and housing market information for the Village of Schaumburg using the 2010 U.S. Census; 2007-2011 American Community Survey, lending data from the Home Mortgage Disclosure Act (HMDA), foreclosure data from RealtyTrac, data and maps from the Village's 2010–2014 Five Year Consolidated Plan, data from the previous Consolidated Annual Performance and Evaluation Reports (CAPERs), and data and maps from documents available via the Village's website. In addition, the consultant conducted public meetings and teleconferences.

Task 3 - Regulatory Review

ASK researched and collected information regarding Schaumburg's current zoning regulations, planning and zoning fees, and housing policies and programs that influence fair housing choice and impediments. ASK corresponded via email and/or teleconference with fair housing service providers and agencies to further investigate fair housing policies and potential impediments.

Task 4 - Compliance Data Review

The consultant collected and analyzed all applicable available data regarding compliance with local, state and federal Fair Housing Law, including the Home Mortgage Disclosure Act (HMDA), the Fair Housing Act and the Community Reinvestment Act (CRA). ASK also analyzed reported fair housing complaints from

the U.S. Department of Housing and Urban Development (HUD), and conducted a review of legal cases in the Village involving Fair Housing law. Complaint data and the processing of cases were reviewed for evidence of fair housing practices and impediments.

Task 5 - Internet Surveys, Direct Surveys, and Personal Interviews

Beginning April 2013, the consultant developed an online survey available to all Schaumburg residents and industry stakeholders. The survey asked respondents about their experience and perception of housing discrimination, their knowledge of fair housing laws, and their utilization of Schaumburg's housing assistance and social service programs, and their opinions about housing and social service needs in the Village. In addition to the online survey for housing consumers, surveys were created to elicit input and fair housing data from housing providers, realtors and lenders. Surveys were also directly administered and public meetings conducted by both Village staff and the consultant to obtain input. In addition to the online surveys, Village staff administered the survey instrument at meetings or through non-profit agencies. The consultant conducted key person interviews with fair housing service providers and Schaumburg Village staff.

Task 6 - Identification and Analysis of Impediments

The consultant then analyzed the findings from the first five tasks in order to determine what impediments to fair housing choice exist in the Village of Schaumburg. The consultant also reviewed identified impediments from the previous AI and 2008 AI draft update to determine what actions had been taken by the Village to address impediments and the existing status of the impediments.

Task 7 - Recommendations

In consultation with Village staff, the consultant developed a recommended Action Plan for addressing the identified impediments.

Summary of Current Impediments Found

- Lack of fair housing education and awareness; need for expansion of fair housing outreach.
- No existing method or designated Fair Housing Officer for fair housing data collection, tracking, and follow-up.
- Lack of fair housing testing to determine where fair housing discrimination is taking place.
- Inadequate information and awareness of the Village's housing programs, particularly for elderly and minorities.
- Lack of affordable housing in the Village of Schaumburg.

- Potential Discouragement of Group Homes and Institutional Housing in Residential Districts.
- The Village's cap on the number of unrelated persons sharing a home may limit the availability or increase the cost of housing for low-income persons.
- Inadequate planning to meet the needs of Village residents protected by the FHA.
- Land use designations and building codes may limit the availability of affordable housing choices and concentrate of multifamily housing to certain neighborhoods due to land use designations and building codes.
- High loan denials among members of the protected classes, limited access to loans due to high credit score requirements.
- Inadequate public transportation between employment centers and affordable housing restricts fair housing choice.

Summary of Recommendations to Address Impediments

- Use existing resources to disseminate fair housing information.
- Partner with existing organizations to achieve fair housing goals.
- Use CVOS Channel 17 to provide fair housing information.
- Use the Public Relations Department to provide fair housing information via radio, newsletters, and social media.
- Include fair housing information on the Village website.
- Establish mandatory fair housing seminars for landlords of rental properties in the Village of Schaumburg.
- Designate a Fair Housing Officer for the Village of Schaumburg.
- Research Strategies to Increase Affordable Housing stock.
- Develop a tracking system to receive and follow up on housing discrimination complaints.

- Survey agencies and organizations for status of fair housing complaints and issues.
- Research and potentially pursue funding for fair housing testing and training.
- Implement/coordinate fair housing testing to determine prevalence of housing discrimination in the Village of Schaumburg.
- Establish an Affirmative Marketing Plan for the Village's housing programs.
- Fund affordable housing needs, and leverage with private sector funds.
- Develop an Affordable Housing Strategy for the Village of Schaumburg.
- Review and revise current zoning and land use requirements to ensure that housing choices are not limited for Village residents.
- Collect demographic data for members of the protected classes utilizing various sources including the U.S. Census as well as local data collected by the Village and non-profit agencies.
- Review current zoning and land use requirements, consider universal design features and promote inclusionary zoning incentives to ensure that affordable housing choices are not limited.
- Pursue varying and alternative financing to meet the need for more housing for the protected classes.
- Expand current transportation choices for members of the protected classes through other funding sources and continue to pursue regional strategies.
- Provide transportation materials in several languages so that limited English proficient persons can take advantage of subsidized transportation programs.

Fair Housing Funding

In its 2010-2014 Consolidated Plan, the Village describes how it intends to use CDBG and other types of federal funding to address identified housing and community development needs of its low- and moderate- income residents. The Village allocated \$17,200 for the preparation of the AI. Although direct funding for fair housing activities or services was not designated in the Five Year Consolidated Plan, the Village identified \$5,000 in CDBG funds, in the 2013 Action Plan, within the administration budget for administration costs for fair housing testing, education and services.

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II. COMMUNITY PROFILE

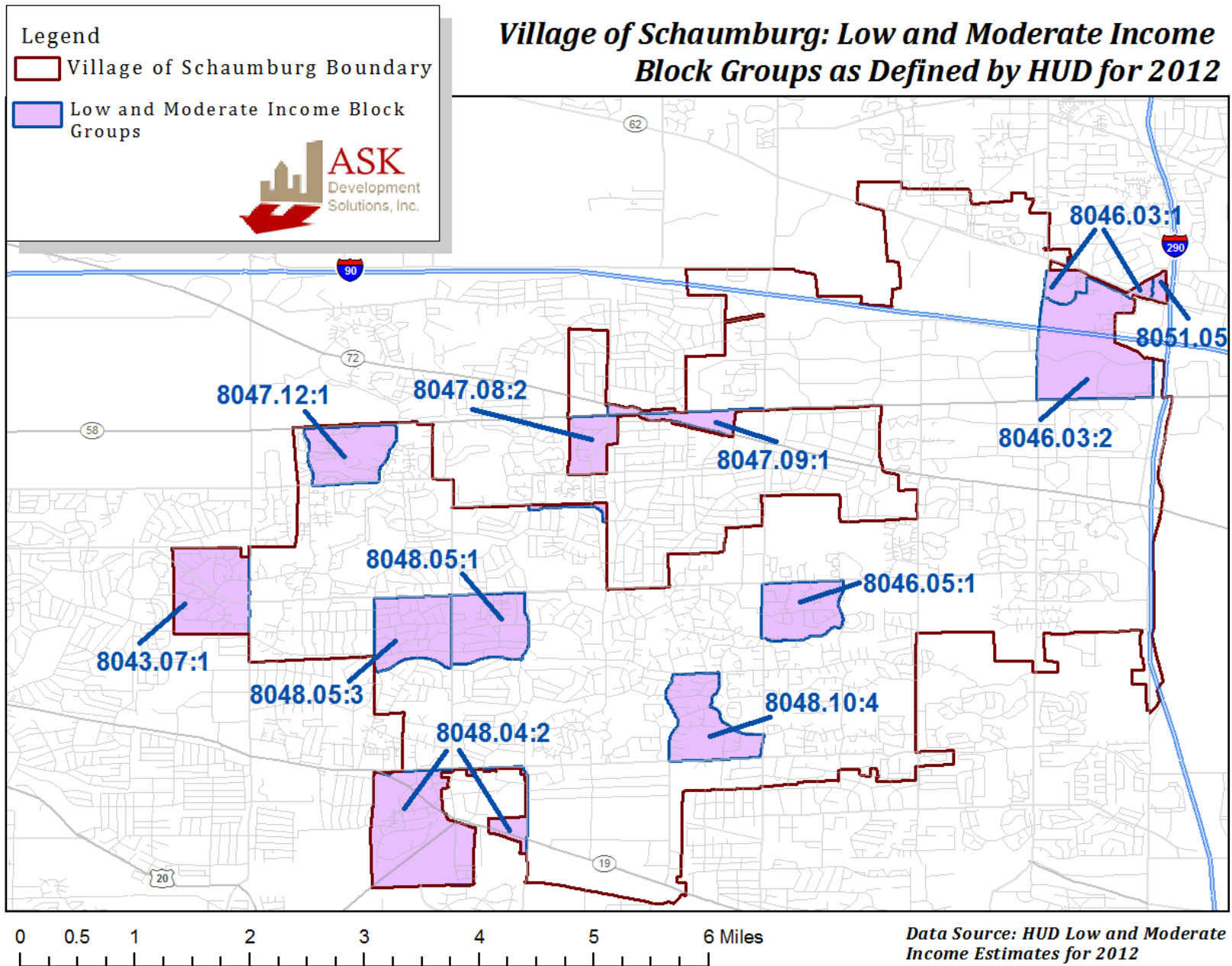
Introduction

The U.S. Census is the data used for this report when possible and available. The census is conducted once every 10 years to provide an official count of the entire U.S. population to Congress. Between the official census, some areas of data-gathering require the use of the American Community Survey (ACS) which provides most informational items as the decennial Census, but is not always as in depth as the decennial Census. The ACS is conducted every year to provide up-to-date information about social and economic needs including education, housing, and jobs. The 2010 Census, American Community Survey (ACS), and a variety of other data sources were utilized for the preparation of this report. Data sources utilized include Home Mortgage Disclosure Act (HMDA) data; RealtyTrac data service; the Village of Schaumburg planning and reporting documents, and direct communication with local agencies. Overall, the data paints a revealing and fair portrait of the community and housing conditions.

The proceeding data indicates that overall population has decreased in Schaumburg from 75,386 in 2000 to 74,227 in 2010 (2000 and 2010 U.S. Census); however, the data indicates increases in the percentages of persons within certain members of the protected classes. The Black or African American population grew by 23.63%; the Asian population grew by 37.71%; the American Indian population grew by 110.39%; and the Hispanic or Latino Origin population grew by 64.34%. Although there has been an increase in the diversity of populations within Schaumburg, there exists no data showing correlation between the protected classes and discrimination or complaints regarding housing discrimination. The increases in population among persons within the protected classes may increase the potential for discrimination based on race, age or familial status. Additionally, the presence of increased concentrations of racial or ethnic populations may not be due to steering by real estate or lending agents, but rather to the preferences of those populations to live in areas close to family, friends, and other similar support systems within their neighborhoods. These overall demographic shifts reflect an increased need for fair housing awareness and education as population changes occur.


The AI uses census tract and income data to analyze the demographic changes and their impact on fair housing choice in the Village of Schaumburg. Maps on the following pages indicate the Schaumburg 2010 census tract boundaries and 2012 low to moderate income census areas as defined by HUD.

Map 1



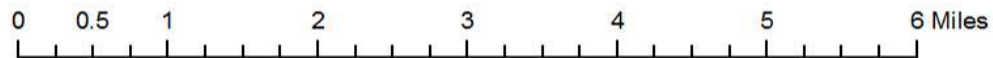
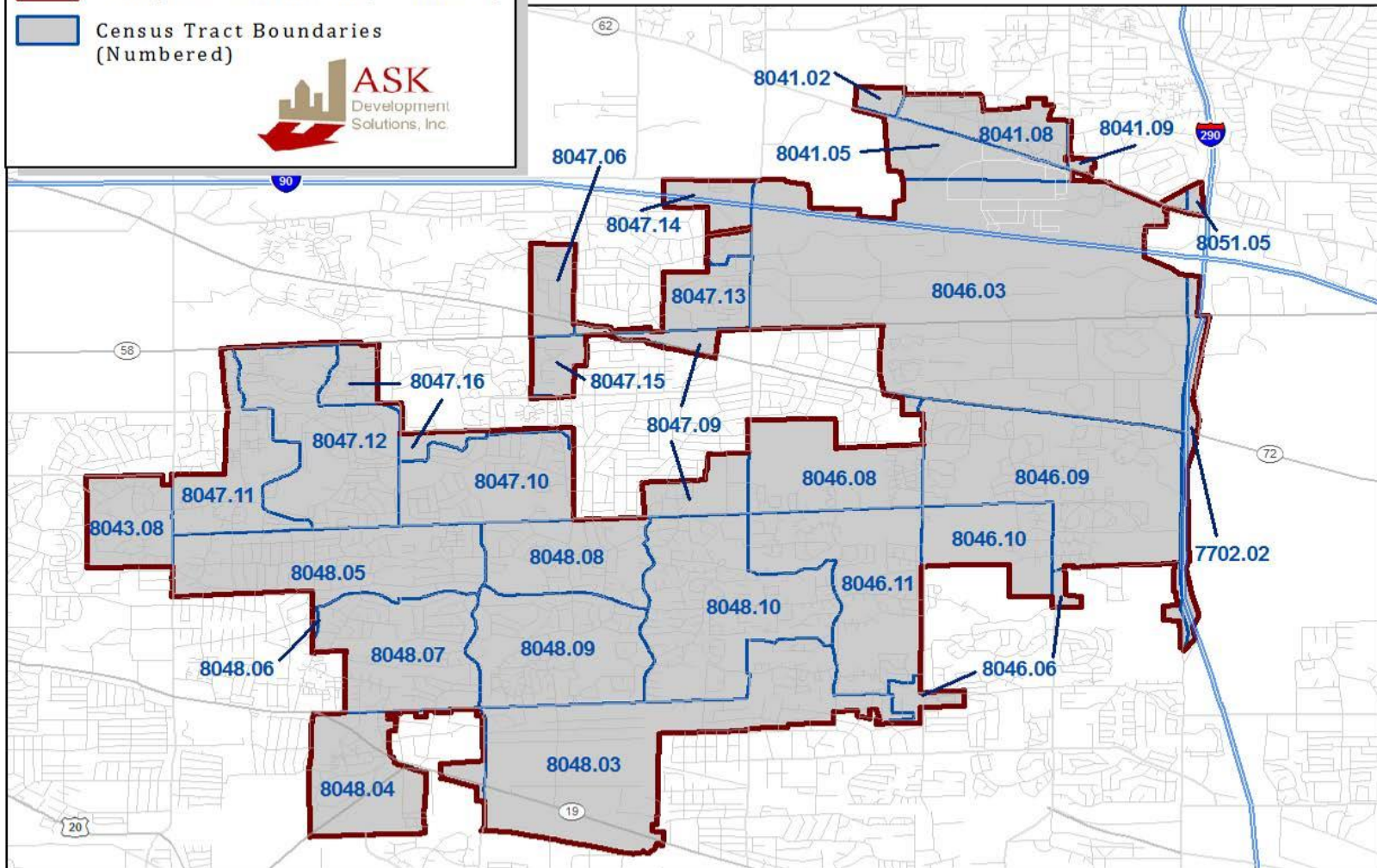
Legend

-  Village of Schaumburg Boundary
-  Census Tract Boundaries (Numbered)



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Solutions, Inc.

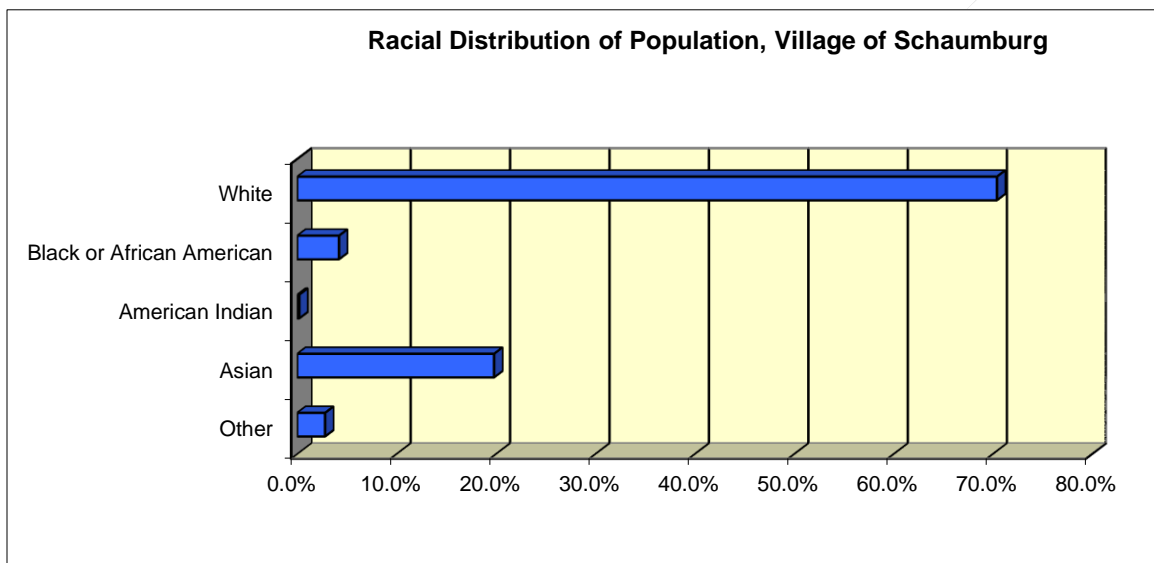
Village of Schaumburg: 2010 Census Tracts



Population, Race, and Ethnicity

The Village of Schaumburg had a total population of 74,227 at the time of the 2010 Census. The 2000 Census reflected a population of 75,386. Schaumburg had a population decline over the ten year period of 1,159 persons between 2000 and 2010. According to the 2010 Census, the racial makeup of the community was primarily White (70.4%), but also included populations identifying themselves as Black or African American (4.2%), American Indian (0.2%), Asian (19.8%), and other races, including two or more (2.4%). Almost 9% (6,554) of Schaumburg's population identified themselves as being of Latino or Hispanic origin.

Figure 1



Source: 2010 U.S. Census

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Table 1

**Village of Schaumburg
 Population, Race and Ethnicity
 2000 and 2010 Census Count Changes**

Schaumburg, Illinois	2000 Census	2010 Census	2000-2010 Change
Total Population	75,386	74,227	-1,159 (-1.54%)
White	59,391	52,281	-7,110 (-11.97%)
Black or African American	2,526	3,123	597 (23.63%)
American Indian	77	162	85 (110.39%)
Asian	10,697	14,731	4,034 (37.71%)
Hawaiian or Other Pacific Islander	43	23	-20 (-46.52%)
Other	1,307	2,100	793 (60.67%)
Two of More Races	1,345	1,807	462 (34.35%)
Hispanic or Latino Origin (of any race)	3,988	6,554	2,556 (64.34%)
Male	36,694	35,840	-854 (-2.33%)
Female	38,692	38,387	-305 (-0.79%)

Sources: 2010 and 2000 U.S. Census

According to the 2011 American Community Survey (ACS), 75% of the people living in Schaumburg in 2011 were native residents of the United States. In addition, 60% of these residents were living in the state in which they were born.

Twenty-five (25%) percent of the people living in Schaumburg in 2011 were foreign born. Of the foreign born population, 55% were naturalized U.S. citizens, and 62% entered the country before the year 2000. Thirty-eight percent (38%) of the foreign born entered the country in 2000 or later.

The AI seeks to analyze the relationships between the racial/ethnic groups and income categories to see how the racial/ethnic groups are represented in low and moderate income households. Low and moderate-income households are defined by HUD as those with income at or below 80% Area Median Income (AMI). Maps 1-4 show these correlations.

According to the Village’s 2013 Action Plan “All activities using CDBG funds must benefit low and moderate-income persons, prevent or eliminate slum or blight, or meet an urgent community development need. An area benefit activity that is eligible for the CDBG program is a particular geographic area where at least 51 percent of the residents are low and moderate-income persons, or for Schaumburg and similar municipalities with fewer low and moderate-income persons, where the proportion of low and moderate-income persons in the area is within the highest quartile of all areas (greater than 30.9%).” This is known as the quartile method. According to the Census 2000 Low and Moderate Income Summary Data, households with incomes less than \$49,100 are considered low and moderate-income. The following areas in Schaumburg are classified as CDBG eligible areas and shown on Map 1:

Table 2

**Village of Schaumburg
 Low and Moderate Income Neighborhoods**

Neighborhood #	% of Low and Moderate Income Persons	Residential Development
1	42.3%	Walden
2	39.7%	Walden, Lakeside at Walden
3	33.2%	Beech Pointe, Lexington Lane, Lexington Village
4	45.0%	Kingsport Estates, Kingsport Village East
5	35.56%	Schaumburg Park District Community Recreation Center and SF Home
5	77.5%	Friendship Village, Pleasant Acres
6	67.0%	Schaumburg Terrace, Schaumburg Villas
7	30.9%	Sheffield Manor, Towne Place East, Wynmark
8	37.1%	AMLI at Poplar Creek, Schaumburg Villas, Sheffield Towne, Windsong

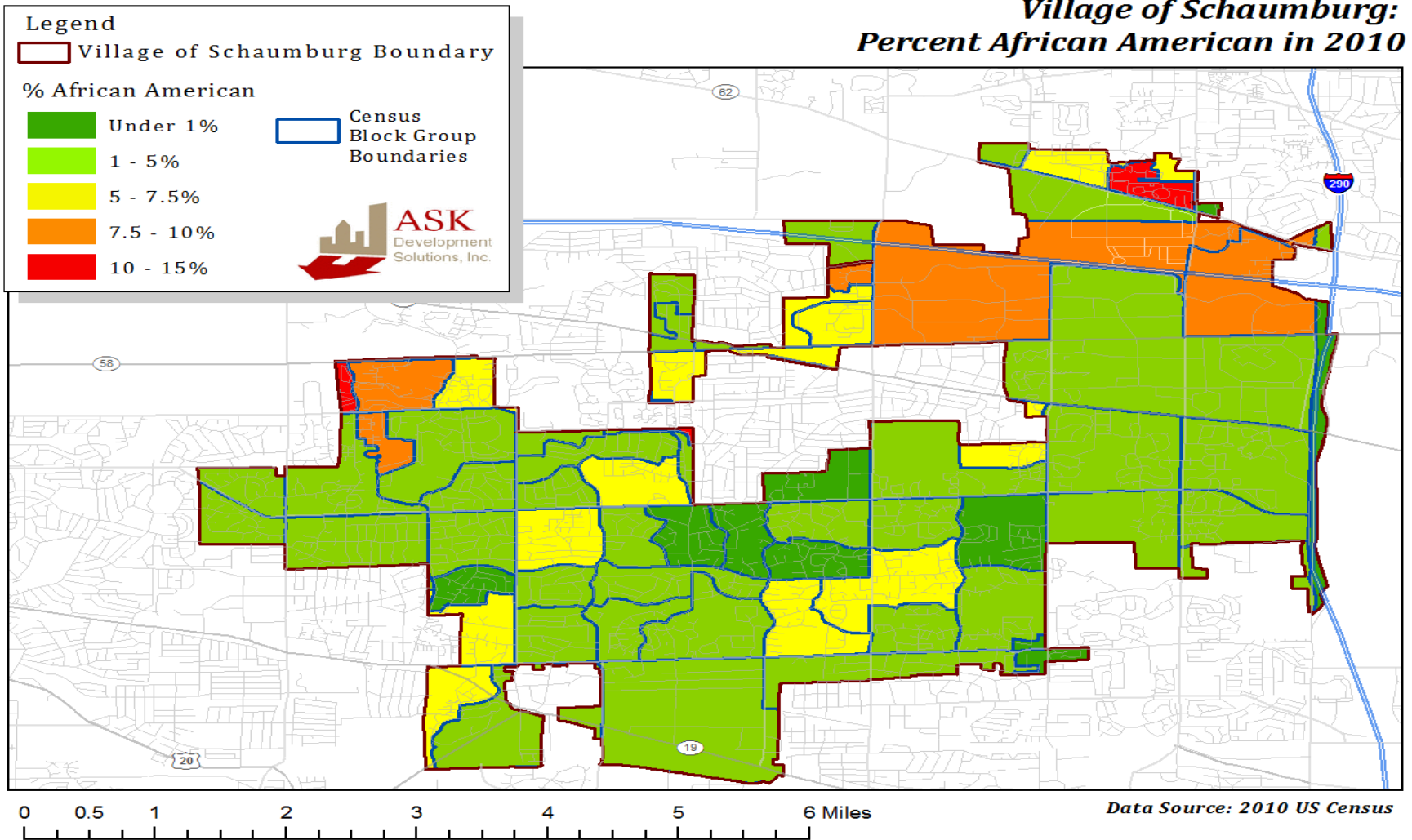
Neighborhood #	% of Low and Moderate Income Persons	Residential Development
9	31.4%	Cloisters, New Kensington, Wellington Court, Meadow Knolls
10	37.1%	Country Lane, Glens, Greencastle, Kingsport Estates, Savannah Trace
11	38.1%	Revere Circle, Weathersfield Commons
12	31.3%	Weathersfield
13	40.8%	Weathersfield Condominiums, Weathersfield
14	35.2%	Emerald Village, Pickwick Place, Weathersfield

Source: 2000 U.S. Census Low and Moderate Income Summary Data

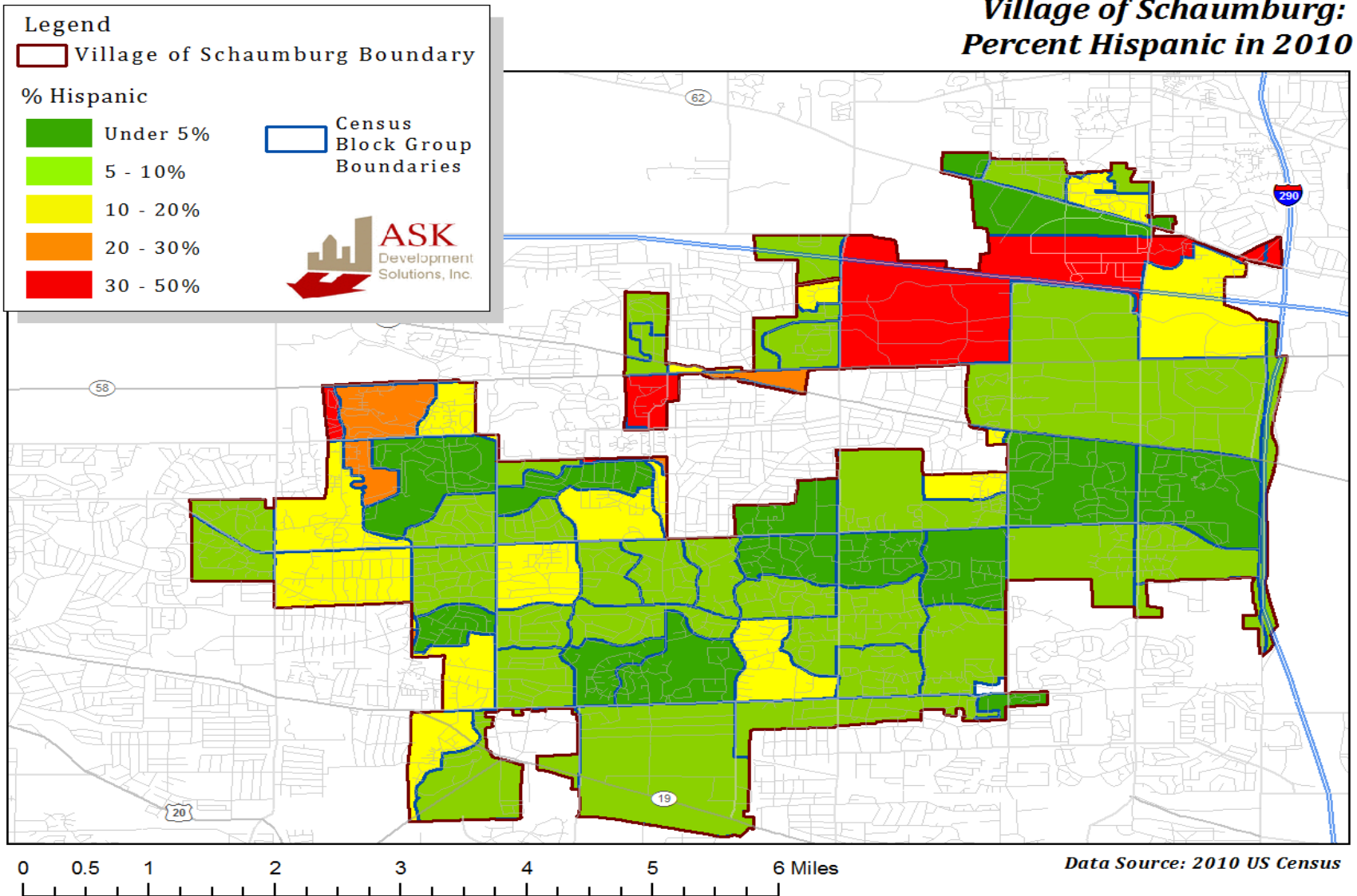
It is noted that in the low and moderate-income block groups as defined by HUD using the quartile method, protected classes such as minority groups have higher representations in the low and moderate-income block groups and are therefore disproportionately affected by the issues related to these income groups as demonstrated in Maps 3 and 4.

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Map 3



Map 4



Demographic Changes and their Implications for Fair Housing Choice

As noted in Table 1, the Village of Schaumburg saw changes in its overall population and its racial and ethnic distributions between the 2000 census and 2010 census. The overall population decreased slightly by 1.54% but changes in racial and ethnic categories showed more significant changes. The white population decreased by 11.97% while other population groups increased: Black or African American (23.6%), American Indian (110.4%), other races (60.7%), and Asian (37.7%). Persons who identified themselves as belonging to two races increased by 34.4% and persons of Hispanic or Latino origin increased by 64.3%. The only other population group other than Whites that decreased was Hawaiian or Other Pacific Islander (46.5%).

As the population shifts from 2000 to 2010 indicate an increase in racial and ethnic populations in the Village of Schaumburg, as noted above, such significant shifts have implications for fair housing choice. Since the Village is certifying that it will “affirmatively further fair housing” and AI assesses discrimination in both the public and private sector, the Village should take proactive steps to address any potential discrimination that could occur as a result of the increases in racial and ethnic populations. The community survey results showed that 44% of the respondents were not knowledgeable about fair housing laws. Lack of knowledgeable on the part of either perpetrator or victim may lead to discrimination. Minority populations as shown in the AI are more likely to be renters and the rental housing showed the most responses for location where discrimination took place.

A national HUD-commissioned study titled “Housing Discrimination Against Racial and Ethnic Minorities 2012” published in June 2013 showed evidence that ethnic minorities still face discrimination in searching for housing. The study used paired testing and noted that when paired testers pose as more marginally qualified home seekers, more discrimination occurs. As such the study noted that the results may actually “understate the total level of discrimination that takes place in the marketplace.” While the Village of Schaumburg was not included in the national study and no testing has been done in the Village, the fact that ethnic and racial minorities nationally face more discrimination should suggest that the Village should proactively plan for potential increases in discrimination through education and awareness.

The increase in the Hispanic or Latino and Asian ethnic groups suggest a greater need for addressing the needs of persons with Limited English Proficiency (LEP). The Village’s increased population suggests that materials on fair housing and discrimination should be translated in other languages and arrangements made for interpreters, as requested. Planning documents soliciting public comments should state that the planning documents can be translated into other languages if requested.

Furthermore, the Village will review its public outreach materials for the Consolidated Plan, Action Plan, and CAPER, to ensure that public notices and planning documents can be translated into other languages upon request and that planning documents can be translated into other languages for LEP persons upon requests. As well, meetings should be held at times that are convenient for families with children. Meeting notices should also make provisions for persons with hearing impaired including a Telecommunications Device for the Deaf (TDD) telephone number. The AI final public notice will comply with these requirements.

As other racial and ethnic groups have increased, the potential for housing discrimination based on race and ethnic origin also increases and would be an impediment to fair housing choice. It is important for the Village of Schaumburg to take a proactive approach in ensuring that there is an increase in education and awareness on fair housing issues especially to groups that may be more impacted. Lack of education and awareness of fair housing issues and fair housing laws seems to be evident. The fair housing resident survey showed that of the 83 respondents that answered the question regarding knowledge of Fair Housing laws, only 8 (9.9%) considered themselves to be Very Knowledgeable; 37 (45.7%) are Somewhat Knowledgeable; and 36 (44.4%) are Not Knowledgeable.

The resident survey also showed that minorities and other persons in the protected classes were not very responsive to the survey. Of the responses received, 79.7% were Anglo/White; 3.8% were Black or African American; 1.3% were Hispanic/Chicano/Latino, 3.8% were Asian/Oriental/Pacific Islander; and 1.3% were multi-racial. Schaumburg's racial/ethnic makeup is: White (70.4%), Black or African American (4.2%), Hispanic (9%), American Indian (0.2%), Asian (19.8%), and two or more races (2.4%).

Census tracts in the upper northwest section of the Village have higher percentages of minority population but do not have high low and moderate income populations.

Household Characteristics

Since the 2000 Census, average household size has declined slightly from 2.36 persons per household (2000 Census) to 2.34 persons per household (2010 Census). According to the 2010 U.S. Census, among Schaumburg's 31,539 households, family households represented 61.4% of all households, including: 15,377 (48.8%) married couple families; 1,062 (3.4%) male-headed households; and 2,924 (9.3%) female-headed households. Non-family households comprised a significant amount at 38.6% (12,176) of all households.

Married couple families were the most common homeowners at 56.5% (12,086) of all households, followed by non-family households at 32.6% (6,967). Female-headed households (1,727) exceeded numbers of male-headed households (603) in terms of homeownership. The married couple rate of homeownership exceeded the respective rental rate. Non-married male-headed and female-headed

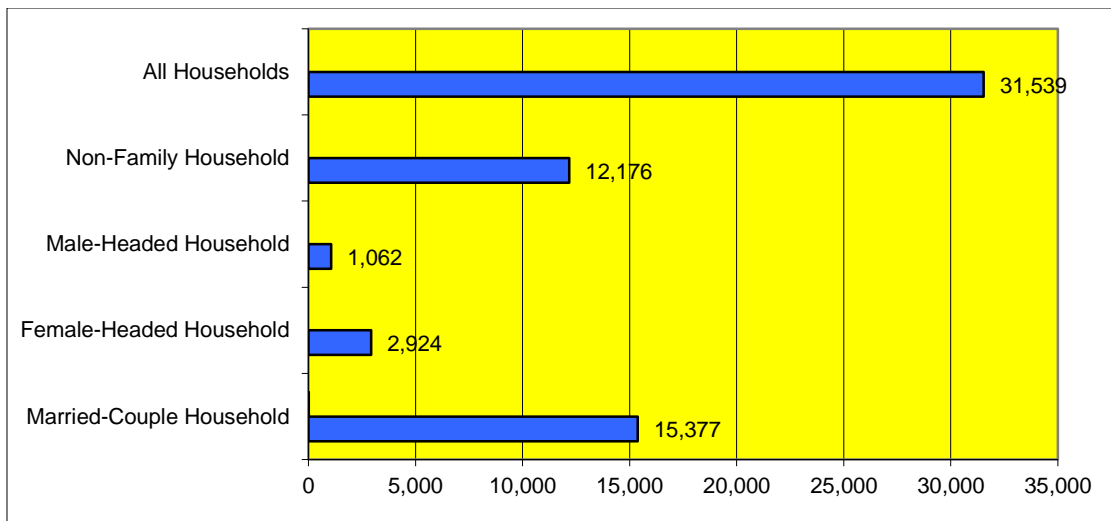
householders were more likely to be renters. Married-couple families exhibited the greatest discrepancy between rates of homeownership and renting.

Non-married male and female headed households are likely to include children below the age of 18 and are likely to be cost burdened. The population was assessed against the incidence of census tracts with a greater percentage of low and moderate income households. Low to moderate income census tracts such as 8043.07, 8047.12, 8048.05, and 8047.09 had higher percentages of female headed households with children. When the percent of female headed households (Map 5) was overlaid with the maps of highest minority population concentration (Maps 3 and 4), the correlations were not significant. Female headed households with children were not shown in large concentrations in minority populations. Areas with large minority populations (between 20-30% and 30-50% for Hispanic population and 7.5-10% and 10-15% for Black or African American populations) did not show high concentrations of female headed households with children (between 5-6% and 6-7.8% ranges).

A small part of the 8047.14 census tract shows one of the highest percentages of female headed households with children in the 6-7.8% range. The Black or African American population in that part of the census tract is at a higher range of 7.5-10% and the Hispanic population is at a midrange of 10-20%. This group would be subject to discrimination based on familial status. As such awareness, education and enforcement must be seen as a priority for those households.

Figure 2

Household Types among All Households, Village of Schaumburg



Source: 2010 U.S. Census

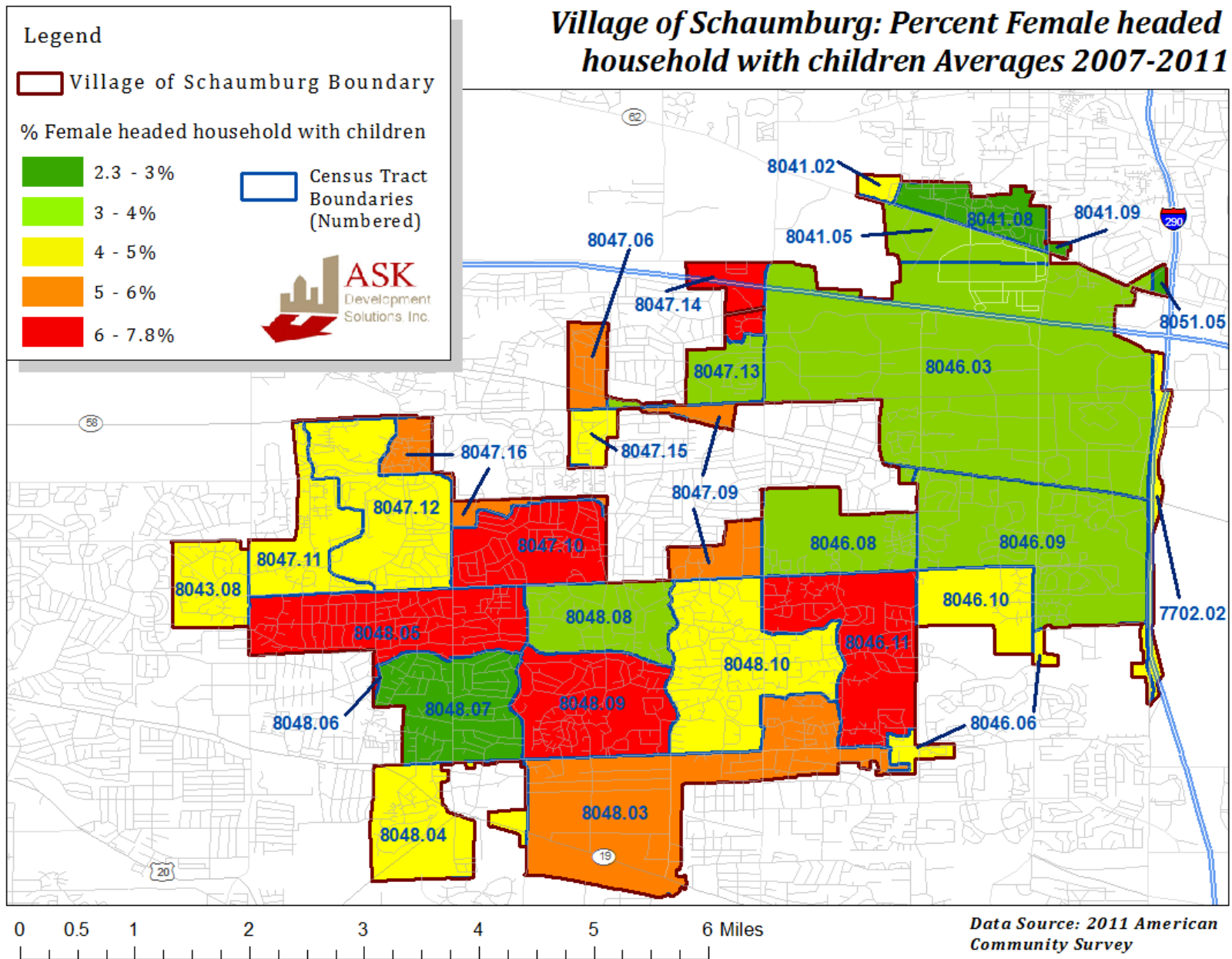
Another household characteristic is the amount of overcrowding in the Village of Schaumburg. HUD defines “overcrowding” as more than one person per room. A “room” is defined by the Census as an enclosed area within a dwelling which is

used for living purposes including living, dining kitchen, and bedrooms. The level of overcrowding as the averages for 2007-2011 ACS data as noted in Map 6 was overlaid with the low and moderate census block groups, Map 1. Overcrowding as a percentage ranged from 1% to 22%. Based on the 2007-2011 ACS averages, the only low and moderate income census block groups that also showed high levels of overcrowding were 8047.08 and 8047.12. The highest range of overcrowding 10-22% of the population occurs in 8047.08 and the range of 5-10% occurs in census tract 8047.12 which also includes a low and moderate income block group 8047.12:1. The areas of high overcrowding had very little correlation to the percent of female headed households with children.

In census tracts with a high Black or African American population, overcrowding averages were within the ranges of less than 1% and 2-5%. Census tract 8047.12 is an exception, which showed incidences of overcrowding in the 5-10% range. Among the Hispanic population, the results were similar except for census tract 8047.15 which showed population percentages in the highest 30-50% range and overcrowding in the 10-22% range. A part of census tract 8047.12 shows the Hispanic population in the 20-30% range and overcrowding in the 5-10% range.

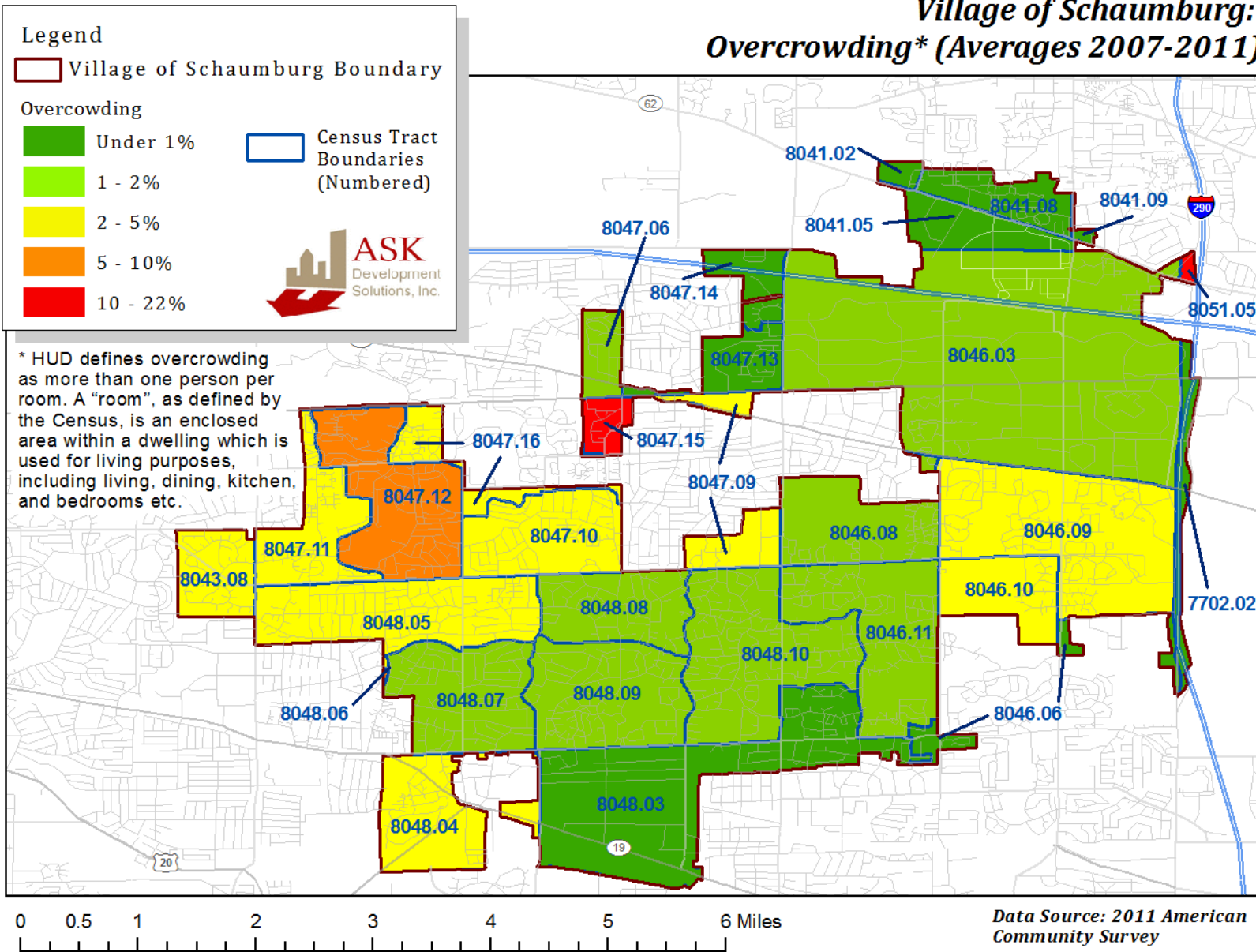
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Map 5



Map 6

Village of Schaumburg: Overcrowding* (Averages 2007-2011)



Income, Education, and Employment

Income Characteristics and Persons in Poverty

The Village of Schaumburg is located in the Chicago-Joliet-Naperville, IL HUD Metro Fair Market Rent (FMR) Area. The Chicago-Joliet-Naperville, IL HUD Metro FMR Area contains the following areas: Cook County, IL; DuPage County, IL; Kane County, IL; Lake County, IL; McHenry County, IL; and Will County, IL. Although income limits were available from HUD for other years, 2011 data was used for comparison with 2011 American Community Survey data. All figures are based on a household size of four (4) and a 2011 Area Median Income of \$74,800 for the Metro Area. HUD's 2011 Income Limits for the Chicago-Joliet-Naperville, IL HUD Metro FMR Area defined Extremely Low (30%) income limits as those earning no more than \$22,450; Very Low (50%) income limits as those earning no more than \$37,400; and Low (80%) income limits as those earning no more than \$59,850.

Table 3

Village of Schaumburg 2011 Income Limits Summary Chicago-Joliet-Naperville, IL HUD Metro FMR Area

FY 2011 Income Limit Category	1 Person HH	2 Person HH	3 Person HH	4 Person HH	5 Person HH	6 Person HH	7 Person HH	8 Person HH
Extremely Low (30%) Income Limits	\$15,750	\$18,000	\$20,250	\$22,450	\$24,250	\$26,050	\$27,850	\$29,650
Very Low (50%) Income Limits	\$26,200	\$29,950	\$33,700	\$37,400	\$40,400	\$43,400	\$46,400	\$49,400
Low (80%) Income Limits	\$41,900	\$47,900	\$53,900	\$59,850	\$64,650	\$69,450	\$74,250	\$79,050

Source: U.S. Department of Housing and Urban Development (HUD), 2011

The Housing Choice Voucher Program administered by The Housing Authority of the County of Cook (IL) will use small area FMRs as defined by zip codes. In metropolitan areas, HUD defines small areas using zip codes within the metro area. The program establishes rent limits within a metro area based on the number of bedrooms in a housing unit. The availability of the data reduces the need for extensive market area rent reasonableness studies. The Housing Choice Voucher Program assists very low income households, including the elderly and the

disabled with meeting their housing needs in the private market. As of January 2013, the Village of Schaumburg had 292 voucher holders living in the Village. See the Public Housing Authority Policies and Local Coordination Section of this AI for more information on the Housing Choice Voucher Program.

The use of small areas FMRs allows voucher holders to select from housing throughout the community since an affordable rent amounts have been established for each zip code. This facilitates the de-concentration of affordable housing in minority or low and moderate income census tracts. The lack of resources has resulted in a waiting list where prospective tenants have been waiting since 2001. As such, the lack of funding for vouchers in the Cook County service area, including the Village of Schaumburg, is an impediment to fair housing choice.

According to the 2011 American Community Survey (ACS), the median household income in the Village of Schaumburg was \$66,553, an increase of approximately 10% over that of 2000 (\$60,491). This reflects a higher 2011 ACS median household income than that of Cook County (\$54,598) and Illinois (\$56,576).

The 2011 ACS further illustrates that of the total 29,274 households in Schaumburg, 14.5% (4,222) earned less than \$25,000 annually, with another 21.5% (6,302) having earned between \$25,000 and \$50,000. Over half of all households (64%) earned incomes within the middle and upper brackets in 2011, with over 19% (5,836) having earned between \$50,000 and \$75,000; 18% (5,278) having earned between \$75,000 and \$100,000; and 26.1% (7,636) having earned \$100,000 and up.

Table 4

**Village of Schaumburg
 Household Income Levels**

INCOME LEVEL	# OF HOUSEHOLDS	% OF HOUSEHOLDS
Less than \$10,000	1,658	5.7
\$10,000 to \$14,999	544	1.9
\$15,000 to \$24,999	2,020	6.9
\$25,000 to \$34,999	1,694	5.8
\$35,000 to \$49,999	4,608	15.7
\$50,000 to \$74,999	5,836	19.9
\$75,000 to \$99,999	5,278	18.0
\$100,000 to \$149,99	4,845	16.6
\$150,000 to \$199,999	1,738	5.9
\$200,000 or more	1,053	3.6

Source: 2011 American Community Survey, U.S. Census Bureau

Per the 2011 American Community Survey, of Schaumburg's estimated 73,814 person population, 6.9% are below the poverty level. This reflects an increase from 2000, when 3.0% of the population was below poverty level. In 2011, persons age 65 years and over had experienced a lower rate of poverty at 5.5%. Families

also experienced a lower rate of poverty at 4.8%, and married couple families had a significantly lower rate of living below poverty level at 2.2%. Female-headed households with children experienced poverty at the greatest rate of all groups (30%), when compared to the number of female-headed households in the total population (9.3% of all households). In 2011, approximately 21.6% of Schaumburg's household population received Social Security income. An additional 7.5% received other public assistance such as Social Security Income (SSI), public assistance income, or food stamp/Supplemental Nutrition Assistance Program (SNAP) benefits. SNAP is the largest program to address domestic hunger, providing nutrition assistance to millions of eligible, low-income individuals and families.

Table 5

**Village of Schaumburg
 People Whose Income in the Past 12 Months
 Is Below the Poverty Level, 2011**

All People	6.1%
Under 18 Years	8.9%
Related Children Under 18 Years	8.9%
Related Children Under 5 Years	6.7%
Related Children 5 to 17 Years	9.9%
18 Years and Over	5.3%
18 to 64 Years	5.3%
65 Years and Over	5.5%
People in Families	5.0%
Unrelated Individuals 15 Years and Over	9.9%

Source: U.S. Census Bureau, 2007-2011 American Community Survey

Table 6

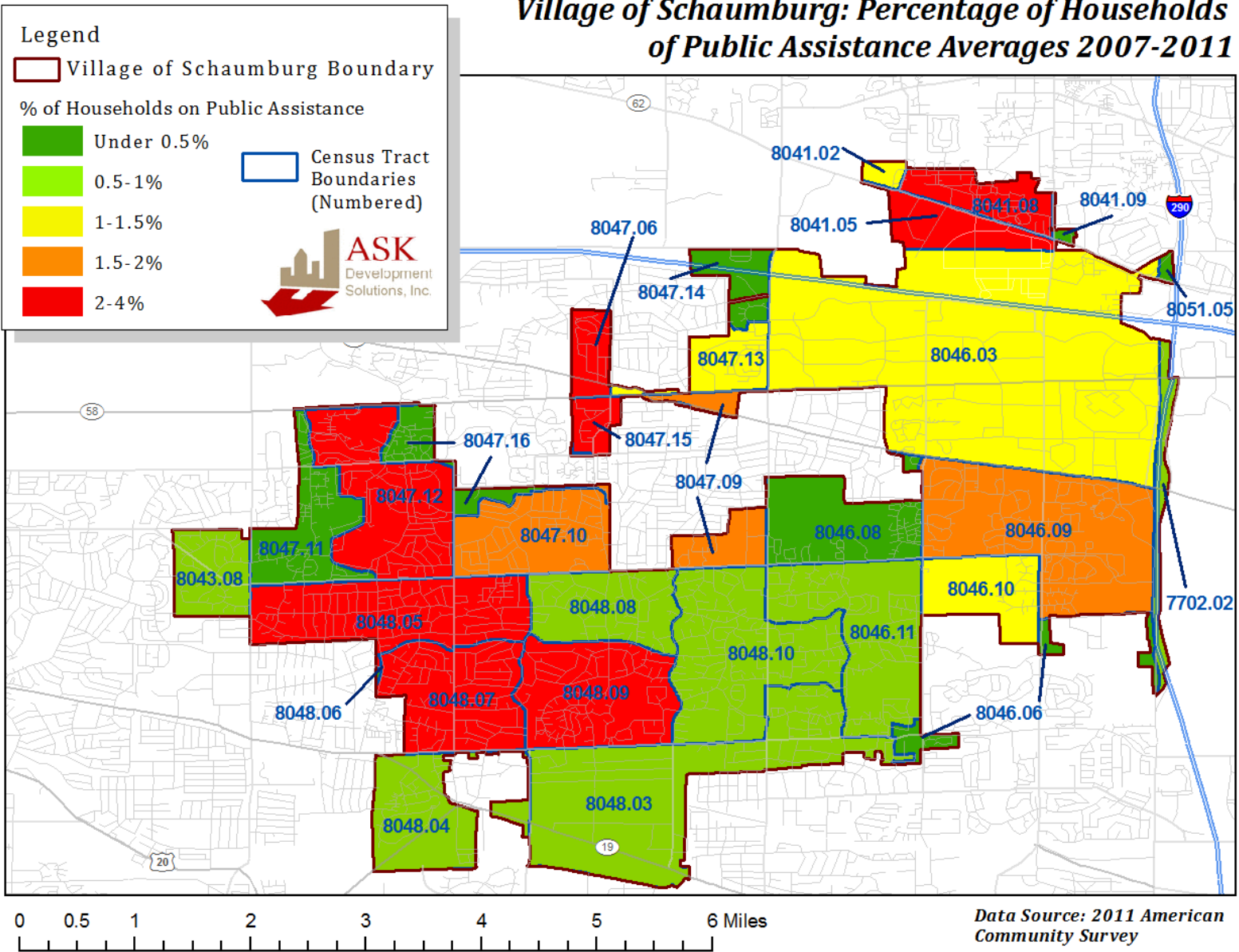
**Village of Schaumburg
 Families With Income in the Past 12 Months
 Below the Poverty Level, 2011**

All Families	4.8%
With Related Children Under 18 Years	7.5%
With Related Children Under 5 Years Only	3.5%
Married Couple Families	2.2%
With Related Children Under 18 Years	2.4%
With Related Children Under 5 Years Only	0.6%
Families With Female Householder, No Husband Present	18.9%
With Related Children Under 18 Years	30.0%
With Related Children Under 5 Years Only	17.2%

Source: U.S. Census Bureau, 2007-2011 American Community Survey

Map 7

Village of Schaumburg: Percentage of Households of Public Assistance Averages 2007-2011

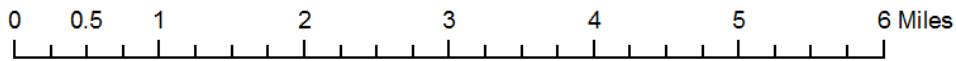
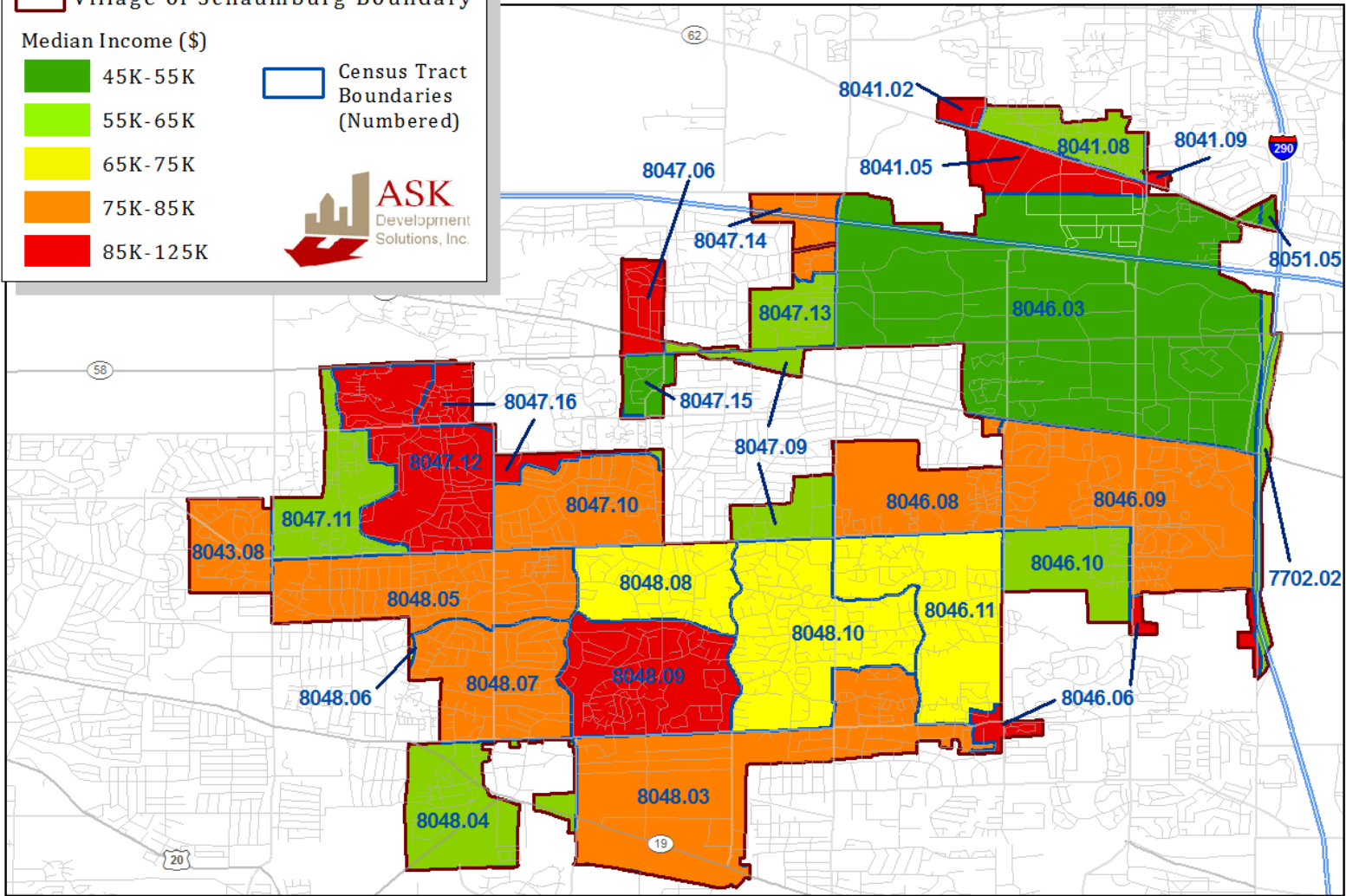



Map 8

Village of Schaumburg: Median Income (Averages 2007-2011)

Legend

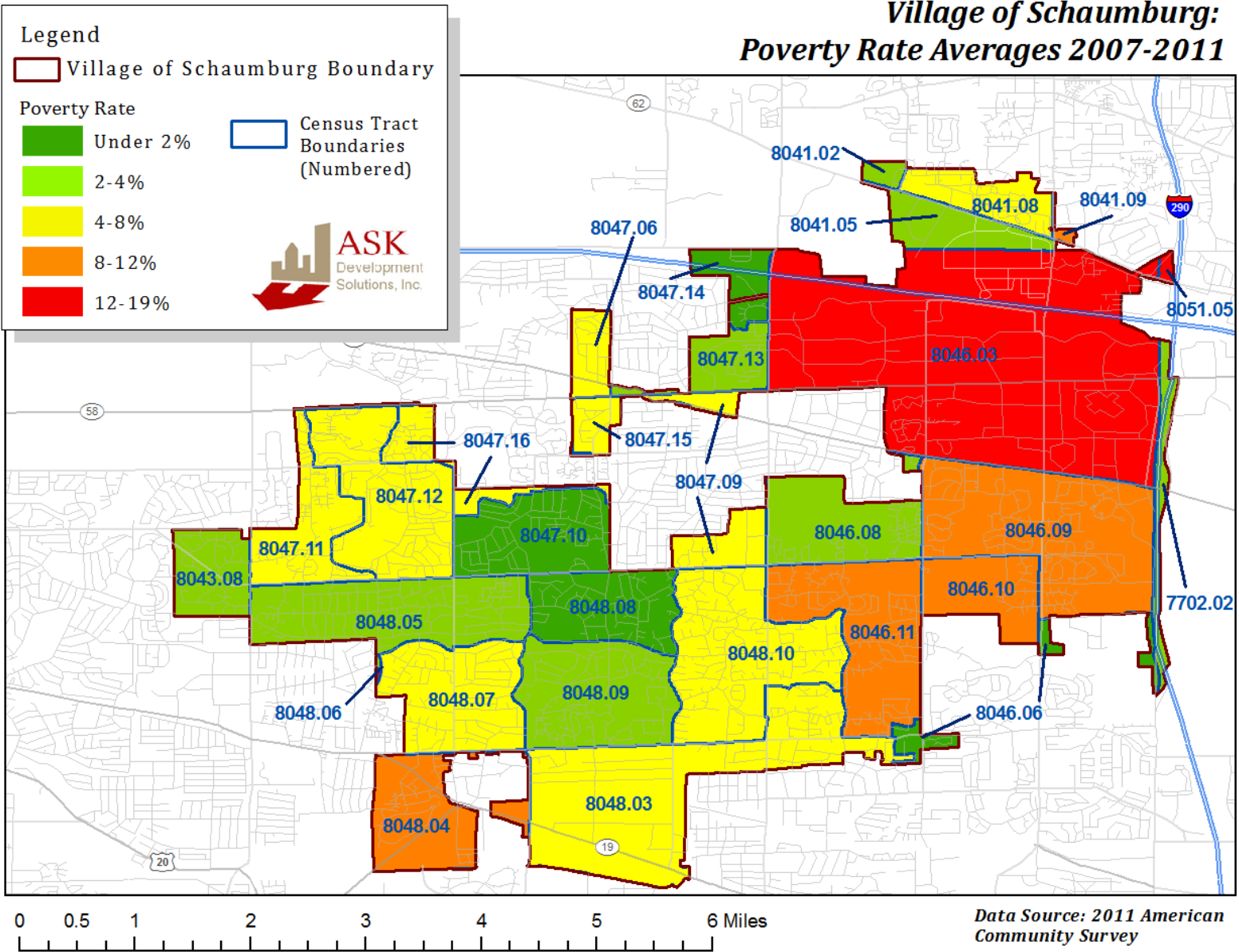
- Village of Schaumburg Boundary
- Median Income (\$)
 - 45K-55K
 - 55K-65K
 - 65K-75K
 - 75K-85K
 - 85K-125K
- Census Tract Boundaries (Numbered)



Data Source: 2011 American Community Survey

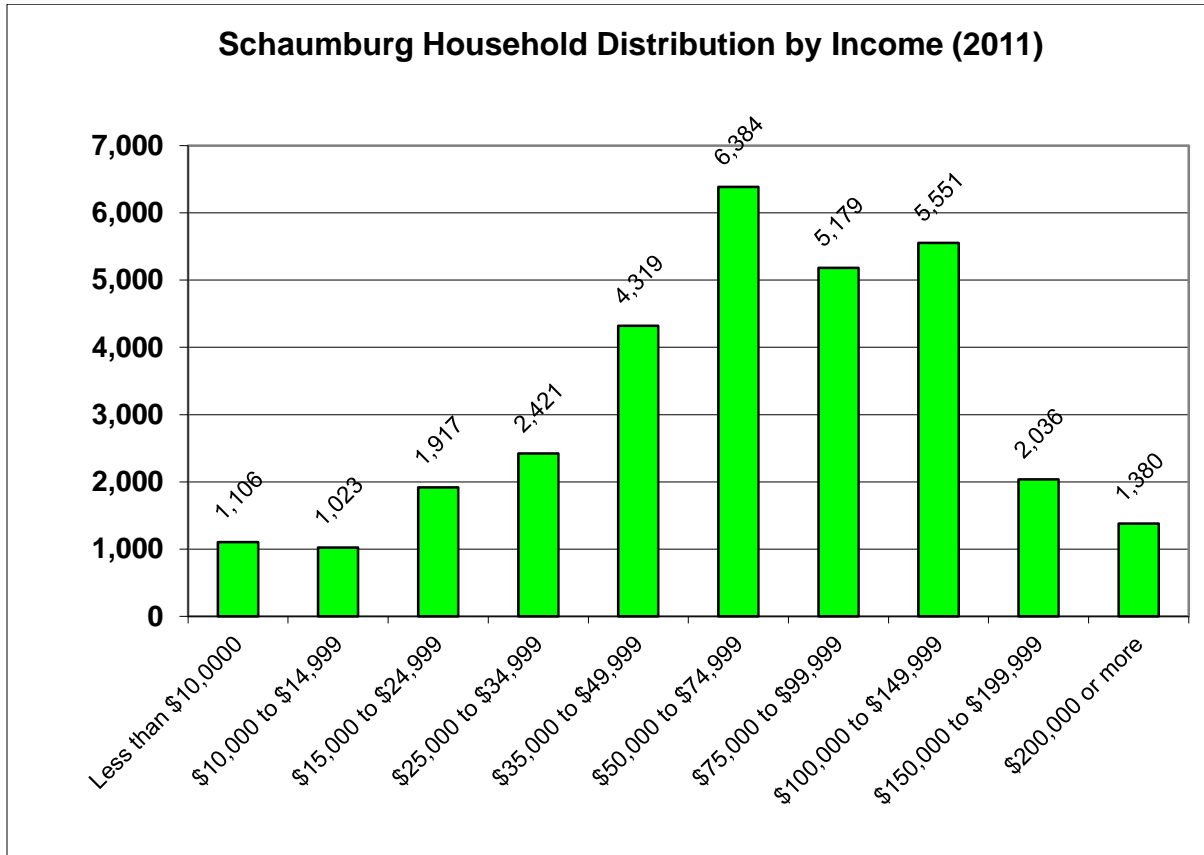
Map 9

Village of Schaumburg: Poverty Rate Averages 2007-2011



The following figure depicts the income distribution of all households in the Village of Schaumburg.

Figure 3



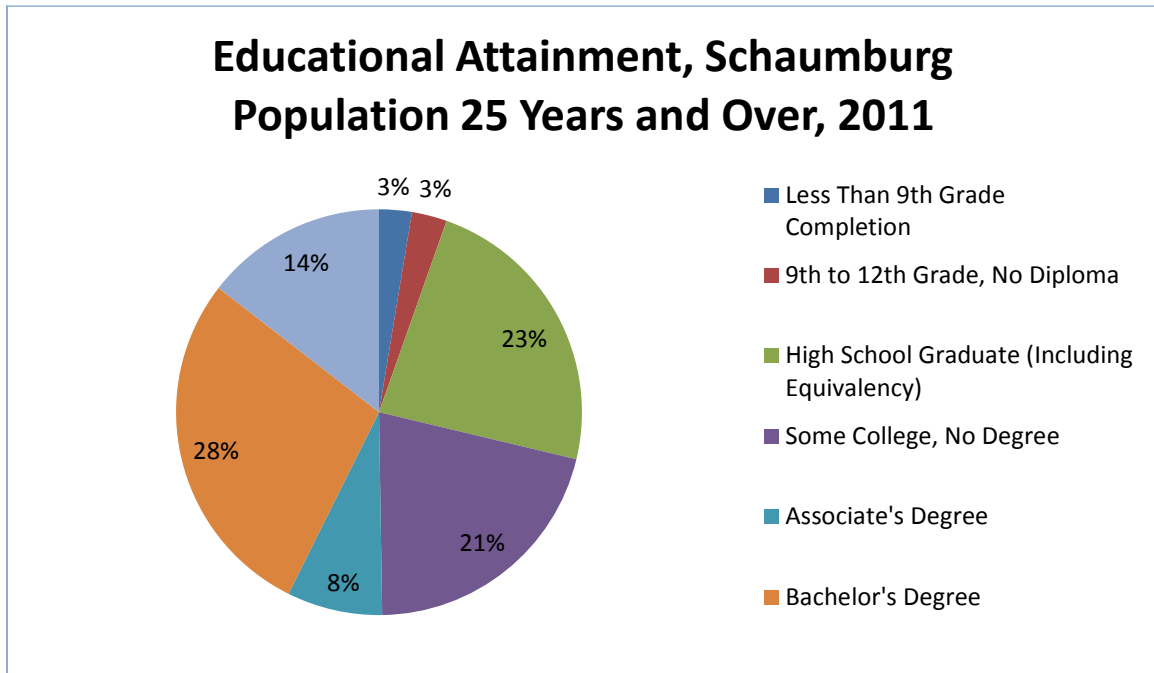
Source: U.S. Census Bureau, 2011 American Community Survey

According to the State of Illinois 2012 Action Plan, 1,291,958 persons, or 10.7% of the total Illinois population were in poverty in 2000. Forty of the state's 102 counties had percentages of persons in poverty that exceeded the state level. Cook County does not number among the counties with the highest poverty rates, but it has the most persons in poverty. Cook County's poverty rate was 13.5% in 2000, but this number represented 713,040 persons, or 55.2% of all the persons in poverty in the state. This is a slightly larger percentage than was concentrated in Cook County in 1990, when just fewer than 54% of the state's total impoverished population lived in Cook County. According to the ACS, 6.1% of Schaumburg's population lives below the poverty level.

Educational Attainment

For the Village of Schaumburg, in 2011 (American Community Survey), 23.3% of people 25 years had obtained a high school degree (including equivalency), 28.1% had a Bachelor's degree, and 14.5% had a graduate or professional degree. Of the same population (25 years and older), 2.6% had less than a 9th grade education, and 2.8% received some high education without a diploma.

Figure 4



Source: U.S. Census Bureau, 2011 American Community Survey

The total school enrollment for the population aged 3 years and over in Schaumburg was 16,737 in 2011. Nursery school and kindergarten enrollment was 1,894 and elementary through high school enrollment was 9,591 children. College or graduate school enrollment was 5,252.

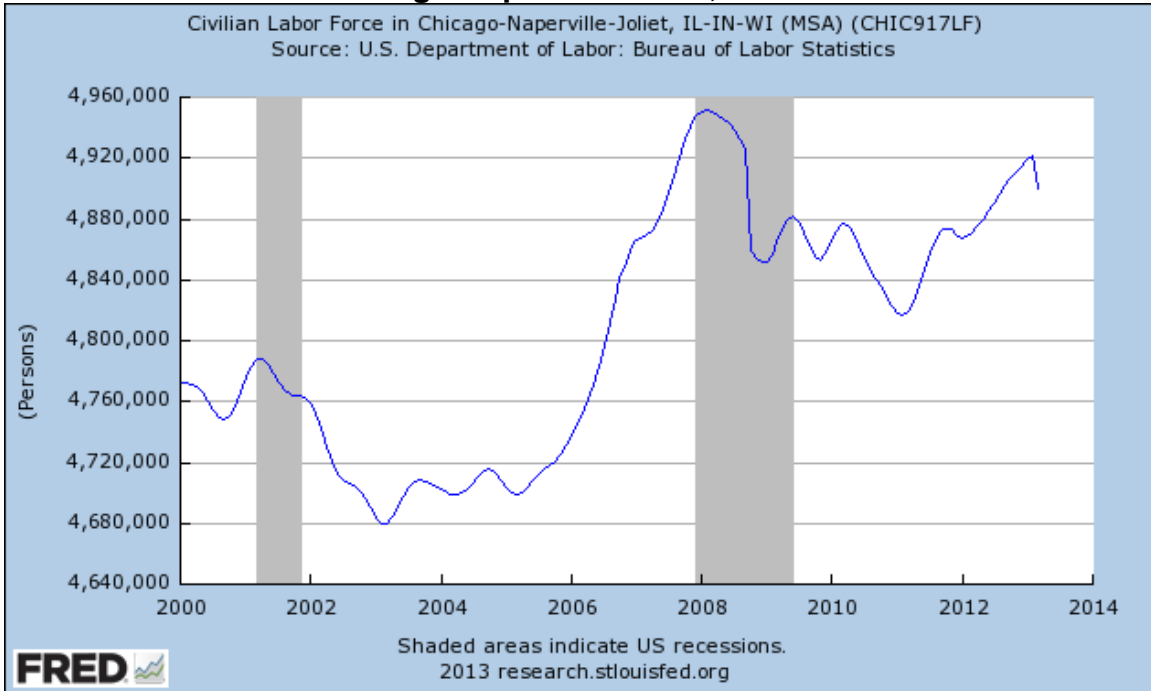
Employment

As of 2011, 60,884 residents of Schaumburg were 16 years and over of which approximately 74.3% (45,217) were in the labor force and 69.3% (42,174) were employed. This reflects some change since 2000 when Schaumburg had 60,525 persons aged 16 and over. In 2000, 75% (45,396) of those persons were in the labor force and 72.7% (43,988) were employed.

The following figures give a larger view of the labor force changes within the Chicago-Naperville-Joliet MSA, as well as Cook County (of which Schaumburg belongs to both), from 2000 to present.

Figure 5

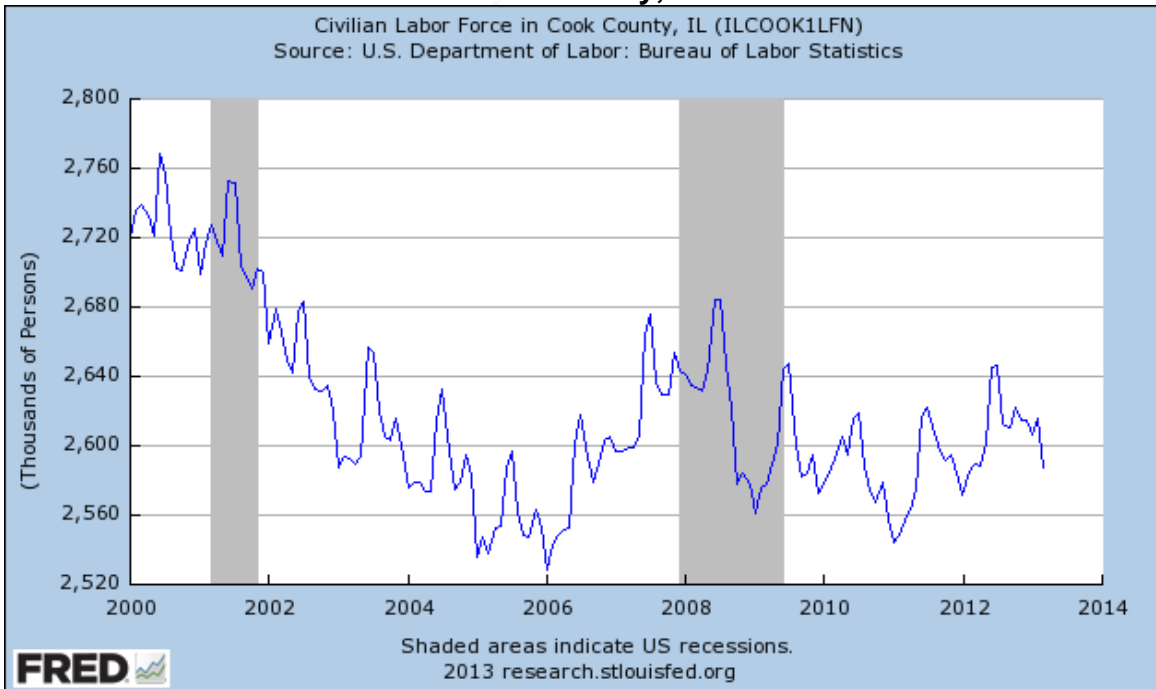
Civilian Labor Force, 2000-Present Chicago-Naperville-Joliet, IL MSA



Source: Federal Reserve Bank of St. Louis, Missouri

Figure 6

Civilian Labor Force, 2000-Present Cook County, IL

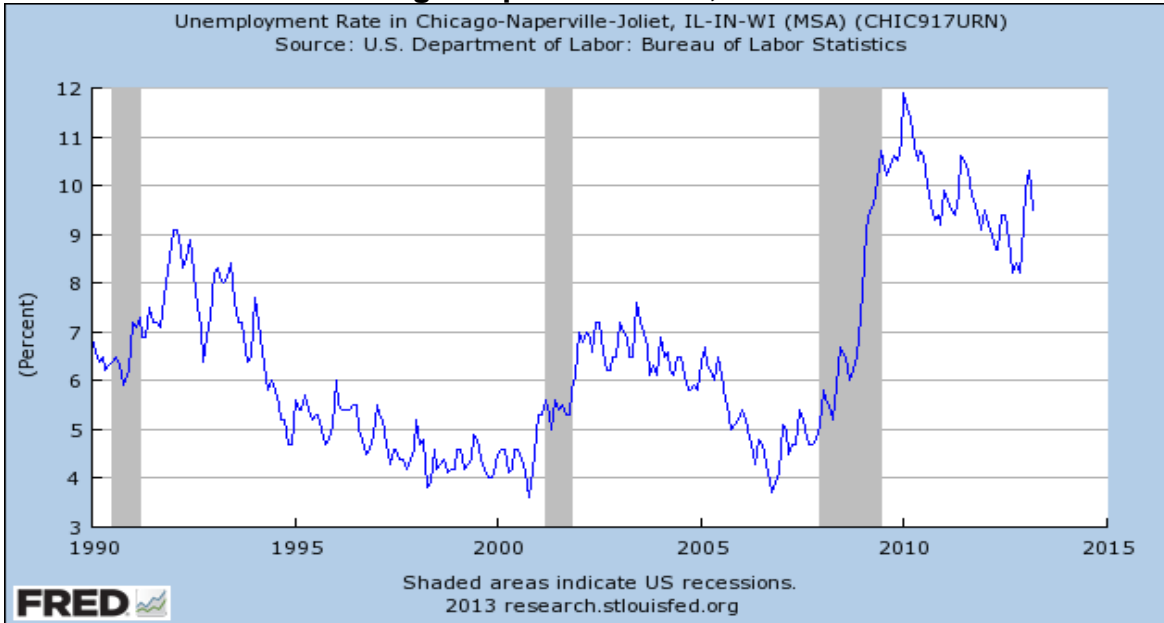


Source: Federal Reserve Bank of St. Louis, Missouri

The national economic downturn in recent years has affected the Schaumburg area as many others, and unemployment in Schaumburg has risen significantly from 3.2% in March 2000 to 6.9% in March 2013, with the State of Illinois exhibiting an even higher March 2013 unemployment rate of 9.5% (U.S. Bureau of Labor Statistics). Further illustration of these regional trends can be found in the following figures.

Figure 7

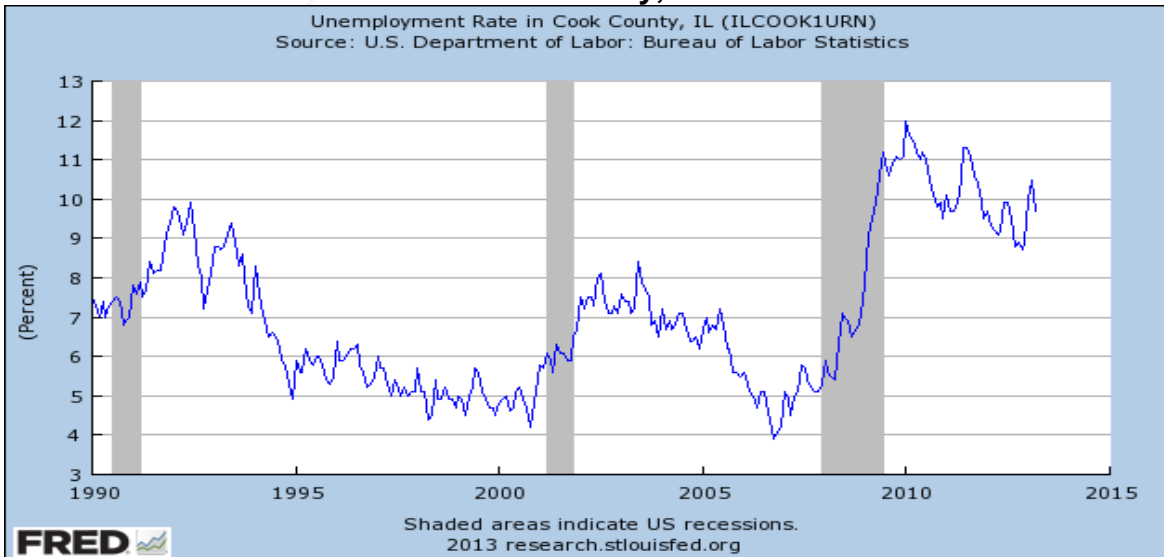
Unemployment Rate, 2000-Present Chicago-Naperville-Joliet, IL MSA



Source: Federal Reserve Bank of St. Louis, Missouri

Figure 8

Unemployment Rate, 2000-Present Cook County, IL



Source: Federal Reserve Bank of St. Louis, Missouri

The Village of Schaumburg has job opportunities in a fairly diversified economy, and the character of its population is reflected in the major industries of employment. According to the 2011 American Community Survey, the six top industries provide employment for almost three-fourths of the Village's workforce:

Table 7

**Village of Schaumburg
 Major Industries**

Industry	Number of Jobs	Percentage
Education, Healthcare, and Social Assistance	7,401	17.5%
Professional, Scientific, Waste Management Services	5,618	13.3%
Manufacturing	5,594	13.3%
Retail Trade	4,600	10.9%
Finance, Insurance, Real Estate, and Rental Leasing	4,221	10.0%
Transportation, Warehousing, and Utilities	3,170	7.5%

Source: U.S. Census Bureau, 2011 American Community Survey

Schaumburg has a well-developed economic base that provides employment opportunities not only for the citizens of Schaumburg but also for commuters from the surrounding communities. This is due, in large part, to its proximity to Chicago. The top ten employers located in Schaumburg provide a total of 15,821 jobs in a variety of fields.

Table 8

**Village of Schaumburg
 Major Employers**

Business Name	Industry Type	Number of Employees
Motorola	Telecommunications	7,000
Zurich American Insurance	Finance/Insurance	2,300
School District 54	Education	1,933
IBM	Computer Systems	950
Genworth Financial Capital	Finance/Insurance	850
Comcast	Telecommunications	725
Verizon Wireless	Telecommunications	625
Nation Pizza Products	Food Distribution	510
Village of Schaumburg	Government	510

Analysis of Impediments to Fair Housing Choice, January 2015
 Village of Schaumburg, IL

Business Name	Industry Type	Number of Employees
Experian	Credit Bureaus and Reporting	500
Friendship Village	Retirement Homes	428
IL Dept of Transportation	Government	400
The Nielsen Co.	Marketing Research	400
IKEA	Retail	400
Nordstrom	Retail	350
Earle M. Jorgensen Co.	Steel Distribution	343
Schaumburg High School	Education	319
United State Postal Service	Government	300
Patrick Group	Auto Dealership	288
Power Construction	Construction	270
Renaissance Schaumburg	Hotel	268
Super Target	Retail	250
RSM McGladrey	Management Consulting	249
Target	Retail	220
Assurance Agency	Finance/Insurance	202
Schaumburg Township District Library	Government	198
Macy's	Retail	189
Roosevelt University	Education	170
Whole Foods Market	Retail	162
Conference Plus	Teleconferencing	160
IL Institute of Art	Education	159
Flexera Software	Computer Software	158
FDIC	Government	150
American Academy of Dermatology	Professional Association	150
Campanelli YMCA	Parks/Recreation	150
Costco	Retail	149
Resnick Automotive	Auto Dealership	149
Carmax	Auto Dealership	145
Rohrman Honda Automobiles	Auto Dealership	140
Cancer Treatment Centers	Healthcare	130
American Veterinary Medical Association	Professional Association	130
Komet of America	Machine Tools	130
Hyatt Regency Woodfield	Hotel	129
Lowe's	Retail	128
Omron Electronics	Manufacturer/Electronic	128

Analysis of Impediments to Fair Housing Choice, January 2015
Village of Schaumburg, IL

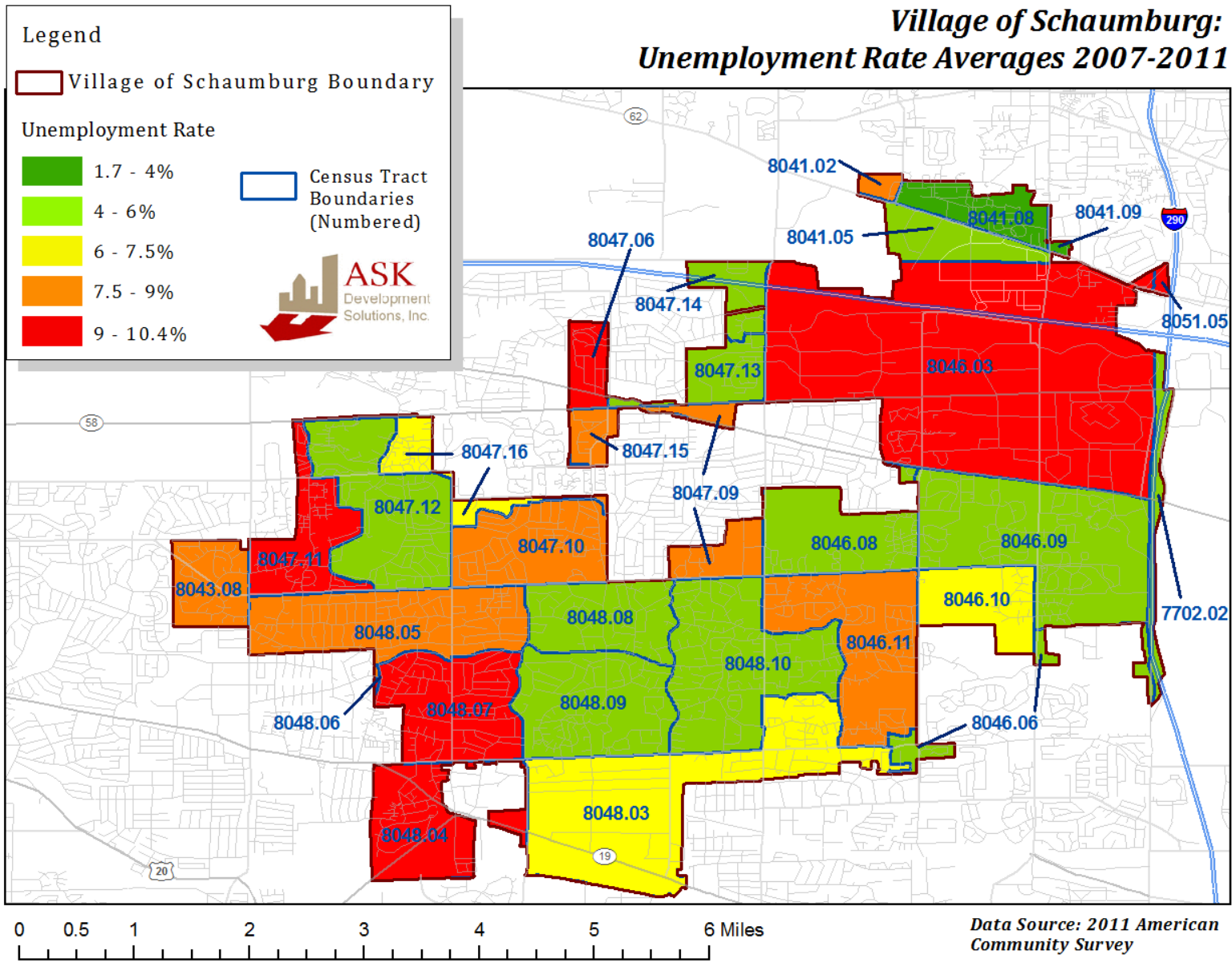
Business Name	Industry Type	Number of Employees
Marriott-Chicago Schaumburg	Hotel	115
Quad/Graphics	Commercial Printing	115
Schaumburg Park District	Parks/Recreation	112
Motor Coach Industries	Transportation	106
Woodfield Chevrolet	Auto Dealership	106
PromoWorks	Marketing/Advertising	103
Jewel Food Stores	Retail	100
TravelCLICK, Inc.	Computer Software	100

Source: Village of Schaumburg Community Development/Economic Development, based on telephone inquiries conducted by Analysights, LLC

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Map 10

Village of Schaumburg: Unemployment Rate Averages 2007-2011



Transportation and Commuting

Transportation

Most of the Village of Schaumburg's public transportation is provided by the Regional Transportation Authority (RTA). The Village jointly funds Schaumburg's DART, Trolley, Pace Route 602 and Pace Route 554. In 1974, the RTA was created upon approval of a referendum in the northeastern Illinois region of Cook, DuPage, Kane, Lake, McHenry and Will counties. The RTA is considered a special purpose unit of local government and a municipal corporation of the State of Illinois. Initially, the RTA provided financial assistance to existing public transit operators. As the need for public transportation increased, the RTA's role expanded to include the acquisition and operation of public transportation carriers as well as contracting to provide service. In 1983, the RTA Act was amended, with substantial changes made to the RTA's organization, funding and operations. The amended Act created three service boards: the Chicago Transit Authority (CTA); Metra commuter rail; and Pace suburban bus. The RTA's primary responsibilities became financial and budget oversight of CTA, Metra and PACE, and regional transit planning issues. The RTA is the third largest public transportation system in North America, providing more than two million rides a day. The RTA has 7,200 route miles in the six-county region, which currently has a population of approximately eight million people.

Pace's fixed-route bus service carries commuters throughout the suburbs using a set schedule and routing. Pace provides more than 240 fixed routes serving over 220 communities in the six county areas to employment centers, hospitals, shopping centers, and many other attractions. The Northwest Transportation Center is located near Schaumburg's Streets of Woodfield shopping center and serves as the central hub. Pace Routes 208, 554, 600, 606, 696, 757, and 895, the Schaumburg Dial-A-Ride service, and the Woodfield Trolley all provide service at this facility, as do seasonal Pace Special Event bus routes to Wrigley Field, Soldier Field, and Great America.

Dial-A-Ride Transportation (DART) is a door to door service provided by the Village of Schaumburg and Pace's Suburban Bus Division. A Pace bus will pick up and drop off passengers anywhere within the Village of Schaumburg. The DART service does not extend beyond the borders of the Village of Schaumburg except to Harper College in Palatine. DART reduced fare eligibility is available to the following persons: seniors 65 and over; persons with disabilities; students through grade 12 to and from school; children age 7 to 11; and children under 7 are free if accompanied by an adult.

According to the RTA, Pace bus fleets are 100% accessible. Special equipment such as lifts, ramps, wheelchair securement areas, priority seating and visual display announcements have been installed on all Pace buses to make fixed route bus service accessible to people with disabilities. The Americans with Disabilities Act (ADA) requires bus drivers to call out stops and to have large print and Braille

signage in fixed route buses. Most buses have automated systems that visually display and verbally announce stops. Bus drivers also are able to assist passengers with boarding and exiting the bus, using a lift or ramp, securing wheelchairs and scooters, or helping put fares in the fare box when asked.

Schaumburg is served by a Metra Rail Line connecting to Chicago's Union Station to the east and Elgin to the west. Metra is the commuter rail agency serving Cook, DuPage, Will, Lake, Kane and McHenry counties in the Chicago area. It is the sister agency to the Chicago Transit Authority, which provides mass transit rail (the L) and bus service to Chicago and some suburbs, and Pace, which provides bus service primarily in the suburbs.

According to the RTA, the majority of Metra stations are accessible, and work to increase the number of accessible stations is currently underway. Accessible Metra stations have audio and visual announcements, TTY, Braille and large print signs, and tactile strips along the edge of the platform to alert customers to the platform edge. In addition, accessible Metra stations that are not at ground level have elevators or ramps. All Metra trains are required to have at least one accessible car per train. For all rail cars without steps, a portable ramp is used by railroad personnel to help with boarding. In instances where the rail car has steps, a lift will be deployed. Many stations have signs that show riders where the accessible boarding area is on the platform.

Under the ADA, commuter rail systems are not required to operate complimentary para-transit systems. Accordingly, Metra does not operate such a system. However, Metra does provide what is called P-8 service (short for paragraph 8 of the Jones II Consent Decree). P-8 is a shuttle service from a qualified origin to the next accessible station. Metra does this at no additional charge to the passenger and does not require certification of disability status.

The Village of Schaumburg offers discounted taxi service to qualified Schaumburg residents who are registered in the Illinois Circuit Breaker Program, or who are senior (65 or older), or disabled (16 or older). The Village also operates a free Woodfield Trolley, providing service to 10 locations and front door drop off service to 9 stops. The Schaumburg Township, which includes the unincorporated area and the villages are Elk Grove, Hanover Park, Hoffman Estates, Rolling Meadows, Roselle, Schaumburg, and Streamwood, administers the TRIP program, a Township state-funded pilot program which provides transportation across township lines for medical reasons for senior citizens and persons with disabilities. This inter-township transportation will cover much of Northwest Cook County and also serves Chicago and Broadview.

Annually, the Village of Schaumburg hosts a Septemberfest celebration which attracts over 250,000 attendees. Schaumburg provides free bus transportation service along six routes throughout the community relieving both traffic and parking

congestion, and allows residents to leave their cars at home. Approximately 35,000 rides are provided over the three day event.

According to the Schaumburg Comprehensive Green Action Plan, the Village extensively promotes local and regional transportation options, particularly in the areas of public transit and biking. The Village of Schaumburg's nationally recognized (League of American Bicyclists "Bicycle Friendly Community") Bicycle Program consists of an 90-mile network of both on and off-street bicycle paths and an outreach program that promotes and encourages bicycling as a viable alternative form of travel. The Village of Schaumburg's program was officially incorporated into the Village's Comprehensive Plan in 1979 with a set of ordinances that address overall development of paths/lanes within the community, formation of the Bikeways Advisory Committee to specifically address bicycling issues, and bicycle parking guidelines that provide parking at most commercial, retail, industrial, and public facilities located within Schaumburg's borders. In addition to facilities, Schaumburg supports several events annually which incorporate bicycling. The Bike to Work Week festivities in May, coincide with the League of American Bicyclists "Bike to Work Week," a Summer Bike Patrol Program which encourages riding and educates on safe riding techniques, and the Adopt-A-Bike Path Program staffed by volunteers who keep the paths clean, attractive, and more desirable to use.

The Schaumburg Comprehensive Green Action Plan reports that the Village works regionally to encourage the development of bicycle facilities throughout the Village and by working with neighboring communities to connect path and trail facilities. Schaumburg served as a Policy Committee representative for the Northwest Municipal Conference's "Making Regional Bikeways a Reality" program and currently serves as a Municipal Representative for the Chicago Metropolitan Agency for Planning's (CMAP) Bike and Pedestrian Task Force.

In addition, according to the Cook County Department of Public Health's website, the Village has instituted the following policy, system and environmental changes:

- Installation of bike directional signage to help commuters and recreational riders find local destinations;
- Adoption of updated standards for the development of on and off-street bicycle facilities; and
- Installation of an intergenerational community garden, focused on serving the needs of the Senior Center, Teen Center and Park District preschool program".

According to the 2012 Cook County Analysis of Impediments to Fair Housing Choice, transportation costs in suburban Cook County exceeded the regional average. The Center for Neighborhood Technology (CNT) conducted research in 2012 on the impact of transportation costs on housing affordability. The transportation costs were found to range from 12% to 30% of household income. Higher percentages were found in suburban locations. While the average regional

transportation cost was found to be \$748, the average cost for suburban Cook County was \$797. CNT has advocated for a new standard of housing affordability that states that housing and transportation costs should not exceed 45% of household income.

Typically, inadequate transportation choice is an impediment to fair housing choice because lower income households are less likely to own a car and depend more on public transportation. While income is not a protected class under the Fair Housing Act and the Illinois Human Rights Act, members of the protected classes under these two laws, including persons with disabilities, families with children, the elderly and minorities, are more represented in the lower income populations. (See section on income characteristics.) The Village of Schaumburg has been very proactive in the areas of transportation policy, funding, and work with regional entities to improve public transportation for persons who are most affected. Residents have greater access to places of employment thereby allowing them to have greater housing choices than having to live close to employment centers. The Village's proactive and comprehensive policies and actions on promoting the use of bicycles as an affordable transportation alternative improves fair housing choice by increasing easier connection between employment centers and housing opportunities. Because resources are inadequate to meet the demand for public transportation, transportation is still an impediment to fair housing choice.

Commuting

According to the 2011 American Community Survey, 84% of Schaumburg workers drove to work alone and 7% carpooled between 2007 and 2011. Among those who commuted to work, it took them on average 27 minutes to get to work one way.

Table 9

Commute Times – Schaumburg, 2011

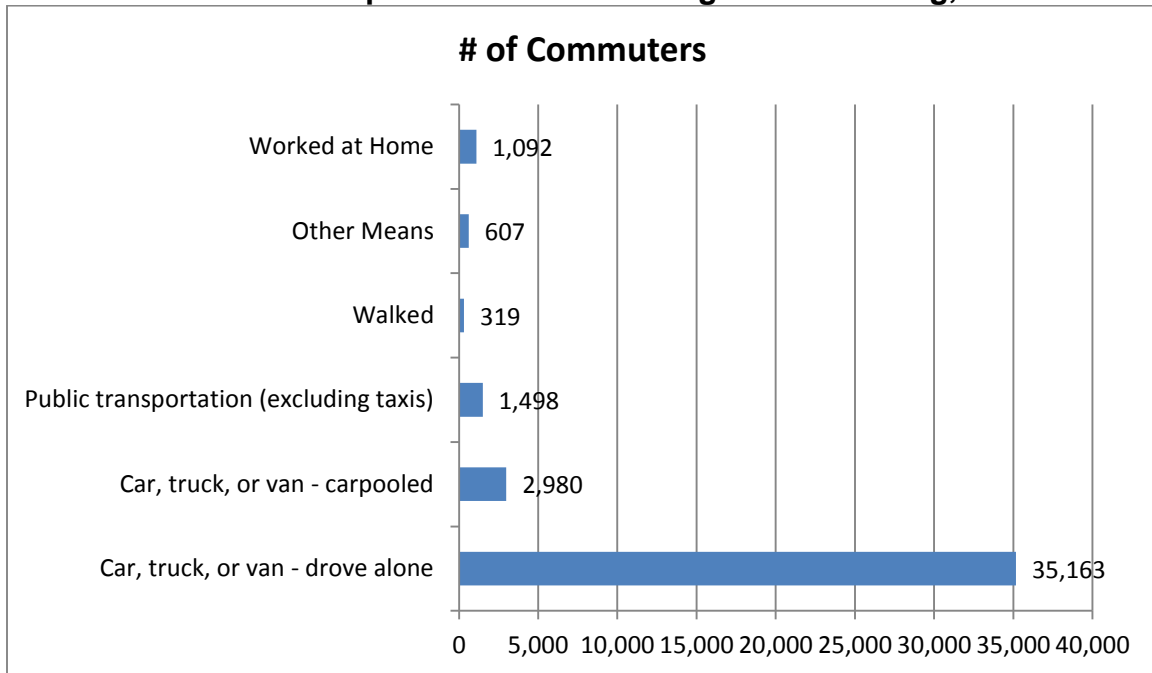
Travel Time to Work (one way)	Persons (#)	Rate (%)
Less than 10 minutes	4,122	10.5
10 to 14 minutes	4,931	12.6
15 to 19 minutes	5,225	13.3
20 to 24 minutes	4,681	11.9
25 to 29 minutes	2,268	5.8
30 to 34 minutes	5,829	14.8
35 to 44 minutes	4,515	11.5
45 to 59 minutes	5,217	13.3
60 or more minutes	2,481	6.3

Source: U.S. Census Bureau, 2011 American Community Survey

A review of the data above shows that almost half of commuters (45.9%) spent 30 minutes or more commuting one way to work. An additional 36.4% spent less than 20 minutes commuting one way to work.

Figure 9

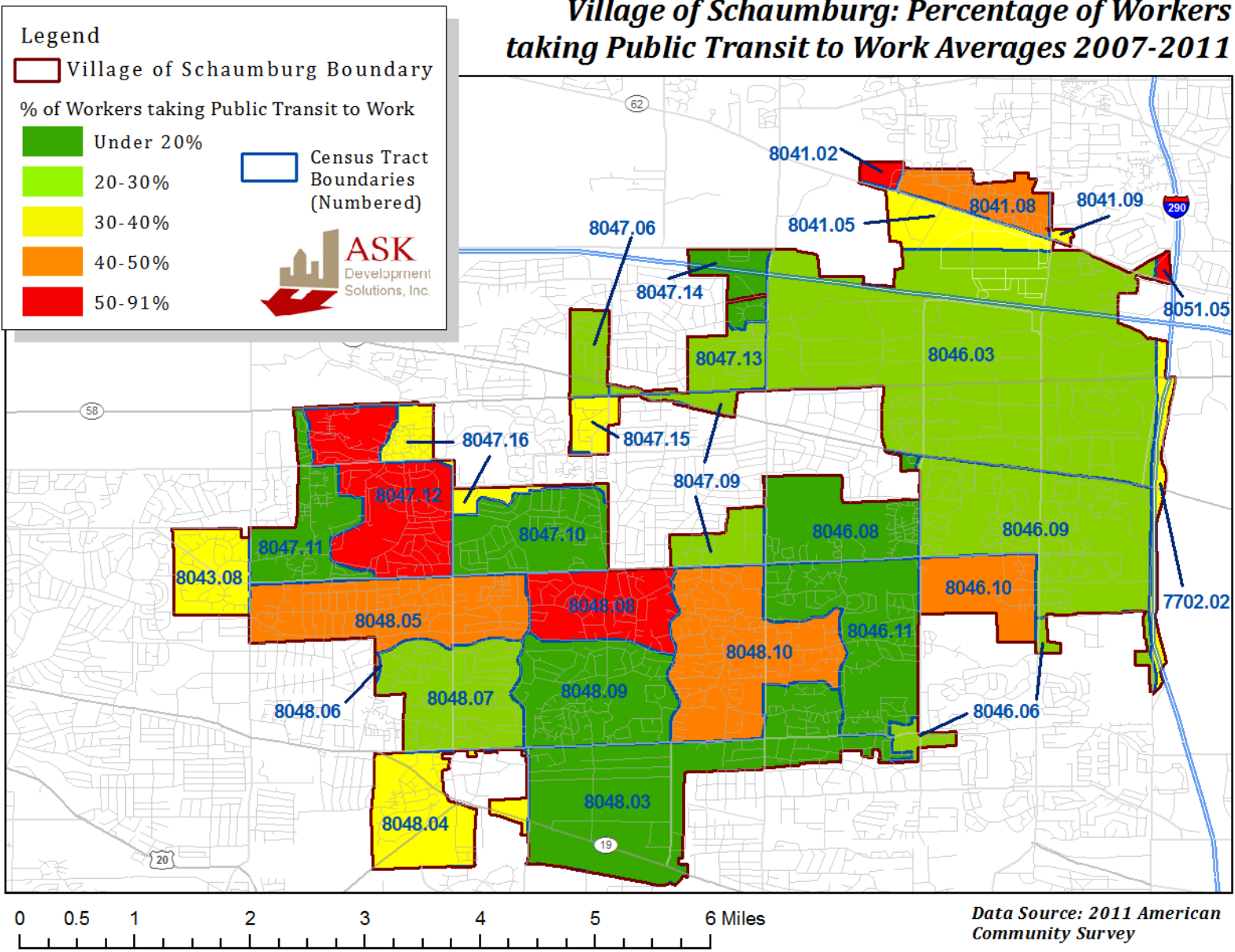
Modes of Transportation – Commuting – Schaumburg, 2011



Source: U.S. Census Bureau, 2011 American Community Survey

Based on the data above and key person interviews with the Village’s Director of Transportation, the Village has a proactive transportation policy and makes efforts to connect Village residents to employment centers, amenities, medical facilities, and other aspects of Village life. The Village also invests general funds in subsidizing transportation costs for Village residents who are low income, persons with disabilities and the elderly who may not be able to afford personal transportation. The transportation policy facilitates fair housing choice by allowing residents who cannot afford private cars to make housing choices that do not have to be near their places of employment, medical facilities or social amenities. This approach is very important since the Village has very little buildable land to provide more affordable housing opportunities for persons within the protected classes, especially persons with disabilities and the elderly who may require special needs housing solutions.

Village of Schaumburg: Percentage of Workers taking Public Transit to Work Averages 2007-2011

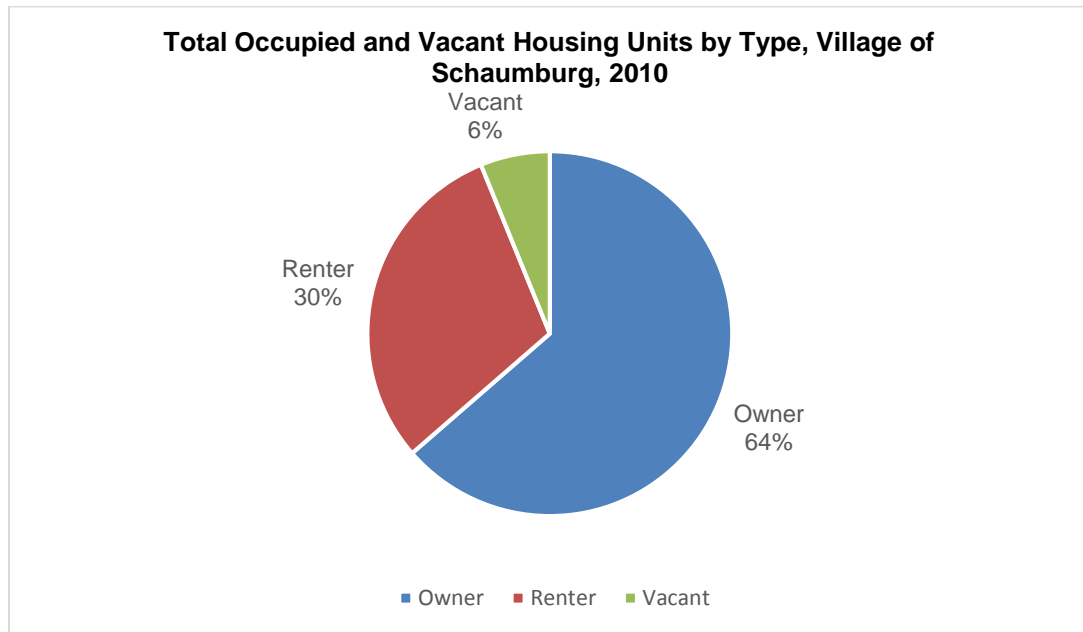


III. HOUSING PROFILE

Housing by Tenure

The number of housing units in Schaumburg has grown marginally from 33,093 in 2000, to 33,610 in 2010. The Village's vacancy rate, however, has risen at a greater rate from 1,294 (3.9%) in 2000 to 2,071 (6.2%) in 2010. Including vacant units in 2010, the Village of Schaumburg contained 21,383 owner occupied units (64%), 10,156 renter occupied units (30%), and 2,071 vacant units (6%). The Code Enforcement Division documents vacant homes under the Vacant Building Registration Program. According to the 2012 ACS, the total number of vacant homes in Schaumburg, including multi-family units, was 2,125.

Figure 10



Source: 2010 U.S. Census

The State of Illinois 2010-2014 Consolidated Plan included information on residential vacancy data on the County level. The following information from the Consolidated Plan is for Cook County and the surrounding counties.

Table 10

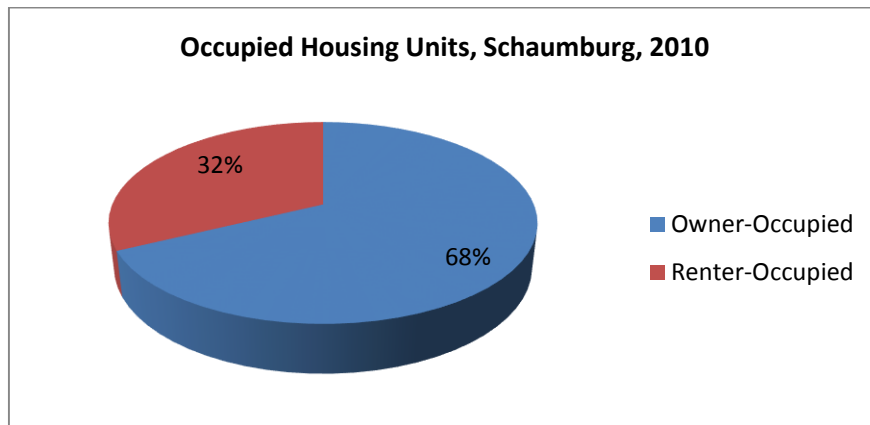
State of Illinois Residential Vacancy Data for Select Counties

County	Total Residential Units	Total Vacant Residential Units	Residential Units Vacant > 90 Days	Residential Vacancy Rate	90-Day+ Vacancy Rate
Cook County	1,979,009	93,225	74,906	4.7%	3.8%
DuPage County	349,534	8,434	5,749	2.4%	1.6%
Kane County	168,733	4,797	3,021	2.8%	1.8%
Lake County	256,322	8,014	5,060	3.1%	2.0%
McHenry County	112,016	1,721	1,059	1.5%	0.9%
Will County	226,519	3,852	2,802	1.7%	1.2%

Source: State of Illinois 2010-2014 Consolidated Plan, compiled by the University of Illinois-Chicago from U.S. Postal Service and Home Mortgage Disclosure Act (HMDA) data.

Of the 31,539 occupied (non-vacant) housing units in Schaumburg in 2010, approximately 67.8% (21,383) were owner occupied and 32.2% (10,156) were renter occupied. This corresponds to the rate of homeownership (69.4%) and rental tenure (30.6%) of non-vacant units in 2000.

Figure 11



Source: 2010 U.S. Census

The maps on the following pages show occupancy by census tracts. The percentage of vacant housing in 2010 (Map 12) is highest in the census tracts that have the highest minority populations. Census tract: block group 8046.03:1 is the largest area in the Village with the highest Hispanic population (30-50%) and also the largest area with the second highest Black or African American population (7.5-10%). Census tract: block group 8046.03:2 is another area which has the second highest Black or African American population range but a much lower Hispanic population range at 10-20%. Census tract: block groups 8041.08:2 and 8047.11:1

are two of the areas with the highest Black or African American population ranges at 10-15%.

Based on 2010 US census data (see Map 12), the largest areas containing the highest percentage of vacant housing are the 8046.03 and 8041.08 census tracts which encompass the areas of minority concentration described above. In addition, the percentage of owner occupied housing in those two census tracts are the lowest at 12.5-50%. Census tract: block group 8046.03:2 is also an area that has a low and moderate income concentration. Census tract: block groups 8047.11:1 and 8047.12:1 have low income and minority concentrations but also have lower percentages of vacant housing (5-7.5%) and higher homeownership rates (50-70% and 70-80%). The limited supply of housing and affordable options due to lack of buildable land has a more disparate impact on minority and lower income populations.

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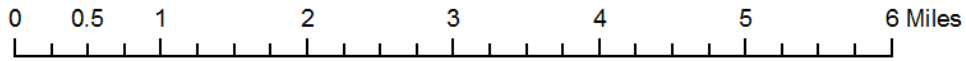
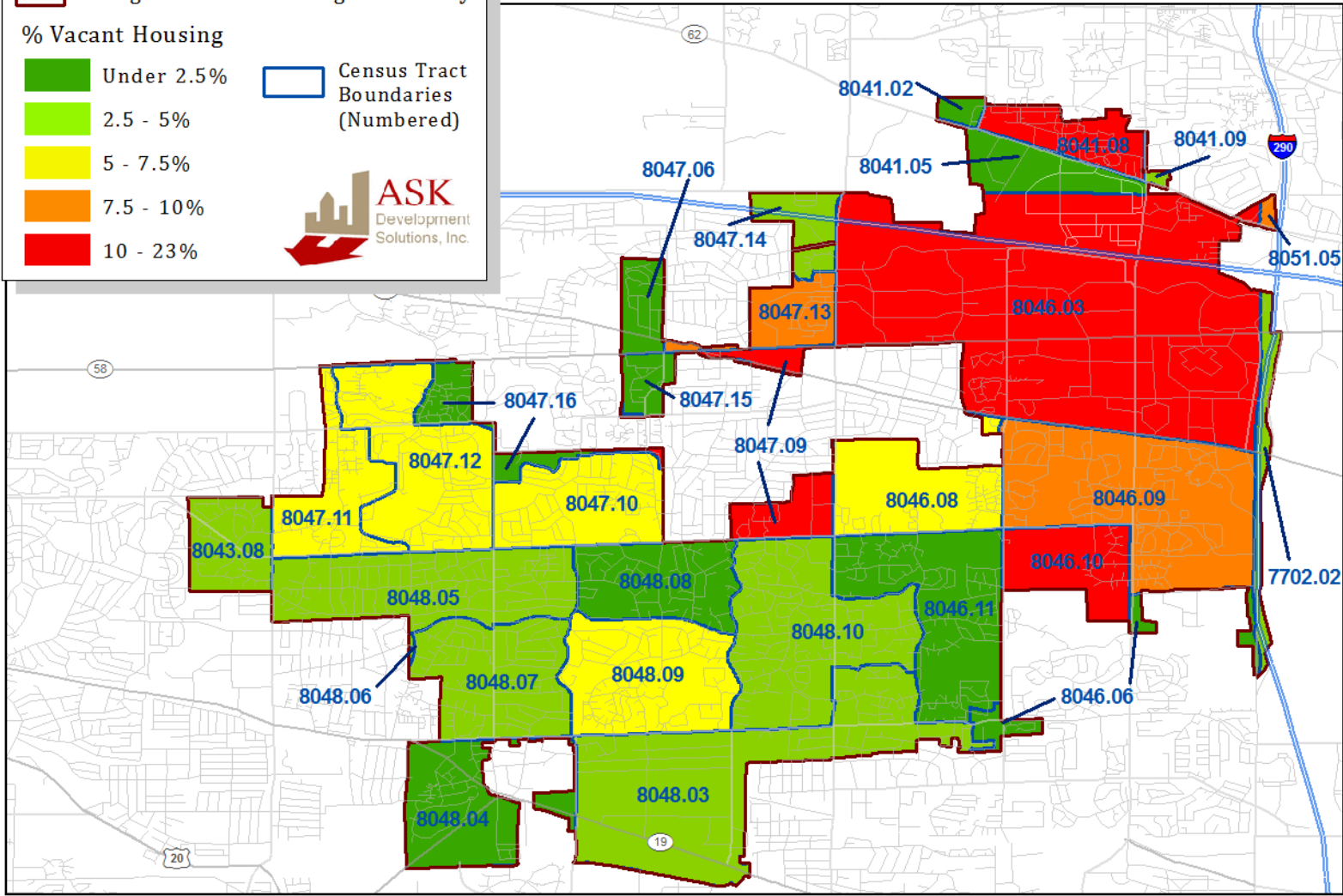
Village of Schaumburg: Percent Vacant Housing in 2010

Legend

- Village of Schaumburg Boundary
- Census Tract Boundaries (Numbered)

% Vacant Housing

- Under 2.5%
- 2.5 - 5%
- 5 - 7.5%
- 7.5 - 10%
- 10 - 23%

Data Source: 2010 US Census


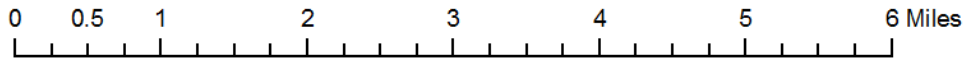
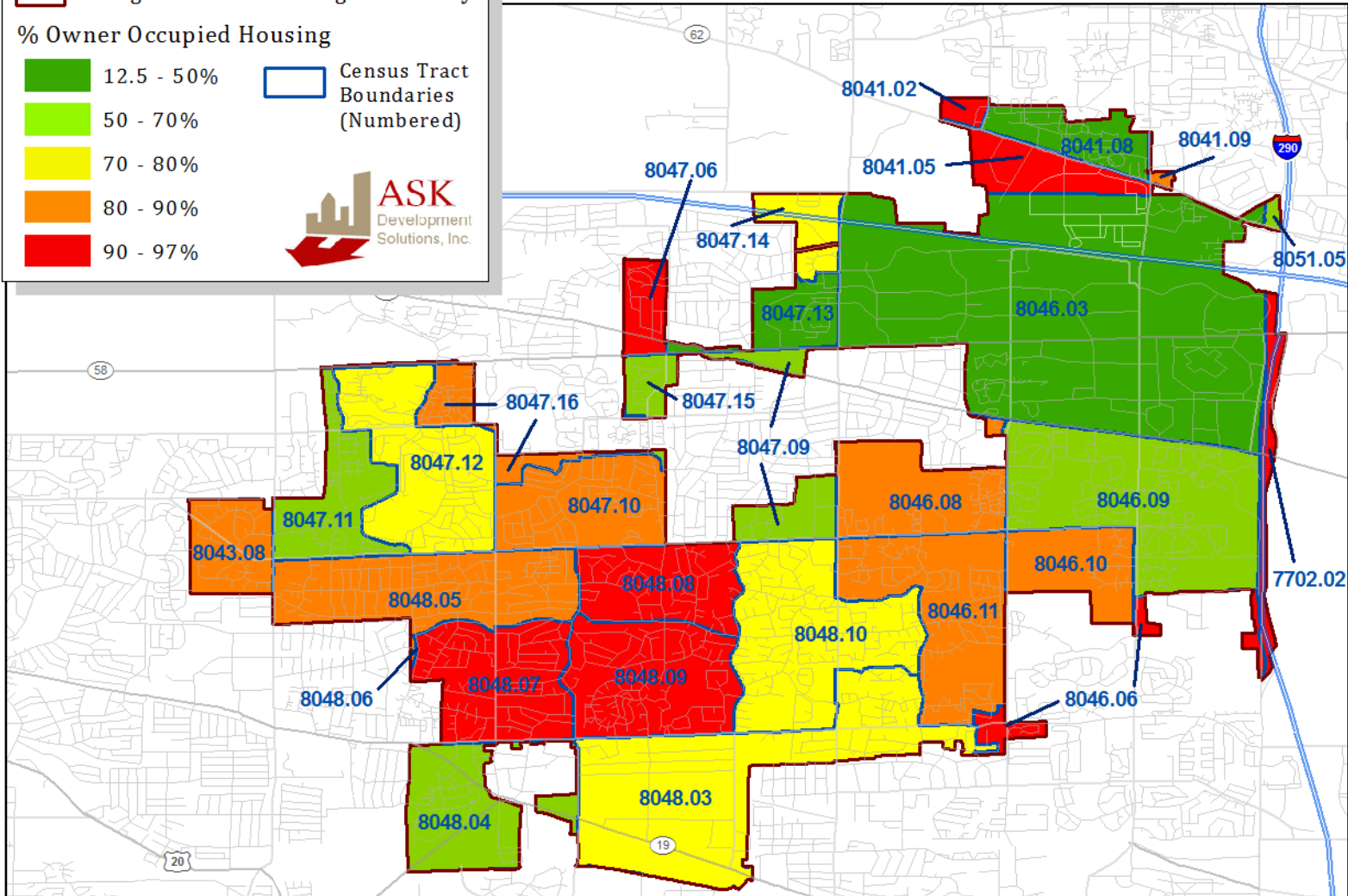
Village of Schaumburg: Percent Owner Occupied Housing in 2010

Legend

- Village of Schaumburg Boundary
- Census Tract Boundaries (Numbered)

% Owner Occupied Housing

- 12.5 - 50%
- 50 - 70%
- 70 - 80%
- 80 - 90%
- 90 - 97%

Data Source: 2010 US Census


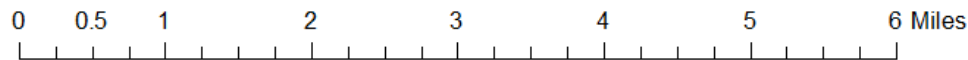
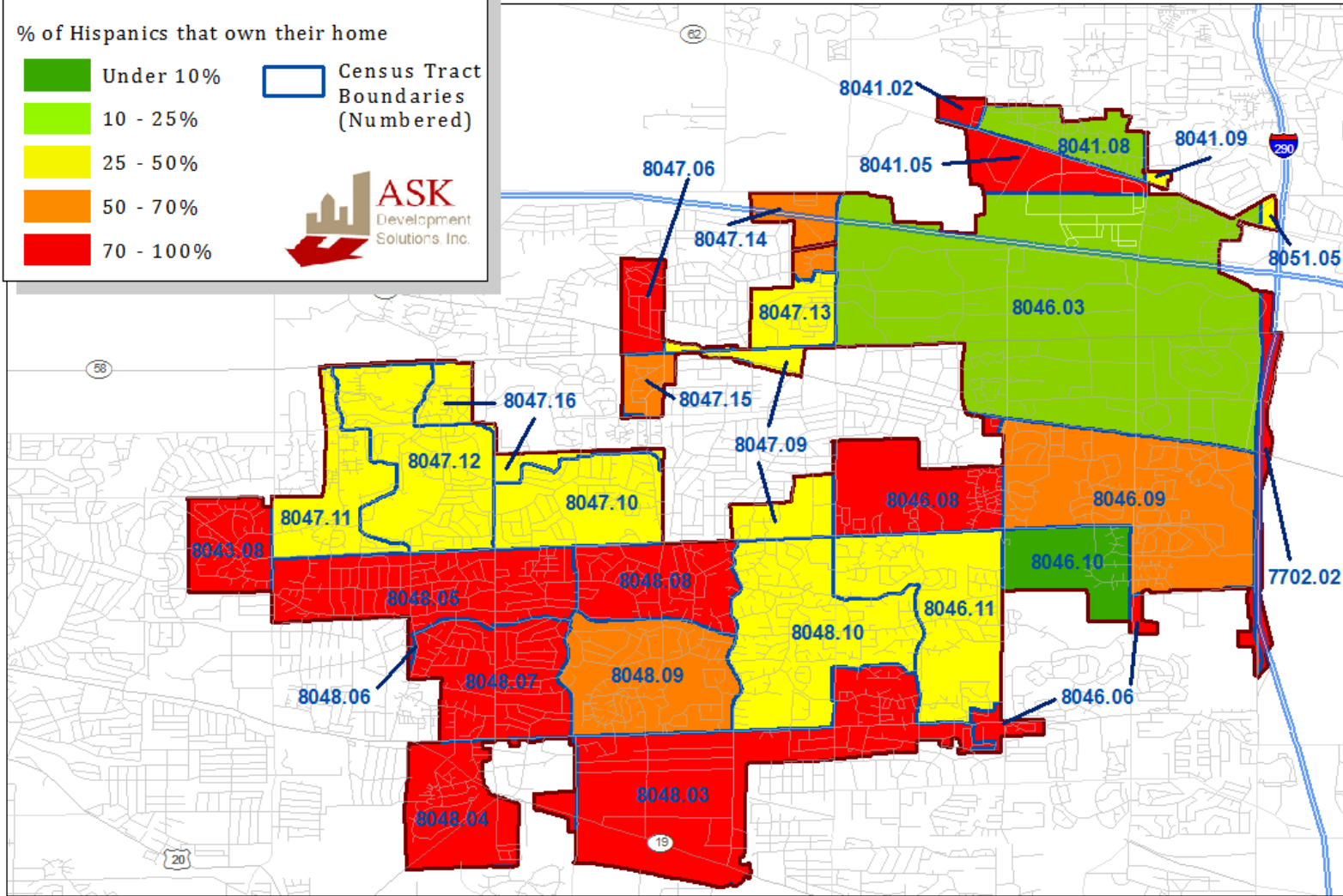
Village of Schaumburg: Percent of Hispanic Households that own their home in 2010

Legend

- Village of Schaumburg Boundary
- Census Tract Boundaries (Numbered)

% of Hispanics that own their home

- Under 10%
- 10 - 25%
- 25 - 50%
- 50 - 70%
- 70 - 100%

Data Source: 2010 US Census


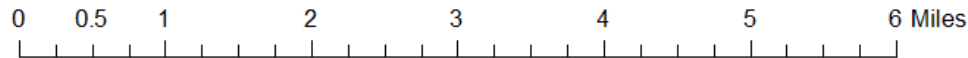
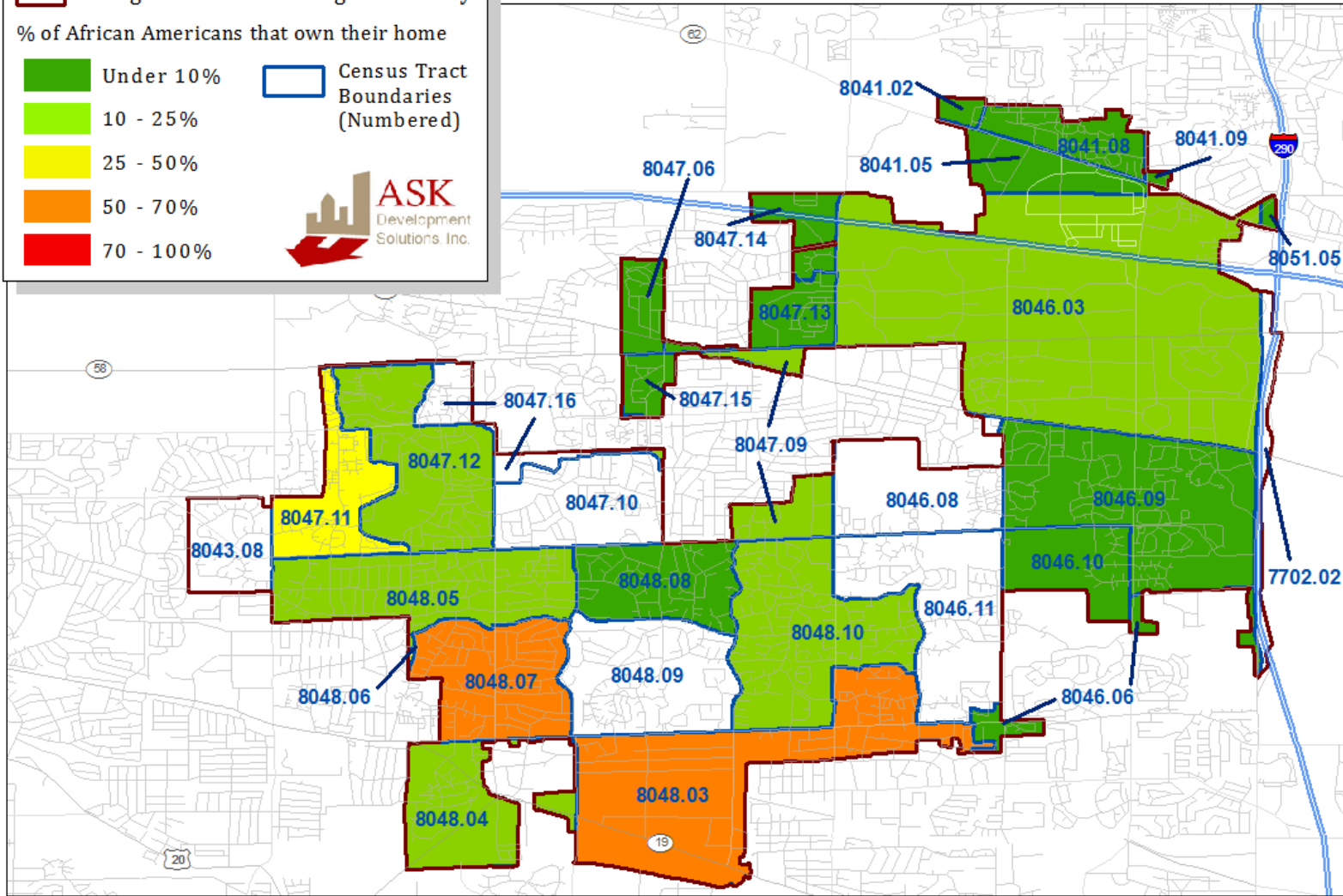
Village of Schaumburg: Percent of African American Households that own their home in 2010

Legend

- Village of Schaumburg Boundary
- Census Tract Boundaries (Numbered)

% of African Americans that own their home

- Under 10%
- 10 - 25%
- 25 - 50%
- 50 - 70%
- 70 - 100%

Data Source: 2010 US Census

The 2007- 2011 five year estimate American Community Survey (ACS) reports 33,669 total housing units in Schaumburg, and gives a break-out of the types of units in the Schaumburg housing stock, as well as the year structures were built. Table 11 shows the housing types in the Village between 2007 and 2011. It should be noted that the 1 year estimate for 2011 shows no units in the categories of mobile homes and boats, which may mean that units in those categories are no longer available. The predominant type of housing in Schaumburg is the single-unit, detached structure (36%), followed by single-unit, attached structures (18%), and structures with 20 or more units (17%).

Table 11

**Village of Schaumburg
 Housing Unit Types, 2007- 2011**

Total/Type Housing Units	Number of Units	Percentage
1-Unit, Detached	12,037	35.8%
1-Unit, Attached	6,154	18.3%
2 Units	395	1.2%
3 or 4 Units	4,146	12.3%
5 to 9 Units	2,999	8.9%
10 to 19 Units	2,307	6.9%
20 or More Units	5,579	16.6%
Mobile Home	43	0.1%
Boat, RV, Van, etc.	9	0.0%

Source: 2007-2011 American Community Survey

Table 12

**Village of Schaumburg
 Year Structure Built, 2011**

Year Structure Built	Number of Units	Percentage
Built 2005 or later	533	1.6%
Built 2000 to 2004	531	1.6%
Built 1990 to 1999	4,268	12.7%
Built 1980 to 1989	7,982	23.7%
Built 1970 to 1979	13,879	41.2%
Built 1960 to 1969	4,961	14.7%
Built 1950 to 1959	843	2.5%
Built 1940 to 1949	233	0.7%
Built 1939 or earlier	439	1.3%

Source: 2011 American Community Survey

Comparatively, the 2000 Census also identified the predominant housing type as single-unit, detached structures (36%), followed by single-unit, attached structures (21%), and structures with 20 or more units (18%). The housing stock is considered to be of older construction, with the majority (60%) of structures being built prior to 1970 and almost all (97%) structures being built before 1990.

Lead-based Paint

According to the Village's Consolidated Plan, there are at least 1,596 households living in affordable housing units that were built before 1970 and that may be at-risk for lead-based paint hazards. In 2004, the Village approved an Ordinance adopting HUD's new lead-based paint regulations. Both the Village's First Time Homebuyer and Residential Rehabilitation programs require properties that were built prior to 1978 undergo a lead-based paint inspection.

Housing Affordability

The median value of an owner occupied housing unit in 2011 was \$257,600, an increase of over 40% since 2000 (\$178,200). Using the industry standard of three (3) times income to afford a 2011 median priced home in Schaumburg, a household would need to earn \$85,867 annually to affordably own a home in Schaumburg.

According to the 2011 American Community Survey, 2011 median contract rent in Schaumburg was \$1,092 monthly. This reflects an increase of \$174 since the 2000 Census (\$918 median rent). Based on HUD standards that a household should not pay more than 30% of its gross income for a housing unit to be considered affordable, a 2011 household would need to earn \$43,680 annually to afford the median contract rent. Table 12 below shows a comparison between the Village of Schaumburg and other nearby communities including the City of Chicago. Of the 12 communities assessed, the City of Chicago and the Village of Mount Prospect have the lowest rents at \$783 and \$854 per month respectively. The Village of Schaumburg and the City of Naperville have the highest median rent at \$1,092 per month. Key person interviews and field data show that the Village and other surrounding suburban areas are increasingly becoming some of the most desirable places to live in Illinois. The high median rent for the Village of Schaumburg is likely to limit the ability of many persons in the protected classes to be able to afford to live there as these groups are overrepresented in lower income households (see Table 13 on the next page). The high rent levels will also have the effect of reducing housing alternatives for these families.

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Table 13

**Village of Schaumburg
 Median Rent and Median Home Value With
 Income Required for Affordability, 2011**

Geographic Area	Median Rent	Annual Income Required to Afford Median Rent	Median Home Value	Annual Income Required To Afford Median Home Value
Schaumburg	\$1,092	\$43,680	\$257,600	\$85,867
Arlington Heights	\$997	\$39,880	\$358,100	\$119,367
Chicago	\$783	\$31,320	\$260,800	\$86,933
Cook County	\$810	\$32,400	\$256,900	\$85,633
Elk Grove Village	\$901	\$36,040	\$286,800	\$95,600
Hanover Park	\$936	\$37,440	\$213,600	\$71,200
Hoffman Estates	\$982	\$39,280	\$284,400	\$94,800
Mt. Prospect	\$854	\$34,160	\$329,000	\$109,667
Naperville	\$1,092	\$43,680	\$394,300	\$131,433
Palatine	\$973	\$38,920	\$300,400	\$100,133
Rolling Meadows	\$942	\$37,680	\$262,500	\$87,500
Roselle	\$937	\$37,480	\$277,500	\$92,500

Source: American Community Survey, U.S Census Bureau (2011)

- 1) Income to afford median rent calculated by multiplying monthly rent by 12 months, and then dividing result by thirty percent (30%).
- 2) Income to afford a home of median value was calculated by real estate industry standard of multiplying household income by three (3) to determine maximum affordable purchase price.

According to the 2007-2011 ACS, the median rents in the census tracts with minority concentration: 8046.03, 8041.08, and 8047.12 had rents between \$1,000 and \$1,250 per month (Map 17). Census tract 8047.11, another tract with minority concentration also had rents from \$750-\$1,000 per month. The maximum monthly housing affordability payment for Black or African American households in Cook County is \$848 and for Hispanics is \$1,092. The only census tracts with rents

below \$500 per month were 8041.02, 841.05, and 8047.06 with the lowest minority populations.

In looking at the median average house values for 2007-2011 according to the ACS (Map 16), it was noted that home values in the areas with minority concentrations ranged from \$200,000-\$250,000 per unit. The lowest median home values ranged from \$150,000 to \$200,000 and were only found in census tracts 8047.11, 8046.10, 8051.05 and 8047.15. Census tracts 8047.11, 8047.15, and 8051.05 had high minority populations in those areas where homeownership rates were lower at 50-70%. The lack of affordable housing in the Village and the limited available land to develop new housing is an impediment to fair housing choice because of its disproportionate impact on minority populations and person with disabilities.

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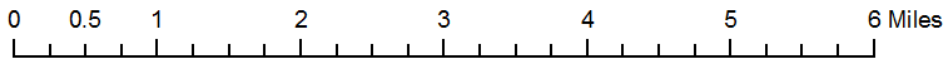
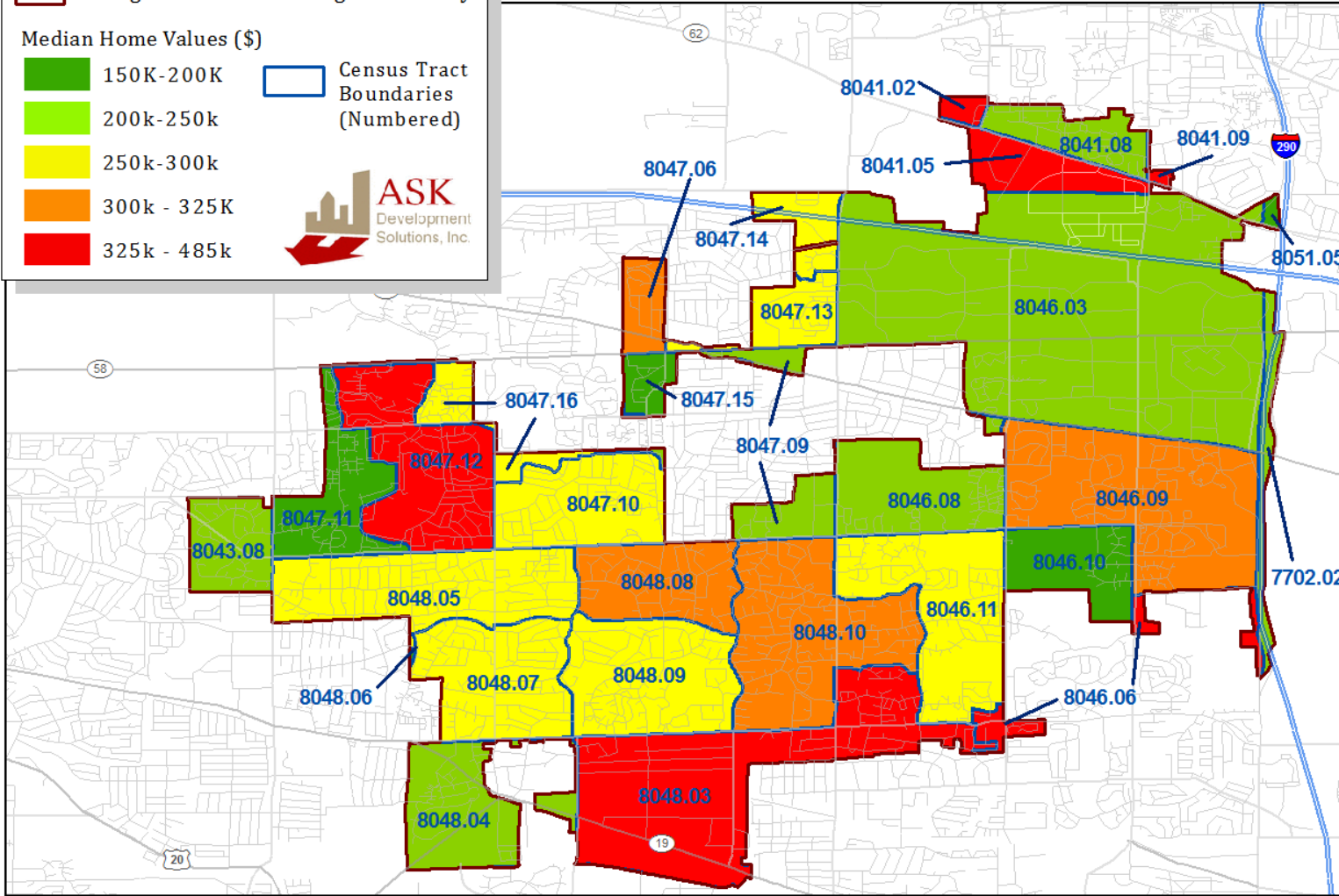
Village of Schaumburg: Median Home Values (Averages 2007-2011)

Legend

- Village of Schaumburg Boundary
- Census Tract Boundaries (Numbered)

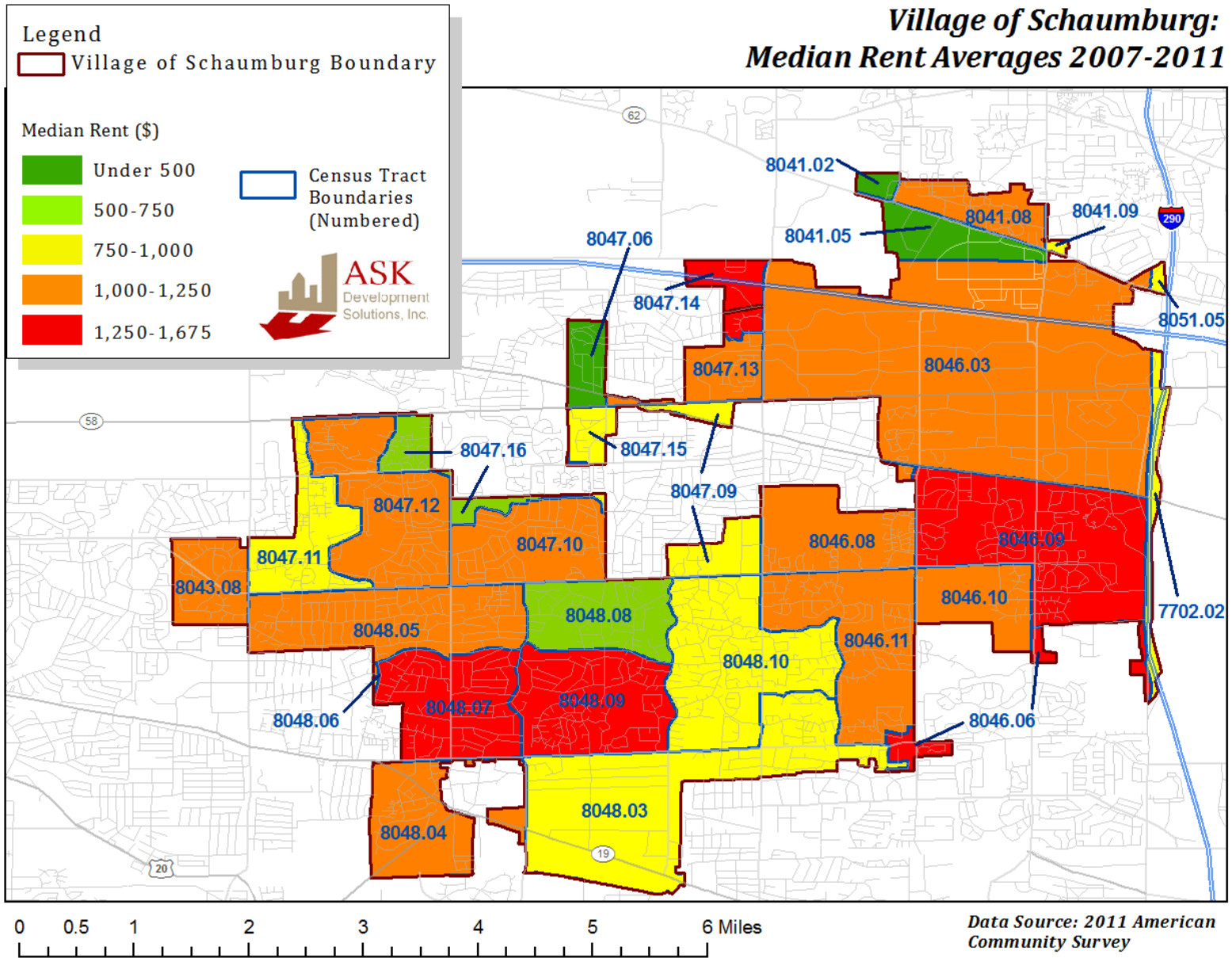
Median Home Values (\$)

- 150K-200K
- 200k-250k
- 250k-300k
- 300k - 325K
- 325k - 485k

Data Source: 2011 American Community Survey

Village of Schaumburg: Median Rent Averages 2007-2011



Cook County AI

According to the 2012 Cook County Analysis of Impediments to Fair Housing Choice (as prepared by Applied Real Estate Analysis, Inc.), the median household income for Cook County (including the City of Chicago) was \$51,466 in 2010. The data also shows that Black or African Americans and Hispanics have median incomes that are significantly lower than the median income. Black or African American households have the lowest median income, nearly half that of Whites. The AI calculated the maximum monthly housing payment a household could afford without being cost burdened, using the standard definition of housing burden as applying more than 30 percent of household income toward housing payment (rent or mortgage). The AI reported the following information:

Table 14

Cook County Housing Affordability

Race/Ethnicity of Household	Median Household Income*	Maximum Monthly Housing Payment
All Households	\$51,466	\$1,287
White	\$65,079	\$1,627
Black or African American	\$33,906	\$848
Asian	\$61,230	\$1,531
Hispanic or Latino	\$43,696	\$1,092

*Includes the City of Chicago

Source: U.S. Census 2010 American Community Survey

Cook County's AI further states that the most readily available and consistent data on rental rates is provided by the U.S. Census; however, the Census does not provide the most accurate estimate of current market rents. This is because the survey asks current renters their rent, which is not reflective of the market. Rents for households who have lived in one place for extended periods of time (often with below-market rent increases) are not distinguished from households that have recently moved. Conducting a full market assessment is outside the scope of this study; therefore, U.S. Census data was used as a proxy for market rent.

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Table 15

**Village of Schaumburg
 2010 Contract/Asking Rent**

Contract/ Asking Rent	Number	Percent
Less than \$100	15	0.1%
\$100 to \$149	0	0.0%
\$150 to \$199	79	0.8%
\$200 to \$249	48	0.5%
\$250 to \$299	99	1.0%
\$300 to \$349	66	0.6%
\$350 to \$399	24	0.2%
\$400 to \$449	59	0.6%
\$450 to \$499	14	0.1%
\$500 to \$549	0	0.0%
\$550 to \$599	60	0.6%
\$600 to \$649	44	0.4%
\$650 to \$699	71	0.7%
\$700 to \$749	237	2.3%
\$750 to \$799	290	2.8%
\$800 to \$849	1468	14.3%
\$900 to \$999	1971	19.2%
\$1000 to \$1,249	3140	30.6%
\$1,250 to \$1,499	1406	13.7%
\$1,500 to \$1,999	816	8.0%
\$2,000 or more	241	2.4%
No Cash Rent	102	1.0%
TOTAL	10,249	100%

Source: U.S. Census Bureau, 2006-2010 American Community Survey

The Cook County AI concluded that White and Asian households have the highest number of affordable housing units from which to select. Based upon the median income, White and Asian households could afford 87% of rental units. Hispanic households could afford 68% of rental units, followed by Black or African Americans, who could afford only 39% of the rental units. This is well below the rate of other races and ethnic groups, as well as the overall affordability rate, which is 82%.

The Cook County AI also calculated the affordability of homes available for purchase. Using the local Multiple Listing Service (MLS), the AI identified the number of units sold within a given price range between August 2010 and August 2011. Assuming a 4.03% interest rate, a 30-year fixed mortgage, and a 20% payment, the AI determined the percentage of units that each race/ethnic category could afford without being cost burdened.

Table 16

Cook County
Single-Family Detached and Attached Homes Sold
August 2, 2010 through July 29, 2011

Sold Price Range	Number	Percent	Estimated Monthly Mortgage Payment*
Less than \$49,999	2,667	13%	192
\$50,000 to \$99,999	3,370	17%	383
\$100,000 to \$149,999	3,352	17%	575
\$150,000 to \$199,999	2,924	15%	767
\$200,000 to \$249,999	2,056	10%	958
\$250,000 to \$299,999	1,368	7%	1,150
\$300,000 to \$349,999	883	4%	1,342
\$350,000 to \$399,999	643	3%	1,533
\$400,000 to \$449,999	488	2%	1,725
\$450,000 to \$499,999	341	2%	1,917
\$500,000 to \$549,999	273	1%	2,108
\$550,000 to \$599,999	228	1%	2,300
\$600,000 to \$699,999	370	2%	2,683
\$700,000 to \$799,999	221	1%	3,067
\$800,000 to \$899,999	182	1%	3,450
\$900,000 to \$999,999	132	1%	3,833
\$1,000,000 to \$1,999,999	355	2%	7,666
\$2,000,000 to \$2,999,999	47	0%	11,500
\$3,000,000 to \$3,999,999	18	0%	15,333
\$4,000,000 to \$4,999,999	3	0%	19,166
\$5,000,000 and over	5	0%	19,166
TOTAL	19,944	100%	

*Principal and Interest Only
 Source: Midwest Real Estate Data, LLC

The Cook County AI concluded that similar to the rental market, Whites and Asians are able to afford the largest percentage of homes, at 87% and 83%, respectively. Hispanic households are able to afford 72% of homes, and Black or African American households are able to afford 62% of homes.

Comprehensive Housing Affordability Study (CHAS)

HUD's Comprehensive Housing Affordability Study (CHAS) is a commonly-used gauge of housing affordability, or lack thereof. HUD considers a housing unit affordable if the occupant household expends no more than 30% of its income on housing cost. In the situation where the household expends greater than 30% of its income on housing cost, the household is considered cost burdened. Cost burdened households have less financial resources to meet other basic needs

(food, clothing, transportation, medical, etc.), less resources to properly maintain the housing structure, and are at greater risk for foreclosure or eviction.

Income Categories

- Extremely Low Income: 0%-30% of the Area Median Income (AMI)
- Low Income: 31%-50% of the AMI
- Moderate Income: 51%-80% of the AMI
- Middle and Upper Income: 80% or more of the AMI

Cost-Burden of Owners and Renters

According to HUD, a household with problems consists of:

1. Persons and families living in units with physical defects (lacking a complete kitchen or bath); or
2. Persons and families living in overcrowded conditions (greater than 1.01 persons/room); or
3. Persons and families cost burdened (paying more than 30% of income for housing, including utilities).

According to the Schaumburg Consolidated Plan for FY 2010-2014, there were a total of 31,532 households in Schaumburg. Of these total 8,165 or 25.9% were considered to be low- and moderate- income households, with 13.5% being moderate income, 6.8% being low income, and 5.6% being extremely low income households. The CHAS reveals that the households in the extremely low income category are the highest percentage experiencing at least one housing problem, as defined by HUD.

Table 17

**Village of Schaumburg
 Extremely Low to Moderate Income Households**

Income Category	Number of Households	% of All Occupied Households
Extremely Low Income	1,770	5.6%
Low Income	2,131	6.8%
Moderate Income	4,264	13.5%
TOTAL Low/Mod Income	8,165	25.9%
Middle/Upper Income	23,367	74.1%
TOTAL Households	31,532	100%

Table 18

**Village of Schaumburg
 Housing Problems by Income Category**

Income Category	Number of Households	# With At Least One Housing Problem	% With At Least One Housing Problem
Extremely Low Income	1,770	1,309	74%
Low Income	2,131	1,417	66.5%
Moderate Income	4,264	2,490	58.4%
TOTAL Low/Mod Income	8,165	5,216	63.9%
Middle/Upper Income	23,367	3,061	13.1%
TOTAL (All Categories)	31,532	8,292	26.3%

As mentioned above, cost burden is experienced when more than 30% of the household income is spent on housing costs. Severe cost burden is experienced when more than 50% is spent on housing costs, generally, for renters housing costs include rent and utilities; and for owners housing costs include mortgage payments, taxes, insurance, and utilities.

Table 19

**Village of Schaumburg
 Cost Burdens for Renters and Owners by Income Category**

Income Category	All Renters		All Owners	
	Cost Burden Cost	Severe Burden	Cost Burden Cost	Severe Burden
Extremely Low Income	64.4%	61.0%	85.4%	56.9%
Low Income	85.0%	58.8%	53.7%	29.2%
Moderate Income	71.0%	11.8%	48.9%	12.6%
Middle/Upper Income	6.2%	0.3%	11.7%	1.0%
TOTAL	28.3%	13.1%	21.8%	6.2%

Table 20

**Village of Schaumburg
 Housing Problems Among Renters**

Income Category	# of Renters With At Least One Housing Problem	% of Renters With At Least One Housing Problem
Extremely Low Income	635	64.8%
Low Income	712	86.2%
Moderate Income	1,079	76.6%
TOTAL Low/Moderate Income	2,426	25.1%

Table 21

**Village of Schaumburg
 Housing Problems Among Owners**

Income Category	# of Owners With At Least One Housing Problem	% of Owners With At Least One Housing Problem
Extremely Low Income	673	85.4%
Low Income	704	54.0%
Moderate Income	1,410	49.4%
TOTAL Low/Moderate Income	2,787	12.7%

According to the Schaumburg Consolidated Plan for 2010-2014, there were 1,173 elderly 1 & 2 member rental households in Schaumburg. Of those, 914 met the definition of low and moderate income. Within the 914 low and moderate income elderly 1 & 2 person rental households, approximately 656 (71.7%) encountered at least one housing problem, as illustrated in the following table.

Table 22

**Village of Schaumburg
 Elderly 1 & 2 Member Rental Households With Housing Problems**

Income Category	# of Elderly 1 & 2 Rental Households With Housing Problem	% of Elderly 1 & 2 Rental Households With Housing Problem
Extremely Low Income	200	56.5%
Low Income	227	78.0%
Moderate Income	229	85.1%
TOTAL Low/Moderate Income	656	71.7%

Additional information within the Consolidated Plan shows that the most frequent cause of housing problems for elderly low and moderate income 1 & 2 person

rental households is affordability. All of the households that experienced a housing problem paid 30% or more of their income on housing, while 50.8% paid 50% or more of their household income on housing, as shown below.

Table 23

Village of Schaumburg
Elderly 1 & 2 Member Rental Households With Severe Cost Burden

Income Category	# of Elderly 1 & 2 Rental Households With Severe Cost Burdens	% of Elderly 1 & 2 Rental Households With Severe Cost Burdens
Extremely Low Income	190	44.0%
Low Income	150	17.6%
Moderate Income	83	8.8%
TOTAL Low/Moderate Income	423	18.2%

The Village's Consolidated Plan states that CHAS data indicates 14,686 small-related (2 to 4 members) households in Schaumburg. Of the 14,686 small households, 3,635 were renter households, and 11,051 were owner households. Of the small-related renter households, 975 (26.8%) were low and moderate income households, and 755 (77.4%) of the total low and moderate income households experienced at least one housing problem.

Table 24

Village of Schaumburg
Small Related Rental Households With Housing Problems

Income Category	# of Small Related Rental Households With Housing Problem	% of Small Related Rental Households With Housing Problem
Extremely Low Income	199	82.6%
Low Income	208	83.9%
Moderate Income	348	71.8%
TOTAL Low/Moderate Income	755	77.4%

The Consolidated Plan indicates that the major housing problem small related households experience is affordability, and a small percentage of households have a housing problem other than affordability. Of the 975 low and moderate income households, 690 (70.7%) are dealing with cost burden, and 328 (33.6%) experience severe cost burden.

Table 25

Schaumburg Small Related Rental Households With Cost Burdens

Income Category	# of Small Related Rental Households With Cost Burdens	% of Small Related Rental Households With Cost Burdens
Extremely Low Income	194	80.9%
Low Income	198	79.9%
Moderate Income	298	61.6%
TOTAL Low/Moderate Income	690	70.7%

Table 26

Schaumburg Small Related Rental Households With Severe Cost Burdens

Income Category	# of Small Related Rental Households With Severe Cost Burdens	% of Small Related Rental Households With Severe Cost Burdens
Extremely Low Income	191	79.3%
Low Income	130	52.6%
Moderate Income	7	1.6%
TOTAL Low/Moderate Income	328	33.6%

Of the small-related owner households, the Schaumburg Consolidated Plan indicates that 1,381 are low and moderate income. A total of 950 (68.8%) small-related owner households are experiencing a housing problem. In addition, the largest housing problem that small owner households experience is affordability. Of the 1,381 low and moderate income small households, 935 (67.7%) experience cost burden, and 360 (26.1%) experience severe cost burden.

Table 27

Schaumburg Small Related Owner Households with Housing Problems

Income Category	# of Small Related Owner Households With Housing Problem	% of Small Related Owner Households With Housing Problem
Extremely Low Income	110	78.6%
Low Income	196	91.6%
Moderate Income	644	62.8%
TOTAL Low/Moderate Income	950	68.8%

Table 28

Schaumburg Small Related Owner Households With Cost Burden

Income Category	# of Small Related Owner Households With Cost Burdens	% of Small Related Owner Households With Cost Burdens
Extremely Low Income	110	78.6%
Low Income	196	91.6%
Moderate Income	629	61.4%
TOTAL Low/Moderate Income	935	67.7%

Table 29

Schaumburg Small Related Owner Households With Severe Cost Burden

Income Category	# of Small Related Owner Households With Severe Cost Burdens	% of Small Related Owner Households With Severe Cost Burdens
Extremely Low Income	85	61.4%
Low Income	129	60.0%
Moderate Income	146	14.3%
TOTAL Low/Moderate Income	360	26.1%

Large related households (5 or more members) have high incidences of housing problems, according to the Schaumburg CDBG Consolidated Plan. Of the 2,219 large-related households, 267 (12.0%) are low and moderate income, and 88 (59.9% of the low and moderate income households experience at least one housing problem. Although 59.9% of all low and mod large related renter households face at least one housing problem, cost burden is not the main factor. The Consolidated Plan states that many apartments in Schaumburg cannot accommodate households with 5 or more persons, and that overcrowding is most likely the largest housing problem. As illustrated below, cost burden does affect these low and moderate income households but not as severely as the elderly households in Schaumburg.

Table 30

Schaumburg Large Related Rental Households With Housing Problems

Income Category	# of Large Related Rental Households With Housing Problem	% of Large Related Rental Households With Housing Problem
Extremely Low Income	4	28.6%
Low Income	43	100%
Moderate Income	41	45.6%
TOTAL Low/Moderate Income	88	59.9%

Table 31

Schaumburg Large Related Rental Households With Cost Burdens

Income Category	# of Large Related Rental Households With Cost Burdens	% of Large Related Rental Households With Cost Burdens
Extremely Low Income	4	26.8%
Low Income	43	100%
Moderate Income	11	13.3%
TOTAL Low/Moderate Income	58	39.5%

Table 32

Schaumburg Large Related Rental Households With Severe Cost Burdens

Income Category	# of Large Related Rental Households With Severe Cost Burdens	% of Large Related Rental Households With Severe Cost Burdens
Extremely Low Income	4	28.6%
Low Income	14	32.6%
Moderate Income	0	0%
TOTAL Low/Moderate Income	18	12.2%

Of the large-related owner households, the Schaumburg Consolidated Plan indicates that 246 (12.6%) are low and moderate income. A total of 177 (71.9%) low and moderate income small-related owner households are experiencing a housing problem. The Consolidated Plan further states that overcrowding is one of the largest issues that large-related owner households experience, although cost burdens do affect these households.

Table 33

Schaumburg Large Related Owner Households With Housing Problems

Income Category	# of Large Related Owner Households With Housing Problem	% of Large Related Owner Households With Housing Problem
Extremely Low Income	24	100%
Low Income	55	61.8%
Moderate Income	98	74.4%
TOTAL Low/Moderate Income	177	71.9%

Table 34

Schaumburg Large Related Owner Households With Cost Burden

Income Category	# of Large Related Owner Households With Cost Burden	% of Large Related Owner Households With Cost Burden
Extremely Low Income	24	100%
Low Income	55	61.8%
Moderate Income	98	74.4%
TOTAL Low/Moderate Income	177	71.9%

Table 35

Schaumburg Large Related Owner Households With Severe Cost Burden

Income Category	# of Large Related Owner Households With Severe Cost Burden	% of Large Related Owner Households With Severe Cost Burden
Extremely Low Income	13	58.3%
Low Income	41	46.1%
Moderate Income	23	18.0%
TOTAL Low/Moderate Income	77	31.3%

The Schaumburg Consolidated Plan included information regarding housing problems within various racial and ethnic groups. According to the Consolidated Plan, the racial and ethnic groups with a disproportionately overall greater incidence of housing problems are Black or African American and Asian owners. These categories are more than 10% higher than the total amount of all owners with housing problems. For renter households, Hispanic Extremely Low Income and Hispanic Low Income Renters have a disproportionately greater incidence of housing problems.

Within the low and moderate income owner households, the Consolidated Plan concludes that Black or African American Low Income Owners, Hispanic Moderate Income Owners, and Asian Low Income Owners experience a disproportionately greater incidence of housing problems. From this, we can conclude that greater housing problems are an impediment to fair housing choice in the Village.

Table 36

**Village of Schaumburg
 Housing Problems Within Racial and Ethnic Groups**

Racial/Ethnic Classification	Renters With Housing Problems	Owners With Housing Problems
White	33.5%	21.1%
Black or African American	28.4%	34.4%
Hispanic	40.5%	30.0%
Asian	34.1%	40.5%
Native American	N/A	N/A
Pacific Islander	N/A	N/A
TOTAL for All Households	33.3%	23.2%

Table 37

**Village of Schaumburg
 Housing Problems Among Racial/Ethnic Minorities
 % of Low/Mod Income Renter Households With Housing Problems**

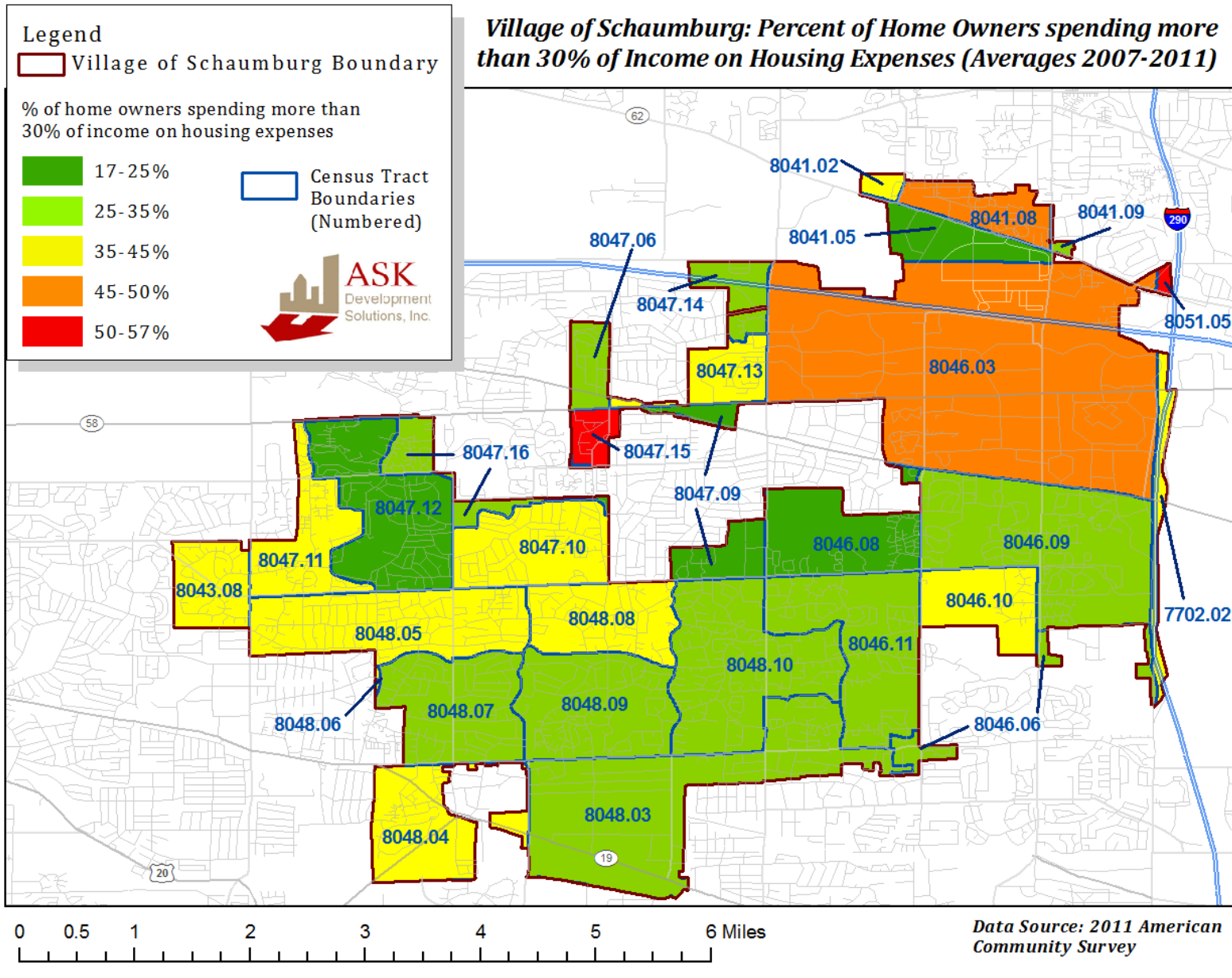
Income Category	All Low Income Renters	Black or African American Households	Hispanic Households	Asian Households
Extremely Low	64.8%	57.1%	100%	61.0%
Low	86.2%	75.9%	100%	93.1%
Moderate	76.4%	59.6%	73.2%	78.4%

Table 38

**Village of Schaumburg
 Housing Problems Among Racial/Ethnic Minorities
 % of Low/Mod Income Owner Households With Housing Problems**

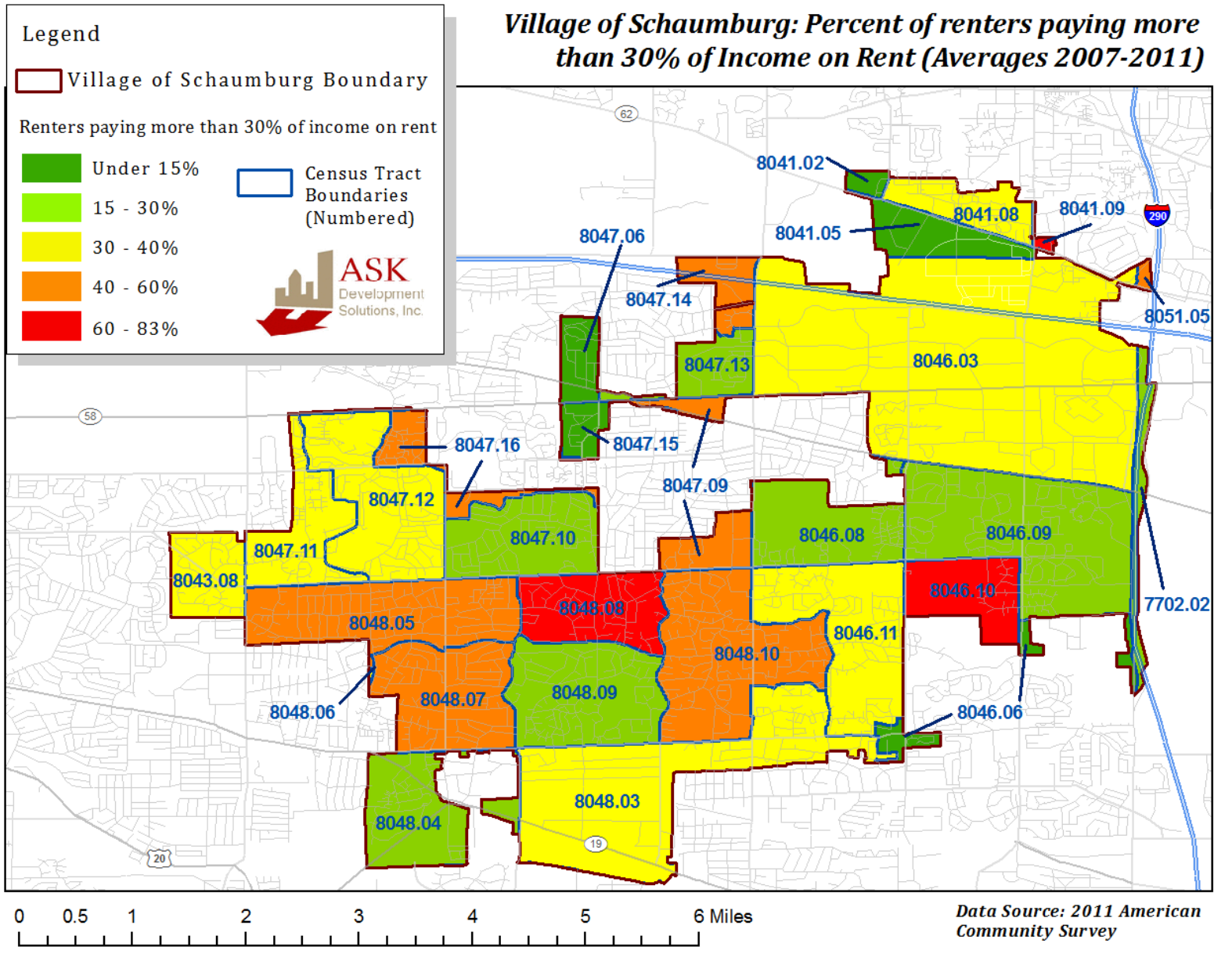
Income Category	All Low Income Owners	Black or African American Households	Hispanic Households	Asian Households
Extremely Low	85.4%	N/A	90.5%	75.6%
Low	54.0%	100%	50.0%	81.4%
Moderate	49.3%	33.3%	81.8%	58.0%

Map 18



Map 19

Village of Schaumburg: Percent of renters paying more than 30% of income on rent (Averages 2007-2011)



State of Illinois

The State of Illinois 2012 Action Plan states that except where HUD Section 8 Project-Based Assistance is available, a large majority of very low and extremely low-income households frequently need rental assistance, even to reside at affordable housing properties, due to rent burden issues (i.e., paying over 30% of household income being spent on rent and utilities). The Heartland Alliance, in its 2009 Study, Report on Illinois Poverty, estimates that between the 2000 census and 2007, severely rent-burdened households in Illinois reached 24.4 %.

Specific problem areas, which were identified by the Illinois Housing Task Force and its Family Housing Working Group in 2004, included the following:

- The ongoing need for federal government agencies (HUD and USDA-Rural Development) project-based and tenant-based rental assistance at a predictable and increasing level;
- The need for alternative sources of rental assistance, such as State resources which do not require commitments of general revenue fund taxes (Rental Housing Support Program, but more needed);
- Public housing modernization, maintenance, and replacement, including redevelopment, privatization, and new innovative approaches;
- Addressing specific housing needs of minority and ethnic populations, including immigrants and undocumented workers;
- Maintenance and expansion of programs offering homeownership opportunities to very low- and extremely low-income households, including lease-to-purchase, Individual Development Accounts (IDAs), Section 8 Homeownership, down payment/closing cost assistance, creative reuse of foreclosed properties, and other ideas;
- Maintenance and expansion of homeowner preservation/rehabilitation programs to help keep very low income households in their current affordable housing;
- Addressing the housing needs of families and children who are wards of the state, under foster care guardianship, and emancipated youth;
- Addressing the housing needs of migrant farm workers and seasonal farm workers and their families; and
- Addressing the market needs of large families (three bedrooms or more).

In response to housing needs of those households at 30% of AMI or below, the Rental Housing Support Program Act (P.A. 094-0118) was signed into law on July 5, 2005, creating the largest State funding rent subsidy program in the nation for households at or below 30% of area median income, with half the funds targeted to households at or below 15% of area median income. Administered by applicant Local Administering Agencies (LAAs), the RHS Program provides a unit-based rental subsidy. The IHDA program rules, guidelines, and application were completed between 2006 and 2007. The first round of RHS funding, with over \$12

million awarded to fourteen administering agencies throughout the State, intends to support over 400 affordable units for a three year period, with additional application rounds held annually.

The Long Term Operating Support Program (LTOS) is part of the Rental Housing Support Program designated for affordable housing developments. LTOS is a unit-based rent subsidy with funding available only to projects outside the City of Chicago. In the LTOS Program, IHDA contracts directly with owners of affordable housing developments to make units affordable for up to 15 years. The tenant pays a portion of the rent (approximately 30% of their income) and the LTOS grant makes up the difference. LTOS funding is targeted for special needs housing units. The RHS Program, with the LTOS component, is a powerful tool for better serving the affordable housing needs of the State's very low and extremely low income households.

Multifamily Rental and Affordable Housing

There are 19 rental developments with 8,498 units of multi-family rental units. Two of the developments (229 units) are considered affordable; however, both of these developments are restricted to seniors 62 years and over. The Village did not receive any Neighborhood Stabilization Program (NSP) funding but several units were NSP funded through the State of Illinois's NSP program. NSP allows assistance to homebuyers up to 120% of AMI. Lack of affordable housing in the Village is an impediment to fair housing choice.

Housing Stock Available to Disabled Persons

The most recent disability status data was the U.S. Census 2011 American Community Survey. In Schaumburg, there are 6,500 people (8.9% of the total population) in Schaumburg with a disability (civilian, non-institutionalized). The survey included the following breakdown of the disabled population by age group. It should be noted that ages 65 and over has the largest percentage of disabled population, and ages 18 to 64 has the largest number of disabled persons.

Table 39

**Village of Schaumburg
 Disability Status of the Civilian
 Non-Institutionalized Population, 2010**

Population Status	Number	Percentage
Total Population	72,773	100%
With a Disability	6,500	8.9%
Population Under 5 years	4,488	
With a Disability	117	2.6%
Population 5 to 17 years	10,688	
With a Disability	594	5.6%

Population Status	Number	Percentage
Population 18 to 64 years With a Disability	49,489 2,942	5.9%
Population 65 years and over With a Disability	8,108 2,847	35.1%

Source: American Community Survey, US. Census Bureau (2011)

The 2011 American Community Survey also provides information regarding type of disabilities within the Schaumburg population, as well as the incidence of two or more disabilities within age groups.

Table 40

**Village of Schaumburg
 Disability Characteristics of the Population, 2011**

Population/ Characteristic	Total	# With a Disability	% With a Disability
Total Population	72,773	6,500	8.9%
Population under 5 years	4,488	117	2.6%
With a hearing difficulty		117	2.6%
With a vision difficulty		0	0%
Population 5 to 17 years	10,688	594	5.6%
With a hearing difficulty		88	0.8%
With a vision difficulty		57	0.5%
With a cognitive difficulty		438	4.1%
With an ambulatory difficulty		109	1.0%
With a self-care difficulty		117	1.1%
Population 18 to 64 years	49,489	2,942	5.9%
With a hearing difficulty		713	1.4%
With a vision difficulty		319	0.6%
With a cognitive difficulty		1,140	2.3%
With an ambulatory difficulty		1,227	2.5%
With a self-care difficulty		737	1.5%
With an independent living difficulty		1,174	2.4%
Population 65 years and over	8,108	2,847	35.1%
With a hearing difficulty		972	12.0%
With a vision difficulty		364	4.5%
With a cognitive difficulty		959	11.8%
With an ambulatory difficulty		1,748	21.6%
With a self-care difficulty		708	8.7%
With an independent living difficulty		1,757	21.7%

Source: American Community Survey, US. Census Bureau (2011)

The highest percentage of disabilities occurs in the 65 and over population group (35.1%). Many of the above individuals have more than one reported disability; therefore, there is much duplication between categories of disability.

Table 41

**Village of Schaumburg
 Age and Number of Disabilities, 2011**

Population	Number
Total Population	72,773
Population under 5 years	4,488
With either a vision or hearing difficulty	117
With both hearing and vision difficulty	0
Population 5 to 17 years	10,688
With one type of disability	438
With two or more types of disability	156
Population 18 to 34 years	19,429
With one type of disability	331
With two or more types of disability	505
Population 35 to 64 years	30,060
With one type of disability	1,277
With two or more types of disability	829
Population 65 to 74 years	4,643
With one type of disability	460
With two or more types of disability	336
Population 75 years and over	3,465
With one type of disability	711
With two or more types of disability	1,340

Source: American Community Survey, US. Census Bureau (2011)

According to the Schaumburg Consolidated Plan for 2010-2014, households classified as disabled include those where one or more persons has: 1) a long-lasting condition that substantially limits one or more basic physical activity, such as walking, climbing stairs, reaching, lifting, or carrying; and/or 2) a physical, mental, or emotional condition lasting more than 6 months that creates difficulty with dressing, bathing, or getting around inside the home. The Consolidated Plan states that that 14,240 persons with disabilities lived in Schaumburg (2000 Census). Of the 14,240 residents, 3,285 had physical disabilities and 10,955 had sensory, mental, employment, or other disabilities.

The majority of the identified disabled population is able to live independently with or without supportive services, or is cared for by family members in private housing arrangements; however, the data still indicates the need for specialized housing for disabled persons, particularly given the high prevalence of disabilities in the older population groups. The need for specialized housing is dependent on the

type of disability. Such housing may be specialized in terms of physical modifications, sleeping accommodations, organizational structure, security monitoring, and staffing with applicable supportive services.

Most home features needed to allow independent living by persons with physical mobility disabilities can be incorporated into new construction without substantially altering the standard unit floor plan. Retrofitting an existing unit is more expensive, and therefore, a less cost-effective alternative. Retrofitting may be necessary for those disabled households which would like to comfortably “age in place” and not have to move from their long-time homes due to developing physical mobility limitations.

State of Illinois

The 2010-2014 State of Illinois Consolidated Plan, prepared by the Illinois Housing Development Authority (IHDA), recognizes low income persons with disabilities as a priority in their Consolidated Plan. According to this plan, this underserved population was identified by Governor’s Executive Order 2003-18 as the following: low income persons with any form of disability, including but not limited to physical disability, development disability, mental illness, co-occurring mental illness and substance abuse disorder and HIV/AIDS.

Due to significant changes in Census data collection in 2000, Census figures reported 3,538,783 people in Illinois with disabilities. These are detailed in the Consolidated Plan’s Needs Assessment by the following categories of disability: sensory (351,469), physical (814,354), self-care (276,505), mental (466,288), go outside home (774,087), and employment (856,080). (In addition, IDHS data indicates there are 6,538 persons in intermediate care facilities for the developmentally disabled and 4,490 persons living in Institutions for mental disease). IDPH indicated that as of June 2004, there were 21,3671 persons with HIV/AIDS living in Illinois, and that in FY 2008 there were 5 designated AIDS facilities funded that provide housing to approximately 7,146 individuals annually.

The Illinois Consolidated Plan further states that the difficulty in assessing affordable housing needs for this area is that it varies by and within each disability sub-group. While there has been an ongoing effort toward de-institutionalization of persons with disabilities and efforts to promote reintegration into community-based housing, certain disability groups still have significant populations in State institutions, hospitals, and in group homes. These facilities also generally provide the needed housing services and financial support to serve these populations.

The Illinois General Assembly passed the Disabilities Services Act of 2003, to establish a State-level disabilities services plan. The Act was passed in response to the U.S. Supreme Court (Olmstead) decision to require states to evaluate the adequacy of their current service systems and to encourage inter-agency coordination of services and housing. The Illinois Disabilities Services Advisory Committee was created by the same law and has submitted annual

recommendations for funding to ensure that persons with disabilities have increased access to housing as well as home and community-based services. In 2009, the Governor formed a Rebalancing Team with representatives from IHDA, (IDHS), Illinois Department of Healthcare & Family Services (IDHFS) and Illinois Department on Aging (IDoA) to coordinate efforts to rebalance long-term care and provide community-based housing and services. According to the Illinois Consolidated Plan, the funding of needed services as well as rental assistance is crucial to developing housing for this priority population.

HUD's Section 811 Supportive Housing for Persons with Disabilities Program and most of IHDA's financing programs: the IHDA-administered Rental Housing Support Program, which serves households earning at or below 30% AMI; the Home Modification program funded through the IHDA-administered Illinois Affordable Housing Trust Fund; the new Bridge Subsidy Program administered by the IHDS – Division of Mental Health; Home repair and modifications programs (CDAP, HOME); and others, require developers to set-aside 10% of units to households headed by persons with disabilities or homeless that earn at or below 30% of Area Median Income (AMI). IHDA has also worked to encourage larger amounts of accessible housing to be built within all of its new developments, most recently via incentives to developers of units financed through the Low-Income Housing Tax Credit (LIHTC) program to exceed the minimum number of fully accessible units required by applicable law(s).

As of September 2009, there are 1,202 Section 811 units currently under management according to the Illinois Consolidated Plan. Many older Section 202 projects were also used for housing with persons with disabilities. There are currently 654 such units under management in Illinois. HUD has 105 new Section 811 units in production in Illinois.

The Illinois Consolidated Plan states that the Illinois Department of Human Services (IDHS) Division of Developmental Disabilities (DDD) provides services and support for individuals with developmental disabilities to help them achieve as much independence as possible, and to live in their home communities with family and friends. Emphasis is placed on enabling individuals to stay in their own homes, in family homes, or in small-group settings. DDD funds over 373 community-based agencies in Illinois that serve individuals with developmental disabilities, and administers nine state-operated developmental centers and programs. Services funded by DDD are delivered in the least restrictive setting appropriate for the individual.

Table 42

**State of Illinois
 Number of Persons with Developmental Disabilities in Institutional or
 Residential Care Settings**

Program Name	# of Individuals Served
State-Operated Developmental Centers (SODC)	2,245
Intermediate Care Facilities for the Developmentally Disabled (ICFDD)	6,538 (629 are seniors 65+)
Community Integrated Living Arrangement (CILA)	8,437
Other Residential Settings	908
Other Programs	25,370
TOTAL	43,498

Source: Illinois Department of Human Services, Division of Developmental Disabilities, FY 2008

According to the Illinois Consolidated Plan, there are residential programs in Illinois to serve people with disabilities complicated by medical or behavioral needs. DHS manages nine developmental centers. The Illinois Department of Human Services (IDHS) - Division of Rehabilitation Services (DRS) is the state's lead agency serving individuals with disabilities. DRS works in partnership with people with disabilities and their families to assist them in making informed choices to achieve full community participation through employment, education, and independent living opportunities. DRS operates the Home Services Program which provides services to individuals with severe disabilities so they can remain in their homes and be as independent as possible. This serves people with severe disabilities under age 60 who need help with daily living activities in their homes. Many of these people are at risk of moving into a nursing home or other facility.

Table 43

**Persons Served by the Home Services Program
 State of Illinois, 2009**

Family Income Bracket	Persons Served
< \$8,980	12,951
\$8,981 - \$12,120	5,777
\$12,121 - \$18,400	5,690
> \$18,401	6,318

Source: Illinois Department of Human Services, 2009

According to the Illinois Consolidated Plan, the IDHS Division of Mental Health (DMH) funds mental health services that can be described as supportive housing. The following table indicates the number of persons in Illinois with mental illness or disability served by various housing facilities.

Table 44

**Persons Served with Mental Illness Served by Housing Facilities
 State of Illinois, 2008**

Housing Type	# of DMH Funded Programs	# of Persons Served Annually	Bed Capacity
Assertive Case Management Residential	13	442	116
Crisis Residential	12	1,763	97
Mental Health Community Integrated Living Arrangement	101	1,438	529
Supported Residential	238	3,545	2,046
Supervised Residential	118	2,917	1,154
Institutes for Mental Disease	-	4,490	-
State Mental Hospitals	-	10,812	1,332

Source: Illinois Department of Human Services, Division of Mental Health, 2008

According to the Illinois Consolidated Plan, IDHS is tasked with designing, coordinating and funding a comprehensive and coordinated community-based and culturally and gender-appropriate array of services throughout the state for the prevention, intervention, treatment and rehabilitation of alcohol and other drug abuse and dependency. This system addresses the needs of at-risk or addicted individuals and their families. As the single state authority for substance abuse issues in Illinois, the Department delegates these responsibilities to the Division of Alcoholism and Substance Abuse (DASA) and the Division of Prevention. The integrated substance abuse service delivery system within DHS is coordinated by DASA and the Division of Prevention within the Division of Community Health and Prevention. These Divisions are primarily responsible for providing prevention, intervention and treatment services related to alcohol, tobacco and other drugs to citizens of Illinois. The table below indicates the total number of persons by level of care served by the DASA funded providers in Fiscal Year 2007. In addition, the table identifies living arrangement for all the persons served.

Table 45
**Persons Served by DASA Network by Service and Living Arrangement
 State of Illinois, 2007**

	Total	Detox-ification	Residential Rehab	Residential Aftercare	Out-patient	Intensive Out-patient	Case Coord-ination	Early Inter-vention
Total	133,197	14,634	15,925	4,263	48,352	15,080	11,852	23,091
Independent Living	41,266	5,065	4,161	646	17,195	5,649	2,893	5,657
Dependent Living	76,845	5,697	9,358	2,001	28,245	8,581	8,594	14,369
Homeless	15,081	3,872	2,406	1,616	2,909	849	365	3,064
State Institutions	0	0	0	0	0	0	0	0
Unknown	5	0	0	0	3	1	0	1

Source: Illinois Department of Human Services, Division of Alcoholism and Substance Abuse (DASA), FY 2007

Housing Stock Available to Elderly Persons

Elderly and Extra Elderly

The Schaumburg Consolidated Plan for 2010-2014 states that there were 3,268 households that have mobility or self-care limitations. This figure is broken down into 868 renter households and 2,400 owner households. Of the 868 renters with mobility and self-care limitations, 550 (63.4%) were low and moderate income households. The renter households with the highest rates of housing problems were extra elderly 1 & 2 member households and elderly 1 & 2 member households. Elderly is defined as a household composed of one or more persons at least one of whom is 62 years of age or more. Extra elderly is defined as a 1 or 2 member household where either person is 75 years of age or older. According to the Consolidated Plan, the biggest issues among renters are the housing problems for the extra elderly 1 & 2 member households, and other households whose income is considered moderate.

Table 46

**Village of Schaumburg
 Housing Problems For Renters With Mobility &
 Self-Care Limitations, 2010-2014**

Household by Type, Income, & Housing Problem	Extra Elderly 1 & 2 Member Households	Elderly 1 & 2 Member Households	Other Households	Total Renters
Extremely Low Income	114	40	55	209
% With Housing Problems	52.6%	50.0%	63.6%	55.0%
Low Income	155	40	29	224
% With Housing Problems	93.5%	50.0%	100.0%	86.6%
Moderate Income	54	19	44	117
% With Housing Problems	100.0%	100.0%	81.8%	93.2%
Middle/Upper Income	69	32	217	318
% With Housing Problems	27.5%	25.0%	3.7%	11.0%
Total Households	392	131	345	868
% With Housing Problems	70.9%	51.1%	31.3%	52.2%

Source: Village of Schaumburg Consolidated Plan, 2010-2014

Additional information from the Schaumburg Consolidated Plan states that of the 2,400 owner households with mobility and self-care limitations, 987 (41.4%) are considered low and moderate income households. Household groups with extremely low income have the highest rate of the housing problems, as illustrated below.

Table 47

**Village of Schaumburg
 Housing Problems For Owners With Mobility &
 Self-Care Limitations, 2010-2014**

Household by Type, Income, & Housing Problem	Extra			Total Owners
	Elderly 1 & 2 Member Households	Elderly 1 & 2 Member Households	Other Households	
Extremely Low Income % With Housing Problems	54	105	38	197
	74.1%	86.7%	100.0%	85.8%
Low Income % With Housing Problems	186	104	51	341
	26.9%	80.8%	64.7%	49.0%
Moderate Income % With Housing Problems	126	121	202	449
	38.9%	28.1%	51.0%	41.4%
Middle/Upper Income % With Housing Problems	224	210	979	1,413
	12.9%	1.9%	17.3%	14.3%
Total Households	590	540	1,270	2,400
% With Housing Problems	28.5%	39.4%	27.0%	30.2%

Source: Village of Schaumburg Consolidated Plan, 2010-2014

According to the 2008-2012 Illinois Consolidated Plan, the State, county and city government officials, non-profit and faith-based organizations and the private sector must all begin to prepare for a potential crisis in housing and related services for seniors in the very near future. Illinois's senior population (age 65 and older) is projected to increase from about 10% of the state's population in 2007 to 18% by 2020. According to 2012 American Community Survey data, there were 245,010 cost-burdened senior owners (paying more than 30% of their income for their housing costs).

The Illinois Housing Development Authority (IHDA) has the ability to have a tremendous impact on the number of senior housing units that are built in the state each year. IHDA oversees funding available for the new construction or rehabilitation of affordable rental housing in Illinois. IHDA administers programs such as the Illinois Affordable Housing Trust Fund, Federal and State Low Income Housing Tax Credit (LIHTC) Program, Long-term Operating Support Program

(LTOS), Illinois Affordable Housing Assistance Tax Credit Program (IAHTC), Preservation Now Program, and Multifamily Advantage, a first mortgage program. The agency also operates the Home Modification Program providing assistance to income-eligible elderly persons and persons with disabilities to modify or repair their homes to improve mobility. The program is offered through the collaboration of IHDA, the Illinois Department of Human Services and the Illinois Department on Aging in an effort to prevent and end unnecessary institutionalization of elderly persons and persons with disabilities by funding home repairs in existing housing. The Governor's Affordable Housing Task Force chaired by the IHDA Executive Director outlined in its 2013 Annual Comprehensive Housing Plan that it expects to finance the new construction and rehabilitation of approximately 2,253 units of senior housing using programs administered by IHDA including LIHTC, HOME, Build Illinois Bond Program, Affordable Housing Trust Funds, Illinois State Donation Tax Credit, as well as Tax Exempt Bonds, and Taxable Debt Programs. Additionally, the Illinois Department of Commerce and Economic Opportunity (DCEO) will provide funding towards the development and rehabilitation of senior housing from sources including the Low Income Energy Efficiency Program, Illinois Home Weatherization Assistance Program, Community Development Assistance Program (CDAP) Housing Rehabilitation and Energy Conservation and Home Repair Program.

Elderly and Frail Elderly

The State of Illinois 2010-2014 Consolidated Plan states that there are at least six sources of data on the elderly and frail elderly population in Illinois.

1. Section 202

The HUD 202 program was originally designated for supportive housing projects for the elderly as well as projects for person with disabilities. Congress separated these programs in 1991 and created a separate Section 811 Program (Supportive Housing for Persons with Disabilities). The Illinois Consolidated Plan reports that the total number of Section 202 units as of September 2009 is 7,972. (Since older 202s could be either for the elderly or the disabled, the further breakdown is 7,318 elderly units, and 654 disabled units.) This figure was compiled using HUD's database on subsidized housing. This number does not include 4,412 former Section 202 units which have been refinanced under some other HUD Insurance program. These units still operate under many of the same use requirements and retain their rental subsidy but are no longer considered Section 202. As of September, 2009, 674 new Section 202 units are currently in some stage of production, from funding reservation to being under construction. HUD does not have information readily available on which of the facilities provide some type of congregate services. New proposals for Section 202 projects must detail the availability of such services as part of the application process. This is usually provided through the local Area Agency on Aging.

2. USDA Rural Development

The second type of elderly housing reported in the Illinois Consolidated Plan is the USDA Rural Development's (RD) major multi-family rental housing loan program for rural areas – Section 515. Section 515 is a federal program through the U.S. Department of Agriculture that provides funding for affordable multifamily rental housing for low and moderate-income households, the elderly, and persons with disabilities. According to reports from RD's State Office obtained in 2009, there are a total of 6,193 Section 515 units for the elderly and persons with disabilities. However, this information does not delineate which projects also provide congregate services to these elderly.

3. Public Housing Authorities

The third type of elderly housing reported in the Illinois Consolidated Plan is through the Public Housing Authorities (PHAs). There are a total of 110 Housing Authorities in Illinois that own and operate units of traditional low-rent public housing for the elderly. Forty five percent of the units had designated units for elderly or family (55% had no designation of units). Of those with designated units, approximately 48% of the public housing units were designated as elderly units. While many PHA's do provide some level of basic services, most generally rely on outside agencies (Area Agencies on Aging) to provide major social services to their elderly residents.

4. Life Services Network

The Illinois Consolidated Plan reports that Life Services Network of Illinois (LSN) is a statewide trade association that represents providers of the complete continuum of services for older adults, including nursing facilities, assisted living, senior housing, and home and community based services. LSN currently has 541 members statewide. Membership is restricted to those organizations who serve the elderly, thus all units reported are for seniors.

5. Community Care Program

The Illinois Department of Aging directly administers the Community Care Program. Designed to help older people live independently, the Community Care Program provides in-home and adult day services to over 56,000 seniors per month. To be eligible for services, clients must be 60 or over and the asset level for a single person cannot be over \$17,500 (not including home, car, and furnishings). The Department determines which Community Care Programs are to be provided and in what areas of the State.

6. Supportive Living Program

The Illinois Department of Healthcare and Family Services (IHFS) operates the Supportive Living Program (SLP) through a federally-approved home and community based services 1915(c) assisted living waiver. This program allows IHFS to pay for services to qualifying SLP-residing elderly

persons not routinely covered by Medicaid, including personal care, medication supervision, and social activities.

Homeownership by Race and Ethnicity

As in most areas of the country, rates of homeownership vary by race/ethnicity in the Village of Schaumburg and its neighboring communities. The overall rate of homeownership in Schaumburg, for all races, was 67.1% (2011 American Community Survey, U.S. Census). In Schaumburg, as in the identified neighboring communities, Whites have the highest rate of homeownership (72.7%), followed by Hispanics (54.4%), Asians (54.4%), and then Black or African American (22.2%). The Schaumburg homeownership rates are higher than those of Cook County as a whole (59.8%), with the exception of Black homeowners (White—68.8%; Asian---57.5%; Hispanic/Latino—51.4%; and Black or African American—42.3%). The following tables depict homeownership rates by race in Schaumburg, Cook County, and the neighboring cities within the Schaumburg area.

Table 48

**Village of Schaumburg
 Homeownership Rates by Race/Ethnicity, 2011**

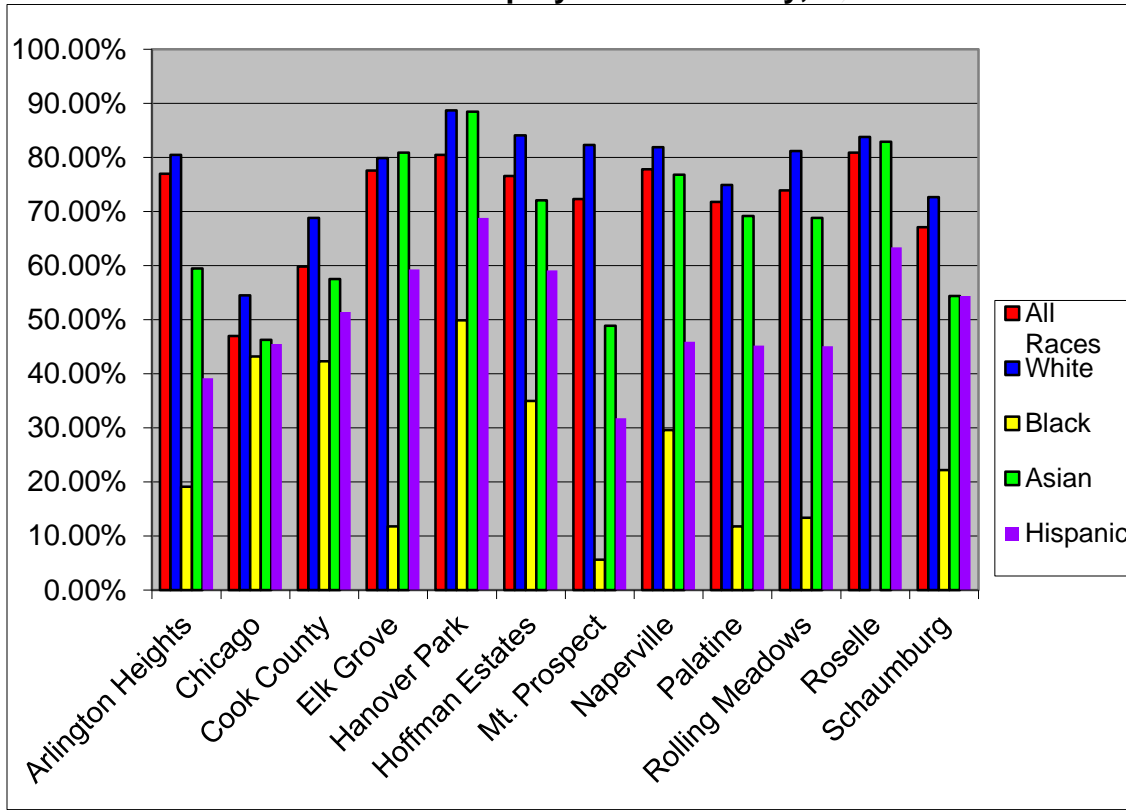
Municipality	Overall Ownership Rate	Ownership Rate - White	Ownership Rate – Black or African American	Ownership Rate - Asian	Ownership Rate - Hispanic
Schaumburg	67.1%	72.7%	22.2%	54.4%	54.4%
Arlington Heights	77.0%	80.5%	19.1%	59.5%	39.2%
Chicago	47.0%	54.5%	43.2%	46.3%	45.5%
Cook County	59.8%	68.8%	42.3%	57.5%	51.4%
Elk Grove Village	77.6%	79.9%	11.8%	80.9%	59.3%
Hanover Park	80.5%	88.7%	49.9%	88.5%	68.8%
Hoffman Estates	76.6%	84.1%	35.0%	72.1%	59.1%
Mt. Prospect	72.3%	82.3%	5.6%	48.9%	31.8%
Naperville	77.8%	81.9%	29.6%	76.8%	45.9%

Municipality	Overall Ownership Rate	Ownership Rate - White	Ownership Rate – Black or African American	Ownership Rate - Asian	Ownership Rate - Hispanic
Palatine	71.8%	74.9%	11.8%	69.2%	45.2%
Rolling Meadows	73.9%	81.2%	13.4%	68.8%	45.1%
Roselle	80.9%	83.8%	0.0%	82.9%	63.4%

Source: American Community Survey, U.S. Census, 2011

Figure 12

Homeownership by Race/Ethnicity, 2010



Source: American Community Survey, U.S. Census (2011)

Recent Village Housing Accomplishments

The Village’s Consolidated Annual Performance and Evaluation Reports (CAPERs) for program years 2007, 2008, 2009, 2010, and 2011, were reviewed to determine recent housing accomplishments and actions taken by the Village to promote fair housing. The CAPER generally includes a summary of programmatic

accomplishments and an assessment of progress toward meeting the specific objectives identified in the Village's Consolidated Plan. The 2010-2014 Consolidated Plan, inclusive of the 2010 Action Plan, was reviewed for fair housing accomplishments.

In its CAPERs, the Village indicated that affordable housing is one of the major barriers to fair housing. By maintaining and increasing the supply of affordable housing, there should be a greater opportunity for the Village of Schaumburg to become more diversified. Other impediments to fair housing indicated in the CAPERs include limited choices and community support. The CAPERs state that Schaumburg seeks support from the community to ensure that all housing is safe, adequate, and available to all people.

The CAPERs state that the Village of Schaumburg has participated in several activities to address aspects of affirmatively furthering fair housing. The Village adopted an Annual Action Plan for the 2011 program year that funded programs addressing the housing needs of low and moderate income residents. The Village Community Development Department acts as a clearinghouse for fair housing complaints. Staff had not received any fair housing complaints in any of the CAPERs examined.

The Schaumburg CAPERs state that the Village's Police Department offers a Crime Free Multi-Housing Program (CFMHP) to educate apartment owners and managers on crime prevention, application process, property management, and fair housing issues. The Village works with area groups such as the Community and Economic Development Association of Northwest Cook County (CEDA), Women in Need Growing Stronger (WINGS), and Journeys the Road Home on issues concerning the homeless and disabled.

The CAPERs and Consolidated Plan describe how the Village maintains an adequate supply of affordable housing with a variety of residential dwellings and services provided by local public service agencies. The Village works to promote the acceptance of affordable housing and current housing options in Schaumburg. The Village works with contractors, developers, and owners to ensure that all housing developments are up to code, and that the neighborhoods provide a healthy environment for residents and neighbors. The Village currently has a range of housing options that include:

- 8,718 apartments
- 4,262 townhomes
- 2,975 manor homes
- 2,984 condominiums
- 1,770 quadrominiums
- 424 duplexes
- 16 row houses
- 12,073 single-family homes

The CAPERs state that the Village manages its Residential Rehabilitation Loan Program to allow homeowners to remain in their units and maintain their home in a safe manner. The Residential Rehabilitation Loan Program provides a maximum loan amount of \$25,000 for single family detached homes and \$15,000 for multi-family homes to make weatherization improvements, correct code compliance violations and repair items in disrepair. Loans are provided at 0% interest and are due upon sale of the home, change of title or in 30 years, whichever occurs soonest. The Village gives priority within the Residential Rehabilitation Program to elderly and disabled homeowners.

The CAPERs report that the Village provides CDBG funds to the First Time Homebuyer's Program. The program provides a maximum loan amount of \$10,000 for down payment and closing cost assistance. Loans are forgiven at a rate of 1/60th per month.

The following table provides the Village's accomplishments between 2007-2011 for the Residential Rehabilitation and First Time Homebuyer's Programs.

Table 49

**Village of Schaumburg
 Residential Rehabilitation and First Time Homebuyer Cases, 2007-2011**

	2007	2008	2009	2010	2011
Residential Rehabilitation Program	6	5	1	6	5
FTHB Program	5	7	9	5	10

The following figures from the Schaumburg 2012 CAPER represent the number of households assisted in obtaining or maintaining affordable housing through shared housing, transitional housing, and rehabilitation. The total number of persons assisted with affordable housing by subrecipients for 2012 equaled 68 persons.

Table 50

**Village of Schaumburg
 Shared Housing, Transitional Housing, and Rehab**

	0-30% of MFI Renters Assisted	0-30% of MFI Owners Assisted	31-50% of MFI Renters Assisted	31-50% of MFI Owners Assisted	51-80% of MFI Renters Assisted	51-80% of MFI Owners Assisted
RCL Shared Housing\			3			

Analysis of Impediments to Fair Housing Choice, January 2015
 Village of Schaumburg, IL

	0-30% of MFI Renters Assisted	0-30% of MFI Owners Assisted	31-50% of MFI Renters Assisted	31-50% of MFI Owners Assisted	51-80% of MFI Renters Assisted	51-80% of MFI Owners Assisted
Fellowship Transitional Housing	4		8			
CEDA Homeless Housing	11	2	11		8	9
Schaumburg Home Buyer's		1		2		7
Schaumburg Residential Rehab				1		1
TOTAL	15	3	22	3	8	17

Source: Village of Schaumburg 2011 Consolidated Annual Performance and Evaluation Report (CAPER)

Between 2005 and 2012 the Village assisted 59 households with homebuyer assistance. Map 20 shows the distribution of funding throughout the Village. The darker shaded areas indicate the census tracts with a larger concentration of households that have received assistance. These census tracts are 8043.08; 8047.11; 8048.05; and 8046.11. Map 21, provides similar information but for homeowner rehabilitation program funding. The census tracts with the largest number of beneficiaries are 8048.05; 8048.07; 8048.08; 8048.10; 8046.11. Both maps show that the Village provides funding for the homebuyer assistance and owner-occupied rehabilitation program village-wide.

The number of first time homebuyers served was distributed throughout the Village in most census tracts but were not found in the largest areas of minority concentration. Only in 8047.13 census tracts were there 3-4 homebuyers assisted. In two other census tracts, only one homebuyer was assisted per area.

Owner-occupied rehabilitation assistance was distributed in census tracts with higher ownership rates between 80-97%. The number of owner occupants that received rehabilitation assistance funding in areas with minority concentration was negligible. Based on key person interviews and review of the Village's marketing strategy, there is the need for increased affirmative marketing to ensure that population groups that would not otherwise be made aware of the program know about the program. Inadequate affirmative marketing is an impediment to fair housing choice in the Village.

Village of Schaumburg: Homes receiving Home Buyer Assistance

Legend


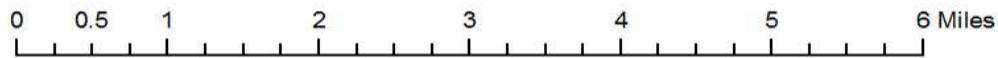
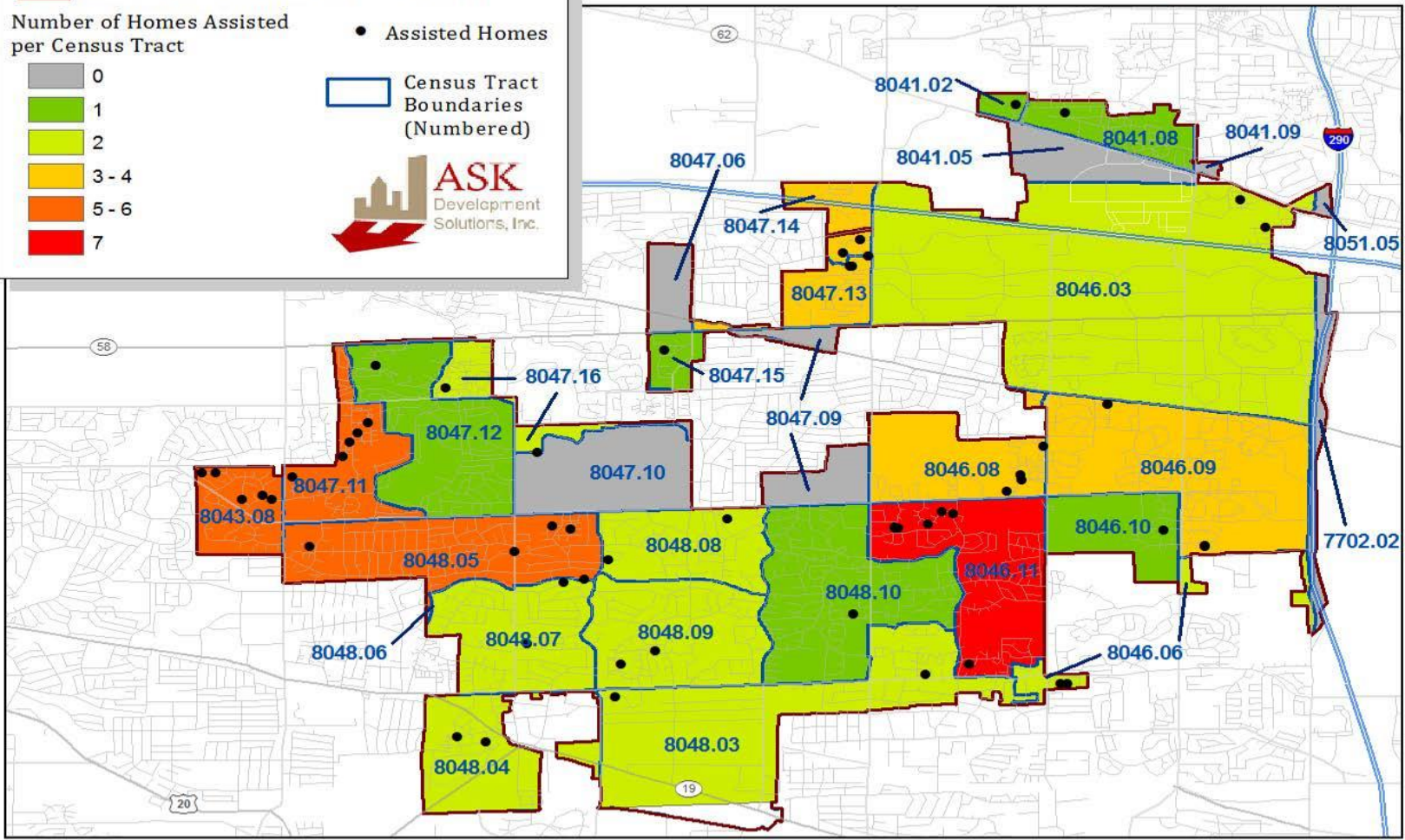
- Village of Schaumburg Boundary
- Census Tract Boundaries (Numbered)

Number of Homes Assisted per Census Tract

- 0
- 1
- 2
- 3-4
- 5-6
- 7

Assisted Homes

- Assisted Homes

Village of Schaumburg: Homes receiving Owner Occupied Rehabilitation Assistance

Legend


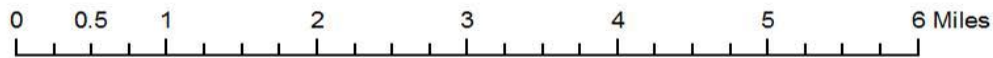
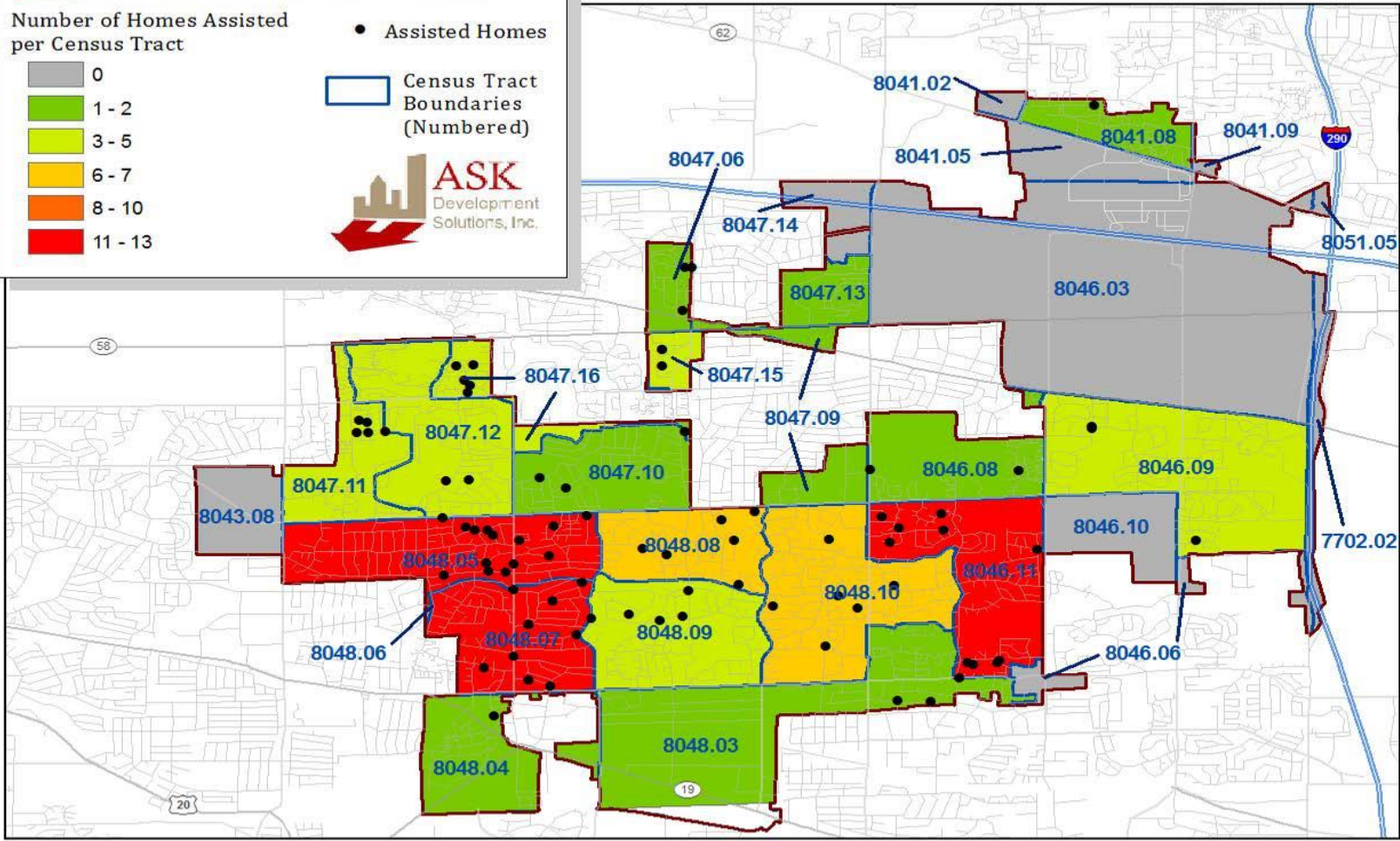
- Village of Schaumburg Boundary
- Census Tract Boundaries (Numbered)

Number of Homes Assisted per Census Tract

- 0
- 1 - 2
- 3 - 5
- 6 - 7
- 8 - 10
- 11 - 13

Assisted Homes

- Assisted Homes

According to the Schaumburg CAPERs, the Village does not provide a Section 215 Housing Program. The Village does address worst-case needs by funding Journeys the Road Home, which provides supportive services for the homeless. Journeys the Road Home provided assistance to 55 persons in 2012.

The Illinois Housing Development Authority (IHDA) reviewed each community's housing stock to determine what percentage of residential units are affordable per the recently enacted Affordable Housing Act by the State of Illinois. IHDA determined that 6,382 owner-occupied units were at the affordable sales price of \$125,244 or below. IHDA also determined that 1,357 rental units were affordable with a monthly rent less than \$775 or below. According to the exemption test for the Affordable Housing Act, Schaumburg has a total of 7,739 affordable units and exceeds the minimum 10% standard with 23.9% of the units defined as affordable. The 2012 CAPER reports that Schaumburg has a good variety of housing types that cover a wide price range.

Within the 2010-2014 Consolidated Plan, the Village reports that there is a limited amount of developable vacant land and a limited supply of affordable housing in Schaumburg, and that housing costs for low income residents may exceed their affordability range. The Village sold a portion of its municipal bond to assist residents through the Assist Bond Program. The Assist Bond Program provides homeowners with a 4.25% cash gift on the amount borrowed. In addition, the Village refers residents seeking down payment assistance to area banks and nonprofits that provide assistance in the form of grants.

Village Regulatory Review

This Section focuses on the review of the local public sector policies to determine if such policies affect housing choice by limiting or excluding housing facilities for persons with disabilities or housing for homeless people from certain residential areas. HUD believes that there are instances where policies have the effect of violating the provisions of the Fair Housing Act since they may indirectly discriminate against persons with disabilities and minorities that may be homeless.

In order to make this determination, ASK examined the Schaumburg Village Code, the 1996 Comprehensive Plan Update, and the Village's Zoning and Building Codes. In addition to the review of these adopted policies, the Consultant provided a questionnaire to the Village to assist in the preparation of the Analysis of Impediments to Fair Housing Choice Study. The purpose of the questionnaire was to review public policies and practices concerning the Zoning Code and Comprehensive Plan as it relates to fair housing choices, particularly housing for individuals with disabilities. The following information was garnered from the examination undertaken and the questionnaire.

Comprehensive Plan

A comprehensive plan is a long-term guide for the development of a community outlining existing conditions and providing goals, policies, and strategies to meet future needs as determined by factors such as population, economic conditions, and impacts of regional change. Comprehensive plans are typically developed with input from stakeholders in the community and functions as a living document used in the decision making process for current and future community leaders. With this in mind, the Village of Schaumburg's Comprehensive Plan was reviewed for this analysis. More specifically, the AI will attempt to identify to what extent the Comprehensive Plan helps the Village to implement its commitment to equal housing opportunity and to what extent the portions of the Plans may serve as impediments to fair housing choice for persons protected by the Fair Housing Act (FHA). As such, five subject areas were selected to be reviewed in the Comprehensive Plan and related documents:

- Inclusion on Protected Group Demographic Description
- Plans for Affordable Housing/Diverse Community
- Reference to CDBG of Other Federal Housing Programs
- Affirmatively Further Fair Housing
- Citizen Participation

The Schaumburg Comprehensive Plan update was adopted in 1996, 35 years after the first Comprehensive Plan was prepared. In addition to the Comprehensive Plan, the Village has adopted more detailed plans for various areas throughout the Village as well as plans geared toward specific elements such as the Comprehensive Green Action Plan and the Bikeways Plan. It is within the Green Action Plan where it states that amendments to the Comprehensive Plan were made in 2004 to incorporate the "Biodiversity Recovery Plan" to ensure preservation of natural areas. The Comprehensive Plan provides guidance for the Village's future in regards to the type and intensity of development, land uses, and open space.

Inclusion of Protected Group Demographic Description

Section III of the Comprehensive Plan, Existing Conditions – Housing and Population Base, identifies the correlation between housing needs and population change and examines population trends in terms of population growth, age distribution, racial composition, marital status, and educational attainment. The plan does not contain data on the number of persons with disabilities. Other than the racial makeup described in this section of the Comprehensive Plan, a review of the other area plans on the Village's website did not include any further reference to protected classes. Both the Comprehensive Plan and the CGAP do include a brief history of the Village and the German heritage from which the Village's name was derived.

Inclusion of information about race, national origin or disability status of persons in a Comprehensive or Master Plan is one way to help remind the community that it is composed of a significant number of persons who are most likely to need the protection of the FHA in their attempts to find or occupy housing in the community. Including a demographic profile can help ensure that protected persons are not excluded or neglected when communities make plans that involve housing related issues. It is for these reasons that a review of demographic information is undertaken, and it is recommended that such data be included in the Comprehensive Plan.

Plans for Affordable Housing/Diverse Community

The Housing Element of the Comprehensive Plan discusses the needs of Schaumburg's population and identifies concerns for low and moderate income residents and special populations – elderly, homeless and the developmentally disabled. The plan includes three objectives to address the needs of this group of persons:

1. Assist the low and moderate income residents of the community through the provision of public improvements and facilities where such are lacking.
2. Remove architectural barriers along public rights-of-way and to public facilities which impede the access of the elderly and disabled.
3. Increase the supply of affordable and homeless housing within the Village through continued participation in numerous housing programs.

Even during the time of the Comprehensive Plan preparation the Village of Schaumburg was significantly built out with only a few vacant residential parcels in existing neighborhoods. While development potential is limited, when it comes to infill housing (housing built on scattered site lots), the Village has a preference for single family housing. This preference is supported by an obligation to provide a mix of housing types and preserve the congruity of single family neighborhoods. According to the Comprehensive Plan, the availability of more multifamily units impacts the diversity of the Village because more mature, settled families with children who have a preference to reside in a single family home are forced to move to other surrounding suburbs because of the short supply of these units. The FHA also protects families with children and it is important for the Village to provide housing options that will meet the needs of its diverse population. As noted above, the Village has over 8,498 multi-family units with only 229 being affordable to seniors only.

As discussed in the Housing Element of the Comprehensive Plan, the Village does not support large scale developments that will create a concentration of any protected class or special population in one area. Instead the plan calls for a mix of income levels, with a suggested ratio of an 80% high income units versus 20% affordable units. The Comprehensive Plan does not provide any detailed design standards for elderly housing, group homes, or affordable housing only stating that surrounding land uses must be respected in terms of use, design, and maintenance of the property.

The FHA does not require that communities plan for constructing or assisting in the construction of “affordable” housing nor require that communities be, or advertise themselves as “diverse communities”. HUD has recognized the inclusion of “affordable” housing and promotion of a community as a “diverse community” are steps that communities can take to “affirmatively further fair housing”. Racial minorities, some recent immigrants, single mothers with children, and persons with disabilities, all protected by the FHA, are overrepresented in the low- and moderate-income categories, and are among the persons most likely to need “affordable” housing. Taking steps to address the housing needs of lower income persons and to establish respect for a “diverse” community are therefore viewed by HUD as “affirmatively furthering fair housing actions”.

Overall, the review of the Comprehensive Plan has made it clear that the Village is aware of the need for increased and appropriate housing choices for special populations. It is identified within the Consolidated Plan to locate housing for all groups throughout the entire community.

Reference to CDBG or Other Federal Housing Programs

Within the Comprehensive Plan there are several references to both the Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) describing potential uses for the funds or highlighting how the Village has spent the funds. CDBG funds are funds allocated to the Village on an annual basis from HUD. These funds are intended to assist low- and moderate income persons. CDBG funds by design have a broader range of eligible uses, and the Village does tie this funding source to the objectives to address the needs of special populations and low and moderate income residents. Specifically, CDBG funds have been proposed to be used to fund upgrades to public improvements and facilities in eligible areas; to provide financial support to social service providers that serve the homeless and/or developmentally disabled; and for rehabilitating residential homes that are aging and in need of repair.

In the past, the Village has received HOME Investment Partnership Program (HOME) funds for administration of a First Time Buyer’s Program. The Village has recently joined the Cook County HOME Consortium, which will allow HOME funds to be provided through Cook County rather than the state. HOME is the largest Federal block grant to State and local governments designed exclusively to create affordable housing for low-income households. The funds can be used for a wide range of activities that build, buy, and/or rehabilitate affordable housing for rent or homeownership or provide direct rental assistance.

ASK reviewed this aspect of the Comprehensive Plan, because Federal housing programs continue to be a valuable funding source to fill gaps to provide all residents in a community access to decent housing options. CDBG, HOME, and other Federal housing program funds such as the Neighborhood Stabilization Program (NSP) have become reliable and important parts of community

development programs for communities throughout the nation, including the Village of Schaumburg. In light of the limited amount of buildable land, the Village should assess alternative and non-traditional housing development strategies such as scattered site rental housing subject to the availability of a developer with capacity and compatibility with the State of Illinois Qualified Allocation Plan for low income housing tax credits.

Affirmatively Further Fair Housing

Each community that accepts Federal CDBG funds certifies that it will “affirmatively further fair housing” and will report to HUD actions that it has taken to implement this pledge.

In 1990 the Village passed Resolution 90-12, affirming a Policy for Fair Housing within the Village of Schaumburg Prohibiting Certain Discriminatory Acts in Connection with the Sale or Rental of Dwelling Units. The resolution prohibits discrimination against persons that are a part of the protected classes. Refusal to negotiate or deal, withhold dwellings, indicate preferences or limitations that are discriminatory in marketing materials, and use of lending and lending terms that result in denial or delay of processing a loan are considered discriminatory practices.

Annually, the Village also proclaims the month of April as Fair Housing Month and commits to promoting fair housing through public-private partnerships to provide and advocate for equal housing opportunities.

Adoption of the fair housing resolution and annual fair housing proclamation constitutes “actions” by the community to affirmatively further fair housing.

Other Civil Rights Related Program Requirements

HUD has started the process of formulating specific regulations to be followed in the preparation of the AI. The new rule proposes to incorporate fair housing planning into the Consolidated Plan and the PHA Annual Plan processes. When finalized, the new rule will incorporate fair housing priorities into housing, community development, land-use, and other policy making documents. The proposed changes came about as a result of a Report by the US Government Accountability Office, where it was determined that HUD needs to enhance its requirements and oversight of jurisdictions’ fair housing plans. HUD’s Office of Fair Housing and Equal Opportunity (FHEO) oversees all fair housing matters including the jurisdictions’ compliance with the Affirmatively Further Fair Housing (AFFH) certification, included in the Consolidated Plan and Action Plan. Should HUD determine that the AFFH is inaccurate, HUD has the authority to disapprove a Consolidated Plan, which may result in withholding CDBG and other formula grant funds until the AFFH matter is resolved. The FHEO administers, in addition to the Fair Housing Act, other fair housing and civil right programs such as Title VI of the

Civil Rights Act of 1964; Age Discrimination Act of 1975; Title II ADA; Section 3 of the HCD Act of 1968; and Section 504 of the Rehabilitation Act of 1973, as amended.

Section 3

The Section 3 program requires that recipients of certain HUD financial assistance, to the greatest extent feasible, provide job training, employment, and contracting opportunities for low- or very-low income residents in connection with projects and activities in their neighborhoods. The Village, in its CAPERs, certifies that it has met the requirements of affirmatively furthering fair housing, the anti-displacement and relocation plan, a drug free workplace, and Section 3, among others.

Section 504

Section 504 provides that no qualified person with a disability should, only by reason of his/her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. According to HUD, it means that a housing provider may not deny or refuse to sell or rent to a person with a disability and may not impose application or qualification criteria, rental fees or sales prices, and rental or sales terms or conditions that are different than those required of or provided to persons who are not disabled. HUD also clarifies that a public housing authority, or a HUD funded non-profit developer is classified as a recipient of federal financial assistance and is subject to Section 504's requirements. However, a private landlord who accepts Section 8 tenant-based vouchers in payment for rent is not considered a recipient of federal financial assistance. Similarly, a family that receives CDBG or HOME funds for rehabilitation of an owner-occupied unit is also not considered a recipient because it is the ultimate beneficiary of the funds.

Based on the Village's Consolidated Annual Performance and Evaluation Reports (CAPERs) for program years 2007, 2008, 2009, 2010, and 2011, the Village has not undertaken a Section 504 project.

Community Participation in Planning Process

During the development of the Village's 2010-2014 Consolidated Plan, the Village consulted with various stakeholders including interested citizens to gather input on their views on fair housing and discrimination in the Village. Residents of the Village were able to participate in a community needs survey that probed into the needs for housing including affordable rental housing, housing for the disabled, senior housing, and fair housing services. In addition to this, housing discrimination was also covered by the survey and respondents were able to state whether they had ever been discriminated against, the basis for the discrimination, and whether or not they reported the event.

Similarly, during the AI process, the Village made efforts to get information to and feedback from its citizens. Online surveys, the Village's website, the government cable television, and information provided through the Village's community newsletter were used. Information was also provided to agencies and organizations that are involved in housing and community development. For example, 117 surveys on the section 8 program were sent out to 117 apartment owners. However, the Consolidated Plan did not detail the results of these efforts. In addition, minorities and single parent households were underrepresented in responses to the AI resident surveys. This suggests that there may be the need for an affirmative marketing approach in seeking citizen participation through other means such as religious/faith based organizations, community centers, and schools. Due to the possibility that many persons in the protected classes may not use the Internet to get community information, other electronic media such as radio may help to get the word out. The Village provided alternative format for AI information for persons with Limited English Proficiency and disabilities but should include the information in other languages as a matter of course rather than "upon request." Specific accommodations were not indicated for persons with hearing impairments.

It appears that the Village involves citizens and encourages public participation in its planning process. The Village is encouraged to continue with citizen participation activities. Activities should include persons from all racial, ethnic and religious groups along with persons with disabilities.

In addition to the Village's resolution, the Village is guided by Cook County's approval of the Cook County's Human Rights Ordinance of ancestry, marital status, military discharge status, sexual orientation, age (40+), parental status, gender identity, and source of income (including Housing Choice Vouchers).

Zoning Code

Zoning Ordinances are enforceable in courts of law by the local community and therefore warrant even closer attention to help ensure that the ordinances help the community affirmatively further fair housing and do not, either intentionally or unintentionally, serve as impediments to the exercise of fair housing choice. As such, four subject areas were selected to be reviewed:

- Minimum Lot Size for Single Family Residential
- Definition of "Family"
- Adult Foster Care Facilities
- Multi-Family Maximum Structure Height and Densities

In general, zoning and land use codes can have the effect of impeding for fair housing choice for several reasons. Zoning codes while intended to allow for orderly development and congruent neighborhoods, can be used as a basis to limit the ability of housing for some persons living in those neighborhoods. For example, minimum lot sizes that require larger lots and increased setbacks can limit the development of affordable housing in some neighborhoods. Minimum lots

sizes can also limit the development of group homes and other types of permanent supportive housing for person with disabilities and the frail elderly. Zoning codes can also be used to facilitate NIMBYism where residents of a neighborhood can protest rezoning and limit type of developments. Limitations on the definition of family such as definitions that limit the number of unrelated persons living together also restrict housing choices. Adult Foster Care Facilities often require special use permits which may limit the siting and number of these that can be in a neighborhood. Multi-family Maximum Structure Height and Densities, if they are conservative, can limit the development of affordable housing options for renters. Developers are not able to take advantage of cost efficiencies created by increased density and may not have an incentive to develop these types of units especially for “built out” communities such as the Village of Schaumburg.

Minimum Lot Size for Single Family Residential

Chapter 154 of the Schaumburg Village Code, Zoning, identifies and addresses the residential districts in the Village. Each district allows for group homes, institutional housing, convalescent homes, and nursing homes with special use approval. The minimum lot width for the R-1 to R-7 residential districts is between 70 feet and 200 feet. For single family homes the minimum lot width is 70 feet under the R-6, R-6C, and R-7 single-family residential districts.

The zoning districts in the Village were designed mainly for larger houses and larger lot sizes. Although the Village has very little land left for building, vacant infill lots could be considered for affordable housing including and assembling consolidating lots. However, the limitations of 10% side setbacks and the larger minimum building sizes of 960 up to 1,500 could limit options such as townhouses or “zero” lot line houses in the well-established residential districts. Each of the districts has certain lot coverage requirements which range from a low of 10% to a high of 32%, which along with requirements of ¼ acre to 5 acre lots would not be suitable for affordable housing. Planned unit development zoning “provides an alternate zoning procedure under which land can be developed, or redeveloped to encourage more creative, imaginative and desirable developments than would generally be possible under conventional zoning regulations.” While this zoning allows for the development of multi-family units, its restrictions do not encourage the development of affordable housing where land is available. The zoning requirement limits 3-bedroom units based on increasing density. The lower the density, the lesser the restrictions. For example, 10 units per acre or less – no regulations and 13 units or over, three bedrooms units cannot make up more than 30% of the development. Some members of the protected classes consist of large families and restrictions on larger units would not encourage the development of affordable units. While affordability and income is not a protected class, members of the protected classes have greater representation in the lower income categories.

In addition to the above, restrictions on building heights limit the fair housing choices especially in areas where land availability is limited. In the residential

zoning districts, the maximum building heights range between 28 feet and 32 feet. In PUDs, building heights of up to 35 feet are allowed. Waivers can be sought for higher limits if its meets the zoning criteria and is congruent with the neighborhood.

Definition of “Family”

Under subchapter 154.27 of the Village Code, family is defined as one of the following:

- A. Two (2) or more individuals related by blood, marriage, or legal adoption (including foster children), together with domestic servants and not more than two (2) gratuitous guests, living as a single, not for profit housekeeping unit occupying a dwelling unit.
- B. Three (3) or fewer individuals not related by blood, marriage, or legal adoption (including foster children), living as a single, not for profit housekeeping unit occupying a dwelling unit. Servants or guests residing with said family shall be included in the unrelated person attained by this definition, and shall not be in addition thereto.
- C. No more than two (2) individuals who are not necessarily related to each other by blood, and their dependents, together with domestic servants and not more than two (2) gratuitous guests, living as a single, not for profit housekeeping unit occupying a dwelling unit.

The definition of family does not prevent unrelated individuals from sharing the same home.

Adult Foster Care Facilities

Chapter 115 of the Village Code of Ordinances (Care Providing Facilities), states that care providing facilities include adult daycare facilities, assisted living facilities, daycare centers, and daycare homes. The Zoning Code includes definitions for each type of care facility except for assisted living facilities, which is defined in the Illinois Assisted Living and Shared Housing Act. The definitions are as follows:

- Adult daycare facility - A nonmedical facility for the daytime care of adult persons who, due to advanced age, handicap, or impairment, require assistance and/or supervision during the day by staff.
- Adult daycare home - A residence which receives at least one, but not more than eight (8) adults for care during all or part of the day.

Adult care providing facilities provides care to persons including the disabled where the Code defines disability as a condition:

- attributable to mental, intellectual or physical impairments or a combination of mental, intellectual or physical impairments;
- likely to continue for a significant amount of time or indefinitely;
- resulting in the functional limitations in three (3) or more of the following areas of major activities: self-care; receptive or expressive language; learning; mobility; self-direction; capacity for independent living; economic

self-sufficiency; or d) reflects the person's need for a combination or sequence of special interdisciplinary or generic care, treatment or other services which are of a lifelong or extended duration.

The Zoning Code also includes a definition for Institutional Housing, which is "any residential facility located in a dwelling, under federal, state or village licensing, that is designed, used or intended to be used to provide a temporary or permanent home environment with professional services and treatment while conducting rehabilitative programs, shelter programs, transitional housing for the homeless, or providing special housing for mentally or physically handicapped persons, where the occupants are allowed to interact with the community while in residence". Institutional housing is allowed in single family residential districts with special use approval in accordance with the provisions of section 154.90. The location and operation of institutional housing is governed by factors such as licensing, inspections, residential character, and maintenance.

Multi-Family Maximum Structure Height and Densities

According to the Chicago Metropolitan Agency for Planning (CMAP) the most commonly cited zoning-related regulatory barrier is the restriction of high-density or multi-family housing. Zoning can often prevent housing affordability if higher density, smaller lots or multi-unit buildings are not permitted. The result of such regulatory barriers is an uneven distribution of housing types across the region. Lower-income communities tend to host the lion's share of multi-family and high density housing when higher income communities restrict this type of development. Therefore, exclusionary zoning practices bring to light issues of equity and access to opportunity for low-income residents. Appendix A of the Zoning Code, Summary of Permitted Uses and Special Uses, indicates that multifamily dwellings in planned unit development (PUD) are special uses in the R-6 and R-7 single family residential districts. Appendix B, Zoning District Bulk and Setback Requirements list the design standards for all residential structures and provides for a maximum height of 28 feet and 35 feet or 2½ stories, whichever is less, in the R-6 and R-7 residential districts respectively. The PUD Ordinance in the Zoning Code allows for some flexibility in regards to general design standards including maximum building height, density and setback. The Village may approve a credit to increase the maximum building height above 35 feet provided the PUD meets the general design standards and conforms to the Village's Comprehensive Plan.

Other Comments

The Zoning Code includes regulations for Off-Street Parking and Loading. Section 154.124, Handicapped Parking, states that all handicapped accessible parking spaces shall be constructed and maintained in full compliance with the State of Illinois Accessibility Code. The Village indicated in its Building Code that it adopted the International Building Code of 2009. Chapter 11 of this Code states the provisions that shall control the design and construction of facilities for accessibility

to physically disabled persons. The Village is in compliance with the Chapter 11 of the International Building Code of 2009 as it relates to accessibility. It is important that the Village has policies and procedures in place to monitor compliance by developers and ensure that units are being adequately inspected by Village Building Inspection staff.

Residential Rental Licenses

The Village has adopted an ordinance requiring landlords and property managers of all rental properties, both single family and multi-family, obtain a rental license and participate in a crime free housing seminar. The Village also operates the Crime Free Multi-Housing (CFMH) Program which in addition to the seminar, provides Crime Prevention through Environmental Design (CPTED) certification and requires property managers to hold a tenant crime prevention meeting to obtain full certification. As part of the CFMH Program, landlords are provided with training materials including a Tenant-Landlord Handbook. The handbook along with class presentations addresses the Fair Housing Act by identifying the protected classes, educating participants on the importance of screening applicants without discriminating against them, and providing sample documents and HUD guidance on fair housing.

The Residential Rental Ordinance does not require a criminal background check but does make criminal activity a cause for eviction through the use of a Crime Free Lease Addendum. According to the Village's program materials, the CFMH program has been implemented in 18 major rental properties in the Village and "several rental apartment communities are either certified or becoming certified in the CFMH program while a number of Homeowners Associations have adopted the principals of CFMH in their rules and regulations to deal with the number of rental (non-owner occupied) units in their associations."

The Village has seen a reduction in calls for police service since the program has been operational. Its materials references an 11% decrease in calls for police service at the rental properties participating in the CFMH program compared to a 16% increase in calls for police service village-wide over the same period. The CFMH program works with rental property managers along with police beat teams and specialty units and the program reports that it has been effective.

Studies have shown that due to the possibility of eviction, victims of crime, especially women and children, affected by domestic abuse; do not call the police as often for fear of eviction when a crime free housing program is in place. A review of the draft of the Fair Housing Equity Assessment being conducted by the Chicago Metropolitan Agency for Planning in conjunction with other agencies addresses concerns about Crime Free Rental Ordinances. According to the assessment, an increased number of jurisdictions are adopting crime free rental ordinances with the goal of making their communities safer for its residents; however the research shows that there is a disparate impact on Black or African

American and Latino renters, as well as women who have been the victims of domestic abuse.

The concern here is that this may disparately affect members of the protected classes. In the report “the Cost of Being Crime Free” 106 it was noted that female headed households with children are twice as likely to rent as the general population in Illinois and 59.1 % of African American households and 47.4% of Hispanic households rent versus 25% of non-Hispanic White households. According to the 2012 ACS, 11.5% of rental units in Schaumburg are occupied by female headed households with children. Minorities also account for 43% of the renter-occupied units in the Village. Concerns also center on how rental communities are chosen for Crime Free programs.

While there is no current evidence of disparate impact, it is recommended that the Village research and collect data on how the crime free housing program is affecting fair housing by requiring that rental communities that participate in the CFMH Program collect information on the number of residents that are evicted due to criminal charges and cross-reference against any demographic information provided by the resident on the rental application or observed and noted by the property manager or landlord.

Once the data is available, it should be analyzed to determine if the program is having an unintended impact on persons that may require protection of the FHA, victims of domestic abuse, or other groups that may be excessively impacted. Depending on the results of the analysis, the Village may consider making changes to the crime free housing program.

Public Housing Authority Policies and Local Coordination

Public Housing is a program funded by the U.S. Department of Housing and Urban Development (HUD) for low-income residents. Eligible applicants must meet annual gross income limits as established by HUD. Eligible families pay a monthly rent equal to the greatest of 30% of their monthly adjusted income or 10% of unadjusted monthly income. Applicants may qualify as a family and/or as a single person.

According to the Schaumburg 2010-2014 Consolidated Plan, the Village does not currently have any public housing, nor does it intend to develop any in the future. The Village’s long-term housing goals focus on integrating subsidized housing with non-subsidized housing. The Housing Choice Voucher Program (formerly known as Section 8) is administered by the Housing Authority of Cook County (HACC). The Housing Choice Voucher Program is a federal program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Housing assistance is provided on behalf of the family or individual, and participants are able to find their own housing, including single-family homes, townhouses and apartments. The participant is free to choose any housing that meets the requirements of the program and is not limited

to units located in subsidized housing projects. A housing subsidy is paid to the landlord directly by the PHA on behalf of the participant. The participant then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program. Eligibility for a housing voucher is determined by the PHA based on the total annual gross income and family. In general, the family's income must not exceed 50% of the median income for the county or metropolitan area in which the participant chooses to live.

Since 1974 the U.S. Department of Housing and Urban Development (HUD) has helped low-income households obtain better rental housing and reduce the share of their income that goes toward rent through a program that relies on the private rental market. In 1997, 1.4 million households held Section 8 certificates or vouchers, which allow them to rent eligible units in the private market and receive rental subsidies from the Federal Government. A key parameter in operating the certificate and voucher programs is the Fair Market Rent (FMR).

Since Congress established the Section 8 program in 1974, there have been three definitions of FMRs. The current definition, which became effective in 1995, contains several elements: "The FMR is the 40th percentile of gross rents for typical, non-substandard rental units occupied by recent movers in a local housing market." FMRs are set for rental units based on the number of bedrooms. Section 8 rules determine eligible units by household size and the age and sex of children. The following table indicates the FY 2013 FMRs by unit bedrooms for the Chicago-Joliet-Naperville, IL HUD Metro FMR Area:

Table 51

FY 2012 FMRs By Unit Bedrooms Chicago-Joliet-Naperville, IL HUD Metro FMR Area					
	Efficiency	One Bedroom	Two Bedroom	Three Bedroom	Four Bedroom
FY 2012 FMR	\$717	\$815	\$966	\$1,231	\$1,436

Source: U.S. Department of Housing and Urban Development (HUD), 2012

The Housing Choice Voucher Program administered by The Housing Authority of Cook County (HACC) will use Small Area FMRs as defined by zip codes. In metropolitan areas, HUD defines Small Areas using zip Codes within the metropolitan area. Using zip codes as the basis for FMRs provides tenants with greater ability to move into "Opportunity Neighborhoods" with jobs, public transportation, and good schools. They also provide for multiple payment standards within a metropolitan area, and they are likely to reduce need for extensive market area rent reasonableness studies. Lastly, HUD hopes that setting FMRs for each zip code will reduce overpayment in lower-rent areas. The

following zip codes are located within the Village of Schaumburg, and have the following FMRs as defined by HUD. It should be noted that zip Code areas are defined by the postal service to facilitate the efficient delivery of mail. Because of this, zip code areas may cross city, county, and in some limited instances, state lines. As of January 2013, the Village of Schaumburg had 292 voucher holders.

Table 52

The Housing Authority of Cook County, IL Small Area Demonstration Rents By Unit Bedrooms					
Zip Code	Efficiency	One Bedroom	Two Bedroom	Three Bedroom	Four Bedroom
60173	\$900	\$1,020	\$1,210	\$1,540	\$1,800
60193	\$880	\$1,000	\$1,190	\$1,520	\$1,770
60194	\$900	\$1,020	\$1,210	\$1,540	\$1,800
60195	\$910	\$1,040	\$1,230	\$1,570	\$1,830

Source: The Housing Authority of Cook County, 2013

The Housing Authority’s website notes: “The Housing Authority of Cook County also known as the HACC, is the second largest public housing authority in Illinois. The HACC is a municipal corporation that was established in 1946 to serve 108 communities, as well as unincorporated areas in suburban Cook County. The Housing Authority of Cook County administers several rent assistance programs to meet the housing needs of our rental participants. The HACC’s conventional public housing program consists of over 2,100 owned units of low-income housing. The Rent Assistance Division services over 13,000 families, senior citizens, and persons with disabilities. Other programs such as our Mobility Assistance Program, Family Self-Sufficiency Program, and Home Ownership Program are designed to make a positive difference and help participants achieve independence.

According to its website, the HACC administers the Community Choice Program which is designed to “help families with vouchers to explore all your housing options.” The HACC provides a housing counselor to assist tenants with identifying their needs and wants in terms of housing and community services and then help them to locate housing in opportunity areas in suburban Cook County. The HACC defines “opportunity areas as communities that have been identified as high-performing communities. In general, they have less violent crime, a good mix of people from different backgrounds, better schools and better community services.”

In order to facilitate its “Community Choice Program” and meets its HUD mandate to affirmatively further fair housing, the Housing Authority of Cook County carries out the following activities to ensure fair housing compliance:

- Conducts monthly landlord outreach meetings for new landlords interested in participating in the Housing Choice Voucher Program.
- Conducts landlord seminars monthly for current landlords including training on fair housing and discrimination.
- Provides program information on the HCA’s website for landlords
- Provides property taxes reduction incentives for participating

Under the Community Choice Program, the Village of Schaumburg is not considered a complete “Opportunity Area” community but is considered a community with a mix of opportunity areas and traditional areas. A majority of the Village’s census tracts are included as areas that are eligible for the program.

The landlord training PowerPoint presentation provided by the HACC did not specifically address fair housing in detail. The information packet provided to landlords contained a fact sheet on fair housing prepared by the Chicago Area Fair Housing Alliance including a recent ordinance passed by Cook County adding voucher holders as a protected class under the County’s fair housing guidelines approved May 8, 2013.. In addition, information is provided on the Fair Housing Act and the seven protected classes. In addition to the above, the Cook County’s Human Rights Ordinance of March 16, 1993 added the following classes for protection against housing discrimination: ancestry, marital status, military discharge status, sexual orientation, age (40+), parental status, source of income (including housing choice vouchers), and gender identity. These protections are intended to protect voucher holders from discrimination and ensure the de-concentration of subsidized and affordable housing in the Village.

In its Five Year Action Plan prepared during 2013, the Cook County Housing Authority identifies goals and objectives that will enable the PHA to serve the needs of lower-income families for the next five years. Among the goals and objectives, the following will continue to assist the Village in addressing some of the requirements of the FHA. The PHA proposes to target project-based vouchers to priority areas such as supportive housing and housing for families in opportunity areas; counsel voucher holders planning to move on the benefits of areas with higher performing schools, access to jobs and transportation, and lower crime rates; and continue to support efforts to transition persons with disabilities from institutional settings into community-based living by providing a preference for housing this population and working with the State of Illinois on the Colbert Consent Decree.

IV. COMPLIANCE DATA AND ANALYSIS

Introduction

This section contains an analysis of home loan, community reinvestment and fair housing complaint data. Community Reinvestment Act (CRA) performance ratings and Home Mortgage Disclosure Act (HMDA) data are used in AIs to examine fair lending practices within a jurisdiction. Data regarding fair housing complaints and cases help to further illustrate the types of fair housing impediments that may exist.

CRA Compliance

The CRA, enacted by Congress in 1977 (12 U.S.C. 2901) and implemented by Regulations 12 CFR parts 25, 228, 345, and 563e, is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate. Specifically, the Act seeks to address discrimination in loans made to individuals and businesses from low and moderate-income neighborhoods. The CRA requires the Federal Deposit Insurance Corporation (FDIC), in connection with the examination of a State nonmember insured financial institution, to assess the institution's CRA performance. All FDIC-insured banks are evaluated to determine if the bank offers credit in all communities in which they are chartered to offer business. CRA examinations are conducted by the Federal Financial Institutions Examinations Council (FFIEC) of federal agencies that are responsible for supervising depository institutions: the Board of Governors of the Federal Reserve System (FRB), the FDIC, the Office of the Comptroller of the Currency (OCC), and the Office of Thrift Supervision (OTS).

The CRA requires that each insured depository institution's record in helping meet the credit needs of its entire community be evaluated periodically. That record is taken into account in considering an institution's application for deposit facilities, including mergers and acquisitions. A financial institution's performance is evaluated in the context of information about the institution (financial condition and business strategies), its community (demographic and economic data), and its competitors. Upon completion of a CRA examination, the FDIC rates the overall CRA performance of the financial institution using a four-tiered rating system. These ratings consist of:

- ✓ Outstanding
- ✓ Satisfactory
- ✓ Needs to Improve
- ✓ Substantial Noncompliance

From 2000 to present, 9 CRA Performance Ratings have been given to banks based in Schaumburg, Illinois. All 9 bank examinations received a rating of "Satisfactory." It should be noted that a bank may have been rated more than once during this time period. Surrounding municipalities were also researched, and the results are included in the tables below.

Table 53

**Village of Schaumburg
 FFIEC CRA Performance Ratings**

Exam Date	Bank Name	Village	State	FFIEC CRA Rating	Asset Size (in thousands)
01/01/2002	American Chartered Bank	Schaumburg	IL	Satisfactory	\$695,111
06/01/2004	American Chartered Bank	Schaumburg	IL	Satisfactory	\$1,325,156
05/01/2007	American Chartered Bank	Schaumburg	IL	Satisfactory	\$2,435,088
07/01/2010	American Chartered Bank	Schaumburg	IL	Satisfactory	\$2,738,846
08/01/2003	American United Bank and Trust Company USA	Schaumburg	IL	Satisfactory	\$197,686
12/05/2008	American United Bank and Trust Company USA	Schaumburg	IL	Satisfactory	\$363,889
01/01/2012	American United Bank and Trust Company USA	Schaumburg	IL	Satisfactory	\$285,349
01/27/2003	Diamond Bank, FSB	Schaumburg	IL	Satisfactory	\$139,235
04/28/2008	Diamond Bank, FSB	Schaumburg	IL	Satisfactory	\$202,359

Source: FDIC, <http://www.ffiec.gov/craratings>

Table 54

**Village of Schaumburg
 FFIEC CRA Performance Ratings
 Municipalities Neighboring Schaumburg, Illinois**

Exam Date	Bank Name	Village	State	FFIEC CRA Rating	Asset Size (in thousands)
09/29/2003	Advantage National Bank	Elk Grove Village	IL	Satisfactory	\$103,599
11/17/2007	Advantage National Bank	Elk Grove Village	IL	Satisfactory	\$369,756
12/10/2010	First American Bank	Elk Grove Village	IL	Satisfactory	\$2,849,572
05/20/2002	Harris Bank Elk Grove, N.A.	Elk Grove Village	IL	Satisfactory	\$157,008
06/29/2009	First Eagle Bank	Hanover Park	IL	Outstanding	\$314,943
09/12/2011	First Eagle Bank	Hanover Park	IL	Outstanding	\$334,390
08/20/2001	First Eagle National Bank	Hanover Park	IL	Satisfactory	\$190,483
02/27/2007	First Eagle National Bank	Hanover Park	IL	Satisfactory	\$308,374
03/24/2008	Charter National Bank and Trust	Hoffman Estates	IL	Satisfactory	\$114,952
02/01/2003	Bank of Palatine	Palatine	IL	Satisfactory	\$58,451
05/05/2008	Bank of Palatine	Palatine	IL	Satisfactory	\$58,383
01/08/2009	Cornerstone National Bank & Trust Co.	Palatine	IL	Satisfactory	\$409,320
07/16/2012	Cornerstone National Bank & Trust Co.	Palatine	IL	Satisfactory	\$440,121
03/01/2003	First Bank and Trust Company of Illinois	Palatine	IL	Satisfactory	\$800,256
04/01/2005	First Bank and Trust Company of Illinois	Palatine	IL	Satisfactory	\$528,513

Exam Date	Bank Name	Village	State	FFIEC CRA Rating	Asset Size (in thousands)
06/05/2008	First Bank and Trust Company of Illinois	Palatine	IL	Satisfactory	\$473,972
09/01/2011	First Bank and Trust Company of Illinois	Palatine	IL	Needs to Improve	\$354,872
05/22/2000	Harris Bank Palatine, N.A.	Palatine	IL	Satisfactory	\$496,125
05/20/2002	Harris Bank Palatine, N.A.	Palatine	IL	Satisfactory	\$520,120
02/01/2003	Harris Bank Arlington-Meadows	Rolling Meadows	IL	Satisfactory	\$295,793
06/01/2010	Northwest Community Bank	Rolling Meadows	IL	Satisfactory	\$80,430
04/03/2000	Platinum Community Bank	Rolling Meadows	IL	Satisfactory	\$28,793
10/28/2004	Platinum Community Bank	Rolling Meadows	IL	Satisfactory	\$140,756
01/01/2001	Harris Bank Roselle	Roselle	IL	Satisfactory	\$410,724
02/01/2003	Harris Bank Roselle	Roselle	IL	Satisfactory	\$472,914

Source: FDIC, <http://www.ffiec.gov/craratings>

In addition, the FFIEC publishes annual Census Reports that use a limited number of demographic, income, population, and housing data from the FFIEC's Census files prepared for HMDA and CRA data. The FFIEC annually updates the Census Windows Application, a Windows-compatible database with over 1,000 fields of census data. This annual update reflects changes to MSA/MD boundaries announced by the Office of Management and Budget (OMB), include income estimates developed by the FFIEC, and include CRA distressed/underserved tracts as announced by the federal bank regulatory agencies. The following reports were gathered from the FFIEC for the Census tracts within the Village of Schaumburg, IL.

Table 55

**Village of Schaumburg
 2012 FFIEC Census Report - Summary Census Demographic Information**

Tract Code	Tract Income Level	Distressed or Under-served Tract	Tract Median Family Income %	2012 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2012 Est. Tract Median Family Income	2010 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
7702.02	Middle	No	92.73	\$77,300	\$71,680	\$67,461	4912	14.78	726	1796	1424
8041.02	Upper	No	192.62	\$77,300	\$148,895	\$140,130	6993	15.37	1075	2476	2515
8041.05	Upper	No	168.21	\$77,300	\$130,026	\$122,374	4000	17.85	714	1225	1299
8041.08	Middle	No	96.28	\$77,300	\$74,424	\$70,041	3879	58.29	2261	267	306
8041.09	Upper	No	166.67	\$77,300	\$128,836	\$121,250	2955	14.38	425	948	938
8043.08	Middle	No	107.89	\$77,300	\$83,399	\$78,490	5486	40.47	2220	2127	2329
8046.03	Moderate	No	71.03	\$77,300	\$54,906	\$51,678	5581	56.15	3134	898	845
8046.06	Upper	No	141.35	\$77,300	\$109,264	\$102,833	7118	20.89	1487	2286	2374
8046.08	Upper	No	121.01	\$77,300	\$93,541	\$88,033	3787	39.64	1501	1285	1357
8046.09	Upper	No	141.34	\$77,300	\$109,256	\$102,821	5672	41.80	2371	1495	1745
8046.10	Middle	No	117.31	\$77,300	\$90,681	\$85,341	2320	29.31	680	1105	1005
8046.11	Middle	No	118.87	\$77,300	\$91,887	\$86,481	4359	19.36	844	1556	1818
8047.06	Upper	No	138.03	\$77,300	\$106,697	\$100,417	2472	25.40	628	814	814
8047.09	Middle	No	82.27	\$77,300	\$63,595	\$59,854	6510	43.49	2831	1157	1330
8047.10	Middle	No	117.70	\$77,300	\$90,982	\$85,625	4350	26.23	1141	1346	1628
8047.11	Middle	No	97.22	\$77,300	\$75,151	\$70,726	7442	57.30	4264	1816	2056
8047.12	Upper	No	139.73	\$77,300	\$108,011	\$101,651	5392	34.31	1850	1427	1766
8047.13	Upper	No	125.91	\$77,300	\$97,328	\$91,600	4694	46.44	2180	564	628

Analysis of Impediments to Fair Housing Choice, January 2015
 Village of Schaumburg, IL

Tract Code	Tract Income Level	Distressed or Under-served Tract	Tract Median Family Income %	2012 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2012 Est. Tract Median Family Income	2010 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
8047.14	Middle	No	110.75	\$77,300	\$85,610	\$80,572	3480	29.02	1010	972	1076
8047.15	Moderate	No	79.24	\$77,300	\$61,253	\$57,651	3292	70.32	2315	736	446
8047.16	Upper	No	152.61	\$77,300	\$117,968	\$111,024	5490	55.36	3039	1436	1504
8048.03	Upper	No	147.08	\$77,300	\$113,693	\$107,000	5392	29.19	1574	1624	1792
8048.04	Middle	No	88.93	\$77,300	\$68,743	\$64,698	6537	40.60	2654	1936	2004
8048.05	Middle	No	106.77	\$77,300	\$82,533	\$77,679	6911	30.69	2121	2082	2430
8048.06	Middle	No	93.78	\$77,300	\$72,492	\$68,229	3751	53.91	2022	947	1050
8048.07	Middle	No	103.63	\$77,300	\$80,106	\$75,394	5172	28.71	1485	1594	1667
8048.08	Middle	No	112.50	\$77,300	\$86,963	\$81,845	2533	15.28	387	871	914
8048.09	Upper	No	138.83	\$77,300	\$107,316	\$101,000	4224	18.61	786	1405	1538
8048.10	Middle	No	100.08	\$77,300	\$77,362	\$72,806	6949	30.46	2117	1977	1708
8051.05	Moderate	No	72.13	\$77,300	\$55,756	\$52,474	7356	62.23	4578	1546	1130

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Table 56

**Village of Schaumburg
 2012 FFIEC Census Report - Summary Census Income Information**

Tract Code	Tract Income Level	2010 MSA/MD Statewide non-MSA/MD Median Family Income	2012 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2010 Tract Median Family Income	2012 Est. Tract Median Family Income	2010 Tract Median Household Income
7702.02	Middle	\$72,747	\$77,300	3.29	107.70	\$78,350	\$83,252	\$59,888
8041.02	Upper	\$72,747	\$77,300	3.50	192.62	\$140,130	\$148,895	\$121,413
8041.05	Upper	\$72,747	\$77,300	1.07	168.21	\$122,374	\$130,026	\$121,032
8041.08	Middle	\$72,747	\$77,300	9.64	96.28	\$70,041	\$74,424	\$55,227
8041.09	Upper	\$72,747	\$77,300	8.97	166.67	\$121,250	\$128,836	\$92,083
8043.08	Middle	\$72,747	\$77,300	4.15	107.89	\$78,490	\$83,399	\$75,471
8046.03	Moderate	\$72,747	\$77,300	14.21	71.03	\$51,678	\$54,906	\$47,096
8046.06	Upper	\$72,747	\$77,300	0.87	141.35	\$102,833	\$109,264	\$96,667
8046.08	Upper	\$72,747	\$77,300	2.51	121.01	\$88,033	\$93,541	\$76,275
8046.09	Upper	\$72,747	\$77,300	2.79	141.34	\$102,821	\$109,256	\$80,984
8046.10	Middle	\$72,747	\$77,300	10.04	117.31	\$85,341	\$90,681	\$61,862
8046.11	Middle	\$72,747	\$77,300	5.98	118.87	\$86,481	\$91,887	\$65,380
8047.06	Upper	\$72,747	\$77,300	5.20	138.03	\$100,417	\$106,697	\$87,500
8047.09	Middle	\$72,747	\$77,300	14.45	82.27	\$59,854	\$63,595	\$55,215
8047.10	Middle	\$72,747	\$77,300	2.57	117.70	\$85,625	\$90,982	\$72,443
8047.11	Middle	\$72,747	\$77,300	5.74	97.22	\$70,726	\$75,151	\$61,664
8047.12	Upper	\$72,747	\$77,300	4.19	139.73	\$101,651	\$108,011	\$93,774
8047.13	Upper	\$72,747	\$77,300	3.44	125.91	\$91,600	\$97,328	\$63,011
8047.14	Middle	\$72,747	\$77,300	1.08	110.75	\$80,572	\$85,610	\$72,577
8047.15	Moderate	\$72,747	\$77,300	8.38	79.24	\$57,651	\$61,253	\$56,799
8047.16	Upper	\$72,747	\$77,300	2.94	152.61	\$111,024	\$117,968	\$107,969
8048.03	Upper	\$72,747	\$77,300	2.87	147.08	\$107,000	\$113,693	\$82,417
8048.04	Middle	\$72,747	\$77,300	10.63	88.93	\$64,698	\$68,743	\$58,490
8048.05	Middle	\$72,747	\$77,300	5.43	106.77	\$77,679	\$82,533	\$70,673
8048.06	Middle	\$72,747	\$77,300	8.14	93.78	\$68,229	\$72,492	\$68,229
8048.07	Middle	\$72,747	\$77,300	4.07	103.63	\$75,394	\$80,106	\$73,909
8048.08	Middle	\$72,747	\$77,300	2.82	112.50	\$81,845	\$86,963	\$77,568
8048.09	Upper	\$72,747	\$77,300	1.59	138.83	\$101,000	\$107,316	\$91,693
8048.10	Middle	\$72,747	\$77,300	7.71	100.08	\$72,806	\$77,362	\$64,775
8051.05	Moderate	\$72,747	\$77,300	14.01	72.13	\$52,474	\$55,756	\$46,690

Table 57

**Village of Schaumburg
 2012 FFIEC Census Report - Summary Census Population Information**

Tract Code	Tract Population	Tract Minority %	Number of Families	# of Households	Non-Hisp White Population	Tract Minority Population	American Indian Population	Asian/Hawaiian/Pacific Islander Population	Black or African American Population	Hispanic Population	Other Population/ Two or More Races
7702.02	4912	14.78	1356	2085	4186	726	6	227	50	380	63
8041.02	6993	15.37	2062	2510	5918	1075	4	740	36	213	82
8041.05	4000	17.85	1145	1270	3286	714	3	488	42	121	60
8041.08	3879	58.29	746	2202	1618	2261	10	1410	357	398	86
8041.09	2955	14.38	784	1147	2530	425	2	204	44	131	44
8043.08	5486	40.47	1310	2281	3266	2220	6	1174	230	733	77
8046.03	5581	56.15	1099	2468	2447	3134	11	1123	367	1531	102
8046.06	7118	20.89	2018	2504	5631	1487	7	1016	62	318	84
8046.08	3787	39.64	900	1473	2286	1501	6	808	179	432	76
8046.09	5672	41.80	1458	2474	3301	2371	9	1830	139	268	125
8046.10	2320	29.31	534	1215	1640	680	6	426	45	153	50
8046.11	4359	19.36	1204	2054	3515	844	5	483	80	204	72
8047.06	2472	25.40	704	814	1844	628	5	329	57	193	44
8047.09	6510	43.49	1545	2669	3679	2831	6	1249	358	1049	169
8047.10	4350	26.23	1153	1559	3209	1141	3	459	141	439	99
8047.11	7442	57.30	1740	2779	3178	4264	8	1816	613	1613	214
8047.12	5392	34.31	1524	1809	3542	1850	9	918	243	572	108
8047.13	4694	46.44	942	2053	2514	2180	19	1387	240	438	96
8047.14	3480	29.02	1003	1290	2470	1010	2	398	120	418	72
8047.15	3292	70.32	849	1192	977	2315	3	833	231	1187	61
8047.16	5490	55.36	1425	1689	2451	3039	0	1670	186	1055	128

Analysis of Impediments to Fair Housing Choice, January 2015
 Village of Schaumburg, IL

Tract Code	Tract Population	Tract Minority %	Number of Families	# of Households	Non-Hisp White Population	Tract Minority Population	American Indian Population	Asian/Hawaiian/Pacific Islander Population	Black or African American Population	Hispanic Population	Other Population/ Two or More Races
8048.03	5392	29.19	1462	2009	3818	1574	11	873	158	464	68
8048.04	6537	40.60	1560	2596	3883	2654	6	1072	252	1199	125
8048.05	6911	30.69	1924	2426	4790	2121	14	863	229	819	196
8048.06	3751	53.91	877	1035	1729	2022	5	534	335	1073	75
8048.07	5172	28.71	1389	1770	3687	1485	7	599	173	589	117
8048.08	2533	15.28	735	914	2146	387	2	174	19	166	26
8048.09	4224	18.61	1208	1497	3438	786	4	394	78	252	58
8048.10	6949	30.46	1826	2571	4832	2117	6	1039	290	647	135
8051.05	7356	62.23	1789	2775	2778	4578	4	624	216	3630	104

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Table 58

**Village of Schaumburg
 2012 FFIEC Census Report - Summary Census Housing Information**

Tract Code	Total Housing Units	1- to 4-Family Units	Median House Age (Years)	Inside Principal Municipality?	Owner Occupied Units	Vacant Units	Owner Occupied 1- to 4-Family Units	Renter Occupied Units
7702.01	2760	1641	31	-	1502	-	1405	1161
8041.02	2555	2515	32	-	2476	-	2436	34
8041.05	1299	1299	35	-	1225	-	1225	45
8041.08	2721	306	33	-	267	-	136	1935
8041.09	1198	938	37	-	948	-	888	199
8043.08	2383	2329	17	-	2127	-	2086	154
8046.03	2698	845	35	-	898	-	638	1570
8046.06	2504	2374	29	-	2286	-	2204	218
8046.08	1612	1357	34	-	1285	-	1148	188
8046.09	2638	1745	24	-	1495	-	1374	979
8046.10	1355	1005	31	-	1105	-	755	110
8046.11	2054	1818	33	-	1556	-	1531	498
8047.06	814	814	42	-	814	-	814	0
8047.09	2989	1330	37	-	1157	-	1061	1512
8047.10	1628	1628	36	-	1346	-	1346	213
8047.11	3006	2056	32	-	1816	-	1691	963
8047.12	1929	1766	31	-	1427	-	1427	382
8047.13	2288	628	34	-	564	-	521	1489
8047.14	1362	1076	42	-	972	-	937	318
8047.15	1192	446	35	-	736	-	385	456
8047.16	1778	1504	30	-	1436	-	1388	253
8048.03	2092	1792	31	-	1624	-	1543	385
8048.04	2640	2004	31	-	1936	-	1618	660
8048.05	2517	2430	39	-	2082	-	2033	344
8048.06	1106	1050	37	-	947	-	917	88
8048.07	1851	1667	42	-	1594	-	1471	176
8048.08	914	914	39	-	871	-	871	43
8048.09	1544	1538	37	-	1405	-	1399	92
8048.10	2708	1708	36	-	1977	-	1564	594
8051.05	3055	1130	34	-	1546	-	819	1229

HMDA Data Analysis

Home Mortgage Disclosure Act (HMDA) data consists of information about mortgage loan applications for financial institutions, savings and loans, savings banks, credit unions and some mortgage companies. The data contains information about the location, dollar amount, and types of loans made, as well as racial and ethnic information, income, and credit characteristics of all loan applicants.

The data deemed most pertinent to this report is limited to loan denial rates by location within areas of racial/ethnic concentration and income distinction. The applications are for loans for 1–4 family dwellings and manufactured homes. The data excludes loan applications for investment purposes (non-owner occupancy). Three types of loan products were included: home-purchase loans (conventional and government-backed), refinancing, and home improvement loans.

HMDA provided the disposition of various types of loan products at the Census Tract level, which were extracted and displayed for each individual tracts within the Village of Schaumburg. These tracts were analyzed to identify those whose median income (in relation to the MSA) fell below that of the village as a whole, and those with a significantly higher minority concentration than the Village-wide rate. Specifically, data was analyzed pertaining to the disposition of loan applications by the minority and income demographics of the Census Tract in which the subject property of the loan was located to identify if there were any discernible patterns that might suggest discriminatory lending practices based on race.

It should be noted that Census Tracts include areas both within and outside the municipal bounds of the Village of Schaumburg. In best effort to most accurately portray HMDA data for the Village, only those tracts were utilized which were either entirely within the Village or whose area fell predominantly within Village boundaries. Certain tracts where only a small area fell within the Village boundaries were excluded from the calculations. It should be noted discriminatory lending practices cannot be definitively identified by correlation of HMDA data elements; however, the data can display real patterns in lending to indicate potential problem areas.

General Loan Application Data

The most recent available HMDA data was for the 2009, 2010, and 2011 calendar years and was utilized in this analysis (extracted from HMDA Flat Files, 2009-2011).

Analysis

The tables below examine total loan applications and denial rates versus minority application and denial rates. Table 59 reviews conventional loans applications as compared to denial rates for minority applications, while Tables 61-63 look at different loan purposes including loans for home purchase, home refinance, and home improvement. The highlighted yellow areas indicate tracts where the minority denial rate is higher than the overall denial rate of all applications. Minority applicants included those who identified themselves as American Indian or Alaska Native, Asian, Black or African American, and Native Hawaiian or Other Pacific Islander and takes into account the demographics of the main applicant. For purposes of this analysis, a “minority tract” is defined as a census tract where the minority percentage exceeds the average minority concentration for the Village (34.5%) by at least 10%. Therefore, Tracts with 44% or greater minority population were considered “minority.”

Among the Census Tracts analyzed, there were 31,698 loan applications made for purchase, refinancing, or improvement of owner-occupied homes. Of this total, 4,318 (13.6 percent) applications were denied. The minority denial rate Village-wide is larger with a total of 6,849 loan applications of which 1,239 were denied. This represents an 18.1% minority denial rate for the Village. Of the 25 census tracts analyzed, four (4) met the definition of minority. When looking at the four (4) “minority” census tracts there were 3,345 loan applications and 605 denials, equating to a denial rate of 18.1%, 4.5 percent higher than the overall Village rate. The minority denial rate in the 4 “minority tracts” also increased to 22.5%. The census tracts highlighted below are the “minority tracts”. This variance may indicate the existence of some discrimination in lending based on property location in areas of minority concentration.

Table 59

**Village of Schaumburg
 Loan Applications and Denials, Minority Percentage, and
 Percent of MSA Median Income by Census Tract, 2009-2011**

Census Tract	Total Applications	Total Denials	Denial Rate %	Total Minority Applications	Minority Denials	% Of Minority Denials	Median Income as % of MSA
7702	2103	305	14.5%	273	54	2.6%	111.9
8041.02	2101	193	9.2%	322	32	1.5%	222.02
8041.05	1112	108	9.7%	184	17	1.5%	159.78
8041.07	849	82	9.7%	117	15	1.8%	122.42
8043.07	1951	312	16%	552	107	5.5%	116.34
8046.03	604	132	21.9%	159	40	6.6%	113.89
8046.04	2387	323	13.5%	748	124	5.2%	137.22
8046.05	1690	214	12.7%	268	34	2.0%	117.3

Analysis of Impediments to Fair Housing Choice, January 2015
 Village of Schaumburg, IL

Census Tract	Total Applications	Total Denials	Denial Rate %	Total Minority Applications	Minority Denials	% Of Minority Denials	Median Income as % of MSA
8046.06	1764	183	10.4%	276	36	2.0%	143.66
8047.06	543	48	8.8%	93	14	2.6%	152.46
8047.07	1408	236	16.8%	286	62	4.4%	123.99
8047.08	1601	283	17.7%	597	128	8.0%	107.27
8047.09	838	127	15.2%	255	53	6.3%	101.83
8047.10	948	121	12.8%	133	26	2.7%	121.27
8047.11	1277	185	14.5%	419	79	6.2%	102.73
8047.12	1088	113	10.4%	207	36	3.3%	127.95
8048.03	1302	155	11.9%	308	47	3.6%	123.17
8048.04	1181	194	16.4%	295	53	4.5%	99.26
8048.05	1484	208	14.0%	285	59	4.0%	118.39
8048.06	611	122	20.0%	205	47	7.7%	104.56
8048.07	1111	179	16.1%	170	45	4.1%	112.99
8048.08	599	59	9.8%	63	8	1.3%	137.35
8048.09	1019	119	11.7%	143	29	2.8%	127.47
8048.10	1274	151	11.9%	253	30	2.4%	127.84
8051.05	853	166	19.5%	238	64	7.5%	88.88
TOTAL	31,698	4,318	13.6%	6,849	1,239	18.1%	

Source: Data extracted for Village of Schaumburg from HMDA, LAR Files, 2009-2011

The following tables include an analysis of the HMDA data for each year included in the detailed table above. In the 3-year period, the overall denial rate has steadily increased demonstrating the presence of a tighter lending market possibly due to the downturn in the economy and the housing market during that period of time.

Table 60

**Village of Schaumburg
 Loan Applications and Denials
 Schaumburg MSA, 2009-2011**

	Applications	Denials	Denial Rate %
2009	11,953	1,253	10.5
2010	10,424	1,395	13.4
2011	9,321	1,391	14.9

Table 61

Village of Schaumburg				
Home Purchase Loans (Conventional) Applications				
2009-2011				
Census Tracts	Home Purchase Loans (Conventional) Applications	Home Purchase Loan Denials (Conventional) Application Denials	Home Purchase Loan (Conventional) Applications Denial Rates %	2012 Tract Minority %
7702	269	34	12.6%	14.78
8041.02	259	14	5.4%	15.37
8041.05	102	6	5.9%	17.85
8041.07	104	6	5.8%	N/A
8043.07	247	24	9.7%	N/A
8046.03	88	14	15.9%	56.15
8046.04	308	32	10.4%	N/A
8046.05	232	21	9.1%	N/A
8046.06	154	9	5.8%	20.89
8047.06	47	5	10.6%	25.40
8047.07	196	29	14.8%	N/A
8047.08	181	29	16.0%	N/A
8047.09	72	11	15.3%	43.49
8047.10	84	7	8.3%	26.23
8047.11	176	23	13.1%	57.30
8047.12	105	3	2.9%	34.31
8048.03	157	18	11.5%	29.19
8048.04	153	11	7.2%	40.60
8048.05	141	16	11.4%	30.69
8048.06	70	11	15.7%	53.91
8048.07	113	9	8.0%	28.71
8048.08	45	4	8.9%	15.28
8048.09	102	11	10.8%	18.61
8048.10	163	13	8.0%	30.46
8051.05	128	16	12.5%	62.23

Table 62

Village of Schaumburg				
Census Tracts	Refinance Loan Applications	Refinance Loan Application Denials	Refinance Loan Applications Denial Rates %	Tract Minority %
7702	1602	242	15.1%	14.78
8041.02	1770	175	9.9%	15.37
8041.05	949	95	10.0%	17.85
8041.07	688	67	9.7%	N/A
8043.07	1380	242	17.5%	N/A
8046.03	425	106	24.9%	56.15
8046.04	1955	276	14.1%	N/A
8046.05	1303	177	13.6%	N/A
8046.06	1480	156	10.5%	20.89
8047.06	450	40	8.9%	25.40
8047.07	966	163	16.9%	N/A
8047.08	1231	218	17.7%	N/A
8047.09	634	96	15.1%	43.49
8047.10	786	102	13.0%	26.23
8047.11	911	142	15.6%	57.30
8047.12	866	97	11.2%	34.31
8048.03	1025	126	12.3%	29.19
8048.04	868	157	18.1%	40.60
8048.05	1159	166	14.3%	30.69
8048.06	422	93	22.0%	53.91
8048.07	823	142	17.3%	28.71
8048.08	497	52	10.5%	15.28
8048.09	794	94	11.8%	18.61
8048.10	1025	126	12.3%	30.46
8051.05	586	128	21.8%	62.23

Table 63

Village of Schaumburg				
Census Tracts	Home Improvement Loan Applications	Home Improvement Loan Application Denials	Home Improvement Loan Applications Denial Rates %	Tract Minority %
7702	43	12	27.9%	14.78
8041.02	44	2	4.5%	15.37
8041.05	20	6	30.0%	17.85
8041.07	21	5	23.8%	N/A
8043.07	38	14	36.8%	N/A
8046.03	7	3	42.9%	56.15
8046.04	43	10	23.3%	N/A
8046.05	35	5	14.3%	N/A
8046.06	44	8	18.2%	20.89
8047.06	13	2	15.4%	25.40
8047.07	24	11	45.8%	N/A
8047.08	32	12	37.5%	N/A
8047.09	16	8	50.0%	43.49
8047.10	27	5	18.5%	26.23
8047.11	16	2	12.5%	57.30
8047.12	32	7	21.9%	34.31
8048.03	32	5	15.6%	29.19
8048.04	31	16	51.6%	40.60
8048.05	28	9	32.1%	30.69
8048.06	13	4	30.8%	53.91
8048.07	29	8	27.6%	28.71
8048.08	13	2	15.4%	15.28
8048.09	23	7	30.4%	18.61
8048.10	22	10	45.5%	30.46
8051.05	20	6	30.0%	62.23

The following tables summarize similar information by examining loan applications classified by loan purpose and loan type for the Village rather than by census tract. Table 64 shows the total number of applications by purpose subdivided into the number of applications that were originated or denied distributed by race/ethnicity. The table shows that while more whites are applying for loans in Schaumburg, especially for refinancing, the denial and original rates for minorities and whites in terms of percentages are relatively close. The largest distinction is for home purchase loans where 17.1% of minority loan applications were denied as compared to 9.5% for whites.

Table 64

Village of Schaumburg Analysis of Home Mortgage Disclosure Act Data HMDA Activity, 2009-2011							
	# Apps.	% of Apps.	# Denied	% Denied	# Orig	% Orig	
Home Purchase Loans							
Minorities	1034	24.2%	177	17.1%	535	51.7%	
Whites	2736	64.1%	261	9.5%	1569	57.3%	
Not Provided							
Home Improvement Loans							
Minorities	81	17.1%	24	29.6%	45	55.6%	
Whites	306	64.7%	82	26.8%	153	50.0%	
Not Provided							
Refinance Loans							
Minorities	3281	19.2%	591	18.0%	1862	56.8%	
Whites	11458	67.1%	1977	17.3%	6885	60.1%	
Not Provided							
All Loans Purpose							
Minorities	4396	20.2%	792	18.0%	2442	55.6%	
Whites	14500	66.5%	2320	16.0%	8607	59.4%	
Not Provided							

Table 65 below examines total loan originations within the categories of loan type, ethnicity, and loan purpose. There are three classifications for loan type: conventional, FHA (Federal Housing Administration), and VA (Veterans Administration) loans. Conventional loans are loans that are not guaranteed or insured by the federal government under the VA, the FHA, or the Rural Housing Service (RHS) of the U.S. Department of Agriculture. FHA and VA loans are backed by the government meaning that the FHA or the Department of Veteran's Affairs promises to pay lenders if a borrower defaults on the loan. Borrowers must meet certain requirements to be eligible for each loan type.

All types of loan applications within the areas of minority concentration were lower (600-1000) than those of non-minority population groups. See Map 22, below. As a comparison, if we look at the Maps 23-24 showing total denials to loan applications, there is a significant shift. The areas (census tracts; 8051.05 and 8046.03) having the highest minority population groups in terms of Hispanics and Black or African American had the highest denial rates in the Village at 15-18%. No other census tracts had higher rates. Other census tracts with lower minority populations such as 8047.15, part of 8047.14, and 8047.16 had denial rates of 15-18%. In looking at data on total loan denials in all minority groups throughout

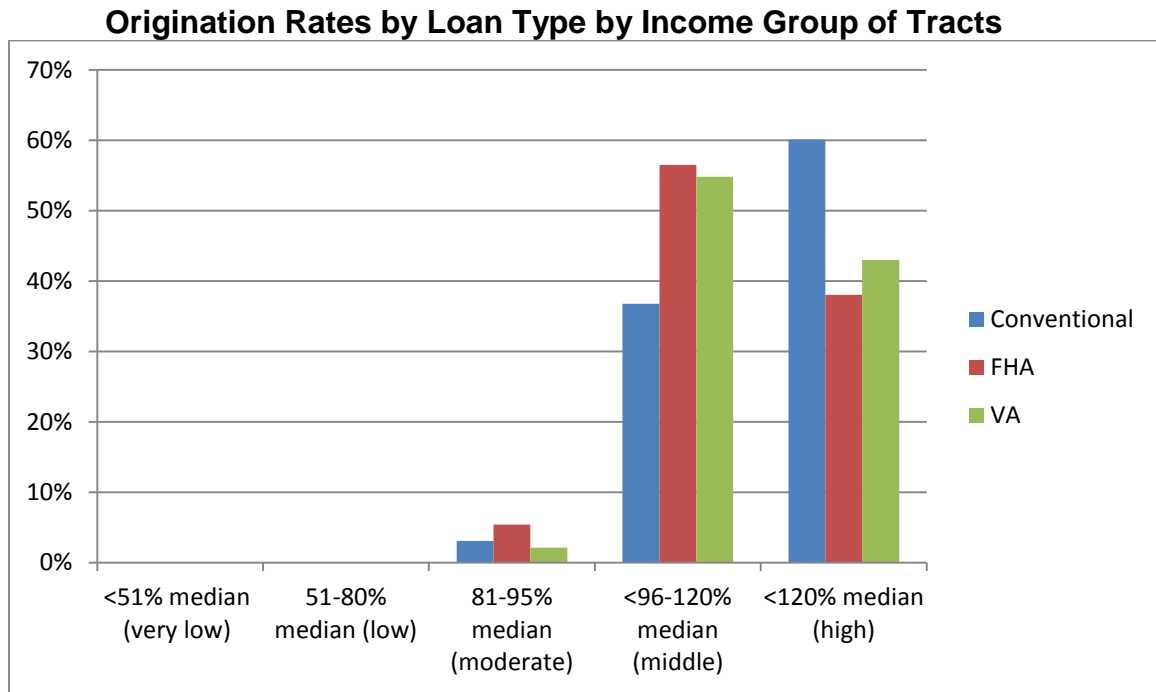
the Village, the pattern still holds with highest denials rates of 20-27% and 17.5-20% among minorities.

Based on the above data coupled with low homeownership rates and the high cost of rental and ownership housing, loan denial rates are an impediment to fair housing choice among minorities in the Village.

Table 65

Village of Schaumburg Home Mortgage Disclosure Act (HMDA) Analysis Comparison of Originations Within Categories, 2009-2011					
	Number of Applications	Number of Originations	Percent of Originations	Number of Denials	Denial Rate
Loan Type					
Conventional	17881	9653	44.3%	2406	13.5%
FHA	3757	1621	7.4%	445	11.8%
VA & Other	174	93	0.4%	17	9.8%
Ethnicity					
White	14500	8607	39.5%	1977	13.6%
Black or African American	255	123	0.6%	61	23.9%
Hispanic	1085	509	2.3%	242	22.3%
American Indian or Alaska Native	54	22	0.1%	13	24.1%
Asian	2909	1748	8.0%	456	15.7%
Other	93	40	0.2%	20	21.5%
Not Provided	1743	815	3.7%	337	19.3%
Loan Purpose					
Home purchase	4267	2091	9.6%	411	9.6%
Home Improvement	473	217	1.0%	122	25.8%
Refinance	17072	9059	41.5%	2335	13.7%
Income:					
<51% median (very low)	0	0	0%	0	0%
51-80% median (low)	0	0	0%	0	0%
81-95% median (moderate)	853	390	45.7%	166	19.5%
<96-120% median (middle)	9209	4517	49.0%	1452	15.8%
<120% median (high)	11750	6460	55.0%	1250	10.6%

Figure 13

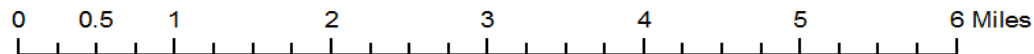
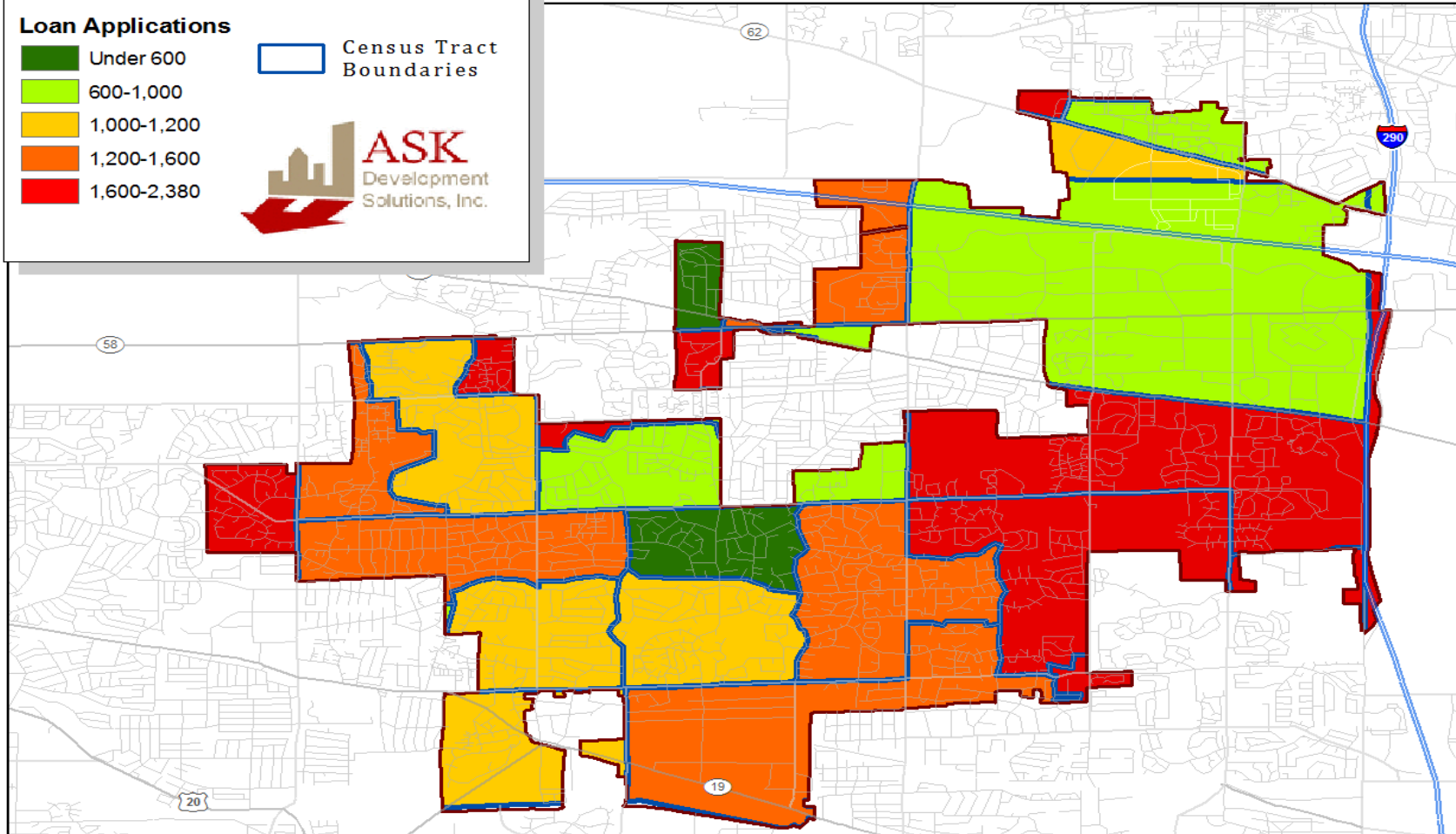



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Village of Schaumburg: Total number of loan applications, 2009-2011

Legend

- Village of Schaumburg Boundary
- Loan Applications**
 - Under 600
 - 600-1,000
 - 1,000-1,200
 - 1,200-1,600
 - 1,600-2,380
- Census Tract Boundaries



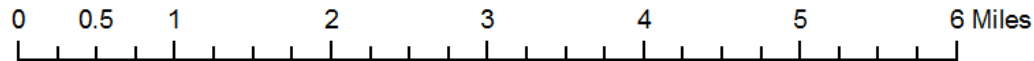
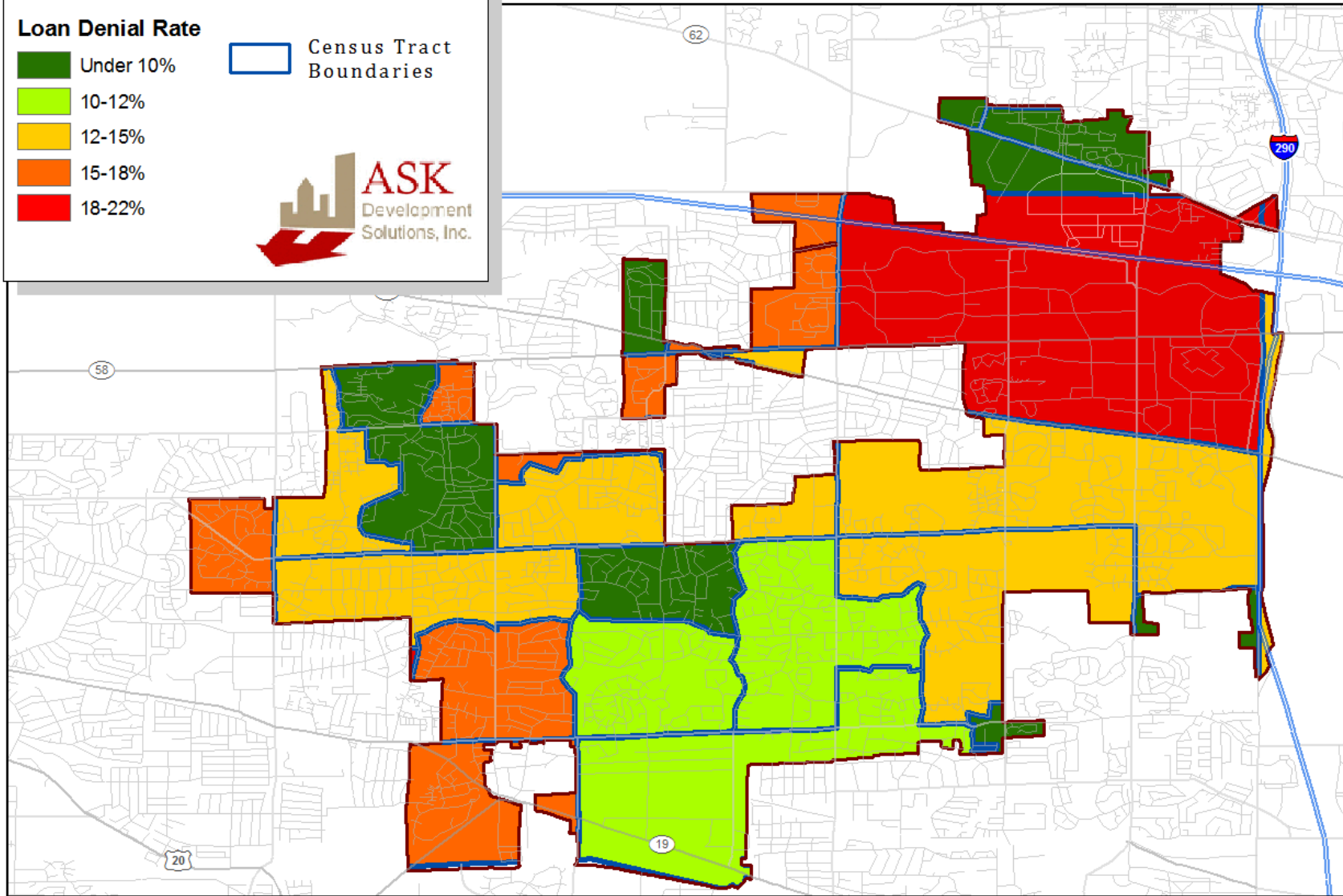

Data Source: HMDA

Map 23

Village of Schaumburg: Ratio of all types of loan denials to applications, 2009-2011

Legend

- Village of Schaumburg Boundary
- Loan Denial Rate**
 - Under 10%
 - 10-12%
 - 12-15%
 - 15-18%
 - 18-22%
- Census Tract Boundaries

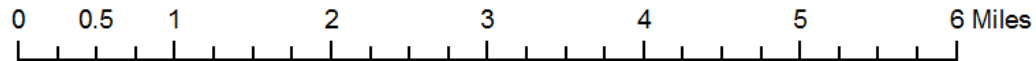
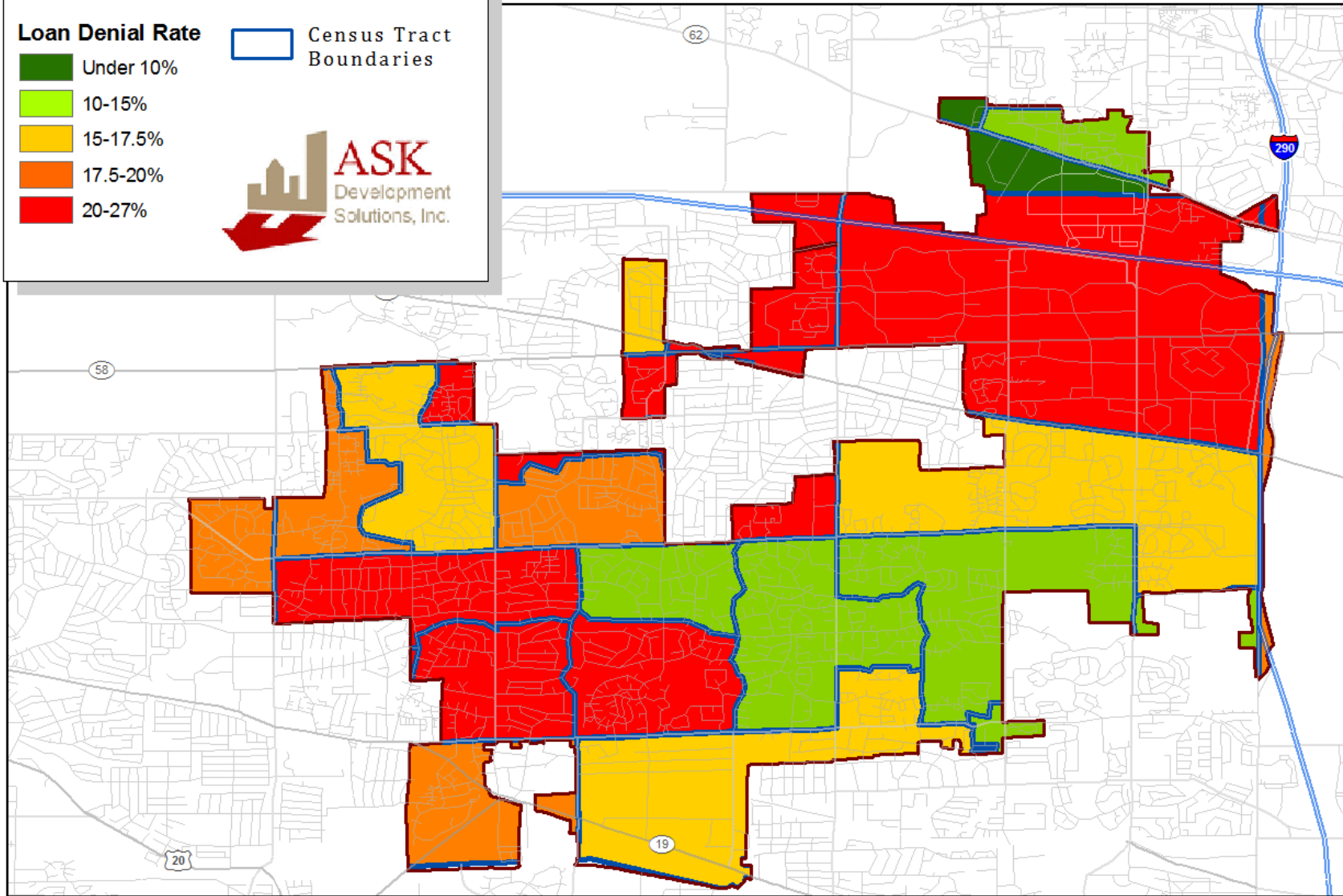



Data Source: HMDA

Village of Schaumburg: Ratio of all types of loans denials to applications among Minority Applicants, 2009-2011

Legend

- Village of Schaumburg Boundary
- Loan Denial Rate**
 - Under 10%
 - 10-15%
 - 15-17.5%
 - 17.5-20%
 - 20-27%
- Census Tract Boundaries



Data Source: HMDA

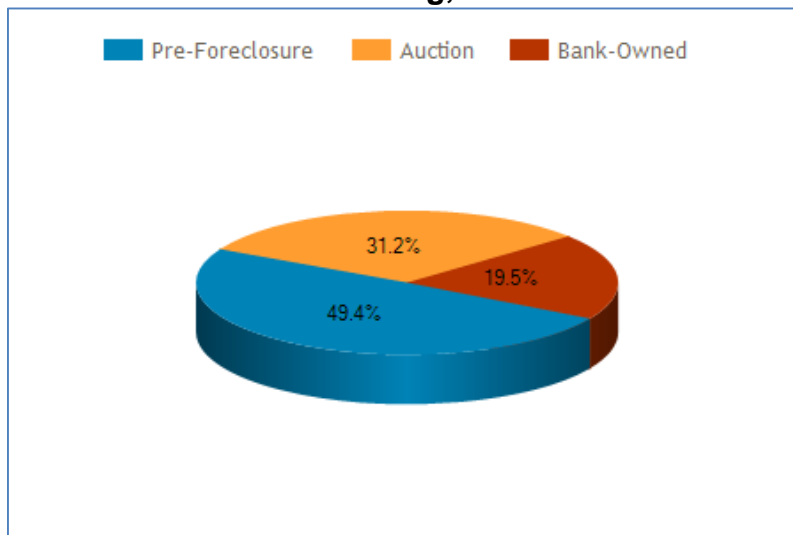
Foreclosure Data

For analysis of foreclosure impacts in Schaumburg, data was gathered from RealtyTrac.com. RealtyTrac is recognized as the most comprehensive, one-stop source of foreclosure data. The RealtyTrac data management system was utilized to gather the figures and charts cited herein, including homes in pre-foreclosure, at auction, and bank-owned (REO) properties. The RealtyTrac data for Schaumburg was available for zip codes 60173, 60192, 60193, 60194, and 60195. The information from RealtyTrac represents current data for a snapshot in time (one calendar month), as of May 2013.

According to RealtyTrac, the Median List Price for housing in Schaumburg is \$169,900, down 3% (\$5,000) from April 2012. The Median Sales Price is \$170,000, representing no change since April 2012. The Median Foreclosure Sales Price is \$114,000, down 3% (\$3,500) from April 2012. The prices reflect a Foreclosure Discount of \$56,000 (32.9%), up 6.7% (\$3,500) from April 2012. As of May 2013, there are currently 1,604 properties in Schaumburg that are in some stage of foreclosure (default, auction, or bank owned); while the current number of homes listed for sale on RealtyTrac is 154.

Figure 14

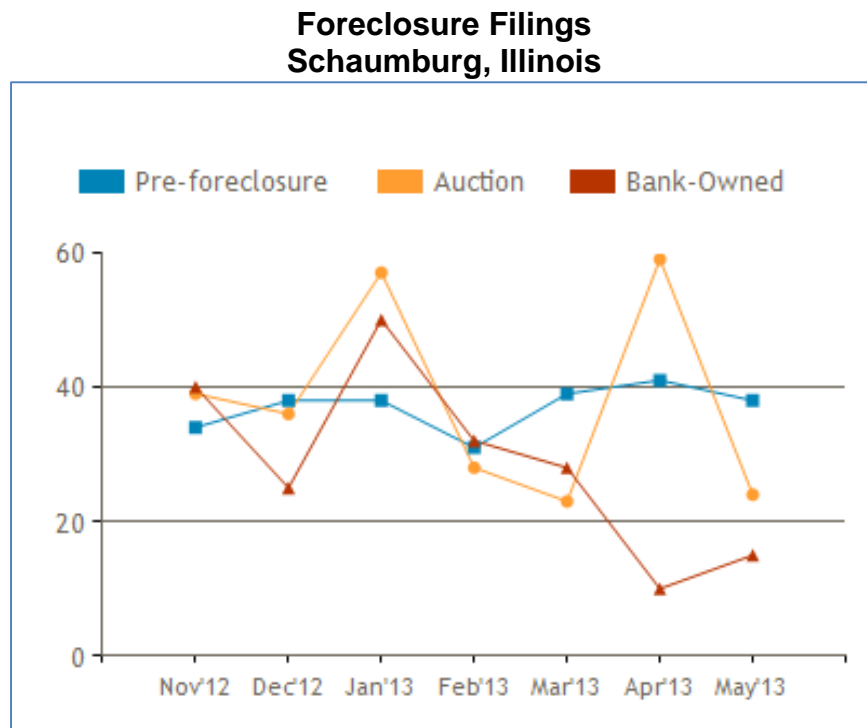
May 2013 Distribution of Foreclosure Type Schaumburg, Illinois



Source: RealtyTrac, 2013

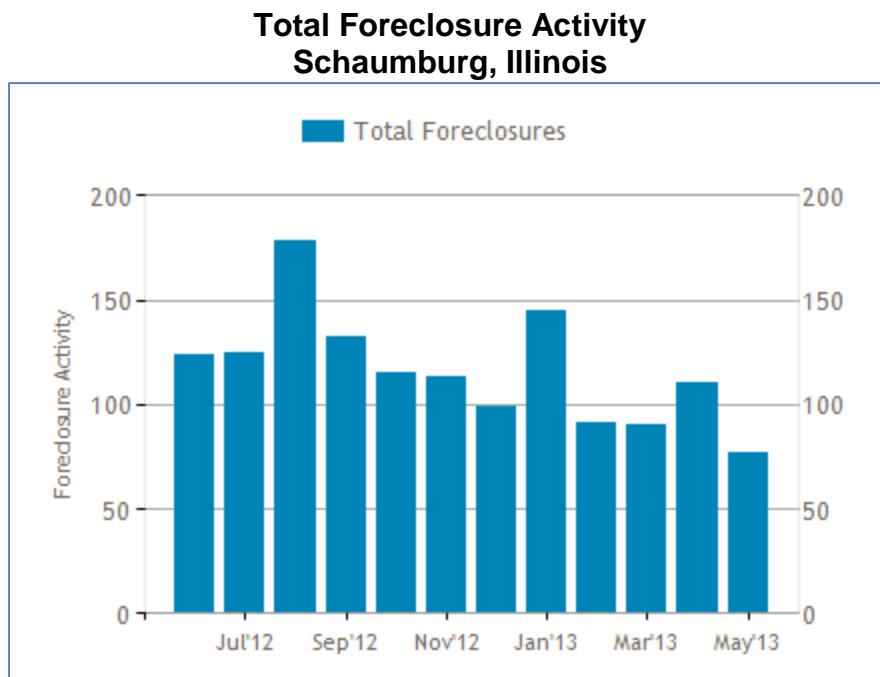
The following figures illustrate the trend in foreclosure filings and sales in Schaumburg over the last year.

Figure 15



Source: RealtyTrac, 2013

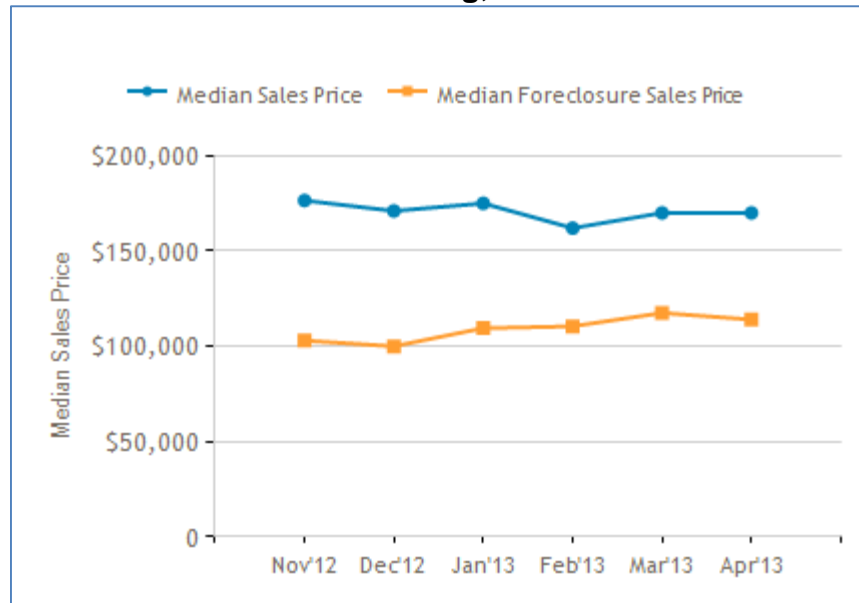
Figure 16



Source: RealtyTrac, 2013

Figure 17

**Foreclosure Sales Prices
 Schaumburg, Illinois**



Source: RealtyTrac, 2013

In May 2013, the number of properties that received a foreclosure filing in Schaumburg was 30% lower than the previous month, and 53% lower than the same time last year. Home sales for April 2013 were up 72% compared with the previous month and up 54% compared with a year ago. The following table compares home sales and foreclosure discounts in nearby cities.

Table 66

Village of Schaumburg Total Sales and Foreclosure Savings Comparison			
Municipality	April 2013 Sales (change from prior year)	Median Sales Price (change from prior year)	Foreclosure Savings (change from prior year)
Schaumburg	Up 54%	\$170,000 No change	32.9% Up 6.7%
Palatine	160 Up 77.8%	\$204,000 Up 20.2%	60.8% Up 59.6%
Arlington Heights	121 Up 95.2%	\$224,500 Down 0.2%	41.2% Up 38.6%
Streamwood	79 Up 58.0%	\$135,500 Up 4.2%	13.3% Up 26.9%
Mount Prospect	78 Up 50.0%	\$215,000 Down 2.3%	17.6% Up 10.0%
Hanover Park	67	\$106,500	2.6%

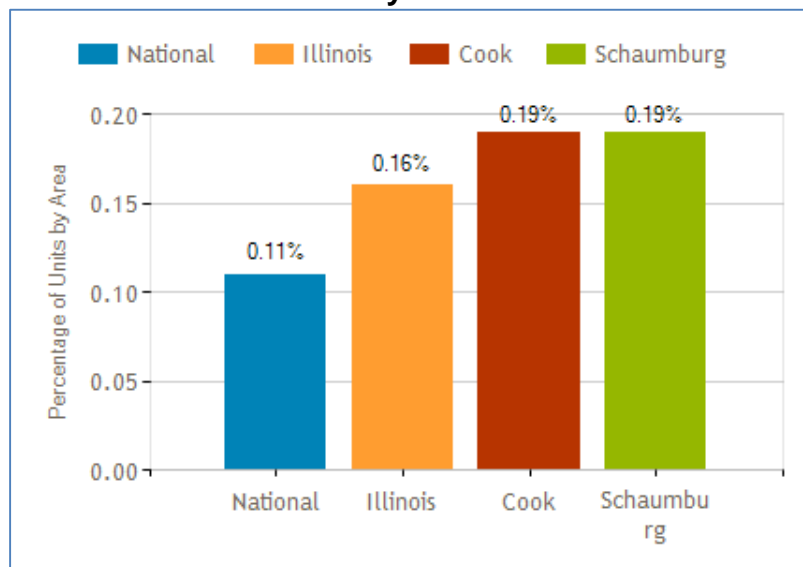
Village of Schaumburg Total Sales and Foreclosure Savings Comparison			
Municipality	April 2013 Sales (change from prior year)	Median Sales Price (change from prior year)	Foreclosure Savings (change from prior year)
	Up 81.1%	Down 14.5%	Up 15.7%
Glendale Heights	64 Up 28.0%	\$126,000 Up 21.2%	24.2% Up 13.5%
Wheeling	63 Up 18.9%	\$115,000 Up 35.3%	28.7% Down 5.9%
Rolling Meadows	61 Up 90.6%	\$130,250 Up 4.2%	53.9% Up 36.0%
Bartlett	58 Up 56.8%	\$190,000 Down 1.6%	2.6% Up 15.5%
Carol Stream	53 Up 103.8%	\$176,500 Up 10.7%	26.3% Up 13.5%

Source: RealtyTrac, 2013

To determine current foreclosure rates, RealtyTrac divided the number of properties that received a foreclosure filing in the most recent reported month (May 2013) by the total number of housing units in the zip code, county, state, or nation. When compared to Cook County, the State of Illinois, and the U.S. as a whole, Schaumburg has the same foreclosure rate as Cook County, but a higher rate than Illinois or the national average.

Figure 18

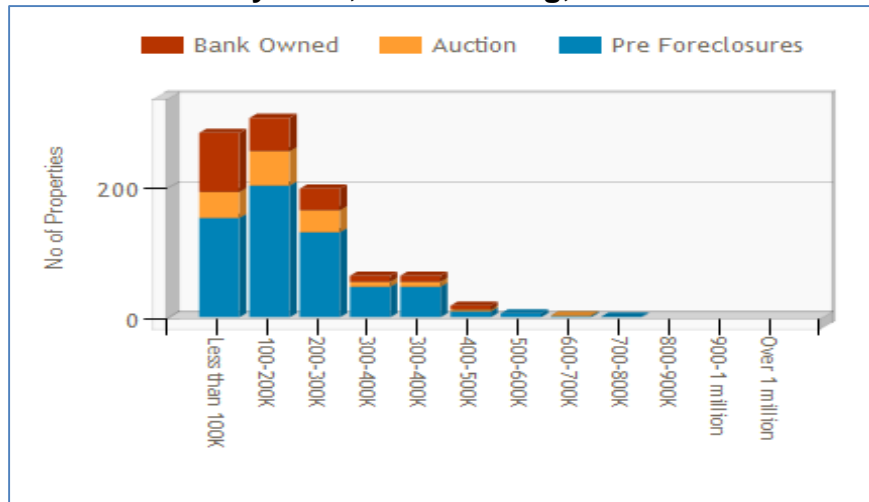
**Current Foreclosure Rate Comparison
May 2013**



Source: RealtyTrac, 2013

RealtyTrac reports that of the 1,604 Schaumburg properties in some stage of foreclosure, the highest availability rate occurs in the \$100,000 - \$200,000 price range (307 properties). The following is a depiction of properties available per estimated market for the Village of Schaumburg.

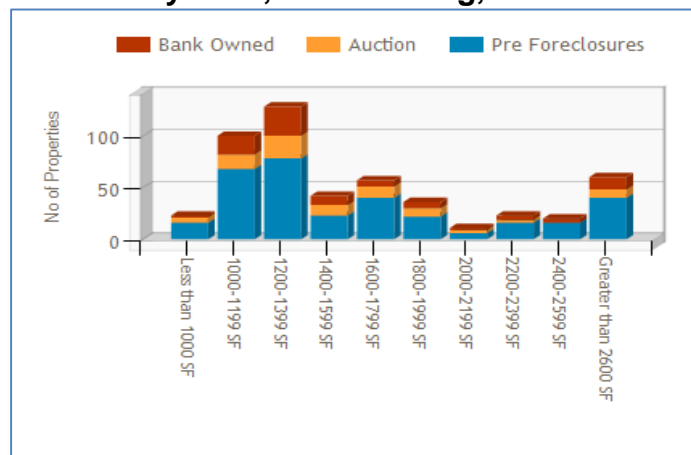
Figure 19
**Number of Foreclosure Properties Available Per Estimated Market
 May 2013, Schaumburg, Illinois**



Source: RealtyTrac, 2013

Of the foreclosure properties available in the Schaumburg market, RealtyTrac reports on the number of properties available per square footage, number of bedrooms, and year built. The following charts indicate that the highest availability of properties occurs with those that are 1,200 – 1,399 square feet (128 properties), Studio with no defined bedroom (491 properties), and properties built between 1970 and 1979 (243 properties).

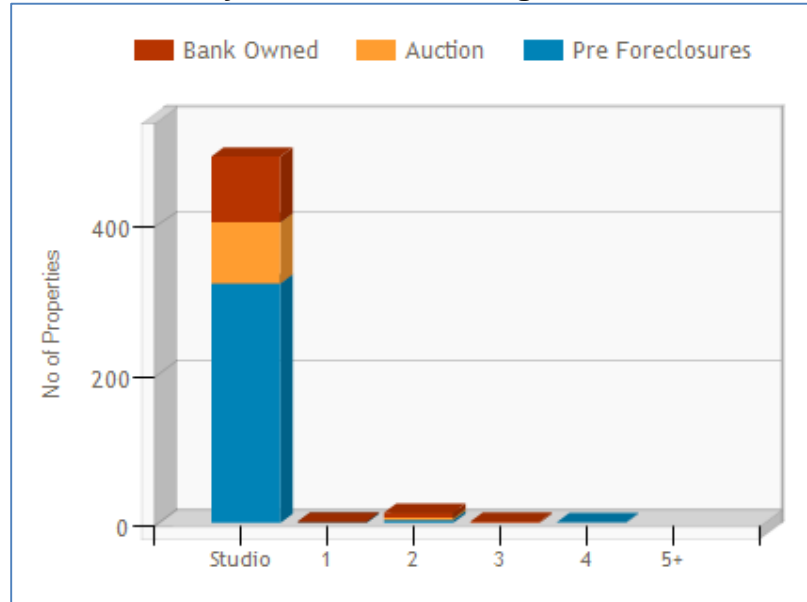
Figure 20
**Number of Foreclosure Properties per Square Footage
 May 2013, Schaumburg, Illinois**



Source: RealtyTrac, 2013

Figure 21

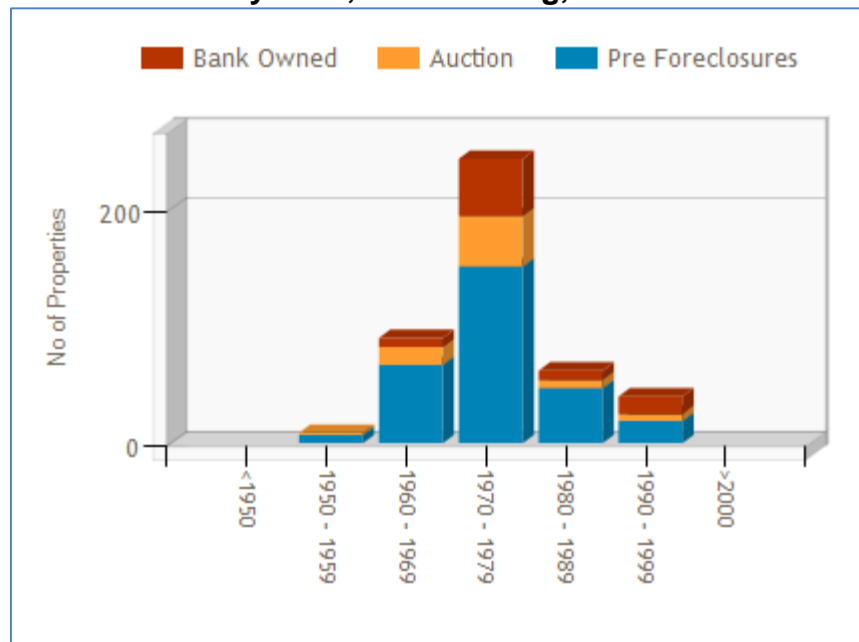
**Number of Foreclosure Properties per Bedroom
May 2013, Schaumburg, Illinois**



Source: RealtyTrac, 2013

Figure 22

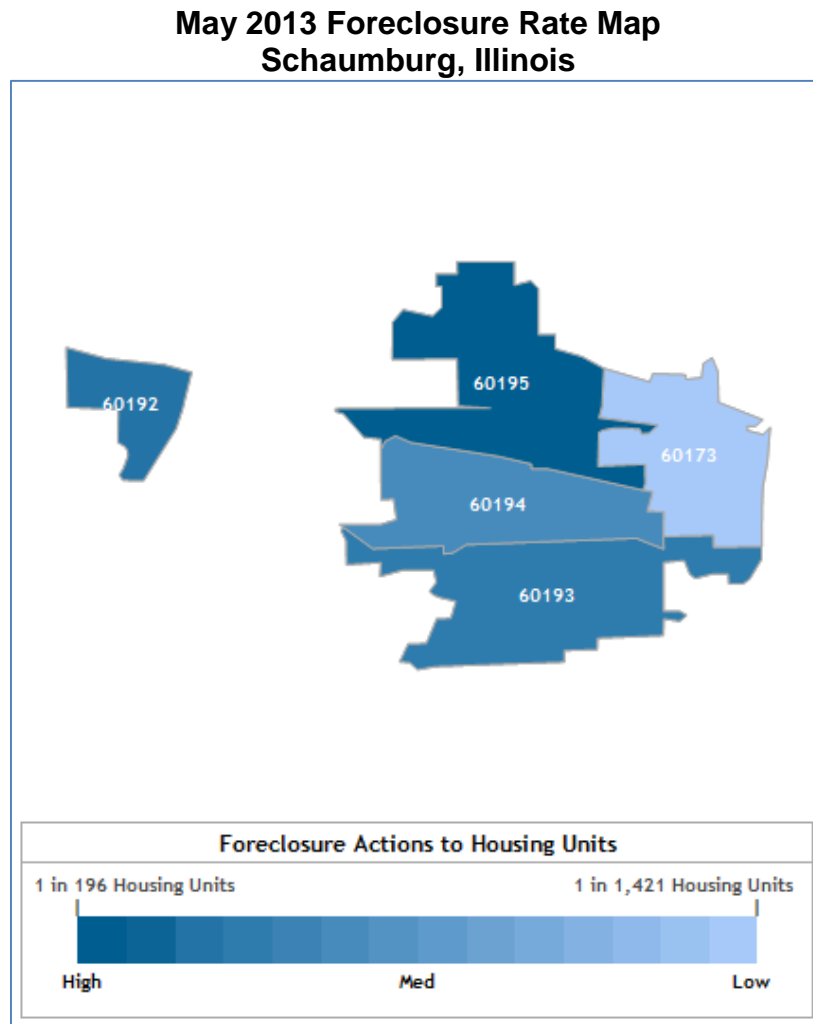
**Number of Foreclosure Properties per Year Built
May 2013, Schaumburg, Illinois**



Source: RealtyTrac, 2013

The following map indicates the May 2013 Foreclosure Rate Map for Schaumburg. RealtyTrac estimates that 1 in every 516 Schaumburg housing units received a foreclosure filing in May 2013. Within each zip code, the following foreclosure rates are shown: 1 in every 196 units in 60195; 1 in every 442 units in 60192; 1 in every 465 units in 60193; 1 in every 683 units in 60194; and 1 in every 1,421 in 60173.

Figure 23

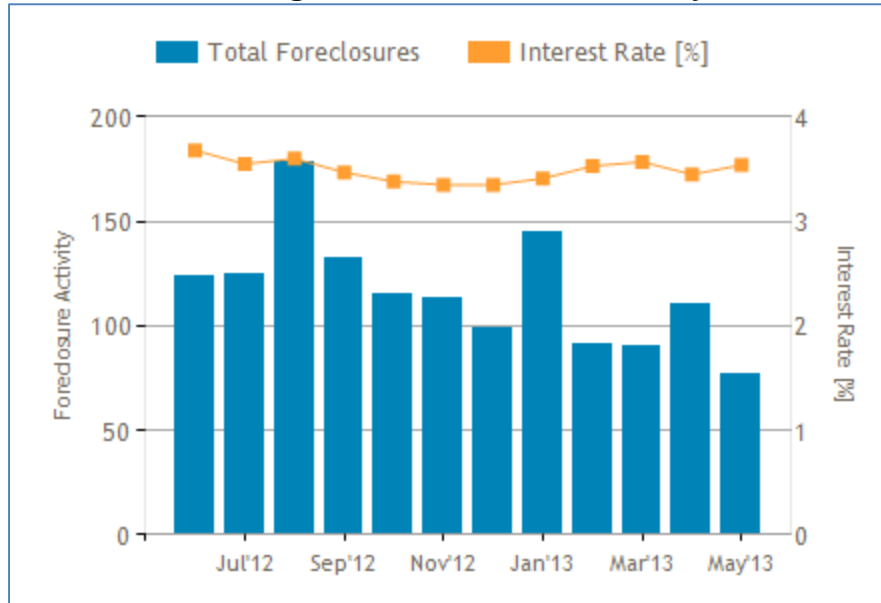


Source: RealtyTrac, 2013

RealtyTrac tracks current foreclosure activity and interest rates on 30-year mortgages. In August 2012, when interest rates were rising slightly, the number of foreclosures peaked in Schaumburg. January 2013 showed the second highest number of foreclosures, when interest rates were on the rise.

Figure 24

**12-Month Foreclosure Activity and 30-Year Mortgage Rate
Schaumburg, Illinois, June 2012 to May 2013**



Source: RealtyTrac, 2013

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Fair Housing Complaint Data

Fair housing complaints may be filed with the U.S. Department of Housing and Urban Development (HUD) or the Illinois Department of Human Rights (IDHR). Housing discrimination complaints filed with HUD may be done online at (<http://www.hud.gov/complaints/housediscrim.cfm>). Complaint forms may also be obtained by calling or writing to the local HUD Fair Housing office at:

U.S. Department of Housing and Urban Development
Ralph H. Metcalfe Federal Building
77 W. Jackson Boulevard, Room 2101
Chicago, Illinois 60604-3507
(312) 353-7776, extension 2453
or (800) 765-9372; TTY (312) 353-7143

To make a complaint or fair housing violation charge, residents can go directly to the Illinois Department of Human Rights (IDHR). IDHR can be reached in Chicago at (312) 814-6200 or (800) 662-3942; TTY (312) 263-1579, or in Springfield at (217) 785-5100; TTY: (217) 785-5125.

If a complaint is filed with HUD, it may be referred to IDHR for investigation. IDHR must begin work on complaints within 30 days or the complaints can revert to HUD. After an investigation, either IDHR or HUD will determine whether there is reasonable cause to believe that discrimination occurred. If reasonable cause is established, there will be a (re)conciliation conference where the agency will attempt to facilitate an agreement between the complainant and the respondent. If an agreement cannot be reached, the case will be heard at an administrative hearing or in court. This is done at no charge to the complainant.

If the fair housing case goes to an administrative hearing, government attorneys will litigate the case on behalf of the complainant. According to Illinois Legal Aid, complainants may also have their own attorney intervene. After hearing all evidence, the hearing officer will decide whether discrimination occurred. If it is determined that discrimination has occurred, the respondent can be ordered to: 1) pay for actual damages, including humiliation, pain and suffering; 2) stop the discrimination or make the housing available; 3) pay the government a civil penalty to defend the public interest; and 4) pay reasonable attorney's fees and costs.

After filing the complaint or charge, complainants can also elect to have the case decided in court by a judge, rather than by an administrative hearing officer. If a complainant chooses to pursue a court/judge and HUD or IDHR finds there is reasonable cause to believe discrimination occurred, then either the state or federal Attorney General will file a suit to litigate. A court can order the same type of remedies as can an administrative hearing officer, but a court can also order the respondent to pay punitive damages.

A complainant can also choose to bypass the entire procedure by filing a lawsuit, at their own expense, in federal district court or state court. Complainants must file such a lawsuit within two years of the violation. Complainants may file their own lawsuit even after filing a complaint or charge with HUD or IDHR or a local agency, as long as they have not signed a conciliation agreement and a hearing or trial has not yet started.

U.S. Department of Housing and Urban Development

The following tables indicate the fair housing complaints handled by the U.S. Department of Housing and Urban Development (HUD) Midwest Hub/Chicago Program Center, Office of Fair Housing and Equal Opportunity, for calendar years 2005 through 2012. The information includes date and year the complaint was filed, basis of the complaint, major issue(s), zip code area, and closure status.

During the 6-year period there was a total of 23 fair housing complaints filed on the basis of race, disability, religion, national origin, familial status, sex, and in a few cases, the discrimination was thought to be due to retaliation. Each case may have more than one basis for discrimination and the majority of complaints include race. Of the 23 complaints, 9 were determined to have no cause, 9 were withdrawn after resolution, 2 complainants failed to cooperate, HUD charged one respondent with violating the law, one case was settled, and one case remained open at the time of data collection.

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Analysis of Impediments to Fair Housing Choice, January 2015
 Village of Schaumburg, IL

CY Filed	Bases	Case Number	Filing Date	Issues	Zip Code	Why Closed	Total
CY2005	Race,	05-05-0456-8	2/8/2005	382 - Discrimination in terms/conditions/privileges relating to rental,	60173	25 No Cause	1
		05-05-1072-8	6/21/2005	320 - Discriminatory advertising, statements and notices, 382 - Discrimination in terms/conditions/privileges relating to rental,		25 No Cause	1
		05-05-1505-8	9/6/2005	380 - Discriminatory terms, conditions, privileges, or services and facilities,	60195	18 Withdrawn After Resolution	1
		05-06-0004-8	10/5/2005	310 - Discriminatory refusal to rent,	60193	18 Withdrawn After Resolution	1
		05-06-0218-8	11/17/2005	382 - Discrimination in terms/conditions/privileges relating to rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.),		25 No Cause	1
		Total					5
	Race, Disability,	05-06-0156-8	11/4/2005	380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 510 - Failure to make reasonable accommodation,		Charged (HUD)	1

Analysis of Impediments to Fair Housing Choice, January 2015
 Village of Schaumburg, IL

CY Filed	Bases	Case Number	Filing Date	Issues	Zip Code	Why Closed	Total
		05-06-0213-8	11/16/2005	382 - Discrimination in terms/conditions/privileges relating to rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.),		25 No Cause	1
		05-06-0212-8	11/16/2005	382 - Discrimination in terms/conditions/privileges relating to rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.),		25 No Cause	1
		Total					3
	Race, National Origin,	05-05-1470-8	8/25/2005	382 - Discrimination in terms/conditions/privileges relating to rental,	60193	25 No Cause	1
		Total					1
	Total						9
CY2006	Disability,	05-06-0828-8	3/20/2006	510 - Failure to make reasonable accommodation,	60193	18 Withdrawn After Resolution	1
		05-07-0128-8	10/27/2006	382 - Discrimination in terms/conditions/privileges relating to rental, 510 - Failure to make reasonable accommodation,	60173	18 Withdrawn After Resolution	1
		Total					2
	National Origin, Retaliation	05-06-0638-8	2/21/2006	450 - Discriminatory acts under Section 818 (coercion, Etc.),	60194	25 No Cause	1

Analysis of Impediments to Fair Housing Choice, January 2015
 Village of Schaumburg, IL

CY Filed	Bases	Case Number	Filing Date	Issues	Zip Code	Why Closed	Total
		Total					1
	Race, Retaliation	05-06-0813-8	3/7/2006	380 - Discriminatory terms, conditions, privileges, or services and facilities,	60195	18 Withdrawn After Resolution	1
		Total					1
	Total						4
CY2007	Familial Status,	05-07-0424-8	1/17/2007	310 - Discriminatory refusal to rent, 382 - Discrimination in terms/conditions/privileges relating to rental,	60193	18 Withdrawn After Resolution	1
		Total					1
	Total						1
CY2008	Disability,	05-08-1413-8	7/16/2008	510 - Failure to make reasonable accommodation,	60173	18 Withdrawn After Resolution	1
		Total					1
	Race,	05-08-1584-8	2/8/2008	450 - Discriminatory acts under Section 818 (coercion, Etc.),	60194	25 No Cause	1
		05-08-1050-8	5/15/2008	380 - Discriminatory terms, conditions, privileges, or services and facilities,	60194	04 Complainant Failed to Cooperate	1
		Total					2
	Total						3
CY2009	Familial Status, National	05-09-0556-8	1/26/2009	310 - Discriminatory refusal to rent,	60173	04 Complainant Failed to Cooperate	1

Analysis of Impediments to Fair Housing Choice, January 2015
 Village of Schaumburg, IL

CY Filed	Bases	Case Number	Filing Date	Issues	Zip Code	Why Closed	Total
	Origin, Sex,						
		Total					1
	National Origin, Religion,	05-10-0220-8	11/2/2009	350 - Discriminatory financing (includes real estate transactions),	60193	16 Conciliated/Settled	1
		Total					1
	Total						2
CY2010	Disability,	05-10-1492-8	7/7/2010	510 - Failure to make reasonable accommodation,		25 No Cause	1
		Total					1
	Total						1
CY2011	Disability,	05-12-0336-8	12/21/2011	510 - Failure to make reasonable accommodation,	60193	18 Withdrawn After Resolution	1
		Total					1
	Total						1
CY2012	Disability,	05-13-0049-8	10/22/2012	510 - Failure to make reasonable accommodation,	60193	18 Withdrawn After Resolution	1
		Total					1
	Race,	05-12-1157-8	7/18/2012	310 - Discriminatory refusal to rent, 332 - False denial or representation of availability - rental,	60193	Open	1
		Total					1
	Total						2
Total							23

Village of Schaumburg, IL (summary)

Major Bases w/ Latino (Complaints)	CY Filed	CY2005	CY2006	CY2007	CY2008	CY2009	CY2010	CY2011	CY2012	Total
	Metrics	# Filed	# Filed	# Filed	# Filed	# Filed	# Filed	# Filed	# Filed	
Race		9	1		2				1	13
National Origin		1	1			2				4
National Orig. - Hispanic		1				2				3
Religion						1				1
Sex						1				1
Disability		3	2		1		1	1	1	9
Familial Status				1		1				2
Retaliation			2							2
Total Cases		9	4	1	3	2	1	1	2	23

Source: HUD Midwest Hub/Chicago Program Center, Office of Fair Housing and Equal Opportunity

Each case is counted under each basis. Total cases (23) is the actual number of cases filed for the period.

Illinois Department of Human Rights

The subsequent tables indicate the fair housing complaints handled by the Illinois Department of Human Rights (IDHR) for calendar years 2005 through 2012. The information includes date and year the complaint was filed, basis of the complaint, major issue(s), respondent, and final status. The tables include abbreviations used by IDHR for filing complaints. The following is an explanation of the abbreviations used in the IDHR tables.

BASIS ABBREVIATIONS

FAM STATUS = Familial Status
MSTAT = Marital Status
PHYHAN = Physical Disability
RETAL = Retaliation
MENHAN = Mental Disability
NTLORG = National Origin
RELIGN = Religion

ISSUES ABBREVIATIONS

ADDL CIVIL RHTS = Other civil rights violations, e.g. coercion or interference
DENIAL = Denial of accommodation request (rental)
DF TERM/COND = Different terms and conditions
ENJFAC = Interference with enjoyment of the facilities
FAIL TO ACC/REN = Failure to accommodate a disability/rental situation
FAIL TO ACC/SAL = Failure to accommodate a disability/sale situation
LENDIN = Lending
PUBINT = Publication with intent to discriminate (discriminatory ad)
RENTAL = Failure to rent
REPRES = Misrepresentation of availability
SALETR = Discrimination in a sales transaction
STAMNT = Discriminatory statement
STEERING/RENT = Steering/rental
TERMS = Discrimination in terms of rental

CLOSURE ABBREVIATIONS (if none listed, the case is still open)

ACL: Administrative Closure
AT: Adjusted with terms (of settlement and agreement)
AW: Adjusted and withdrawn
DEF: Default (of the Respondent due to failure to provide a verified response)
FTP: Failure to proceed (i.e., Complainant's failure to cooperate with the investigation)
LOJ: Lack of jurisdiction
LSE: Lack of substantial evidence
SE: Substantial evidence
WD: Withdrawn by Complainant

The location listed refers to the location of the Respondent (the entity charged with discrimination), and is not necessarily the same as the location of the property in question. Some of these may have been corrected to reflect the city where the alleged discrimination occurred. If the case is crossed out, that indicates a correction, in other words, the discrimination is not alleged to have occurred in the city or county indicated. Note that charges often allege discrimination on multiple bases or issues; however, only one basis and one issue can be shown on the report.

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**Illinois Department of Human Rights
 Housing Charges Filed in Village of Schaumburg
 January 2005 through December 2012**

File Date	Respondent	Location	Basis	Issues	Final Status
02/08/05	Tree House Apartments II	Schaumburg	Race	TERMS	LSE
07/28/05	Schaumburg Villas	Schaumburg	Race	TERMS	AW
07/28/05	Schaumburg Villas	Schaumburg	NTLORG	ENJFAC	FTP
08/25/05	Town Square Condo Association	Schaumburg	Other	RENTAL	LSE
09/06/05	Archstone Garden Glen	Schaumburg	FAM STATUS	TERMS	AW
03/07/06	Sparks Associates	Schaumburg	RETAL	RENTAL	AW
03/20/06	Cedar Village of Schaumburg	Schaumburg	PHYHAN	TERMS	AW
07/28/06	American Community Management	Schaumburg	PHYHAN	ENJFAC	AT
08/10/06	American Community Management	Schaumburg	FAM STATUS	DF TERM/COND	AW
10/16/06	Properties Apts Inc.	Schaumburg	Race	TERMS	FTP
10/27/06	Treehouse Apartments	Schaumburg	PHYHAN	FAIL TO ACC/REN	AW
12/12/06	MDM Properties LLC	Schaumburg	FAM STATUS	LISTINGS	LSE
01/05/07	Treehouse Apartment	Schaumburg	PHYHAN	FAIL TO ACC/REN	WD
01/17/07	Savannah Trace Apts	Schaumburg	FAM STATUS	RENTAL	AW

Analysis of Impediments to Fair Housing Choice, January 2015
 Village of Schaumburg, IL

File Date	Respondent	Location	Basis	Issues	Final Status
03/30/07	Patel, Rita	Schaumburg	FAM STATUS	RENTAL	AW
06/05/07	Starck Realty Company	Schaumburg	Race	RENTAL	LSE
09/26/07	Glenview Place Condo Association	Schaumburg	FAM STATUS	DF TERM/COND	LSE
02/08/08	Avalon at Poplar Creek	Schaumburg	Race	FAIL TO ACC/REN	LSE
05/15/08	Towne Place Condo Association	Schaumburg	Race	TERMS	FTP
07/16/08	Alma Property Management	Schaumburg	PHYHAN	FAIL TO ACC/REN	AW
08/01/08	Crystal Tower Condominium	Schaumburg	NTLORG	TERMS	AW
01/07/09	Kandu, James	Schaumburg	NTLORG	TERMS	AW
01/08/09	Fain, Steven	Schaumburg	PHYHAN	TERMS	LSE
01/26/09	Tree House Apartments	Schaumburg	NTLORG	RENTAL	AW
01/26/09	Tree House Apartments	Schaumburg	FAM STATUS	RENTAL	FTP
08/05/09	Patel, Dilip	Schaumburg	FAM STATUS	PUBINT/RENTAL	SE
08/05/09	Patel, Dilip	Schaumburg	FAM STATUS	TERMS	SE
10/01/09	Alma Property Management	Schaumburg	NTLORG	TERMS	LSE
01/21/10	Vanguard Community Management	Schaumburg	PHYHAN	FAIL TO ACC/SAL	AW
05/19/10	Walden Woods Condominium	Schaumburg	PHYHAN	FAIL TO ACC/SAL	LSE

Analysis of Impediments to Fair Housing Choice, January 2015
 Village of Schaumburg, IL

File Date	Respondent	Location	Basis	Issues	Final Status
06/29/10	Austin Court Condominium	Schaumburg	Race	ADDL CIVIL RHTS	LSE
08/19/10	Prospect Mortgage	Schaumburg	Race	Lending Standards	LSE
09/13/10	Federal Square Dearborn	Schaumburg	Race	TERMS	LSE
12/07/10	Alma Property Management	Schaumburg	FAM STATUS	ADDL CIVIL RHTS	LSE
12/20/10	Jigar, Desi	Schaumburg	NTLORG	RENTAL	WD
03/07/11	RMK Management	Schaumburg	PHYHAN	FAIL TO ACC/REN	AT
12/21/11	Carriage Homes of Summit	Schaumburg	PHYHAN	FAIL TO ACC/REN	AW
01/19/12	Alma Property Management	Schaumburg	MENHAN	ADDL CIVIL RHTS	LSE
05/04/12	Olive Tree Condominiums	Schaumburg	MENHAN	ADDL CIVIL RHTS	LSE
07/18/12	Andrzeg, Zorychta	Schaumburg	Race	REPRES	SE
10/22/12	Associate Vanguard Commun	Schaumburg	PHYHAN	FAIL TO ACC/SAL	AW

Source: Illinois Department of Human Rights, Fair Housing Division

Legal Cases - Village of Schaumburg and Statewide

A review of legal cases involving fair housing complaints was done for the Village. If no cases within the Village were found, the review was expanded to include neighboring municipalities and the State of Illinois as a whole. The following cases include cases in the Village of Schaumburg, Hanover Park (five miles away), Evanston (20 miles), and Woodstock (35 miles away).

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

The U.S. Department of Housing and Urban Development announced on August 21, 2006, that it charged Georgina Estrada, a Schaumburg, Illinois, property owner, and her son, Martin Estrada, with violating the Fair Housing Act for refusing to provide an accessible parking space to a tenant with physical disabilities. The charge alleges that the Estradas refused Gail Griswold's requests for an accessible parking space, despite seeing her disability placard in her car window and her Social Security disability check. Griswold's disabilities make it difficult for her to walk, requiring her to use a cane at times.

HUD's investigation showed that when Griswold moved into the property in November 2004, the former owner provided her with an accessible parking space. In April 2005, the Estradas acquired the property and assumed the leases. Upon meeting the Estradas, Griswold notified them that the former landlord had assigned an accessible parking space to her. Griswold requested that the Estradas continue this accommodation and inform the other tenants of her assigned parking space. Mr. Estrada's alleged response to the request was the universal symbol of accessibility is "painted on the parking lot-what else do you want?"

In July 2005 the parking lot was repaved, removing the universal accessibility logo from the spot formerly reserved for Griswold's use. Without the designation, other tenants and visitors began parking in the space. Griswold asked Mr. Estrada to assign the accessible parking space to her, notify the other tenants of the assignment, replace the universal accessibility logo on the assigned space, and place an accessible parking sign in front of the space. The Estradas admitted that they rejected Griswold's request, stating that they did so because they did not think she was disabled or in need of an accessible parking space. "No one who has a physical disability should be denied a reasonable accommodation needed in order to function on a daily basis," said Kim Kendrick, HUD Assistant Secretary for Fair Housing and Equal Opportunity. "Only through continuous education efforts and aggressive enforcement actions can we end the unlawful practice of denying these requests."

U.S. Department of Justice, Civil Rights Division

According to the U.S. Department of Justice, Civil Rights Division, the developer of a 168-unit apartment complex in far northwest suburban Woodstock has agreed to pay up to \$100,000 to settle a housing discrimination lawsuit filed in December 2000 by the Department of Justice. Cunat Bros. Inc., developer of Prairie Trails

Apartments, agreed to provide \$25,000 to cover the cost of making ground-floor units accessible to tenants in wheelchairs and an additional \$75,000 to compensate victims of the allegedly discriminatory practices.

State of Illinois, Attorney General's Office

In June 2009, the Illinois Attorney General's office sued a prominent Chicago-area condo developer, alleging that his Evanston condominium complex, while marketed to people with disabilities, failed to comply with state and federal accessibility laws.

The suit, filed in Cook County Circuit Court against Thomas Roszak and several of his affiliated companies, deal with the two-building Sienna Court Condominiums complex. The suit states that Roszak worked with the Center for Independent Futures, a non-profit that aids the disabled, to offer customized condos. At least a dozen of the center's clients purchased residences at Sienna, according to a report by the *Chicago Tribune*.

Other Fair Housing Cases

In January 2002, the Chicago Lawyers' Committee for Civil Rights Under Law, Inc., and the law firm of Freeborn & Peters, announced that a settlement was reached in a federal Fair Housing Act lawsuit filed on behalf of Michael Scialabba, a disabled young man; his parents, James and Barbara Scialabba; and HOPE Fair Housing Center against the Sierra Blanca Condominium Number One Association in Hanover Park, Illinois, and ABC Property Managers, Inc.

Under the general terms of the settlement, the Condominium Association and Property Manager agreed to pay \$110,000 to the Scialabbas, HOPE Fair Housing Center, and their attorneys, and to take measures to prevent and eradicate discrimination against any current or future resident at Sierra Blanca on the basis of the individual's actual or perceived disability. The defendants also agreed to purchase an annuity for Michael Scialabba's benefit.

In 1984, Michael, who was 16 years old at the time, suffered a traumatic brain injury in an automobile accident. As a result of the injuries he sustained in the accident, Michael's speech and movements are impaired, causing him to have difficulty speaking and to walk unsteadily. The lawsuit, alleged, among other things, that the Condominium Association and Property Manager failed to reasonably accommodate Michael's disability in violation of the federal Fair Housing Act, and that the association failed to follow its own rules and regulations in violation of the Illinois Condominium Property Act.

According to the Chicago Lawyers' Committee for Civil Rights Under Law, the federal court made two important rulings prior to the case settling. First, the court determined that housing providers have a duty to make good faith efforts to accommodate disabled residents before they attempt to remove them from units.

This is true even if a landlord or association contends that a disabled resident may pose a direct threat to the property, health or safety of others. To escape liability, a housing provider must demonstrate that it attempted to reasonably accommodate the resident's disability and that the resident remained a direct threat despite these accommodations before attempting to force the resident out. If an accommodation could eliminate the risk posed by a resident considered to be a threat, a housing provider must provide that accommodation.

Second, the court determined that the Illinois Condominium Property Act allows a cause of action based on negligence, meaning that an association may be held liable for negligently failing to follow its declaration, by-laws, rules and regulations.

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V. PUBLIC OUTREACH

Introduction

This section summarizes the results of the surveys, public meetings, and key person interviews conducted as part of the public outreach process for the Schaumburg AI. In addition, this section gives a brief overview of fair housing public outreach conducted by stakeholders in Schaumburg. ASK conducted an online and written survey available to all Schaumburg residents, industry stakeholders, area realtors, and lending institutions. The survey asked respondents about their experience and perception of housing discrimination, knowledge of fair housing laws, experience with Schaumburg's housing assistance and social service programs, and opinions about housing and social service needs in the Village. ASK also directly administered surveys, conducted public meetings, and held key person interviews.

ASK developed specific fair housing surveys for citizens, housing service providers, realtors, and lending institutions. Copies of the survey were available electronically with a link posted on the Village website. Paper copies of the survey were distributed to various community locations such as the Schaumburg Township District Library, Schaumburg Township, Schaumburg Park District, and Village Hall.

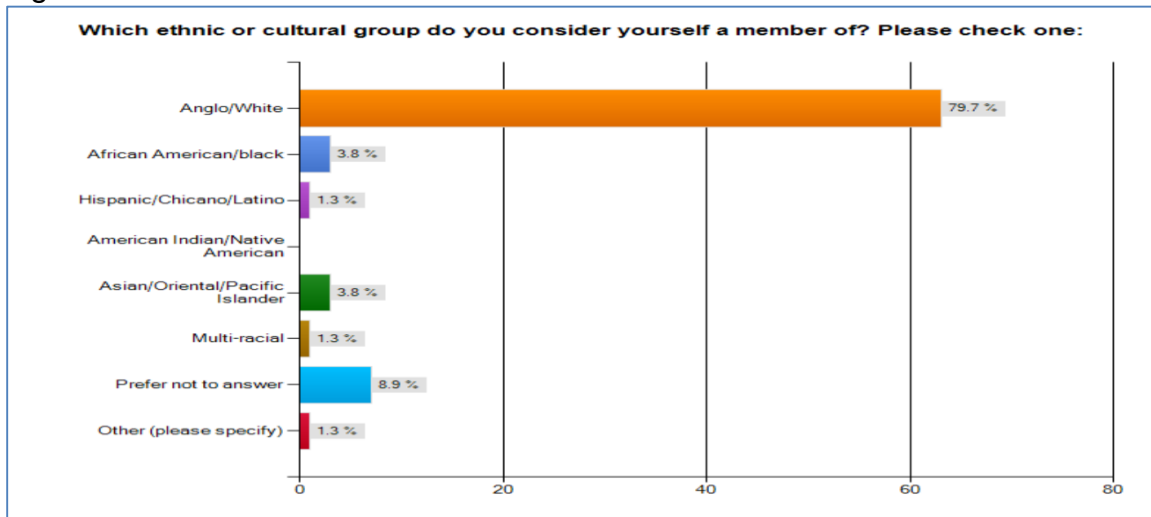
Please refer to the Appendix section of the AI to view the surveys. The findings from these activities are discussed in turn.

Citizen Surveys

An online, 30-question fair housing survey was designed by ASK and available for all residents to complete via Survey Monkey (<http://www.surveymonkey.com>) and as distributed by Village of Schaumburg staff. The survey was available in June 2013 and was completed by 83 Schaumburg area residents.

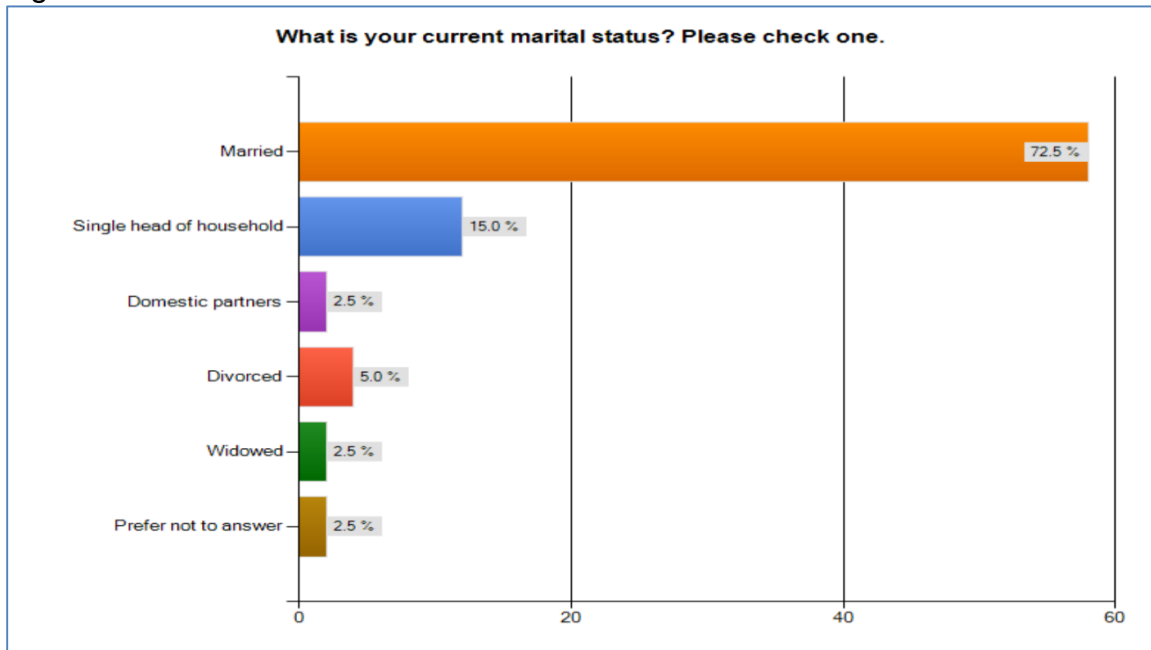
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Figure 25



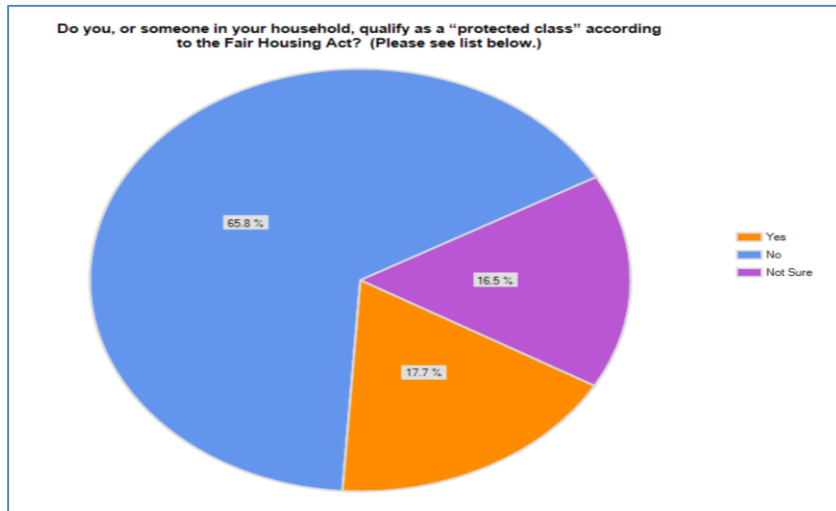
Of the citizens surveyed, 63 persons (79.7%) were Anglo/White; 3 (3.8%) were Black or African American; 1 (1.3%) was Hispanic/Chicano/Latino; 3 (3.8%) were Asian/Oriental/Pacific Islander; and 1 (1.3%) was multi-racial. Schaumburg's racial/ethnic makeup is: White (70.4%), Black or African American (4.2%), Hispanic (9%), American Indian (0.2%), Asian (19.8%), and two or more races (2.4%). The survey group does not include a representation from American Indian. Although other groups are represented, the number of Asians surveyed is the most underrepresented, relative to population.

Figure 26



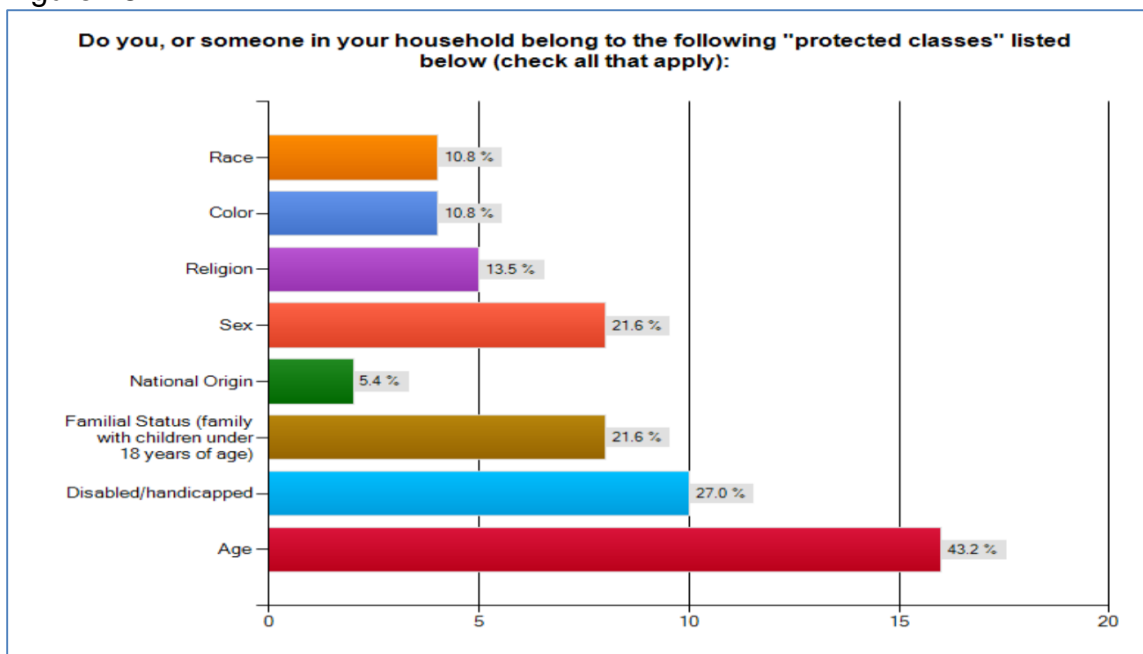
Of the citizens surveyed, 58 persons (72.5%) are married; 12 (15.0%) are single head of household; 4 (5.0%) are divorced; 2 (2.5%) are domestic partners; and 2 (2.5%) are widowed.

Figure 27



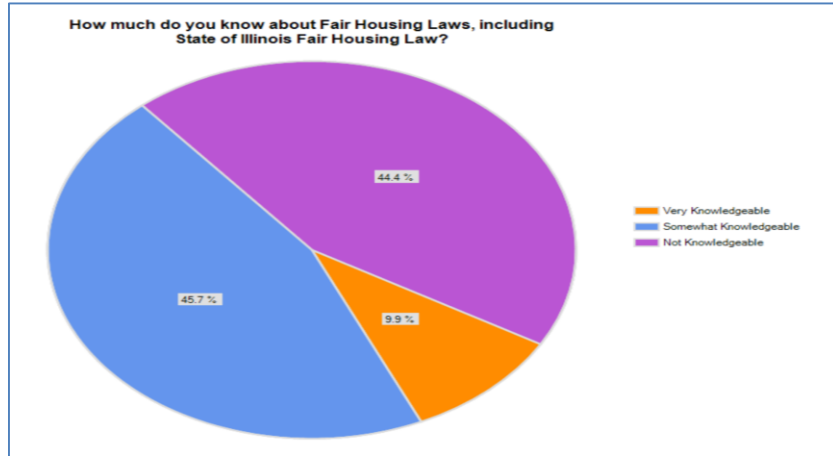
When asked about persons of a protected class within their household, the majority of survey respondents (65.8%) responded that no members of the household belonged to those classes. However, 17.7% reported having household members belonging to protected classes, and 16.5% were not sure (even after being given a list of the protect classes).

Figure 28



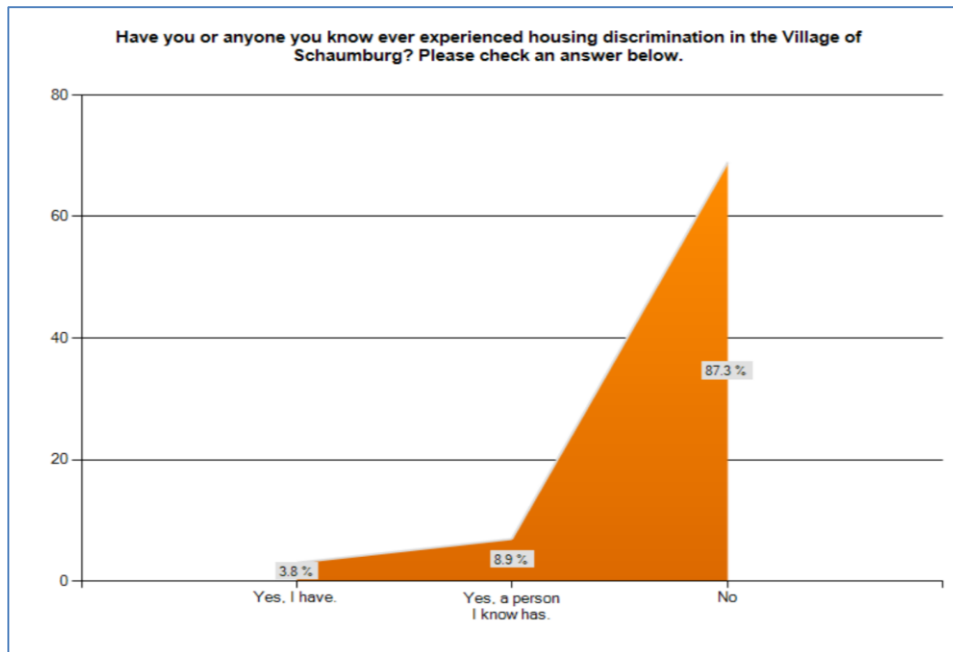
Of the 37 survey respondents that considered their household to belong to a protected class, the classification breakdown is as follows: 2 (5.4% of respondents answering affirmatively this question) qualify for their National Origin; 4 (10.8%) for Race; 4 (10.8%) for Color; 5 (13.5%) for Religion; 7 (21.2%) for Family Status; 7 (21.2%) for Disabled/Handicap; 8 (21.6%) for Sex; and 16 (43.2%) for Age.

Figure 29



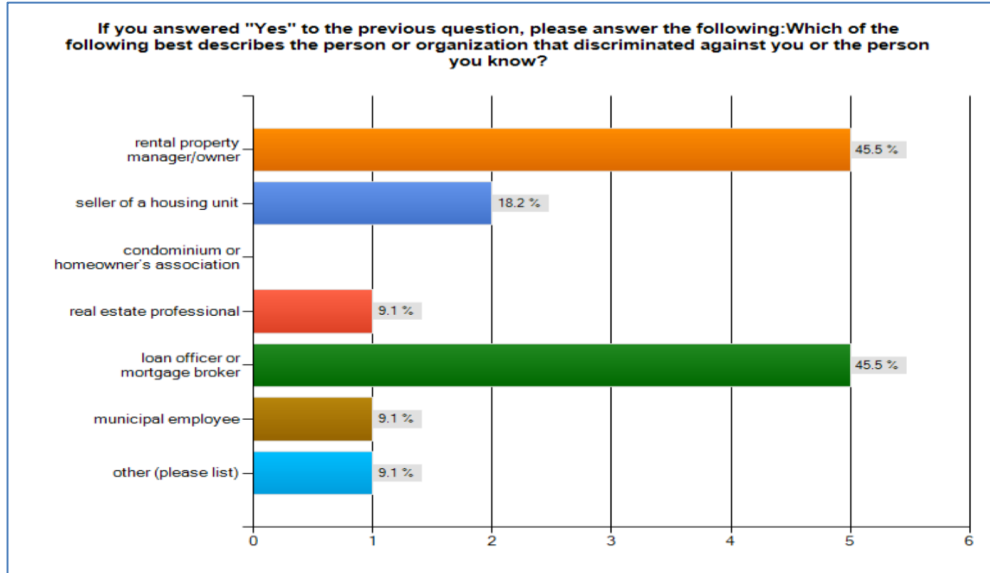
Of the 81 respondents that answered the question regarding knowledge of Fair Housing laws, only 8 (9.9%) considered themselves to be Very Knowledgeable; 37 (45.7%) are Somewhat Knowledgeable; and 36 (44.4%) are Not Knowledgeable.

Figure 30



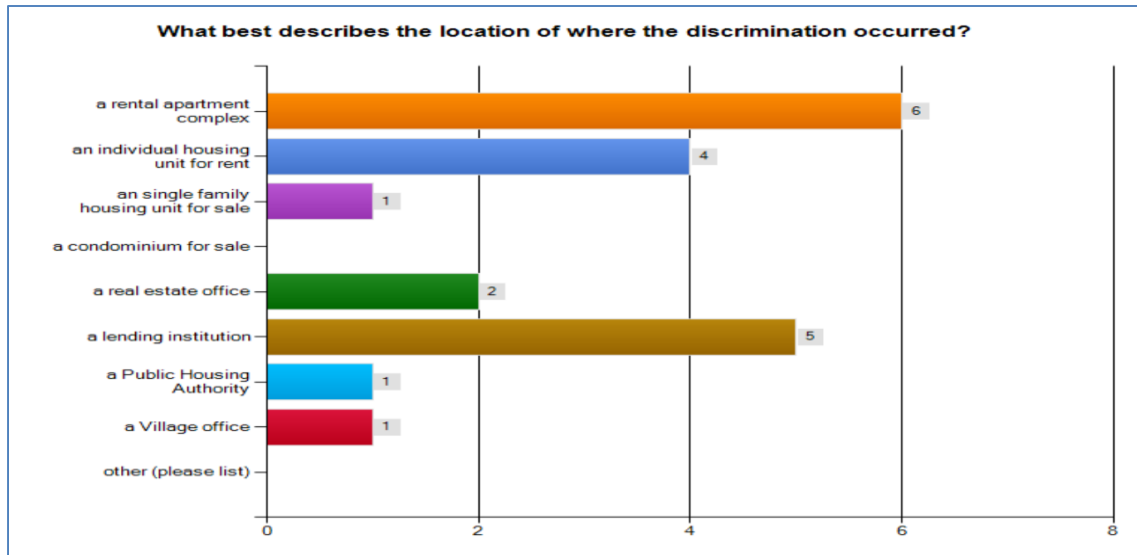
Of the survey respondents, 3 persons (3.8%) feel that they have experienced housing discrimination; 7 persons (8.9%) know of someone who has; and 69 persons (87.3%) have not experienced housing discrimination (do not have first- or second-hand knowledge).

Figure 31



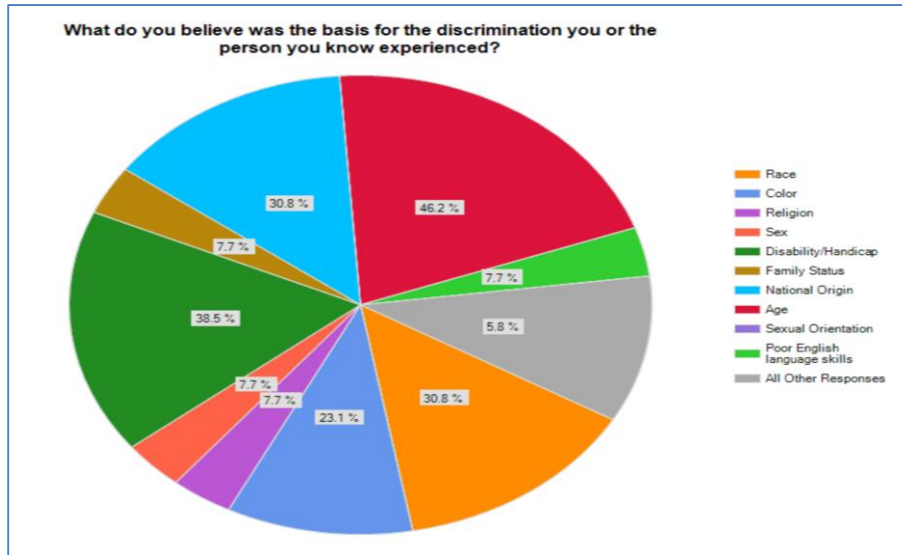
Eleven respondents indicated the person/organization they feel are responsible for housing discrimination. Respondents were able to indicate more than one answer. Of these responses, 5 (45.5%) indicated discrimination by a rental property manager/owner; 2 (18.2%) by the seller of a housing unit; 1 (9.1%) by a real estate professional; and 5 (45.5%) by a loan officer or mortgage broker.

Figure 32



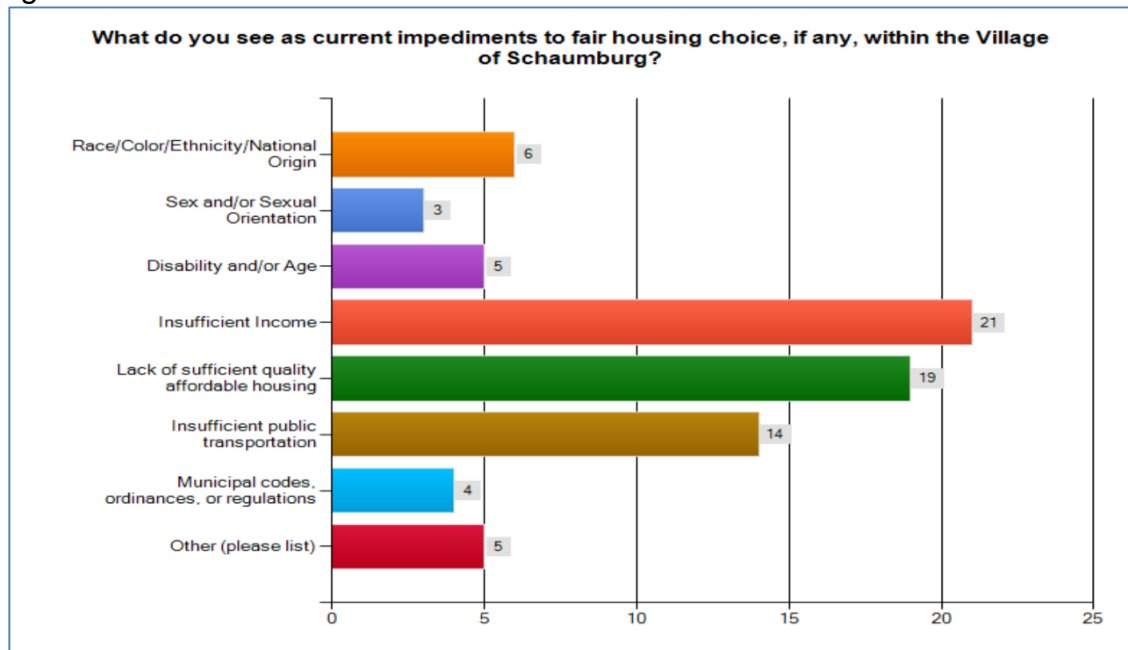
There were 13 responses that listed the location where housing discrimination occurred, and respondents were able to indicate more than one location. The largest number of respondents (6 or 46.2%) indicated that discrimination occurred at a rental apartment complex; 5 (38.5%) at a lending institution; 4 (30.8%) at an individual housing unit for rent; 1 (7.7%) at a single family housing unit for sale; and 2 (15.4%) at a real estate office.

Figure 33



Of the 13 listed responses to this question, Age was most frequently the basis of housing discrimination (included in 46.2% of responses); followed by Disability/Handicap (38.5%); Race (30.8%); National Origin (30.8%); Color (23.1%); Level of Income (15.4%); Source of Income (7.7%); Religion (7.7%); Sex (7.7%); Family Status (7.7%); and Poor English Language Skills (7.7%). Of these responses, many experienced discrimination on more than one basis, but no respondents used the "Other" category to describe any other basis.

Figure 34



Of the 38 respondents to this question, the largest impediment to fair housing is shown as being Insufficient Income (21 respondents or 55.3%); followed by Lack of Sufficient Quality Affordable Housing (19 or 50.0%); Insufficient Public Transportation (14 or 36.8%); Race/Color/Ethnicity/National Origin (6 or 15.8%); Disability and/or Age (5 or 13.2%); Municipal Codes/Ordinances/Regulations (4 or 10.5%); and Sex/Sexual Orientation (3 or 7.9%). Of the 5 responses for “Other,” most felt that there are multiple impediments and used the Other category to describe that. These responses include, but are not limited to:

- High taxes.
- Gender identity issues.
- Financial irresponsibility of people who are making bad choices for themselves.
- “Having families when they can’t even take care of themselves alone first.”

Of the citizens surveyed, 21.6% feel that housing choices are geographically limited to certain areas or neighborhoods in the Village of Schaumburg while 78.4% do not. The citizens that feel that limitations exist named the following reasons (many of these responses were repeated in various forms):

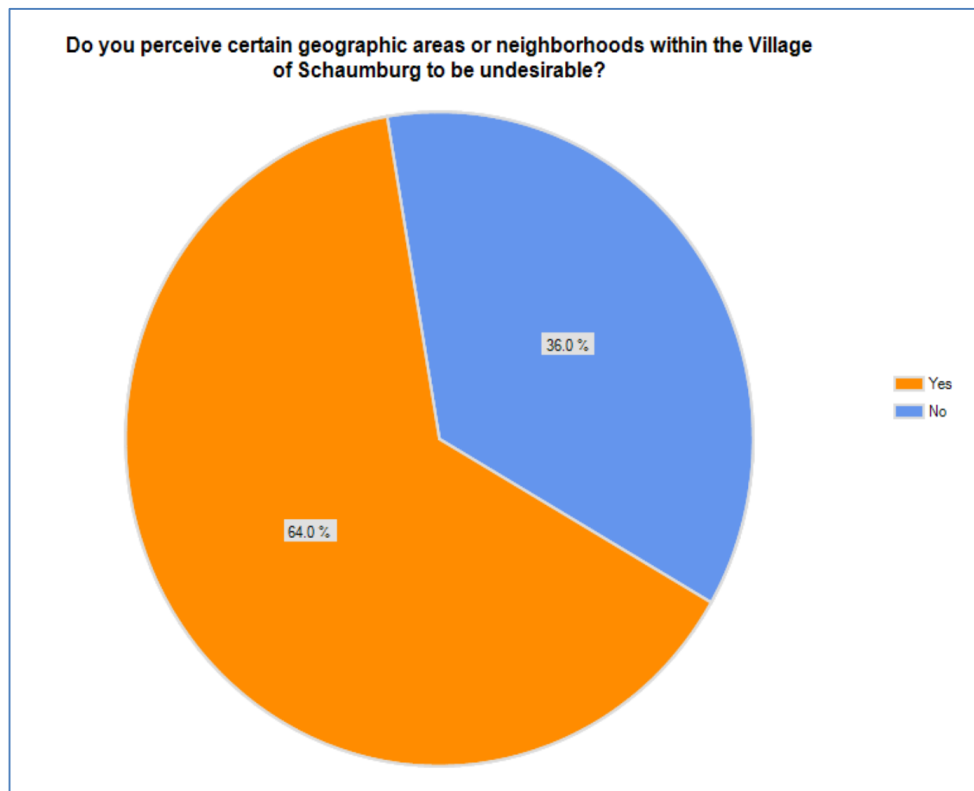
- Affordable housing is limited to certain properties and neighborhood.
- Level of income, safety.
- “Because there are people who don’t maintain their property and I wouldn’t want to live near those areas. Would you want to live near Bode and Salem?”
- Price
- High taxes

- Through someone's experience.

Thirty-seven respondents (53.6%) feel that affordable housing options are located throughout the Village of Schaumburg, but 32 respondents (46.4%) feel that affordable housing options are concentrated in certain areas/neighborhoods. When asked to identify the areas with concentrated affordable housing, the answers included the following (many of these responses were repeated):

- West side of Schaumburg
- Intersection of Higgins & Barrington and Bode & Holmes Way
- Multiple dwelling units
- Certain apartment complexes
- Salem/Bode
- Weathersfield, Lancer Park, Lions Gate

Figure 35



When asked if they perceive certain geographic areas or neighborhoods within Schaumburg to be undesirable, the majority of respondents answered affirmatively (48 respondents, 64.0%). In addition, the undesirable areas were identified by those surveyed to include (many of these responses were repeated in various forms):

- South side, bordering Hanover Park
- West side of Schaumburg, close to Streamwood and Hanover Park area

- Northwest corner area of Bode and Knollwood
- Bode Road and Summit
- Bode Road. and Walnut
- Algonquin Rd. near Route 53
- “Those with section 8 housing given to people who choose not to work, who have extended family, all who do not work, and who have no interest in keeping up the property.”
- “People with lower respect, values, morals, integrity, tend to have lower income and lower the desire for others to be in their community.”
- Most multi-family rentals
- Area along Schaumburg Road across from the High School

The majority of respondents (70.8%) felt that there was an adequate supply of affordable housing in Schaumburg. Those that felt that there was not an adequate supply gave the following reasons:

- Good, safe neighborhoods are not affordable.
- Lack of rentals that will accept families getting government aid.

Similarly, the majority (61.4%) felt that there was an adequate supply of affordable housing for disabled residents. Those that felt that there was not an adequate supply gave the following reasons:

- “Most houses were built in the 1960's-70's and don't seem to facilitate those with disabilities, leaving few choices. Those choices would most likely be very expensive.”
- “Most housing is not set up for people with handicaps.”

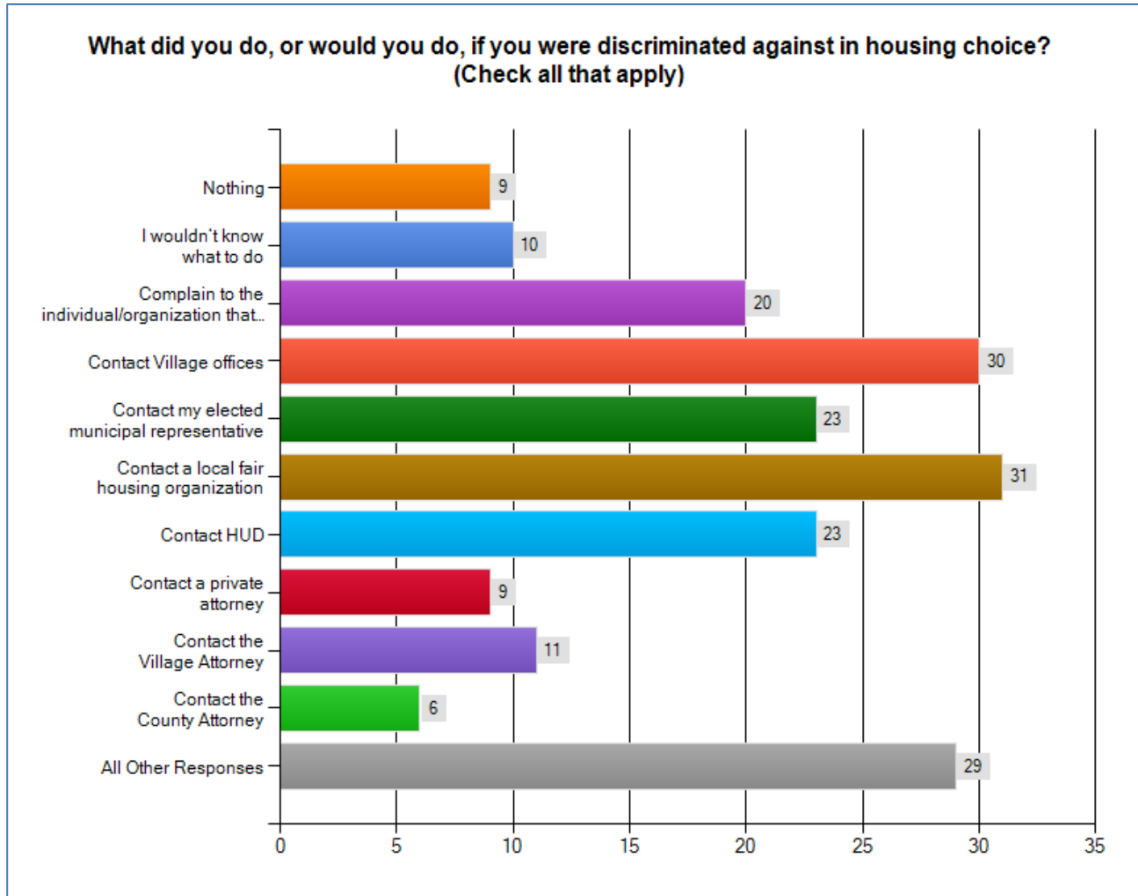
The majority of respondents (68.3%) felt that an adequate supply of affordable housing was available to senior citizens. Those that felt the senior citizen housing was inadequate gave the following reasons:

- Prices are always going up on utilities, etc. and seniors have fixed incomes.
- Only adequate supply for Medicaid-eligible skilled nursing.

In addition, 81.0% felt than an adequate supply of affordable housing was available to families with children. The respondents (19.0%) that felt that families with children did not have adequate access to affordable housing gave the following reasons:

- “The cheapest houses within the Village are in mild/severe disrepair or are too small for families. Due to the severe prices, families usually have to rent condominiums or apartments. The current inflated cost of housing within the Village does not seem to be aimed at middle-class families.”
- “Low-income families are not encouraged to settle in Schaumburg.”

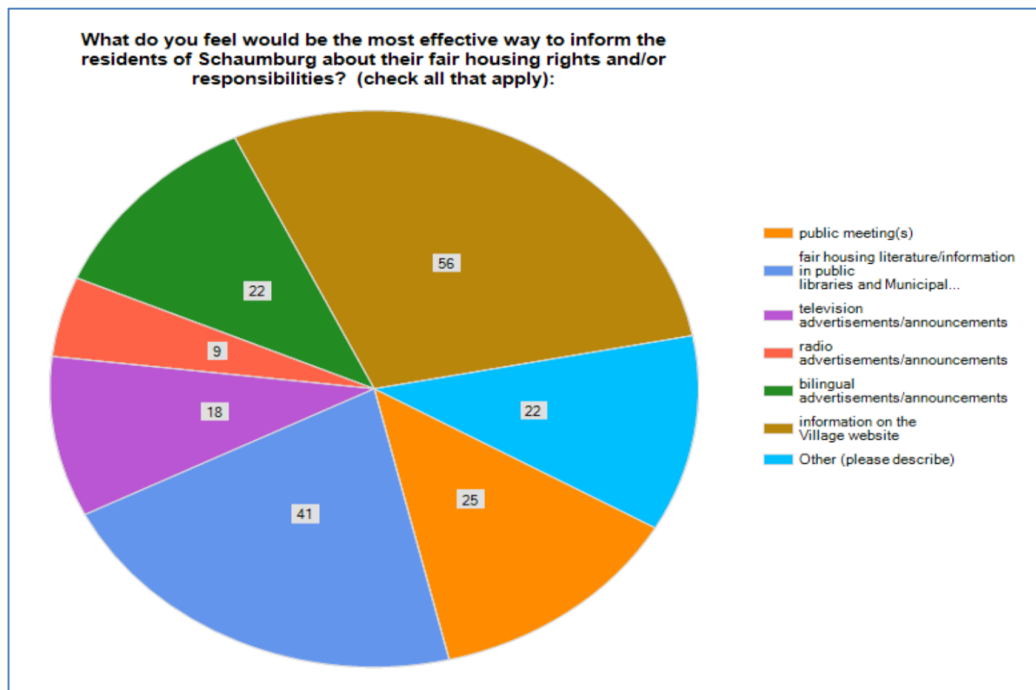
Figure 36



Of citizens surveyed, the largest groups (31 persons or 42.5% of all responses) answered that they would contact a local fair housing organization if discriminated against in housing choice. Other answers were spread throughout the other options, as shown above.

Based on the survey results, there would appear to be a deficit of fair housing information that is either familiar or recognizable to residents. Fifty respondents (67.6%), are not familiar with the fair housing or the social services provided by the Village of Schaumburg. In addition, 82.4% (61 persons) have not seen or heard information regarding fair housing programs, laws, or enforcement within the Village of Schaumburg. When asked if current fair housing laws and enforcement mechanisms are effective, 32.3% felt they are Very Effective, 51.6% felt that they are Somewhat Effective, and 16.1% felt that they are Not Effective.

Figure 37



Of the 74 respondents to this question, the most effective way to inform residents is shown as being Information on the Village Website, followed by Fair Housing Information in Public Buildings, Public Meetings, Bilingual Advertisements, Television Ads, and Radio Ads. Of the 22 responses for Other, most felt that there are multiple ways and used the Other category to describe that. These responses include:

- Cable TV
- Village Newsletter
- Representatives, Senators, and Congressman Offices
- Cracker Barrel
- Posters at libraries, township offices, municipal center, grocery stores, literature included with utility bills, available at fairs (Septemberfest), etc.
- E-Newsletter
- Association Newsletters
- Pamphlets in local realtors' office.
- "Public meetings would only be useful if they covered many topics: maybe events such as "Tips for Buying a House in Schaumburg" that would attract potential homebuyers and you could introduce them to all the services available. Open up the Community Development office to assist with potential homebuyers to try and fill our many vacant houses. For example, DeKalb has an annual guide for renting properties within their city that informs people about what to look for and how to avoid excessive fines and abuse. I'd say do the same for housing. Informing residents about fair housing would not be effective, because it doesn't affect everybody and

discrimination usually affects those moving into the Village more so than those who already do. Create an initiative aimed at all housing issues.”

The survey results reflect a recurring theme of either frustration/annoyance with fair housing policy and/or misunderstanding of current fair housing efforts. Feedback requested throughout the survey included the following comments: “There is too much emphasis on seniors in this town. They do not pay their fair share of the costs of the community and require too many services at others' expense.”

- “I don't believe discrimination is wrong. Business people are allowed to follow their beliefs and principles just like anyone else.”
- “As a victim of sexual orientation discrimination, I usually just move on without having the time to contact local officials that don't really care.”
- “Not in the mindset to feel discriminated against. Move on to the next possibility. Too many people feeling sorry for themselves. Nobody said life was going to be fair all the time. Everybody faces discrimination - no need to cry about it.”
- “Have you really wasted tax money by disseminating information in all these ways???”
- Fair housing laws and programs are not advertised.
- “There should be no fair housing laws. Why should someone else get what I have at a lower rate because of their financial status. I work too hard for what I have provided for my family.”
- “They seem to concentrate mainly on racial issues and avoid more politically risky violations (I constantly emphasize sexual orientation and gender identity). Also, I'm unsure about what enforcement ability the Village has. Thus if I made a complaint, would it go anywhere?”
- The people that need assistance are reluctant to ask for help or are not aware that help is available.
- “Why does there have to be fair housing? There are so many places to live. If it doesn't work out for you in one town, search for housing in another one. They are all a bike ride away from each other. Fair housing goes against natural law, market dynamics, and violates the conscience of businessmen and women.”

Surveyed citizens were asked for suggestions to change fair housing laws and practices. Suggestions included (and many were repeated in various forms):

- Accept more housing choice vouchers.
- Eliminate gang activity.
- Do not let banks practice above the law.
- More subsidized government programs, more incentives to single-family and apartment owners to include more affordable houses choices.
- “It should just go away. It's a waste of money. It is out of control. It is too much about government trying to make a utopian society when it is really

- doing just the opposite. Blatant discrimination can be handled by the lawyers, not the government.”
- “The Village of Schaumburg is committed to furthering fair housing and prohibits the discrimination in housing or services directly or indirectly on the basis of race, color, religion, sex, national origin, age, familial status, or disability.” As a resident, I am really disappointed by the lack of sexual orientation and gender identity. The Village needs to seem as more of a welcoming environment to ALL people, not just the traditional family structure. We have a very unique and diverse population, so let's stop ignoring that. Aim at an inclusive community and Schaumburg may yet be as thriving as it was in the 1970's housing boom.”
 - “Please really help people by getting them to make better choices and be as responsible for themselves as possible. Help them move to a more healthy functional lifestyle where they can achieve and grow as a person, independent and free. That should be the goal of any government program in order to be sustainable. Teach people to fish. Don't give them fish or fish for them. Learned dependency is equal to being in servitude.”

Survey respondents were asked to suggest actions that the Village of Schaumburg could take to address impediments and improve fair housing choice for all residents. Based on the comments, several residents sense a tension between landlords and tenants, particularly within the Section 8 Housing Voucher Program, and the enforcement of rights and responsibilities. Other answers reflect a need for additional outreach and/or education to many Schaumburg residents regarding the rights and responsibilities of fair housing law. Suggestions and/or responses include:

- “More police presence on the northwest side of Schaumburg. Greater enforcement of existing noise laws - dog barking, outdoor speakers, landscaping equipment.”
- “Publicize fair housing resolutions to any complaints that may have arisen. Additional PR for the appointed/nominated Head of Fair Housing for Schaumburg -- does this role exist?”
- Allow residents to report section 8 people renting to others, as well as code violations without fear.
- Encourage multiple-unit owners to offer more affordable housing choices.
- Eliminate all Section 8 housing in Schaumburg.
- “Create initiatives to fill our vacant houses, which will allow future residents to know more than just Fair Housing rules. This initiative might also allow a centralized area for available homes to be advertised than through so many separate realty agencies.”
- Contact senior groups, organizations that deal with handicapped people, ethnic organizations.
- “Rental property owners who don't take care of their property and manage their tenants are the problem. Stricter enforcement of rental properties in residential areas.”

- “A Section 8 family should be held accountable to maintain a clean yard and not have lots of cars and company all the time, a house with 8-9 children living in it with very little supervision can cause a problem for other neighbors who worked their whole lives to live in the nice clean town of Schaumburg. There should be some program to help them manage that many kids in one house and to help them keep the yards clean and maintained. Especially if the landlord is from out of state and doesn't care about the neighborhood. I see so much garbage around these types of places... that's what makes the neighborhood start to look undesirable.”

Additional Surveys

Additional online surveys and questionnaires were created for Housing Service Providers, Realtors, and Lending Institutions in the Schaumburg area via Survey Monkey (<http://www.surveymonkey.com>). These surveys were available starting in June 2013 and links were mailed and emailed to area service providers, Realtors, and lenders. At the time of publication, three representatives had completed surveys.

Lender Surveys

Of the 2 Lenders that responded to the Schaumburg Fair Housing survey, one stated they were Very Knowledgeable of fair housing law, and one felt Somewhat Knowledgeable. In addition, both respondents worked for a company with written policies regarding fair housing law, and had marketing materials for soliciting borrowers that included images of people of diverse racial/ethnic backgrounds.

One of the two respondents worked for companies with advertisements in languages other than English, as well as marketing specifically for minorities or low income clients. One respondent worked for a company that intentionally employed bilingual individuals in order to serve clients with poor English language skills. None of the respondents had branch offices in minority or low income neighborhoods within Schaumburg, but both respondents write mortgages for home purchases in minority or low income neighborhoods within Schaumburg. In addition, both respondents provide acquisition, construction, or predevelopment loans for developers of affordable housing or housing in low income neighborhoods using public subsidies.

None of the respondents perceive Federal, State, or local banking regulations as impediments to fair housing mortgage lending. In addition, neither respondent have had any complaints filed against their company on the basis of fair housing discrimination. Both respondents felt that current fair housing laws and enforcement mechanisms were “Somewhat Effective,” rather than “Highly Effective” or “Not Effective.” The only suggestion for improving fair housing practices was “access to capital.”

Housing Service Provider Surveys

One housing service provider completed the fair housing survey for the Village of Schaumburg. The respondent answered that they were “Very Knowledgeable” about fair housing law, on the federal and state level. The respondent did not feel that housing choices in Schaumburg were geographically limited to certain areas or neighborhoods, and did not perceive any areas of Schaumburg to be undesirable. All other survey questions regarding fair housing in Schaumburg were left unanswered.

Realtor Surveys

No real estate professionals completed a fair housing survey for the Village of Schaumburg.

Key Person Interviews

In conjunction with the surveys, ASK conducted key person interviews person-to-person interviews by teleconference, and via email correspondence with members of the Village of Schaumburg staff, Illinois Department of Human Rights staff, and nonprofit and advocacy groups.

Organization	Key Person	Title
Community Crisis Center	Judy Cornelius	Economic Crisis Program Coordinator
Shelter Incorporated	Diana Morris	Coordinator
Silver Connections	Barbara Sheldon	Senior Care Consultant
Habitat for Humanity of Northern Fox Valley	Barb Beckman	Executive Director
Sunrise of Schaumburg	Sheryl Kern	Executive Director
The Harbour	Terri Szewczyk	Development Coordinator
Chicago Area Fair Housing Alliance	Rob Breymaier	President
Chicago Metropolitan Agency for Planning (CMAP)	Drew Williams-Clark	Staff Liaison
North West Housing Partnership	Paula Bush	Program Manager

Community Crisis Center

Community Crisis Center (CCC) provides comprehensive services to individuals and families in crisis due to domestic violence, sexual assault, or economic/financial difficulties. Services include counseling, operation of shelters, and advocacy.

CCC operates a shelter that serves residents from the Village of Schaumburg. In addition to emergency shelters, the agency also provides economic crisis shelter and adult transitional living programs. There is also a rental housing assistance program which is operated when funding available but the program is primarily for residents in Northern Kane and in the Cook portion of Elgin.

- The organization does not provide any fair housing services but it does occasionally receive some fair housing complaints. One of the services CCC provides is a 24-hr crisis intervention hotline and typically provides referrals to clients or callers when they have a fair housing issue.

Habitat for Humanity of Northern Fox Valley

Habitat's mission is to build, rehab, and preserve homes for qualifying families. Habitat's main program is providing interest-free mortgages for newly constructed or rehabbed homes. The organization is currently focused on rehabbing foreclosed and abandoned homes to help revitalize the neighborhoods in which it works. To expand the mission of preserving affordable housing, Habitat is helping homeowners in need, especially the elderly, rejuvenate the exterior of their existing homes through the "A Brush with Kindness" program. The program bolsters the pride of homeownership, revitalizes the appearance of the neighborhood, encourages connections within the community, and helps preserve affordable housing stock.

The organization provides education about the home buying process and works with other social services agencies that provide similar services or classes. In addition to homeownership, Habitat also works with renters and is sometimes informed of situations involving renters that may be discriminative in which case the individuals are referred to other organizations for assistance.

- Habitat stated that the organization is precluded from doing more work in the Village of Schaumburg because of high property taxes. Lower income households that are eligible for assistance from the organization cannot afford to live in Schaumburg and maintain expenses at or below 30% of their income and as such Habitat constructs or rehabs homes elsewhere.

The Harbour

The Harbour provides emergency shelter, transitional housing, and case management to homeless, locked-out, and runaway youth in the north and northwest suburbs of Chicago. Housing includes supervised foster homes and independent living apartments for youth ages 12-21 years. The agency operates six foster homes one of which is locate in the Village of Schaumburg.

The goal of the programs is to protect youth from homelessness, while helping them achieve their educational and employment goals. By working to build self-reliance and independence, the Harbour keeps youth off the street and helps them develop into responsible members of the community. The Village has provided funding to the agency to service homeless youths.

- While the organization does not receive fair housing complaints, it does provide training and education to program participants on housing and tenant rights.

Chicago Area Fair Housing Alliance

The Chicago Area Fair Housing Alliance (CAFHA) is a consortium of fair housing and advocacy organizations, government agencies, and municipalities committed to the value of fair housing, diversity, and integration. The CAFHA conducts innovative research projects and is engaging in the promotion of fair housing at local, state, and federal levels.

- Als often focus too much on losses and enforcement actions, and what can be done – and not enough on what the community can do in a proactive sense.
- The Village of Schaumburg needs to promote itself to underrepresented groups. The biggest issue in Chicago is that none of the suburbs do anything to promote themselves.
- The Chicago Fair Housing Alliance could talk to the Village about a marketing plan, diversity, and a way to include all inclusive families throughout the community.
- The primary fair housing barriers are affordable housing and housing for families.
- Recommendations are: educate residents on affordable housing; use strategies to increase education and awareness regionally; and work with other agencies if budgeting is an issue.
- The Alliance can provide technical assistance, talk to the community, talk about programs and models to consider implementing in the community, and offer training.
- The Alliance does not do testing. Hope Fair Housing does testing.
- Nothing is being done in Schaumburg regarding inclusionary zoning strategies.

Chicago Metropolitan Agency for Planning (CMAP)

CMAP is the official regional planning organization for the northeastern Illinois counties of Cook, DuPage, Kane, Kendall, Lake, McHenry, and Will. CMAP developed the GO TO 2040, metropolitan Chicago's first comprehensive regional plan in more than 100 years. To address anticipated population growth of more than 2 million new residents, GO TO 2040 establishes coordinated strategies that help the region's 284 communities address transportation, housing, economic development, open space, the environment, and other quality-of-life issues.

- CMAP is currently working on a fair housing equity analysis for the region.
- CMAP is working with the Chicago Area Fair Housing Alliance on regional initiatives that would address fair housing issues.
- CMAP not currently working on any projects with the Village of Schaumburg, but is available for technical assistance.
- There is not much land for development in Schaumburg. CMAP could help with acquiring data on that.

North West Housing Partnership (NWHP)

North West Housing Partnership administers the Village's Residential Rehabilitation Loan Program. The agency provides homeownership counseling.

- For the Residential Rehabilitation Loan Program, the Village sends out information to the community via the website and community newspaper. The program is spread mostly by word of mouth; there is no affirmative marketing plan.
- NWHP expanded marketing to flyers at local libraries, centers, Park Districts, and churches.
- The typical demographic of the program clientele is 70% Caucasian. There is a very small percentage of minorities, elderly, and disabled.
- Housing Choice Voucher holders have challenges in finding homes that accept vouchers.
- NWHP owns two elderly housing facilities, not located in Schaumburg.
- NWHP has assessed the marketing of the program. Approximately five persons per day are seeking rentals in Schaumburg and the surrounding suburban areas. The affordability of rents in Schaumburg is a challenge.
- There are no rent subsidies, and getting on the Housing Voucher (Section 8) list is difficult.
- NWHP has received some calls for people seeking rent-controlled buildings and handicapped accessible facilities.
- NWHP has 10-25 persons in each homebuyer class. House prices in the northwest suburban area (including Schaumburg and Hoffman Estates) are between \$80,000 and \$150,000.

Some of the other agencies interviewed do not directly provide fair housing information or education but may receive complaints or are informed of situations that they refer to the appropriate entities. Silver Connections is one such resource. Silver Connections is a free senior housing and care resource network for seniors, their families, and for the professionals that assist older people. The mission of the organization is to help seniors transition from one home to another or finding the services they need.

In regards to informing Schaumburg residents of fair housing rights and responsibilities, all the persons interviewed had suggestions about potential ways to disseminate the information. These include posting or making information available at Village Hall, police stations, library, and social service agencies; providing information online and at community workshops, and printing publications that can be sent through regular mail especially for the elderly.

Village Staff

Schaumburg staff members were asked a number of questions about the status of fair housing, affordable housing and community service needs in Schaumburg. Discussion and responses from Village Staff are summarized below.

Staff Member Name	Title
Marisa Warneke	Community Planner
June Johnson	Director of Transportation
Kristin Jordan	Police Social Worker
Kathleen Tempesta	Director of Community Services (standing in for Public Relations Coordinator)

Transportation

- Dial-A-Ride is available door-to-door. The Northwest Transportation Centers has reduced fares for disabled persons. Schaumburg Township (different from Village) also provides services for \$5, 24 hours per day.
- The Harper College bus goes outside of Schaumburg. The Woodfield bus service is extended until 9:30 pm weekdays and 8:00 am to 6:00 pm on Saturdays. The buses are handicapped accessible.
- Buses are provided by Pace Suburban Bus, partly funded by Pace and the Village (pays the drivers). The Mayor sits on the Pace Board and signed a new five-year contract beginning June 1, 2013. The Village works with Pace to provide services and plan routes to ensure connection to train service.
- The Village's current transportation budget is \$2 million, for 50,000 rides per year.
- A bike rack is a code requirement. The Village has bike racks and bike rooms, and these are used by employees as well. Schaumburg has 90 miles of bike paths and routes. There is covered bike parking at the train station.

Public Relations, Education

- The Village currently has a public television station with scheduled programs, run through the Prairie Center for the Arts.
- The public television station has not been used to promote fair housing, but "canned" videos and the YouTube channel could be used to broadcast fair housing information from HUD or the national fair housing groups. The station

could also do community service spots. Cable programming services are provided through the Department of Cultural Services.

- There are activities celebrating fair housing month, only a fair housing month resolution. Posters are available on bulletin boards.
- The online survey links and information about the AI was posted on the Village's website and social media and weekly e-newsletter.
- The Village website does not include any fair housing information, other than promotion of the AI and survey. The Village could use the website for fair housing information and links. The Village e-newsletter could also be used to disseminate fair housing information.

Community Services

- The Village has a Senior Center, Teen Center, Public Relations Division, weekly e-newsletter, quarterly Cracker Barrel newsletter, and advisory bodies.
- Property taxes have been historically lower in Schaumburg, with no property taxes prior to 2009.
- The Village Cultural Services Department does productions. There are lecture halls and a theatre at the Prairie Arts Center. "Change" is a show for seniors through Schaumburg public television.
- The Village has Section 8 mortgage information. Cook County manages the Section 8 voucher program.
- The Police Department operates the Crime Free Multi-Housing Program.

Public Meetings and Community Outreach

Members of the general public, as well as representatives of various community groups were invited to attend public input meetings. Public meetings were held on May 20, 2013. All meetings were open to the public, and one meeting included an open forum just for feedback from members of the public. A joint public meeting was held with members of the Schaumburg Plan Commission, Zoning Board, and Olde Schaumburg Centre Commission. An additional meeting has held specifically for Residents, Lenders, Realtors, and Housing Service Providers. In addition, many representatives were contacted via phone and email in order to solicit their input and participation in the appropriate fair housing survey. Since survey completion is anonymous, it is not known which organizations provided input through the survey; however, many organizations were contacted and their information has been included in this analysis.

**Public Meeting (Housing Professionals)
May 20, 2013 at 1:30 p.m.**

Meeting Participant(s)	Organization (if applicable)
Katie Leff	Director, Heritage Bank Schaumburg
Nancy Zawaski	Compliance Officer, Heritage Bank Schaumburg
Maria Copeland	Loan Officer, Wells Fargo Bank
Dariush Kakvand	Mortgage Consultant, Wells Fargo Bank
Marisa Warneke	Community Planner
Michael Palermo	Planning and Zoning Intern

Realtors, Lenders, and Housing Providers

- Loan officers and mortgage consultants guide clients, as opposed to choosing a path for them. The role is to educate people on programs available and offer loan products to everyone. There is no discrimination based on income, race, etc.
- Some lending institutions have a Compliance Officer to provide training to lenders and reports information to the lending institution's board.
- The fair housing alliance offers training. Lenders have to follow fair housing guidelines, rate of denials, etc.
- Need to educate landlords, real estate agents, and lenders about fair housing practices.
- The challenge in Schaumburg is that there is not much open land for development.
- There are no incentives such as waiver of fees, expediting the permit process for affordable housing, inclusionary zoning, etc.; however, fees can be waived for CDBG-related projects and non-profit agencies.
- The Village assists homebuyers to purchase new homes and with owner occupied rehab.

**Public Meeting (Community Development Boards/Commissions)
 May 20, 2013 at 6:30 p.m.**

Meeting Participant(s)	Organization (if applicable)
Joanne Jester	Olde Schaumburg Centre Commission
Elizabeth Veach	Olde Schaumburg Centre Commission
Brian Bieschke	Plan Commission/CDBG Subcommittee
James Dolbeare	Zoning Board of Appeals
Roger Williams	Zoning Board of Appeals
Tom Kosin	Plan Commission/CDBG Subcommittee
Glenn Szurgot	Zoning Board of Appeals
Gary Caby	Plan Commission/CDBG Subcommittee
Tom Farace	Planning and Permits Manager
Marisa Warneke	Community Planner
Michael Palermo	Planning and Zoning Intern

Plan Commission, Zoning Board of Appeals and Olde Schaumburg Centre Commission

- There is not much open land for development. Schaumburg may need to look toward redevelopment, tax credit projects.
- Incentives could include waiver of fees, expediting permit process, inclusionary zoning, and homebuyer assistance. Schaumburg has an owner occupied rehab grant program.
- The Village is a diverse community, but there is need to educate landlords, real estate agents, and lenders about fair housing practices. The fair housing alliance offers training.
- The survey questions are complex.
- Schaumburg has a far-reaching marketing plan to seek people who want to invest in this community.

**Public Meeting (Residents)
 May 21, 2013 6 p.m.**

Meeting Participant(s)	Organization (if applicable)
Rick Paisley	Friendship Village Retirement Community
Marisa Warneke	Community Planner

Residents

- Friendship Village Retirement Community has 800 to 1200 residents. The housing types are quite similar, depending on the degree of independence and mobility.

- Schaumburg has many services that cater to the elderly. There is close proximity to theatre, doctor's offices, and shopping. Proximity to family is common.
- There is a reasonable supply of housing for elderly, and currently more openings (low occupancy) than desired.
- There used to be part of the Friendship Village organization called "Friendship Neighborhood Services" that provided funds for accessibility issues in homes. It is dormant right now due to low participation.
- The population at Friendship Village is generally heavily Caucasian, with a small Asian, Black or African American, and Hispanic population. The demographics reflect that of the Village of Schaumburg. As the Village population changes, Friendship Village is becoming more diverse. Income plays a factor since there are entrance fees and monthly service fees at Friendship Village.
- There are no subsidized, Section 202, or 811 units at Friendship Village, but that is something that could be explored, particularly since there are unoccupied apartments. Cost is the biggest challenge for increasing occupancy.
- Friendship Village was founded by clergy, but does not endorse or cater to any one religion. There are two chaplains, partnerships with Rabbis, and a multi-faith service every year.
- Friendship Village advertises on radio, TV, newspapers, and by word of mouth. It partners with the Village Park District on senior activities.
- Friendship Village is not aware of any complaints from elderly people denied access to housing.
- The Pleasant Square project is a reflection of affordable housing incentives in the Village of Schaumburg.

Public Meetings for Approval of the AI

On September 25, 2014, the AI was reviewed by the Health and Human Service Commission at a meeting that was advertised as a public hearing allowing for public comment. See appendix #5. The Commission recommended approval of the document, and it was then submitted to the Village's Plan Commission at a public meeting held on December 2, 2014. Prior to that meeting the AI Executive Summary, including a link to the AI document, was made available to the public via the Village's website for a public comment period of at least 30 days, beginning November 1, 2014. A hard copy of the document was also made available to the public at the following locations which were also included in the newspaper and the Village's website with addresses and telephone numbers (see Appendix #5):

- Village of Schaumburg's Community Development Department

- Schaumburg Township Clerk's Office
- Schaumburg Township District Library, Reference Desk

On January 13, 2015, the Schaumburg Village Board approved the AI for adoption during their regular meeting. No public comments were received as a result of the public comment period and public meetings as noted in Appendix #7 – Public Comments.

Public Education and Outreach

Village of Schaumburg

The following is a list of committees, advisory boards, and commissions within Schaumburg. Some committees are part of Village departments and offices, but most members are residents. Some members sit on multiple committees.

- Village Board
- Committee of the Whole (COW)
- Engineering and Public Works Committee (EPW)
- Finance, Legal, and General Government Committee (FLAGG)
- Health and Human Services Committee (HHS)
- Environmental Committee
- Committee on Aging
- Teen Center Advisory Board
- Family Counseling Committee
- Blood Program Committee
- Board of Health
- Sister Cities Commission
- Olde Schaumburg Centre Commission (OSCC)
- Planning, Building, and Development Committee (PBD)
- Public Safety Committee
- Transportation Committee
- Bikeways Advisory Committee
- Schaumburg Regional Airport Advisory Commission
- Pilot's Technical Advisory Committee
- Traffic Fee Impact Advisory Committee
- Plan Commission
- Schaumburg Business Development Commission (SBDC)
- Electrical Commission
- Septemberfest Committee
- Zoning Board of Appeals (ZBA)
- Cultural Commission

- 1% for Art Committee
- Fire and Police Commission
- Fire Pension Board
- Peer Jury Oversight Committee
- Community Development Block Grant (CDBG) Subcommittee
- Police Pension Board

CVOS Cable Channel 17 is the Village of Schaumburg's Public, Education & Government (PEG) cable TV station. It can be seen on Comcast and WOW channel 17, and on AT&T channel 99. CVOS provides informational programming related to programs, events and services available in Schaumburg. CVOS programs include:

- Artist of the Month - Profile of the artists exhibiting work in the gallery at the Prairie Center.
- Speaking of Schaumburg - News and information with Village President Al Larson.
- Change - Schaumburg: Then and Now from the perspective of area seniors.
- Schaumburg Youth Orchestra: Chamber Live - Performances by ensembles from the symphony orchestra recorded live in CVOS studios.
- Public service announcements.

All CVOS original programming can be seen on demand. CVOS promotes community events for local, not-for-profit groups.

Village of Schaumburg e-Newsletter is available weekly to anyone subscribing. The e-Newsletter includes committee agendas, community news, and events happening in Schaumburg.

The Cracker Barrel is a full-color newsletter for the Village of Schaumburg. It is published quarterly and mailed to residents and businesses in the Village of Schaumburg.

The **Family Counseling Center** has been providing counseling services to Schaumburg residents since 1974, serving thousands of residents during that time. The Family Counseling Center in the Village of Schaumburg offers Village residents:

- Family therapy
- Individual therapy
- Marital/Couples therapy
- Pre-Marital consultation & therapy
- Substance abuse evaluations

All services are offered at highly affordable rates, which bases payment due on your ability to pay for services. The Family Counseling Center also accepts many major insurance plans.

The Schaumburg Police Department's Domestic Violence Response Team (DVRT) is made up of eleven patrol officers from all three shifts, three social workers, one crime analyst, three detectives, one sergeant and one lieutenant.

The goals of the team are:

- To provide effective and improved service to victims of domestic violence.
- To provide a thorough, professional investigation for the State's Attorney's Office.
- To have a current understanding of domestic violence, the laws that pertain to it, and to have the versatility to adjust and change with the times.
- To offer a combined, consistent departmental approach from social services, patrol, administration, and investigations in an attempt to break the cycle of repeat calls and escalating violence.

The Barn serves as a second home for many of the area's seniors and disabled citizens. The Village of Schaumburg's programs for seniors and disabled persons provide food, fun, and fellowship, as well as an opportunity for seniors to help their fellow seniors and their community. The Barn offers nutritious, affordable meals (suggested donation \$3-\$3.25), fellowship through numerous special events, and educational programs enlightening seniors on current topics.

The Senior Resource Directory, compiled by the Village of Schaumburg's Committee on Aging, provides seniors and their families with a list of resources regarding Assisted Living; Senior Housing; Senior Meals; Social Groups; Dental, Hearing, And Vision Resources; Mental Health; and Special Senior Services.

The Schaumburg Teen Center offers an assortment of educational, supportive, and recreational activities for youth in the Schaumburg community. Activities and programs encourage personal development in a supportive, accepting, and safe environment. The Teen Center is open to junior high and high school students, age 12-19, who reside in the Village of Schaumburg. Teens must show proof of age and residence to obtain an ID card for admission.

The Schaumburg Crime Free Multi-Housing Program was designed to assist tenants, owners, and managers of rental property in keeping drugs and other illegal activity away from their property. This program can also be adopted by homeowner's associations to effectively deal with the portions of their association that are rental units.

Other Public Outreach

The John Marshall Law School operates the **Fair Housing Legal Clinic**, where faculty, staff, and clinical interns represent clients in the Chicago metropolitan area who have been denied housing, because of race, color, national origin, sex,

disability, familial status, marital status, age, source of income, sexual orientation, and other protected classes.

The Chicago Area Fair Housing Alliance (CAFHA) is a consortium of fair housing and advocacy organizations, government agencies, and municipalities committed to the value of fair housing, diversity, and integration. Since 1985, CAFHA works to combat housing discrimination and promote integrated communities of opportunity through research, education, and advocacy.

The Progress Center for Independent Living in Forest Park, Illinois directly assists persons with disabilities to establish lives in the community. They serve and support people with disabilities of all ages to increase and maintain independence. They also assist families and the community.

Schaumburg Township Disability Services Department assists residents of Schaumburg Township with disabilities with a variety of services and acts as a referral and information resource center for many programs offered to the disabled community.

The Community Nutrition Network and Senior Services Association (CNNSSA) provides meals and resources to older adults and persons with disabilities and assists them in leading active and healthy lives. CNNSSA serves nearly 600,000 meals a year to over 7,500 seniors and persons with disabilities regardless of their race, religion or economic status in Suburban Cook, Kendall & Grundy Counties.

Chicago Metropolitan Agency for Planning (CMAP) is the official regional planning organization for the northeastern Illinois counties of Cook, DuPage, Kane, Kendall, Lake, McHenry, and Will. CMAP developed and now guides the implementation of GO TO 2040, metropolitan Chicago's first comprehensive regional plan in more than 100 years. To address anticipated population growth of more than 2 million new residents, GO TO 2040 establishes coordinated strategies that help the region's 284 communities address transportation, housing, economic development, open space, the environment, and other quality-of-life issues.

The Housing Site (www.thehousingsite.org) has been developed for the Illinois Association of REALTORS® under the guidance of the Partnership for HomeOwnership Foundation. The site strives to provide a broad range of information on fair housing laws, as well as other housing information, to real estate professionals, lenders, renters, landlords, home-buyers, sellers, insurers, and appraisers.

VI. FAIR HOUSING IMPEDIMENTS AND RECOMMENDATIONS

Based on research and the review of the Village's demographic, economic, and housing characteristics; laws, regulations, and administrative policies, procedures and practices; an assessment of how those laws, policies and practices affect the location availability and accessibility of housing; and an assessment of conditions, both public and private, affecting fair housing choices for all protected classes, it is recommended that the activities and actions listed below be taken to reduce and/or eliminate impediments to fair housing choice.

Current Impediments and Recommendations

Based on the above, the following activities and proposed Action Plan are recommended to reduce current identified impediments to fair housing choice:

A. Impediment: Lack of Fair Housing Awareness; Need for Expansion of Fair Housing Education and Outreach

Action: Increase Efforts to Disseminate Fair Housing Information and Education Opportunities

Recommendation #1

The Village should use existing institutional structure and programs to disseminate fair housing information, and work with other fair housing groups to educate the community and increase fair housing awareness. The Village should partner with local and regional organizations that were engaged in the AI process.

Status: The Village has not used some of the existing community resources to promote fair housing issues and provide education. Responses from the survey reflect a need for continued and increased efforts in this area, particularly as the population grows and becomes increasingly more diverse. Over 91 percent of survey respondents felt that they were only "Somewhat Knowledgeable" or "Not Knowledgeable" about fair housing laws. In addition, opinions expressed on the fair housing survey indicate a definite need for further education of fair housing. Responses included:

- *Fair housing laws and programs are not advertised.*
- *There is not much information publicized in the media about fair housing problems or resolutions.*
- *The people that need assistance are reluctant to ask for help or are not aware that help is available.*
- *I am not aware of current laws, programs, or enforcement mechanisms.*
- *(There is a) lack of interest by those running the (fair housing) program.*
- *Contact senior groups, organizations that deal with handicapped people, and ethnic organizations.*

Of the survey responses, 71 percent are not familiar with the fair housing or social services provided by the Village of Schaumburg, and 84 percent have not seen or

heard information regarding fair housing programs, laws, or enforcement within the Village of Schaumburg. In addition, over 65 percent of persons surveyed felt that current fair housing laws and enforcement mechanisms are either only Somewhat Effective or Not Effective at all.

Recommendation #2

The Village should partner with existing organizations to achieve fair housing education and awareness goals.

Status: As part of the AI process, the Village and the Consultant conducted key interviews with representatives of agencies that are either involved in fair housing education and advocacy services or have access to a population that would benefit from fair housing awareness. In an economy where municipalities and other government agencies are cutting back on services and budgets are challenging, collaborating with existing service providers is strategic. Without a significant funding outlay, the Village can “piggy back” on existing training, referrals, awareness, and workshops provided by fair housing organizations. In addition, an awareness of the services carried out by these agencies will provide information to the Village’s constituencies so there is a place for clients to learn their rights; how to know when they are being discriminated and how to file complaints.

The following local and regional agencies that participated in the AI process have indicated a willingness to partner with or continue to partner with the Village of Schaumburg on fair housing issues:

- Chicago Metropolitan Agency for Planning (CMAP)
- Chicago Area Fair Housing Alliance
- North West Housing Partnership

The Village also has a comprehensive list of agencies to which information can be disseminated electronically for fair housing outreach and education.

Recommendation #3

The Village should use existing partnerships with CVOS Channel 17 and the Prairie Center for the Arts in a more effective manner to provide fair housing information. The Village can use public service announcements, shows on fair housing, interviews, news release, etc. Videos on fair housing topics can be accessed through the HUD fair housing YouTube Channel or national fair housing groups and shown on the television channel if the format is compatible. Programs can be provided on an ongoing basis or during the annual fair housing month during April.

Status: According to Village staff, CVOS Channel 17 has not been used in the past to promote fair housing; however, there are potential opportunities to promote fair housing through the station’s programs.

Recommendation #4

The Village should maximize the use of its outgoing communications to capitalize on all media outlets such as the radio, internal and external publications and social media such as Facebook and Twitter for providing fair housing information. Fair housing advertising and publications should increase during Fair Housing month. The Village should also use its community newsletter that is published quarterly to disseminate fair housing information. The Village should include the fair housing and equal opportunity logo on all publications, notices, and other written information that relates to the provision of housing in the Village. This provision does not cover all Village documents.

Status: The Public Relations Division has not been used for fair housing until the AI process. An increasing number of members of the protected classes gain more of their information from radio and social media. The Village publishes both internal and external newsletters which have not been used to provide fair housing information. During fair housing month, the Public Relations Division was not involved; however, the Division did utilize social media to promote fair housing surveys for the AI.

Recommendation #5

The Village's website should include information on fair housing and/or a direct link to fair housing agency if the resident wants to file a housing discrimination or fair housing complaint. Potential links can be to a fair housing agency, the relevant HUD fair housing office or the State of Illinois fair housing office, as appropriate. The Village should use a web translator to provide the information and link in other languages. The Village should also provide a link to the State of Illinois Human Rights Department at <http://www2.illinois.gov/dhr/Publications/Pages/default.aspx> since they offer a guide on how to file a complaint in 14 languages.

Status: There is not adequate access to fair housing information via the web. Someone wanting to find fair housing information or file a housing discrimination complaint on the Village's website would not be able to access the needed information via a direct link. Information is not provided in other languages other than English.

Recommendation #6

The Village should require that realtors and lender representatives who work with Village programs take advantage of training programs on fair housing/diversity compliance.

Status: Lenders and realtors are required to do continuing education courses including fair housing compliance. There are lenders that have fair housing compliance units while other may not. As well, there are continuing education training courses provided for Realtors such as ones provided by the person noted in the Key Person Interview section.

B. Impediment: No Existing Method or Designated Staff for Fair Housing Data Collection, Tracking, and Follow-Up

Action: Formally designate a Village Staff Person or Establish a Fair Housing Function in a current position to oversee Fair Housing

Recommendation #7

The Village should formally designate a Village staff person to consistently be available to address fair housing issues and conduct and coordinate fair housing activities. That person should maintain representation and active participation with fair housing networks and service providers.

Status: The Village does not have a designated Fair Housing Office or designated Officer but the Village's Community Planner now carries out any fair housing activities.

Recommendation #8

The Village should develop a tracking system to track and determine the disposition of housing discrimination complaints received directly or through referrals to fair housing agencies as noted in recommendation #5 above.

Status: The Village does not have a formal system for the receipt and referral of fair housing complaints. A simple data base using Excel and a cooperative agreement with the referral agencies to provide periodic reports to the Village on the disposition of referred cases would be a minimum requirement.

Recommendation #9

Use existing institutional structure to conduct annual survey of agencies and organizations for status of fair housing complaints and issues and assess data on a periodic basis for any needed follow-up.

Status: There currently exists no mechanism for the Village to track and follow-up on fair housing issues that may be reported to other groups or organizations. In conjunction with other recommendations, the Village could also target their outreach efforts to existing organization meetings to survey, track, and assess fair housing issues. If needed, the Village could take any needed action or follow-up by the designated staff person.

Recommendation #10

Conduct a mid-period assessment in year 3 of 5 of the fair housing action plan implementation schedule to take a comprehensive look at the community in light of the changes that have been made due to the implementation of the actions and

in relation to changes in population, demographics, economy, legislation, or any other factors that may impact fair housing choice.

Status: The Village does not currently track progress of its actions to further fair housing. The mid-period assessment is just one of the suggested methods to monitor the Village's efforts and to guide the fair housing strategies during the remainder of the implementation period.

C. Impediment: Lack of Fair Housing Testing to Determine Where Fair Housing Discrimination Is Taking Place

Action: Implement/Coordinate Fair Housing Testing as Needed

Recommendation #11

The Village should examine data on regional fair housing testing and trends in housing discrimination, from all sources available such as HUD and the State of Illinois, to determine the prevalence of fair housing discrimination. The Village should analyze this data annually or bi-annually to ascertain the need for, and feasibility of, conducting fair housing testing.

Status: According to the 2013 report by the John Marshall Law School Fair Housing Legal Support Center, *Segregation in the Chicago Metropolitan Area – Some Immediate Measures to Reverse this Impediment to Fair Housing*, fair housing testing is “perhaps the single most effective way to detect and prove a case of housing discrimination.” There is little fair housing testing being done in Schaumburg. Funds are required to hire agencies to conduct testing. Feasibility could be determined through reviewing the level of complaints received for cases within the Village from HUD and fair housing agencies and determining the cost of testing services. If the data indicates that there is a significant number of complaints (5-10) that would suggest a pattern or trend.

Recommendation #12

The Village should research funding opportunities for fair housing testing activities and the training necessary to gain expertise in the oversight of a fair housing testing program.

Status: During program year 2013, the Village identified \$5,000 in funding for conducting fair housing testing in the Village of Schaumburg. A determination should be made as to the whether or not this funding amount is sufficient. In addition, current staff coordinating fair housing activities does not have the expertise necessary to conduct fair housing testing.

D. Impediment: Inadequate Information and Awareness of the Village's Housing Programs, Particularly for Elderly and Minorities

Action: Improve Marketing and Access to Information on the Village's Housing Programs

Recommendation #13

Provide information on housing programs in other languages such as Spanish and target Asian, Hispanic and Black or African American populations through neighborhood and faith based organizations. In addition, all written materials, meeting notices, and information should include language that states that information can be provided in alternative language for persons with Limited English Proficiency (LEP) and in alternative formats for persons with disabilities such as the hearing impaired. The Village should review its public outreach materials for the Consolidated Plan, Action Plan, and CAPER, to ensure that public notices and planning documents can be translated into other languages upon request and that planning documents can be translated into other languages for LEP persons upon requests.

Status: It was pointed out during the key person interviews, that the typical consumer of the Village's housing programs is Caucasian (approximately 70%). Despite the growing diversity, very few seniors and minorities access the programs. The distribution of assistance does reach areas with higher minority populations.

Recommendation #14

Establish an Affirmative Marketing plan for the Village's housing programs to help increase awareness among the protected classes and persons who may not have access to information on the programs. Ethnic and community newspapers, television and radio could be used to target these groups.

Status: The Village's housing programs are not adequately marketed to groups that could qualify for funding, particularly elderly and minorities. Currently the Village advertises its programs on its website and with flyers, mailings and other written materials at Village Hall; however, seniors or minorities may not have access to this information. The fair housing survey indicated that a majority of the respondents were uninformed about the Village's housing programs.

E. Impediment: Lack of Affordable Housing in the Village of Schaumburg for members of the protected classes

Action: Expand Strategies to Increase Affordable Housing Stock

Recommendation #15

In light of the limited amount of buildable land, the Village should assess alternative and non-traditional housing development strategies such as scattered site rental housing subject to the availability of a developer with capacity and compatibility

with the State of Illinois Qualified Allocation Plan for low income housing tax credits.

Status: The Village has become a preferred suburban destination for many families; however, the Village is almost built out with very little land for development of new housing. The Village has a fairly young population with only 12.3% of the population being persons 65 years and over. The development of housing for young professionals, students, singles, and retirees is a need bolstered by the demographics analyzed in the AI. A bigger challenge is the Village being able to attract a wide variety of persons. Minority populations are disproportionately impacted by the lack of affordable housing. The Village will need varied housing types to make it an attractive place for persons in the protected classes such as the elderly, persons with disabilities and minorities

Recommendation #16

Develop an Affordable Housing Strategy for the Village which may include actions such as adopting an Inclusionary Zoning Ordinance and Affordable Housing Trust Fund; seeking funding from sources such as State Housing Preservation Funding, Low Income Housing Tax Credits, Tax Increment Financing, and private sources.

Status: According to the 2013 report by the Institute for Housing Studies at DePaul University, *The State of Rental Housing in Cook County*, over 50% of the demand for affordable housing is unmet in the Schaumburg/Streamwood area. The establishment of affordable and mixed income housing will make the Village a more attractive place to live.

F. *Impediment: Potential Discouragement of Group Homes and Institutional Housing in Residential Districts*

Action: Review and revise current zoning and land use requirements to ensure that housing choices are not limited for Village residents.

Recommendation #17

Assess and revise the zoning code to provide for more inclusive development of housing for persons with disabilities by removing or lowering the minimum distance between group homes of 1,320 feet for single family residential districts and 600 feet for multi-family residential areas.

Status: The zoning code requires a minimum distance of 1,320 feet between group homes in single-family residential districts and at least 600 feet in a multi-family residential area thus limiting the availability of group homes. This requirement may only be waived if the village board finds that the effect of such uses would not alter the residential character of the neighborhood, would not create an institutional setting and would not adversely affect surrounding properties. The zoning code already regulates the aesthetic appearance and operation of group homes to ensure that they maintain the characteristics of the

residential neighborhoods in which they are located reducing the need to restrict the spacing of group homes.

Recommendation #18

The Village should review the group home requirements and research the impact of allowing the establishment of group homes that function as residential uses in residential zones consistent with similar residential uses.

Status: The group home regulations may be restrictive for operation, location, and development due to licensing requirements. Group homes are required to obtain and maintain valid licensing, certification, and/or accreditation by appropriate local, state and national bodies charged with the regulation of group homes. Group homes not licensed will not be allowed.

G. Impediment: *The Village's cap on the number of unrelated persons sharing a home may limit the availability and increase the cost of housing for low-income persons.*

Action: *Review current zoning and land use requirements to ensure that housing choices are not limited for persons in protected classes.*

Recommendation #19

The Village should consider revising the definition of family so that it does not differentiate between related and unrelated persons and remove the limit on the number of persons that may constitute a family. Instead, the Village should utilize occupancy restrictions in the Building Code regarding the maximum number of occupants permitted in a dwelling in order to prevent overcrowding and protect their health and safety.

Status: While the definition of family allows unrelated persons to share a home it does place a cap on the number of unrelated persons that can live together at three (3) or fewer, including domestic servants and guests. The limit in the number of unrelated persons may increase housing cost for low-income persons that share a dwelling. The restrictive definition of family may also limit housing choice for groups of people living together in a single household. In the past two years there has only been one overcrowding complaint in the Village. While overcrowding is not a major issue, utilizing occupancy restrictions ensures that all persons are treated equally.

H. Impediment: *Inadequate planning to meet the needs of Village residents protected by the FHA.*

Action: *Collect demographic data for members of the protected classes utilizing various sources including the U.S. Census as well as local data collected by the Village and non-profit agencies.*

Recommendation #20

The Village should ensure that it includes more extensive demographic data in its planning documents to ensure that protected persons are not excluded or neglected when communities make plans that involve housing related issues. Being unaware of or omitting such data has the potential to limit actions or decisions made by the Village and may lead to discrimination.

Status: A review of the Village's Comprehensive Plan and other neighborhood planning documents did not reveal the use of significant data for protected class members in planning for the Village needs. While the Comprehensive Plan did include some information on age distribution and racial composition, it did not provide any data on disabled individuals. Other planning documents reviewed did not include any demographic data for the area covered.

- I. ***Impediment: Land use designations and building codes may limit the availability of affordable housing choices; and focus multifamily housing to certain neighborhoods.***

Action: Review current zoning and land use requirements, consider universal design features and promote inclusionary zoning incentives to ensure that affordable housing choices are not limited.

Recommendation #21

Encourage new multi-family residential developments to increase the supply, variety, and affordability of housing types in the Village.

Status: Multi-family dwellings, the most likely form of affordable housing options, are permitted in PUDs in the R-6 and R-7 residential districts as a special use. This impacts the location of affordable housing to certain neighborhoods and may limit the number of available units. This may also limit housing choices in an environment of limited available properties for development or redevelopment of housing.

Recommendation #22

Ensure that minimum accessibility standards are being adhered to in new developments through enforcement of building codes and explore the use of Universal Design concepts.

Status: A search of the Village Comprehensive Plan and website showed no references to the use of Universal Design. Trying to retrofit existing housing units for ADA accessibility may be expensive, varied and unnecessary for persons with disabilities. Accessibility can also be achieved by including Universal Design concepts in all new housing. These features include zero-step entrances, varying countertop heights, wider doorways, plywood under sheetrock in bathrooms for

easier installation and removal of grab bars, roomy baths, and lever door handles. These features are usable by a variety of persons.

Recommendation #23

The Village should promote the provision of inclusionary zoning and incentives it provides to further promote the development of affordable housing.

Status: While the Village's Comprehensive Plan and other community plans state that the Village should encourage developers to set-aside an appropriate proportion of units for lower income residents this is not required within the Village Code. Affordable housing or fair housing is not specifically discussed in the Code nor is there any reference to inclusionary zoning.

J. Impediment: High loan denials among members of the protected classes and limited access to finance due to high credit scores restrict the supply of housing opportunities.

Action: Pursue varying and alternative financing to meet the need for more housing for the protected classes.

Recommendation #24

Continue to fund affordable housing needs and leverage those funds with private sector funds and other government funds to increase the variety and affordability of housing suitable for different type of households. The Village should initiate discussions with area lenders to identify more diverse loan products that use alternative credit history and leverage HOME and CDBG funding to expand the number of units to be funded.

Status: The Village provides homebuyer assistance but is limited by the amount of funding allocated to the program. The lack of affordable housing for members of the protected classes requires new strategies and the leverage of other federal, local and state funding through the Village.

Recommendation #25

The Village should investigate and access non-traditional funding sources such as local community development financial intermediaries and community development financial institutions (CDFI) and Habitat for Humanity to expand the supply of affordable housing.

Status: The Village is in the process of expanding housing opportunities through joining a HOME consortium which provides additional housing funding for housing for households with incomes at or below 80% AMI.

Recommendation #26

The Village should assess the use of Section 108 loan funds through its CDBG allocation in order to leverage funding to promote housing and also to assemble land for partnering with a capable for-profit or non-profit developer.

Status: The Village has not used its CDBG allocation to access Section 108 loan funds for expansion of housing opportunities.

K. Impediment: *Inadequate public transportation between employment centers and affordable housing restricts fair housing choice.*

Action: *Expand current transportation choices through other funding sources and pursuing regional strategies.*

Recommendation #27

The Village should continue and expand, where possible, its current proactive and innovative approaches to address public transportation.

Status: The Village has one of the most proactive transportation policies in the State and provides dedicated sources of funding for public transportation. However, there is still a need for more transportation offerings as the cost of housing has the effect of limiting members of the protected classes in finding housing.

Recommendation #28: The Village should provide information about subsidized transportation programs in several languages so that limited English proficient (LEP) persons are aware of and can take advantage of such programs.

Status: The Village currently utilizes general funds to subsidize transportation costs for low income residents, persons with disability, and the elderly. However, the availability of the subsidized programs is not marketed or published in other languages. This may preclude targeted persons who may have limited English proficiency from benefiting from lower cost transportation.

Remedial Action Recommendations Table and Timeline

REMEDIAL ACTION RECOMMENDED	1-2 YEAR GOALS	3- 5 YEAR GOALS	ON- GOING
ACTIONS TO ADDRESS CURRENT IMPEDIMENTS			
A. Impediment: Lack of Fair Housing Awareness; Need for Expansion of Fair Housing Education and Outreach Action: Increase Efforts to Disseminate Fair Housing Information and Education Opportunities			
Recommendation #1: The Village should use the existing institutional structure and programs to disseminate fair housing information, and work with other fair housing groups to educate the community and increase fair housing awareness. This includes involving social service agencies and Village staff to work with the community to address concerns such as NIMBYism.			X
Recommendation #2: The Village should partner with existing organizations to achieve fair housing education and awareness goals including local and regional organizations that participated in the AI process.			X
Recommendation #3: The Village should use existing partnerships with CVOS Channel 17 and the Prairie Center for the Arts in a more effective manner to provide fair housing information.			X
Recommendation #4: The Village should maximize the use of its communications division to capitalize on all media outlets such as the radio, internal and external publications and social media such as Facebook and Twitter for providing fair housing information especially the annual during Fair Housing month. The Village should also use its community newsletter that is published quarterly to disseminate fair housing information.			X
Recommendation #5: The Village’s main home page, as well as the web page for Village housing programs, should include information on fair housing and/or a direct link to a fair housing agency if the resident wants to file a housing discrimination or fair housing complaint. Also provide a link to the State of Illinois Human Rights Department at http://www2.illinois.gov/dhr/Publications/Pages/default.aspx	X		
Recommendation #6: The Village should require that realtors and lender representatives who work with Village programs take advantage of training programs on fair housing/diversity compliance.		X	
B. Impediment: No Existing Method or Designated Staff for Fair Housing Data Collection, Tracking, and Follow-Up			

REMEDIAL ACTION RECOMMENDED	1-2 YEAR GOALS	3- 5 YEAR GOALS	ON- GOING
Action: Formally designate a Village Staff Person or Establish a Fair Housing Function in a current position to oversee Fair Housing			
Recommendation #7: The Village should formally designate a Village staff person to consistently be available to address fair housing issues and conduct and coordinate fair housing activities and work with networks and service providers.	X		
Recommendation #8: The Village should develop a tracking system to track and determine the disposition of housing discrimination complaints received directly or through referrals to fair housing agencies as noted in recommendation #5 above.		X	
Recommendation #9: Use existing institutional structure to annually survey agencies and organizations for status of fair housing complaints and issues and assess data on a bi-yearly basis for any needed follow-up.		X	
Recommendation #10: Conduct a mid-period assessment in year 3 of 5 of the fair housing action plan implementation schedule to take a comprehensive look at the community in light of the changes that have been made due to the implementation of the actions and in relation to changes in population, demographics, economy, legislation, or any other factors that may impact fair housing choice.		X	
C. Impediment: Lack of Fair Housing Testing to Determine Where Fair Housing Discrimination Is Taking Place Action: Evaluate Existing Testing Data, Determine Prevalence of Housing Discrimination, and Implement/Coordinate Fair Housing Testing as Needed			
Recommendation #11: The Village should examine data on regional fair housing testing and trends in housing discrimination, from all sources available such as HUD and the State of Illinois annually or bi-annually, to determine the prevalence of fair housing discrimination and to ascertain the need for, and feasibility of, conducting fair housing testing.			X
Recommendation #12: The Village should research existing HUD, or other funding opportunities, for fair housing testing activities and the training necessary to gain expertise in the oversight of a fair housing testing program.			X
D. Impediment: Inadequate Information and Awareness of the Village's Housing Programs, Particularly for Elderly and Minorities Action: Improve Marketing and Access to Information on the Village's Housing Programs			

REMEDIAL ACTION RECOMMENDED	1-2 YEAR GOALS	3- 5 YEAR GOALS	ON- GOING
Recommendation #13: Provide housing program information in other languages such as Spanish and include language that information can be provided in other languages for persons with Limited English Proficiency or persons with disabilities such as the hearing impaired if requested.		X	
Recommendation #14: Establish an Affirmative Marketing plan for the Village’s housing programs to help increase awareness among the protected classes including the use of ethnic and community newspapers, television and radio. The Schaumburg Township Library has a list of existing community groups that can be used as a resource.		X	
E. Impediment: Lack of Affordable Housing in the Village of Schaumburg Action: Expand Strategies to Increase Affordable Housing Stock			
Recommendation #15: Continue to fund affordable housing needs using CDBG funds, and leverage as far as possible, those funds with private sector funds and other government funds to increase the variety and affordability of housing suitable for different type of households.			X
Recommendation #16: Research the development of an Affordable Housing Strategy for the Village which may include actions such as amending zoning codes and seeking funding sources.		X	
F. Impediment: Potential Discouragement of Group Homes and Institutional Housing in Residential Districts. Action: Review and revise current zoning and land use requirements to ensure that housing choices are not limited for Village residents.			
Recommendation #17: Assess and revise the zoning code to provide for more inclusive development of housing for persons.		X	
Recommendation #18: The Village should expand opportunities for the siting of group homes and allow the establishment of group homes that function as residential uses in residential zones consistent with similar residential uses.		X	
G. Impediment: The Village’s cap on the number of unrelated persons sharing a home may limit the availability and increase the cost of housing for low-income persons. Action: Review current zoning and land use requirements to ensure that housing choices are not limited for persons in protected classes.			

REMEDIAL ACTION RECOMMENDED	1-2 YEAR GOALS	3- 5 YEAR GOALS	ON- GOING
<p>Recommendation #19: The Village should consider revising the definition of family so that it does not differentiate between related and unrelated persons and remove the limit on the number of persons that may constitute a family and use the maximum number of occupants permitted in a dwelling in order to prevent overcrowding and protect their health and safety.</p>		X	
<p>H. Impediment: Inadequate planning to meet the needs of Village residents protected by the FHA.</p> <p>Action: Collect demographic data for members of the protected classes utilizing various sources including the U.S. Census as well as local data collected by the Village and non-profit agencies.</p>			
<p>Recommendation #20: The Village should ensure that it includes more extensive demographic data in its planning documents to ensure that protected persons are not excluded or neglected when communities make plans that involve housing related issues</p>			X
<p>I. Impediment: Land use designations and building codes may limit the availability of affordable housing choices; and focus multifamily housing to certain neighborhoods.</p> <p>Action: Review current zoning and land use requirements, consider universal design features and promote inclusionary zoning incentives to ensure that affordable housing choices are not limited.</p>			
<p>Recommendation #21: Encourage new multi-family residential developments to increase the supply, variety, and affordability of housing types in the Village. Provide information to potential developers about different funding sources that promote affordable housing.</p>			X
<p>Recommendation #22: Ensure that minimum accessibility standards are being adhered to in new developments through enforcement of building codes and explore the use of Universal Design concepts.</p>		X	
<p>Recommendation #23: The Village should promote the provision of inclusionary zoning and incentives it provides to further promote the development of affordable housing.</p>			X
<p>J. Impediment: High loan denials among members of the protected classes and limited access to finance due to high credit scores restrict the supply of housing opportunities.</p> <p>Action: Pursue varying and alternative financing to meet the need for more housing for the protected classes.</p>			

REMEDIAL ACTION RECOMMENDED	1-2 YEAR GOALS	3- 5 YEAR GOALS	ON- GOING
Recommendation #24: The Village should initiate discussions with area lenders to identify more diverse loan products that use alternative credit history and leverage HOME and CDBG funding.			X
Recommendation #25: The Village should investigate and access non-traditional funding sources such as local community development financial intermediaries and community development financial institutions (CDFI) and Habitat for Humanity to expand the supply of affordable housing.		X	
Recommendation #26: The Village should research the use of Section 108 loan funds through its CDBG allocation in order to leverage funding to promote housing and also to assemble land for partnering with a capable for-profit or non-profit developer.		X	
<p><i>K. Impediment: Inadequate public transportation between employment centers and affordable housing restricts fair housing choice.</i></p> <p><i>Action: Expand current transportation choices through other funding sources and pursuing regional strategies.</i></p>			
Recommendation #27: The Village should continue and expand, where possible, its current proactive and innovative approaches to address public transportation.			X
Recommendation #28: The Village should provide information about subsidized transportation programs in several languages so that limited English proficient (LEP) persons are aware of and can take advantage of such programs.			X

Fair Housing Action Planning

Based on the above impediments and recommendations, the Village will develop a Fair Housing Action Plan based on available resources, priorities and what is achievable. Each recommendation in the AI includes a proposed timeframe for completion in periods of 1-2 years, 3-5 years, or on an ongoing basis.

The Consultant recognizes the Village's right to select from the recommendations those that it wishes to consider for implementation.

In order to develop the Fair Housing Action Plan, the Village should take the following steps:

- Select recommendations from the above list provided by this report that the Village will consider implementing based on resources and priorities.
- Define a clear set of objectives, with measurable results, that are directly related to the conclusions and recommendations selected by the Village from the AI.
- For each objective, develop a set of goals for the completion of one or more discrete actions, or set of actions, which serve as milestones toward achieving each objective.
- List fair housing action(s) to be completed for each objective and determine the time period for completion.
- Identify resources from local, State, and Federal agencies or programs as well as from financial, nonprofit, and other organizations that have agreed to finance or support fair housing actions.
- Identify individuals, groups, and organizations to be involved in each action and define their responsibilities. Obtain written commitments from all involved, as a formal recognition of their agreement to participate in the effort in the manner indicated.
- Set priorities and schedule actions consistent with the Consolidated Plan cycle.

Village Staff Response and Planned Actions

There were 28 recommended actions to address the identified impediments, of which most pertain to providing education on fair housing, tracking fair housing complaints, and target marketing of available programs. There are also several recommendations that encourage the Village to research funding sources and potential code changes, including the definition of family and group home requirements. The Village proposes to pursue some but not all of the recommended actions. Village Staff's response to the recommendations are provided in Appendix #5. Included are the activities and actions that the Village will implement. A timeline for each activity is to be prepared by Village staff.

Implementation and Tracking

The Village of Schaumburg Community Development Department is responsible for the oversight and tracking of the implementation of the fair housing action plan. The Department will track the progress of the actions to address the impediments to fair housing on an annual basis. The purpose of the monitoring is to analyze the impact of the actions taken during the previous years and demonstrate that the Village has met its obligation to affirmatively further fair housing.

This section describes the process for monitoring the progress in carry out the recommendations to address the impediments to fair housing. A key element of the monitoring process is recordkeeping. The Village should maintain a fair housing file where all actions taken are recorded and updates are made on a regular basis.

HUD requires that at a minimum, the file contain:

- A copy of the AI; and
- Records that show the grantee has taken actions to overcome the effects of impediments identified in the AI.

It is recommended that the Village conduct an annual self-assessment to determine its progress in addressing the identified impediments and maintain the information in the fair housing file through the use of the Fair Housing Compliance File Checklist (Appendix 3). The annual self-assessment will be compared to the timelines stipulated in the fair housing action plan. If the Village notices any deviations from the timeline, it should take the necessary steps to address any shortfalls.

Each recommendation includes a timeframe to complete each action in either one year, three years, or on an ongoing basis. Intermediate reviews of the goals should be undertaken on a quarterly basis, or sooner, so it can be determined if the Village is on target to meet them or if other actions need to be taken.

In addition to the on-going self-assessment the Village will prepare an end of year report on an annual basis. HUD requires that each grantee prepare a Consolidated Annual Performance Evaluation Report (CAPER) explaining how the jurisdiction is carrying out its housing and community development strategies, projects, and activities. As part of the CAPER, the grantee must describe how it is carrying out its certification to affirmatively further fair housing by a) identifying the actions taken during the year, b) providing a summary of impediments to fair housing choice in the AI, and c) identify actions taken to overcome effects of impediments identified in the AI.

The AI is typically updated every five years at the time of preparation of the Consolidated Plan; however, a lot can change within a five year span of time and as such, it is recommended that the Village conduct a mid-period assessment. The purpose of the mid-period assessment is to take a comprehensive look at the community in light of the changes that have been made due to the implementation

of the actions outlined in the fair housing action plan and in relation to changes in population, demographics, economy, legislation, or any other factors that may impact fair housing choice. The mid-period assessment should be conducted at the end of the third year of implementation of the action plan and should include the annual assessment for the year as well as a cumulative review of the actions taken and their impact for the three year period.

The Village should compile and include the following in the mid-period assessment:

- Population demographic data relating to race, ethnic group, sex, age, and head of household;
- Characteristics of program beneficiaries;
- Affirmative marketing strategy and actions;
- Discrimination complaints filed and trends;
- Amendments or revisions to policies impacting land development, site selection, and zoning;
- Actions taken to affirmatively further fair housing; and
- Results of any needs assessments or studies for the area impacting fair housing.

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Appendix 2 – Resident Survey Questionnaire

I. INTRODUCTION

THIS SURVEY IS FOR INFORMATIONAL PURPOSES ONLY AND ALL SURVEY RESPONDENTS' IDENTITIES WILL REMAIN ANONYMOUS.

This survey is for the Analysis of Impediments to Fair Housing Choice (A.I.), a document required of the Village of Schaumburg by the U.S. Department of Housing and Urban Development (HUD).

The Federal Fair Housing Act prohibits discrimination in housing on the basis of race, color, national origin, religion, sex, familial status, and disability.

II. BACKGROUND

HUD defines Impediments to Fair Housing Choice as:

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

If you have encountered a barrier/impediment to renting or buying a home because of your race, color, national origin, religion, family status, gender, disability, or sexual orientation, you may have experienced housing discrimination.

Examples of Possible Housing Discrimination:

- An agent refusing to sell, rent, or show available housing.
- A person only being shown housing in areas or neighborhoods of minority concentration.
- A landlord providing different housing services, or enforcing different rules, for minority tenants.
- A prospective tenant being told the dwelling is not appropriate for a family.
- A dwelling has an available sign, but prospective tenants are told it is not available.
- The existence of planning and zoning regulations that limit the ability or choices of certain groups to secure decent housing.
- A person being denied a loan, or getting a higher interest rate, because of being a member of a certain group.
- A person being denied a loan, or getting a different interest rate, because of buying in a minority neighborhood.

III. SURVEY QUESTIONS

1. Do you live within the limits of the Village of Schaumburg, or have your address listed as the Village of Schaumburg?
 - Yes
 - No

2. Of which ethnic or cultural group do you consider yourself a member?
Please check one:
 - Anglo/White
 - Black or African American
 - Hispanic/Chicano/Latino
 - American Indian/Native American
 - Asian/Oriental/Pacific Islander
 - Multiracial
 - Prefer not to answer
 - Other (please specify):

3. What is your current marital status? Please check one.
 - Married
 - Single head of household
 - Domestic partners
 - Divorced
 - Widowed
 - Prefer not to answer

4. Which income category does your total household income fall into?
Please check one:
 - Less than \$20,000
 - \$20,001 to \$30,000
 - \$30,001 to \$40,000
 - \$40,001 to \$50,000
 - \$50,001 to \$60,000
 - \$60,001 to \$70,000
 - \$70,001 or more
 - Prefer not to answer

5. Do you, or someone in your household, qualify as a “protected class” according to the Fair Housing Act? (Please see next question for a list of protected classes.)
 - Yes
 - No

6. If you answered "Yes" to question #5, to which protected class do you/your household belong? (check all that apply)
- Race
 - Color
 - Religion
 - Sex
 - National Origin
 - Familial Status (family with one or more persons under 18 years of age)
 - Disabled/handicapped
7. Do you have children under the age of 18 years?
- Yes
 - No
8. Housing discrimination can occur if someone is denied housing or housing financing based on which of the following categories (check all that apply):
- Race
 - Color
 - Religion
 - Sex
 - Disability/Handicap
 - Family Status (family with one or more persons under 18 years of age)
 - National Origin
 - Age
 - Sexual Orientation
 - Poor English Language Skills
 - Citizenship Status
 - Level of Income
 - Source of Income (public assistance)
 - Other (please list) _____
-
9. How much do you know about Fair Housing Laws, including State of Illinois Fair Housing Law?
- Very Knowledgeable
 - Somewhat Knowledgeable
 - Not Knowledgeable
10. Have you or anyone you know ever experienced housing discrimination in the Village of Schaumburg?
- Yes, I have
 - Yes, a person I know has
 - No

11. If yes, which of the following best describes the person or organization that discriminated against you or the person you know?

- rental property manager/owner
- seller of a housing unit
- condominium or homeowner's association
- real estate professional
- loan officer or mortgage broker
- municipal employee
- other (please list) _____

12. What best describes the location where the discrimination occurred?

- rental apartment complex
- individual housing unit for rent
- single family housing unit for sale
- condominium for sale
- real estate office
- lending institution
- Public Housing Authority
- Village office
- other (please list): _____

13. What do you believe was the basis for the discrimination you or the person you know experienced?

- Race
- Color
- Religion
- Sex
- Disability/Handicap
- Family Status
- National Origin
- Age
- Sexual Orientation
- Poor English language skills
- Citizenship Status
- Level of Income
- Source of Income (public assistance)
- Other (please list): _____

14. What do you see as current impediments to fair housing choice, if any, within the Village of Schaumburg?

- Race
- Color
- Ethnicity
- National Origin
- Sex
- Sexual Orientation

- Family Status
- Disability
- Age
- Insufficient Income
- Lack of sufficient quality affordable housing
- Insufficient public transportation
- Municipal codes, ordinances, or regulations
- Other (please list): _____

15. Do you feel your housing choices are geographically limited to certain areas or neighborhoods in the Village of Schaumburg?

- No
- Yes

If yes, on what basis? (you may select from list above at question #14):

16. Do you think that affordable housing options are located throughout the Village of Schaumburg, or are they concentrated in certain areas/neighborhoods?

- Spread throughout the Village of Schaumburg
- Concentrated in certain areas/neighborhoods, such as:

17. Do you perceive certain geographic areas or neighborhoods within the Village of Schaumburg to be undesirable?

- No
- Yes

If yes, please identify: _____

18. Do you feel that there is an adequate supply of affordable housing that is available to all residents?

- Yes
- No

Why/why not? _____

19. Do you feel that there is an adequate supply of affordable housing that is available to disabled residents?

- Yes
- No

Why/why not? _____

20. Do you feel there is an adequate supply of affordable housing that is available to senior citizen residents?

- Yes

No

Why/why not? _____

21. Do you feel there is an adequate supply of affordable housing that is available to residents with children?

Yes

No

Why/why not? _____

22. What did you do, or would you do, if you were discriminated against in housing choice? (Check all that apply)

Nothing

I wouldn't know what to do

Complain to the individual/organization that discriminated against me

Contact Village offices

Contact my elected municipal representative

Contact a local fair housing organization

Contact HUD

Contact a private attorney

Contact the Village Attorney

Contact the State Attorney General

Other (please identify):

23. Are you familiar with fair housing services or other social services provided by the Village of Schaumburg?

Yes

No

List the Village services you know of such as senior, youth, disability, and employment services. Provide names/descriptions, if possible.

24. Have you seen or heard information regarding fair housing programs, laws, or enforcement within the Village of Schaumburg?

Yes

No, (please skip to question #26)

25. If you answered yes to question #24, what information have you seen/heard? (check all that apply):

fair housing flyers or pamphlets

fair housing handbook

fair housing public service announcement on the radio

- fair housing public service announcement on the television
- fair housing information at a public event
- other (please list): _____

26. Do you think that adequate fair housing information is available in other language translations?

- Yes
- No

27. In your opinion, how effective are the current fair housing laws, programs, and enforcement mechanisms?

- Very Effective
- Somewhat Effective
- Not Effective

28. What do you feel would be the most effective way to inform the residents of Schaumburg about their fair housing rights and/or responsibilities? (check all that apply):

- public meeting(s)
- fair housing literature/information in public libraries and Village Hall
- television advertisements/announcements
- radio advertisements/announcements
- bilingual advertisements/announcements
- information on the Village website
- other (please describe): _____

29. Do you have any suggestions for changes to fair housing laws and practices that would increase fair housing choice and/or remove impediments to fair housing choice?

If yes, please list:

30. Please list below what additional actions would you suggest that the Village of Schaumburg could take to address impediments and improve fair housing choice for all residents:

IV. SURVEY COMPLETION

Thank you for participating in the fair housing survey. Your responses will influence important fair housing planning decisions made by the Village of Schaumburg.

Appendix 3 – Fair Housing Compliance File Checklist

Grantee: _____ Fiscal Year: _____

DATE	DESCRIPTION
_____	Current Consolidated Plan section applicable to Fair Housing
_____	Analysis of Impediments to Fair Housing
_____	Annual Resolution or Proclamation of Fair Housing Month
_____	A summary report of all activities related to the AI
_____	List of the actions taken during the program year
_____	Notice of public meetings showing the fair housing and equal opportunity logo. Should also include language providing for accommodations for persons with Limited English Proficiency, disabilities including the hearing impaired.
_____	Summary or transcript of all public meetings, hearings, and citizen comments or other public input
_____	Sign-in sheet or list of attendees at public meetings or hearings
_____	Fair housing brochures and publications including subrecipient educational material
_____	Information about housing discrimination complaints and the disposition of each
_____	Notice of training or workshops regarding fair housing and list of attendees
_____	Description of funding or fair housing providers and bi-annual reports from such agencies
_____	Studies or reports evaluating the impact of the actions undertaken including applicable section of the CAPER
_____	Other:

Appendix 4 – Public Notices

**NOTICE OF
PUBLIC MEETING
Attention:
All Schaumburg
Residents**

**ANALYSIS OF
IMPEDIMENTS TO FAIR
HOUSING CHOICE**

Public notice is hereby given that the Village of Schaumburg will hold a Public Meeting on May 21, 2013, at 6:00 P.M. in Conference Room C at the Robert O. Atcher Municipal Center, 101 Schaumburg Court, Schaumburg, Illinois. This meeting is intended to inform Schaumburg residents about the Analysis of Impediments to Fair Housing Choice (AI), as well as provide an opportunity for all to participate in the AI planning process.

Entitlement communities like Schaumburg are required by the U.S. Department of Housing and Urban Development (HUD) to complete an AI every five years. HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

The agenda for the meeting is as follows:

1. Open Public Meeting
2. Fair Housing – Analysis of Impediments
 - a. Introduction
 - b. Consultant/Staff Summary
 - c. Discussion
3. Close Public Meeting

Persons living in Schaumburg are encouraged to attend and provide input. Any one unable to attend this meeting but wishing to make their views known may do so by submitting written comments to Marisa Warneke at mwarneke@schau.org or to the following address: Village of Schaumburg, Community Development Department, 101 Schaumburg Court, Schaumburg, IL 60193.

A fair housing survey can also be found on the Village's website at www.villageofschaumburg.com.

All persons desiring to be heard will be given the opportunity to be heard. Individuals with disabilities who plan to attend this hearing and who require certain accommodations to allow them to observe and/or participate in this meeting are requested to contact the Community Development Department at (847) 923-4430 at least one (1) week prior to this meeting if possible.

Published in Daily Herald
May 3, 2013 (4338284)

CERTIFICATE OF PUBLICATION

Paddock Publications, Inc.

Daily Herald

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County(ies) of Cook, Kane, Lake, McHenry

and State of Illinois, continuously for more than one year prior to the date of the first publication of the notice hereinafter referred to and is of general circulation throughout said Village(s), County(ies) and State.

I further certify that the **DAILY HERALD** is a newspaper as defined in "an Act to revise the law in relation to notices" as amended in 1992 Illinois Compiled Statutes, Chapter 7150, Act 5, Section 1 and 5. That notice of which the annexed printed slip is a true copy, was published May 3, 2013 in said **DAILY HERALD**.

IN WITNESS WHEREOF, the undersigned, the said **PADDOCK PUBLICATIONS, INC.**, has caused this certificate to be signed by, this authorized agent, at Arlington Heights, Illinois.

PADDOCK PUBLICATIONS, INC.
DAILY HERALD NEWSPAPERS

BY *Laula Baltz*
Authorized Agent

Control # 4338284

RECEIVED

MAY 10 2013

PURCHASING

NOTICE OF PUBLIC WORKSHOP

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Public notice is hereby given that the Olde Schaumburg Centre Commission, Plan Commission, and Zoning Board of Appeals will be involved in a Public Workshop on **May 20, 2013, at 6:30 P.M. in Conference Room C at the Robert O. Atcher Municipal Center, 101 Schaumburg Court, Schaumburg, Illinois.** The workshop is being held to give the commissions, board, and public an opportunity to be involved in the Analysis of Impediments to Fair Housing Choice (AI), as well as provide an opportunity for all to participate in the AI planning process.

Entitlement communities like Schaumburg are required by the U.S. Department of Housing and Urban Development (HUD) to complete an AI every five years. HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

The agenda for the meeting is as follows:

1. Open Public Meeting
2. Fair Housing – Analysis of Impediments
 - a. Introduction
 - b. Consultant/Staff Summary
 - c. Discussion
3. Close Public Meeting

Persons living and working in Schaumburg are encouraged to attend and provide input. Anyone unable to attend this meeting but wishing to make their views known may do so by submitting written comments to Marisa Warneke at mwarneke@ci.schaumburg.il.us or to the following address: Village of Schaumburg, Community Development Department, 101 Schaumburg Court, Schaumburg, IL 60193.

A fair housing survey can also be found on the Village's website at www.villageofschaumburg.com.

All persons desiring to be heard will be given the opportunity to be heard. Individuals with disabilities who plan to attend this hearing and who require certain accommodations to allow them to observe and/or participate in this meeting are requested to contact the Community Development Department at (847) 923-4430 at least one (1) week prior to this meeting if possible.

RECEIVED
MAY 1 - 2013
PURCHASING

**NOTICE OF
PUBLIC MEETING
Attention: Realtors,
Lenders, and Housing
Service Providers**
**ANALYSIS OF
IMPEDIMENTS TO FAIR
HOUSING CHOICE**

Public notice is hereby given that the Village of Schaumburg will hold a Public Meeting on May 20, 2013, at 1:30 P.M. in Meeting Room A of the Prairie Center for the Arts Building, located at 201 Schaumburg Court, Schaumburg, Illinois, 60192. This meeting is intended to inform Schaumburg Realtors, Lenders, and Housing Service Providers about the Analysis of Impediments to Fair Housing Choice (AIFHC), as well as provide an opportunity for these housing professionals to participate in the planning process.

Entitlement communities like Schaumburg are required by the U.S. Department of Housing and Urban Development (HUD) to complete an AIFHC every five years. HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

The agenda for the meeting is as follows:

1. Open Public Meeting
2. Fair Housing - Analysis of Impediments
- a. Introduction
- b. Consultant/Staff Summary
- c. Discussion
3. Close Public Meeting

Persons involved in the housing market of Schaumburg are encouraged to attend and provide input. Any one unable to attend this meeting but wishing to make their views known may do so by submitting written comments to: Marisa Warnke at 847.923.3851 or email at mwarnke@cschaumburg.il.us.

A fair housing survey can also be found on the Village's website at www.villageofschamburg.com. All persons desiring to be heard will be given the opportunity to be heard. Individuals with disabilities who plan to attend this hearing and who require certain accommodations to allow them to observe and/or participate in this meeting are requested to contact the Community Development Department at (847) 923-4430 at least one (1) week prior to this meeting if possible.

Published in Daily Herald
May 3, 2013 (4338282)

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IN WITNESS WHEREOF, the undersigned, the said **PADDOCK PUBLICATIONS, Inc.**, has caused this certificate to be signed by, this authorized agent, at Arlington Heights, Illinois.

PADDOCK PUBLICATIONS, INC.
DAILY HERALD NEWSPAPERS

BY *Paula Baltz*
Authorized Agent

Control # 4338282

RECEIVED
MAY 10 2013
PURCHASING

NOTICE OF PUBLIC MEETING

Attention: All Schaumburg Residents

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Public notice is hereby given that the Village of Schaumburg will hold a Public Meeting on **May 21, 2013, at 6:00 P.M. in Conference Room C at the Robert O. Atcher Municipal Center, 101 Schaumburg Court, Schaumburg, Illinois.** This meeting is intended to inform Schaumburg residents about the Analysis of Impediments to Fair Housing Choice (AI), as well as provide an opportunity for all to participate in the AI planning process.

Entitlement communities like Schaumburg are required by the U.S. Department of Housing and Urban Development (HUD) to complete an AI every five years. HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

The agenda for the meeting is as follows:

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2. Fair Housing – Analysis of Impediments
 - a. Introduction
 - b. Consultant/Staff Summary
 - c. Discussion
3. Close Public Meeting

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A fair housing survey can also be found on the Village's website at www.villageofschaumburg.com.

All persons desiring to be heard will be given the opportunity to be heard. Individuals with disabilities who plan to attend this hearing and who require certain accommodations to allow them to observe and/or participate in this meeting are requested to contact the Community Development Department at (847) 923-4430 at least one (1) week prior to this meeting if possible.

RECEIVED
MAY 1 - 2013
PURCHASING

NOTICE OF PUBLIC WORKSHOP

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Public notice is hereby given that the Old Schaumburg Centre Commission, Plan Commission, and Zoning Board of Appeals will be involved in a Public Workshop on May 30, 2015, at 6:30 P.M. in Conference Room C at the Robert O. Atcher Municipal Center, 101 Schaumburg Court, Schaumburg, Illinois. The workshop is being held to give the commissions, board, and public an opportunity to be involved in the analysis of impediments to Fair Housing Choice (A1), as well as provide an opportunity for all to participate in the AI planning process.

Entitlement communities like Schaumburg are required by the U.S. Department of Housing and Urban Development (HUD) to complete an AI every five years. HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

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A fair housing survey can also be found on the Village's website at www.villageofschaumburg.com.

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Published in Daily Herald
May 3, 2015 (4538286)

CERTIFICATE OF PUBLICATION

Paddock Publications, Inc.

Daily Herald

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County(ies) of Cook, Kane, Lake, McHenry

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IN WITNESS WHEREOF, the undersigned, the said PADDOCK PUBLICATIONS, Inc., has caused this certificate to be signed by, this authorized agent, at Arlington Heights, Illinois.

PADDOCK PUBLICATIONS, INC.
DAILY HERALD NEWSPAPERS

BY *Paula Baltz*
Authorized Agent

Control # 4338286

RECEIVED
MAY 10 2013
PURCHASING

NOTICE OF PUBLIC MEETING

Attention: Realtors, Lenders, and Housing Service Providers

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Public notice is hereby given that the Village of Schaumburg will hold a Public Meeting on **May 20, 2013, at 1:30 P.M. in Meeting Room A at the Prairie Center for the Arts Building, located at 201 Schaumburg Court, Schaumburg, Illinois, 60193.** This meeting is intended to inform Schaumburg Realtors, Lenders, and Housing Service Providers about the Analysis of Impediments to Fair Housing Choice (AI), as well as provide an opportunity for these housing professionals to participate in the planning process.

Entitlement communities like Schaumburg are required by the U.S. Department of Housing and Urban Development (HUD) to complete an AI every five years. HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

The agenda for the meeting is as follows:

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 - a. Introduction
 - b. Consultant/Staff Summary
 - c. Discussion
3. Close Public Meeting

RECEIVED
MAY 1 - 2013
PURCHASING

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A fair housing survey can also be found on the Village's website at www.villageofschaumburg.com.

All persons desiring to be heard will be given the opportunity to be heard. Individuals with disabilities who plan to attend this hearing and who require certain accommodations to allow them to observe and/or participate in this meeting are requested to contact the Community Development Department at (847) 923-4430 at least one (1) week prior to this meeting if possible.

Analysis of Impediments to Fair Housing Choice, January 2015
Village of Schaumburg, IL

P1410-01
PUBLIC NOTICE
VILLAGE OF SCHAUMBURG
COMMUNITY DEVELOPMENT BLOCK
GRANT PROGRAM
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING
The Village of Schaumburg will hold a Public Hearing on December 2, 2014 at 7:00 p.m. in Russ Parker Hall, 101, Schaumburg Court, Schaumburg, IL 60194. This public hearing is intended to provide Schaumburg residents the ability to review and provide public comment on the Village's Analysis of Impediments (AI) to Fair Housing Choice and a proposed action plan resulting from the AI recommendations and the Village's priorities.
The Village of Schaumburg is a Community Development Block Grant (CDBG) Entitlement community and receives CDBG funds annually from the U.S. Department of Housing and Urban Development (HUD). HUD requires CDBG entitlement communities to complete an AI every five years as part of its certification to affirmatively further fair housing. HUD defines impediments to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting housing choices, based on race, color, religion, sex, disability, familial status, or national origin.
The Analysis of Impediments to Fair Housing will be available for review and comment for 30 days on the Village's website (www.villageofschaumburg.com) and at the following locations:
Village of Schaumburg Community Development Department
101 Schaumburg Court
Schaumburg IL 60194
Phone (847) 923-3851
Schaumburg Township Clerk's Office
25 Illinois Boulevard
Hoffman Estates, IL 60194
(847) 884-0030
Schaumburg Township District Library, Reference Desk
130 South Roselle Road
Schaumburg, IL 60194
Phone (847) 895-3273
Written comments pertaining to the Village of Schaumburg's Analysis of Impediments to Fair Housing are being accepted until December 2, 2014, and should be submitted to Marisa Warnke via email at marisaw@villageofschaumburg.com or mail at Community Development Department, Attn: Marisa Warnke, 101 Schaumburg Court, Schaumburg, IL 60194. Any questions concerning the Analysis of Impediments to Fair Housing should be directed to the Community Development Department at (847) 923-3851.
Individuals with disabilities who plan to attend this meeting and who require certain accommodations to allow them to observe and/or participate in this meeting are requested to contact the Community Development Department at (847) 923-4430, at least one week prior to the meeting, if possible.
Published in Daily Herald October 30, 2014 (4389822)

CERTIFICATE OF PUBLICATION

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Daily Herald

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County(ies) of Cook, Kane, Lake, McHenry and State of Illinois, continuously for more than one year prior to the date of the first publication of the notice hereinafter referred to and is of general circulation throughout said Village(s), County(ies) and State.

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IN WITNESS WHEREOF, the undersigned, the said PADDOCK PUBLICATIONS, Inc., has caused this certificate to be signed by, this authorized agent, at Arlington Heights, Illinois.

PADDOCK PUBLICATIONS, INC.
DAILY HERALD NEWSPAPERS

BY Laula Baltz
Authorized Agent

Control # 4389822



Appendix 5 – Schaumburg Fair Housing Action Plan

ACTION RECOMMENDED	ACTION TO BE UNDERTAKEN	STAFF RESPONSE
ACTIONS TO ADDRESS CURRENT IMPEDIMENTS		
<p>A. Impediment: Lack of Fair Housing Awareness; Need for Expansion of Fair Housing Education and Outreach</p> <p>Action: Increase Efforts to Disseminate Fair Housing Information and Education Opportunities</p>		
<p>Recommendation #1: The Village should use the existing institutional structure and programs to disseminate fair housing information, and work with other fair housing groups to educate the community and increase fair housing awareness. This includes involving social service agencies and Village staff to work with the community to address concerns such as NIMBYism.</p>	<p>YES</p>	<p>The Village will develop a plan to create fair housing awareness.</p>
<p>Recommendation #2: The Village should partner with existing organizations to achieve fair housing education and awareness goals including local and regional organizations that participated in the AI process.</p>	<p>YES</p>	<p>The Village will partner with various agencies for training, awareness and workshops provided by fair housing agencies.</p>
<p>Recommendation #3: The Village should use existing partnerships with CVOS Channel 17 and the Prairie Center for the Arts in a more effective manner to provide fair housing information.</p>	<p>YES</p>	<p>The Village will utilize CVOS Channel 17 to provide additional information.</p>
<p>Recommendation #4: The Village should maximize the use of its communications division to capitalize on all media outlets such as the radio, internal and external publications and social media such as Facebook and Twitter for providing fair housing information especially the annual during Fair Housing month. The Village should also use its community newsletter that is published quarterly to disseminate fair housing information.</p>	<p>YES</p>	<p>The Village will utilize various types of social media and publications to distribute information.</p>

ACTION RECOMMENDED	ACTION TO BE UNDERTAKEN	STAFF RESPONSE
<p>Recommendation #5: The Village's main home page, as well as the web page for Village housing programs, should include information on fair housing and/or a direct link to a fair housing agency if the resident wants to file a housing discrimination or fair housing complaint. Also provide a link to the State of Illinois Human Rights Department at http://www2.illinois.gov/dhr/Pages/default.aspx</p>	<p>YES</p>	<p>The Village will provide information on the website regarding fair housing.</p>
<p>Recommendation #6: The Village should require that realtors and lender representatives who work with Village programs take advantage of training programs on fair housing/diversity compliance.</p>	<p>NO</p>	<p>The Village does not maintain a list of realtors/lenders for the First Time Buyer's Program. This is intended to give flexibility to eligible applicants in selecting the best loan package and home for their needs.</p> <p>Requiring proof of fair housing training may cause delays in the closing process. The Village will not require realtors and lender representatives to provide proof of fair housing training.</p>
<p><i>B. Impediment: No Existing Method or Designated Staff for Fair Housing Data Collection, Tracking, and Follow-Up</i></p> <p><i>Action: Formally designate a Village Staff Person or Establish a Fair Housing Function in a current position to oversee Fair Housing</i></p>		

ACTION RECOMMENDED	ACTION TO BE UNDERTAKEN	STAFF RESPONSE
<p>Recommendation #7: The Village should formally designate a Village staff person to consistently be available to address fair housing issues and conduct and coordinate fair housing activities and work with networks and service providers.</p>	<p>YES</p>	<p>The Community Planner will be designated as the staff person to address fair housing issues.</p>
<p>Recommendation #8: The Village should develop a tracking system to track and determine the disposition of housing discrimination complaints received directly or through referrals to fair housing agencies as noted in recommendation #7 above.</p>	<p>YES</p>	<p>If any fair housing calls are received, the Village typically refers the complainant to HUD. Staff will continue to do this, but will track housing complaints received and will coordinate with HUD, the Illinois Department of Human Rights, and the Chicago Area Fair Housing Alliance to track the resolution and validity of housing complaints.</p>
<p>Recommendation #9: Use existing institutional structure to annually survey agencies and organizations for status of fair housing complaints and issues and assess data on a bi-yearly basis for any needed follow-up.</p>	<p>YES (with conditions)</p>	<p>The Village agrees to survey agencies and organizations on an annual basis and will assess this data annually (instead of bi-annually) as part of the completion of the CDBG CAPER (Consolidated Annual Performance and Evaluation Report).</p>

ACTION RECOMMENDED	ACTION TO BE UNDERTAKEN	STAFF RESPONSE
<p>Recommendation #10: Conduct a mid-period assessment in year 3 of 5 of the fair housing action plan implementation schedule to take a comprehensive look at the community in light of the changes that have been made due to the implementation of the actions and in relation to changes in population, demographics, economy, legislation, or any other factors that may impact fair housing choice.</p>	<p>YES (with conditions)</p>	<p>The Village will evaluate actions undertaken and demographic data to determine whether the actions are still applicable.</p>
<p><i>C. Impediment: Lack of Fair Housing Testing to Determine Where Fair Housing Discrimination Is Taking Place</i></p> <p><i>Action: Evaluate Existing Testing Data, Determine Prevalence of Housing Discrimination, and Implement/Coordinate Fair Housing Testing as Needed</i></p>		
<p>Recommendation #11: The Village should examine data on regional fair housing testing and trends in housing discrimination, from all sources available such as HUD and the State of Illinois annually or bi-annually, to determine the prevalence of fair housing discrimination and to ascertain the need for, and feasibility of, conducting fair housing testing.</p>	<p>YES (with conditions)</p>	<p>Between 2005 and 2012, a total of 23 fair housing complaints have been reported to HUD. Half of the complaints were determined to have no cause or the complainants failed to cooperate. Between 2005 and 2012, a total of 41 complaints were made to the Illinois Department of Human Rights. The majority of these complaints were withdrawn or found to have lack of sufficient evidence. The Village will examine fair housing trends and complaints from HUD and the State of Illinois to determine whether fair housing testing is necessary. This data will be examined in Year 3.</p>

ACTION RECOMMENDED	ACTION TO BE UNDERTAKEN	STAFF RESPONSE
<p>Recommendation #12: The Village should research existing HUD, or other funding opportunities, for fair housing testing activities and the training necessary to gain expertise in the oversight of a fair housing testing program.</p>	<p>YES</p>	<p>If the Village determines that testing is necessary based on the analysis in Recommendation #11, the Village will research funding opportunities to contract out this service. If a need exists, testing will likely occur in Year 4 or 5. It should be noted that Fair Housing activities are eligible CDBG expenses.</p>
<p><i>D. Impediment: Inadequate Information and Awareness of the Village's Housing Programs, Particularly for Elderly and Minorities</i> <i>Action: Improve Marketing and Access to Information on the Village's Housing Programs</i></p>		
<p>Recommendation #13: Provide housing program information in other languages such as Spanish and include language that information can be provided in other languages for persons with Limited English Proficiency or persons with disabilities such as the hearing impaired if requested.</p>	<p>YES</p>	<p>The Village will provide CDBG program materials, such as the First Time Buyer's Program and Residential Rehabilitation Loan Program in different languages.</p>

ACTION RECOMMENDED	ACTION TO BE UNDERTAKEN	STAFF RESPONSE
<p>Recommendation #14: Establish an Affirmative Marketing plan for the Village’s housing programs to help increase awareness among the protected classes including the use of ethnic and community newspapers, television and radio. The Schaumburg Township Library has a list of existing community groups that can be used as a resource.</p>	<p>NO</p>	<p>The Village will provide information in other languages (as recommended in Recommendation #13) and actively distribute information where protective classes are more likely to see it. This includes locations such as Townships, Senior Centers, Libraries, Churches, etc.</p>
<p><i>E. Impediment: Lack of Affordable Housing in the Village of Schaumburg Action: Expand Strategies to Increase Affordable Housing Stock</i></p>		
<p>Recommendation #15: Continue to fund affordable housing needs using CDBG funds, and leverage as far as possible, those funds with private sector funds and other government funds to increase the variety and affordability of housing suitable for different type of households.</p>	<p>NO</p>	<p>The limited availability of large parcels of land will not allow for scattered site rental housing. Additionally, the Village already has a good mix of housing types, including rental housing.</p>

ACTION RECOMMENDED	ACTION TO BE UNDERTAKEN	STAFF RESPONSE
<p>Recommendation #16: Research the development of an Affordable Housing Strategy for the Village which may include actions such as amending zoning codes and seeking funding sources.</p>	<p>NO</p>	<p>Per the state affordability rate, the Village has a rate of 23.9% of affordable housing units. Staff does not believe that an affordable housing strategy is necessary at this time.</p>
<p><i>F. Impediment: Potential Discouragement of Group Homes and Institutional Housing in Residential Districts.</i> <i>Action: Review and revise current zoning and land use requirements to ensure that housing choices are not limited for Village residents.</i></p>		
<p>Recommendation #17: Assess and consider revising the zoning code to provide for more inclusive development of housing for persons with disabilities by removing or lowering the minimum distance between group homes of 1,320 feet for single family residential districts and 600 feet for multi-family residential areas.</p>	<p>YES</p>	<p>Staff believes that this requirement is necessary so that group homes are not clustered in one specific area; however, Staff will assess whether the Village's standards are overly burdensome.</p>
<p>Recommendation #18: The Village should expand opportunities for the siting of group homes and allow the establishment of group homes that function as residential uses in residential zones consistent with similar residential uses.</p>	<p>YES (with conditions)</p>	<p>Staff believes that Special Use should still be required for group homes to protect the integrity of neighborhoods. Staff is willing to assess the Village's current standards.</p>

ACTION RECOMMENDED	ACTION TO BE UNDERTAKEN	STAFF RESPONSE
<p>G. Impediment: The Village’s cap on the number of unrelated persons sharing a home may limit the availability and increase the cost of housing for low-income persons.</p> <p>Action: Review current zoning and land use requirements to ensure that housing choices are not limited for persons in protected classes.</p>		
<p>Recommendation #19: The Village should consider revising the definition of family so that it does not differentiate between related and unrelated persons and remove the limit on the number of persons that may constitute a family and use the maximum number of occupants permitted in a dwelling in order to prevent overcrowding and protect their health and safety.</p>	<p>YES</p>	<p>Staff will assess whether the Village requirements are overly burdensome.</p>
<p>H. Impediment: Inadequate planning to meet the needs of Village residents protected by the FHA.</p> <p>Action: Collect demographic data for members of the protected classes utilizing various sources including the U.S. Census as well as local data collected by the Village and non-profit agencies.</p>		
<p>Recommendation #20: The Village should ensure that it includes more extensive demographic data in its planning documents to ensure that protected persons are not excluded or neglected when communities make plans that involve housing related issues</p>	<p>YES</p>	<p>Staff agrees to include demographic data in planning documents.</p>
<p>I. Impediment: Land use designations and building codes may limit the availability of affordable housing choices; and focus multifamily housing to certain neighborhoods.</p> <p>Action: Review current zoning and land use requirements, consider universal design features and promote inclusionary zoning incentives to ensure that affordable housing choices are not limited.</p>		

ACTION RECOMMENDED	ACTION TO BE UNDERTAKEN	STAFF RESPONSE
<p>Recommendation #21: Encourage new multi-family residential developments to increase the supply, variety, and affordability of housing types in the Village.</p> <p>Provide information to potential developers about different funding sources that promote affordable housing.</p>	<p>YES (with conditions)</p>	<p>Staff will provide information to potential developers and existing multi-family developments about different funding sources that promote affordable housing.</p>
<p>Recommendation #22: Ensure that minimum accessibility standards are being adhered to in new developments through enforcement of building codes and explore the use of Universal Design concepts.</p>	<p>NO</p>	<p>The Village defers to the State of Illinois Americans with Disability Act for compliance with accessibility standards. Staff does not believe that Universal Design concepts are necessary in the Village.</p>
<p>Recommendation #23: The Village should consider the provision of inclusionary zoning and incentives it provides to further promote the development of affordable housing.</p>	<p>NO</p>	<p>Given that the state has identified that 23.9% of units are affordable in the Village, Staff does not believe that inclusionary zoning is necessary.</p>
<p><i>J. Impediment: High loan denials among members of the protected classes and limited access to finance due to high credit scores restrict the supply of housing opportunities.</i></p> <p><i>Action: Pursue varying and alternative financing to meet the need for more housing for the protected classes.</i></p>		

ACTION RECOMMENDED	ACTION TO BE UNDERTAKEN	STAFF RESPONSE
<p>Recommendation #24: The Village should initiate discussions with area lenders to identify more diverse loan products that use alternative credit history and leverage HOME and CDBG funding.</p>	<p>YES</p>	<p>Staff will meet with area lenders to learn more about available programs. The Village will also continue to participate in the HOME Consortium.</p>
<p>Recommendation #25: The Village should investigate and consider accessing non-traditional funding sources such as local community development financial intermediaries and community development financial institutions (CDFI) and Habitat for Humanity to expand the supply of affordable housing.</p>	<p>NO</p>	<p>There are no local CDFIs and Habitat for Humanity does not undertake projects in this area. The Village will continue to participate in the HOME Consortium.</p>
<p>Recommendation #26: The Village should research the use of Section 108 loan funds through its CDBG allocation in order to leverage funding to promote housing and also to assemble land for partnering with a capable for-profit or non-profit developer.</p>	<p>NO</p>	<p>The Village will not pursue Section 108 loan funds through CDBG. Section 108 is the loan guarantee provision of the CDBG program allowing communities to borrow against their future CDBG allocations. Due to the limited allocation the Village receives and limited land available, Staff will not pursue Section 108 funds.</p>

ACTION RECOMMENDED	ACTION TO BE UNDERTAKEN	STAFF RESPONSE
<p><i>K. Impediment: Inadequate public transportation between employment centers and affordable housing restricts fair housing choice.</i></p> <p><i>Action: Expand current transportation choices through other funding sources and pursuing regional strategies.</i></p>		
<p>Recommendation #27: The Village should continue and expand, where possible, its current proactive and innovative approaches to address public transportation.</p>	<p>YES</p>	<p>The Village will continue its current approach to public transportation issues. Staff will evaluate possibilities for expansion and existing public transportation and ridership increase.</p>
<p>Recommendation #28: The Village should provide information about subsidized transportation programs in several languages so that limited English proficient (LEP) persons are aware of and can take advantage of such programs.</p>	<p>YES</p>	<p>Staff will provide information about subsidized transportation programs in different languages.</p>

Appendix 6 – Glossary of Acronyms

GLOSSARY OF ACRONYMS VILLAGE OF SCHAUMBURG AI

1. ACS: American Community Survey
2. ADA: American with Disabilities Act
3. AFFH: Affirmatively Furthering Fair Housing
4. AI: Analysis of Impediments to Fair Housing Choice.
5. ASK: ASK Development Solutions
6. CAFHA: Chicago Area Fair Housing Alliance
7. CAPER: Consolidated Annual Performance & Evaluation Report
8. CCC: Community Crisis Center
9. CDAP: Community Development Assistance Program
10. CDBG: Community Development Block Grant Program
11. CDFIC: Community Development Financial Institutions
12. CEDA: Community & Economic Development Association of North West County
13. CFMHP: Crime Free Multi Housing Program
14. CHAS: Comprehensive Housing Affordability Strategy
15. CILA: Community Integrating Living Arrangement
16. CMAP: Chicago Metropolitan Agency for Planning
17. CNT: Center for Neighborhood Technology
18. CPTED: Crime Prevention Through Environmental Design
19. CRA: Community Reinvestment Act
20. CTA: Chicago Transit Authority
21. DASA: Division Alcoholism & Substance Abuse
22. DDD: Illinois Department of Human Services - Division of Developmental Disabilities
23. DMH: Illinois Department of Health Services – Division of Mental Health
24. DRS: Illinois Division of Rehabilitation Services
25. DRT: Dial-A-Ride Transportation
26. DVRT: Domestic Violence Response Team
27. FFIEC: Federal Financial Institution Examination Council
28. FHA: Federal Fair Housing Act of 1968 as amended.
29. FHA: Federal Housing Administration
30. FHEO: HUD Office of Fair Housing & Equal Opportunity
31. FMR: Fair Market Rent

32. FRB:	Federal Reserve System
33. HACC:	Housing Authority of Cook County
34. HMDA:	Home Mortgage Disclosure Act
35. HOME:	Home Investment Partnership Program
36. HUD:	The US Department of Housing and Urban Development
37. IAHDC:	Illinois Affordable Housing Assistance Tax Credits Program
38. ICFDD:	Intermediate Care Facilities for the Developmentally Disabled
39. IDA:	Individual Development Accounts
40. IDHFS:	Illinois Department of Health Care & Family Services
41. IDHR:	Illinois Department of Human Rights
42. IDOA:	Illinois Department on Aging
43. IHDA:	Illinois Housing Development Authority
44. LAA:	Local Administering Agency
45. LEP:	Limited English Proficiency
46. LIHTC:	Low Income Housing Tax Credits
47. LSN:	Life Services Network of Illinois
48. LTOS:	Long Term Operating Support Program
49. MSA:	Metropolitan Statistical Area
50. NSP:	Neighborhood Stabilization Program
51. NWHP:	North West Housing Partnership
52. OCC:	Office of the Comptroller of the Currency
53. OTS:	Office of Thrift Supervision
54. PHA:	Public Housing Authority
55. RHS:	Rental Housing Support Program
56. RHS:	Rural Housing Services
57. RTA:	Regional Transportation Authority
58. SODC:	State Operating Development Centers
59. USDA:	US Department of Agriculture
60. VA:	Veterans Administration
61. WINGS:	Women In Need Growing Stronger

Appendix 7 – Public Comments

No public comments on the plan were received during the 30-day comment period.

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