

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



FY 2020 - 2024

Submitted to the U.S. Department of HUD on Month, Day, 2020

PREPARED BY:

City of Waukegan
Community Development Block Grant Department
100 N. MLK Jr. Avenue 3rd Floor
Waukegan, IL 60085

Urban Design Ventures, LLC
212 E. 7th Avenue
Homestead, PA 15120



REPORT FAIR HOUSING DISCRIMINATION



Fair Housing Project
(855)-347-7757

The Fair Housing Project at Prairie State Legal Services investigates and challenges cases of discrimination by housing providers. The Project also helps clients resolve fair housing disputes and conducts community legal education on fair housing rights and responsibilities.

The Fair Housing Project receives special funding to serve people in Winnebago, Boone, Lake, and McHenry counties. There are no income limits for potential clients. If you live in one of those counties and want to know more about filing a fair housing complaint, please call The Fair Housing Project at 855-FHP-PSLS (855-347-7757). If you live in a different county, call your local Prairie State office to see what fair housing services may be available to you.



Table of Contents

Executive Summary.....	4
I. Introduction.....	11
II. Background Data.....	13
A. Population, Race, Ethnicity, and Religion:.....	13
B. Households:.....	22
C. Income and Poverty:.....	28
D. Housing Profile:.....	39
E. Housing Costs:.....	43
F. Household Housing Problems:.....	47
G. Racial and Ethnic Housing Problems:.....	51
H. Segregation.....	56
I. Disabled Households:.....	59
III. Review/Update to Original Plan.....	61
A. Summary of Impediments Waukegan:.....	61
IV. Impediments to Fair Housing 2019.....	65
A. Fair Housing Complaints:.....	65
B. Public Sector:.....	77
C. Public Sector:.....	97
D. Citizen Participation:.....	139
V. Actions and Recommendations.....	140
VI. Maps.....	143
VII. Appendix.....	144



Executive Summary

The City of Waukegan, Illinois is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) Program. In addition, the City of Waukegan is a member of the Lake County HOME Consortium, which is administered by Lake County. In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to "affirmatively further fair housing," each entitlement community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice.

On behalf of the City of Waukegan, Lake County prepared an Analysis of Impediments to Fair Housing Choice in 2015. The City has now prepared this 2020-2024 Analysis of Impediments to Fair Housing Choice. The analysis focuses on the status and interaction of six (6) fundamental conditions within the community:

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

The Fair Housing Act was originally passed in 1968 to protect buyers and renters from discrimination from sellers and landlords by making it unlawful to refuse the sale or rental of a property to persons included under the category of a protected class. The Fair Housing Act prohibits discrimination against persons based on their **race, color, religion, sex, national origin, disability, or familial status** in the sale, rental, and financing of housing.



The methodology employed to undertake this Analysis of Impediments included:

- **Research**
 - Review of the 2014 Regional Analysis of Impediments to Fair Housing Choice, Zoning Ordinance, 1987 Comprehensive Plan, 2015-2019 Five Year Consolidated Plan, 2015-2019 Annual Action Plans and 2015-2018 Consolidated Annual Performance Evaluation Reports.
 - Review of the Housing Authorities' Five Year and Annual PHA Plans.
 - Review of the most recent demographic data for the area from the U.S. Census, which included general, demographic, housing, economic, social, and disability characteristics.
 - Review of the U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (HUD-CHAS) data.
 - Review of financial lending institutions through the Home Mortgage Disclosure Act (HMDA) database.
 - A review of the real estate and mortgage practices.
 - Home mortgage foreclosure data.

- **Interviews & Meetings**
 - Meetings and interviews were conducted with various City and County Departments; Housing Authorities; community, social service, and advocacy agencies, as well as public meetings.
 - Follow up phone calls were made when an organization neither returned a survey nor attended a meeting.

- **Analysis of Data**
 - Low- and moderate-income areas were identified and mapped.
 - Concentrations of minority populations were identified and mapped.
 - Concentrations of owner-occupied and renter-occupied housing units were identified and mapped.
 - Fair housing awareness in the community was evaluated.
 - Distribution by location of public and assisted housing units were analyzed and mapped.
 - The location of CDBG expenditures throughout the area were analyzed.
 - CDBG/HOME Five Year Goals and Objectives were reviewed.



- **Potential Impediments**
 - Public sector policies that may be viewed as impediments were analyzed.
 - Private sector policies that may be viewed as impediments were analyzed.
 - The status of previously identified impediments was analyzed.

- **Citizen Participation**
 - A public survey was publicized by the various participating jurisdictions, public meetings were held, and copies of the draft AI were placed on public display to encourage citizen input.
 - The public survey was available at the following link <https://surveymonkey.com/s/WAUKCDBG> from September 16, 2019 until February 28, 2020.

- **Key Findings**
 - The City of Waukegan has a younger population. According to the 2011-2015 American Community Survey, Waukegan has a median age of 31.2 years old. This is younger than the median age of the State of Illinois (37.7) and the United States (37.6).
 - Homeownership rates in the City are declining. According to the 2000 census and the 2011-2015 American Community Survey, from 2000 to 2015 ownership rates declined by 10%.
 - Inflation rates are rising faster than housing costs. According to the Bureau of Labor Statistics, the cumulative inflation rate from 2000 to 2015 was 37.5%. According to the 2000 Census and 2011-2015 American Community Surveys, the monthly renter costs increased by 26.7%, while owner costs increased by 29.1%.
 - The City has an aging housing stock. According to the 2011-2015 American Community Survey, 72% of the available stock were built prior to the year 1979.
 - The City needs more large family housing options. According to the 2011-2015 American Community Survey, 33.9% of all households in the city consist of 4 or more persons. The current housing stock cannot meet the demand for large family housing, because only 16.4% are 4 or more bedroom units.



- There has been a significant decrease in the number of building permits issued. Since 2000, there has been an average of 99 permits issued per year, however only 387 permits have been issued since 2006 (average of 30 per year).
- Households incomes have increased at a slower rate than home prices. According to the 2000 Census and 2011-2015 American Community Survey, from 2000 to 2015, the median income only increased 7.7% while the monthly renter costs increased by 26.7%, while owner costs increased by 29.1% over the same amount of time.
- Waukegan is a diverse city. According to the University of Virginia's racial dot map and PolicyMap's Theil Index and Diversity Index, the City has high levels of heterogeneity and low levels of segregation.



The City of Waukegan's FY 2020-2024 Analysis of Impediments to Fair Housing Choice has identified the following impediments, goals, and strategies to affirmatively further fair housing.

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

There is a need to improve the knowledge and understanding concerning the rights of individuals, families, and members of the protected classes in regard to the Fair Housing Act (FHA) and awareness of discriminatory practices.

Goal: Improve the knowledge and awareness of both the public and the local officials of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing in the community.

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

- **1-A:** Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-B:** Continue to educate and make realtors, bankers, and housing providers aware of their responsibilities under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-C:** Continue to support Fair Housing organizations and legal advocacy groups to assist persons who may be victims of housing discrimination and/or not aware of how to file a housing complaint.
- **1-D:** Continue to identify Limited English Proficiency (LEP) persons to provide the specific language assistance that is needed.
- **1-E:** Continue to partner with regional jurisdictions and housing providers to encourage fair housing choice throughout the City.

- **Impediment 2: Continuing Need for Affordable Housing**

One out of every two renter households in the City is paying over 30% of their monthly incomes on housing costs. One out of every three owner households with a mortgage is paying over 30% of their monthly income on housing costs.

Goal: Increase the supply of affordable housing by new construction and rehabilitation of various types of housing that is affordable to lower income households.

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



- **2-A:** Continue to support and encourage private developers and non-profit housing providers to create, through construction or rehabilitation, affordable and mixed-income housing located outside of areas of lower income and minority concentrations.
- **2-B:** Continue to support and encourage the rehabilitation of existing housing units in the City to become decent, safe, sound and affordable housing for households below 80% AMI.
- **2-C:** Continue to support homebuyer education and training programs to improve homebuyer awareness.
- **2-D:** Provide federal, state and local funding in response to HMDA data discrimination patterns to support a higher loan to value ratio for minority homebuyers.
- **2-E:** Encourage affordable housing developers to prioritize the development of housing for families of 5+ members.

- **Impediment 3: Continuing Need for Accessible Housing**

There is a lack of accessible housing units in the City of Waukegan as the supply of accessible housing has not kept pace with the demand of individuals desiring to live independently.

Goal: Increase the supply of accessible housing by new construction and rehabilitation of accessible housing for persons with disabilities.

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

- **3-A:** Continue to promote the need for accessible housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is accessible to persons with disabilities.
- **3-B:** Continue to provide financial assistance for accessibility improvements to owner-occupied housing units to enable the elderly and/or persons with disabilities to remain in their existing homes.
- **3-C:** Continue to enforce the ADA and Fair Housing requirements for landlords to make “reasonable accommodations” to their rental properties so they become accessible to tenants with disabilities.

- **Impediment 4: Regional Approach to Fair Housing**

There is a need for a regional collaborative approach to affirmatively further fair housing in the area.



Goal: Form a regional cooperative fair housing consortium to affirmatively further fair housing in the area.

Strategies: In order to meet this goal, the following actions should be undertaken:

- **4-A:** Form a regional fair housing consortium to encourage fair housing choice throughout the area.
- **4-B:** Through the regional fair housing consortium create regional fair housing activities and projects.
- **4-C:** Work collaboratively with affordable housing developers/providers to ensure affirmative fair marketing plans and de-concentration policies are created and implemented.



I. Introduction

HUD defines “fair housing choice” as:

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

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

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

HUD-FHEO suggests that communities conducting a fair housing analysis consider the policies surrounding “visitability,” the Section 504 Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act. Housing that is “visitable” has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. “Visitable” housing has at least one accessible means of ingress/egress, and all interior and bathroom doorways have as a minimum a 32-inch clear opening. Section 504 of the Rehabilitation Act (24 CFR Part 8), known as “Section 504” prohibits discrimination against persons with disabilities in any program receiving Federal funds. The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. The Fair Housing Act requires property owners to make reasonable modifications to units



and/or public areas in order to allow a disabled tenant to make full use of the unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant full use of the unit. In regard to local zoning ordinances, the Fair Housing Act prohibits local government from making zoning or land use decisions, or implementing land use policies that exclude or discriminate against persons of a protected class.

The City of Waukegan previously prepared a Regional Analysis of Impediments to Fair Housing Choice in 2014. This Analysis of Impediments to Fair Housing Choice will outline progress that has been made since the previous Analysis of Impediments, explore the continuation of these impediments where necessary, and identify any new impediments to fair housing choice. Furthermore, this Analysis of Impediments will bring the City of Waukegan into sequence with their FY 2020-2024 Five Year Consolidated Plans. The document is designed to act as a planning tool, providing the participating entitlement communities with the necessary framework to strategically reduce any identified impediments to fair housing choice over the next five (5) years, and continue to make modifications based on events and activities in the community during this time period.



II. Background Data

The site where Waukegan sits was first visited by Pere Marquette in 1673. This resulted in French traders establishing a trading post in a small, Potawatomi Indian settlement named “Small Fort”. In 1829, the Potawatomi – through a treaty – ceded their land to the United States government. By 1849, The settlement had seen a surge in population. This led the settlement to change of name from Little Fort to the name Waukegan. Waukegan is the Potawatomi word for “fort” or “trading post”.

Waukegan continued to grow due to its location as a port city and the creation of the Illinois Parallel Railroad. These factors enabled the settlement to become a manufacturing hub. Ship and wagon production, agriculture, meat packing, and beer brewing were all important to the growth of Waukegan. This economic expansion helped Waukegan’s population grow to 2,500 residents and the incorporation of the town of Waukegan in 1859.

From 1890 to 1930, Waukegan received experienced a large growth in population. Political unrest and wars in Europe, led to a large influx of immigrants from Southeastern Europe and Scandinavia. Additionally, many African Americans from the south moved north to Waukegan in search of economic opportunity. In the late 20th century, the City of Waukegan also experienced a boom in population of Latino and Hispanic residents.

Waukegan continued to be an industrial hub until the end of the 20th century. With many people leaving the City for a more suburban environment and the overall shift in labor markets, major industries have closed. In 2003, Waukegan adopted a redevelopment Master Plan, A 21st Century Vision for Waukegan's Downtown and Lakefront to encourage commercial, entertainment, and employment development. The City’s redevelopment is focused on its diverse community makeup and its urban suburban lifestyle.

A. Population, Race, Ethnicity, and Religion:

Population

According to the 2011-2015 American Community Survey, the total population for the City of Waukegan was 88,570 in 2015. At the time of the 2010 Census, the population was 89,078, and at the time of the 2000 Census, the City of Waukegan had a population of 87,901. These numbers illustrate a relatively stable population.



The U.S. Census Bureau has used the population at the time of the 2010 Census to make annual estimates as to the change in population. The City’s population increased by an estimated 1,479 people between 2000 and 2015, or 0.76%. In 2015, there were 44,639.28 females (50.4%) and 43,931 males (49.6%) living in the City of Waukegan.

Source: 2000 & 2010 U.S. Census and 2011-2015 ACS

Race

The following table highlights the racial composition of the City of Waukegan shown in the 2000 U.S. Census and in 2015.

**Table II-1 – Race and Hispanic or Latino Population
In the City of Waukegan, IL**

Race and Hispanic or Latino	2000 U.S. Census		2011-2015 American Community Survey	
	#	%	#	%
Total	87,901	100.00%	88,570	100.00%
One race	84,822	96.5%	85,382	96.4%
White Alone	44,073	50.1%	57,662	65.1%



Black or African American	16,890	19.2%	15,103	17.1%
American Indian and Alaska Native	471	0.5%	234	0.3%
Asian	3,146	3.6%	4,314	4.9%
Native Hawaiian and Other Pacific Islander	57	0.1%	18	0.0%
Some other race	20,185	23.0%	8,094	9.1%
Two or More Races	3,079	3.5%	3,145	3.6%
Hispanic or Latino	39,396	44.8%	47,612	53.8%

Source: 2000 U.S. Census and 2011-2015 ACS

The most common race identified in the City of Waukegan in 2000 was White Alone with 44,073 residents comprising 50.1% of the population. The second most common race identified in the City of Waukegan in 2000 was Hispanic of Latino with 39,396 residents comprising 44.8% of the population.

The most common race identified in the City of Waukegan in 2015 was White Alone with 57,662 residents comprising 65.1% of the population. The second most common race identified in the City of Waukegan in 2015 was Hispanic or Latino with 47,612 residents comprising 53.8% of the population.

Ethnicity

The following table highlights the ethnicities of Waukegan residents as of 2010 and 2015.

Ethnicity and Ancestry in the City of Waukegan

Ancestry	2000 Census		2011-2015 ACS	
	#	%	#	%
Total Population	87,901	-	88,570	-
Afghan	0	0.00%	0	0.00%



Albanian	9	0.01%	15	0.02%
Alsatian	0	0.00%	0	0.00%
American	1,805	2.08%	1,060	2.08%
Arab	181	0.21%	157	0.18%
Armenian	252	0.29%	160	0.18%
Assyrian/Chaldean/Syriac	18	0.02%	0	0.00%
Australian	13	0.02%	38	0.04%
Austrian	163	0.19%	152	0.17%
Basque	35	0.04%	0	0.00%
Belgian	76	0.09%	46	0.05%
Brazilian	32	0.04%	0	0.00%
British	275	0.32%	169	0.19%
Bulgarian	20	0.02%	56	0.06%
Canadian	150	0.17%	47	0.05%
Carpatho Rusyn	0	0.00%	0	0.00%
Celtic	3	0.00%	8	0.01%
Croatian	317	0.37%	184	0.21%
Cypriot	0	0.00%	0	0.00%
Czech	170	0.20%	193	0.22%
Czechoslovakian	100	0.12%	76	0.09%



Danish	370	0.43%	252	0.28%
Dutch	447	0.52%	377	0.43%
Eastern European	20	0.02%	28	0.03%
English	2,885	3.33%	2,010	2.27%
Estonian	7	0.01%	7	0.01%
European	122	0.14%	535	0.60%
Finnish	635	0.73%	379	0.43%
French (except Basque)	1,204	1.39%	865	0.98%
French Canadian	206	0.24%	114	0.13%
German	7,568	8.74%	5,596	6.32%
German Russian	7	0.01%	0	0.00%
Greek	456	0.53%	249	0.28%
Guyanese	0	0.00%	0	0.00%
Hungarian	210	0.24%	135	0.15%
Icelander	0	0.00%	0	0.00%
Iranian	23	0.03%	77	0.09%
Irish	4,504	5.20%	3,781	4.27%
Israeli	76	0.09%	26	0.03%
Italian	2,113	2.44%	2,393	2.70%
Latvian	0	0.00%	23	0.03%



Lithuanian	525	0.61%	375	0.42%
Luxemburger	33	0.04%	75	0.08%
Macedonian	50	0.06%	53	0.06%
Maltese	0	0.00%	0	0.00%
New Zealander	0	0.00%	0	0.00%
Northern European	30	0.03%	34	0.04%
Norwegian	838	0.97%	679	0.77%
Pennsylvania German	9	0.01%	9	0.01%
Polish	2,841	3.28%	1,781	2.01%
Portuguese	79	0.09%	3	0.00%
Romanian	50	0.06%	42	0.05%
Russian	205	0.24%	232	0.26%
Scandinavian	51	0.06%	74	0.08%
Scotch-Irish	400	0.46%	118	0.13%
Scottish	619	0.71%	446	0.50%
Serbian	93	0.11%	78	0.09%
Slavic	52	0.06%	24	0.03%
Slovak	93	0.11%	40	0.05%
Slovene	444	0.51%	331	0.37%
Soviet Union	0	0.00%	0	0.00%



Subsaharan African	827	0.95%	284	0.32%
Swedish	1,287	1.49%	615	0.69%
Swiss	94	0.11%	247	0.28%
Turkish	0	0.00%	17	0.02%
Ukrainian	78	0.09%	42	0.05%
Welsh	197	0.23%	118	0.13%
West Indian (except Hispanic groups)	722	0.83%	695	0.78%
Yugoslavian	120	0.14%	31	0.04%
Other groups	52,428	60.54%	65,338	73.77%
Unclassified or not reported	N/A	N/A	7,387	8.34%

Source: 2000 Census and 2011-2015 ACS

The most common specific ancestral group identified in the City of Waukegan in 2000 was “German” with 7,568 residents comprising 8.74% of the population. The second most common specific ancestral group identified in the City of Waukegan in 2000 was “Irish” with 4,504 residents comprising 5.20% of the population.

The most common specific ancestral group identified in the City of Waukegan in 2015 was “German” with 5,596 residents comprising 6.32% of the population. The second most common specific ancestral group identified in the City of Waukegan was “Irish” with 3,781 residents comprising 4.27% of the population.

The majority of respondents identified as, “Other Groups” and “Unclassified or Not Reported.” Other Groups accounted for 60.54% of the population in 2000 and 73.77% in 2015. The 2000 Census did collect data on “Unclassified or not reported”, but this group made up 8.34% of the population in 2015, The only notable change in proportional representation of the ancestral groups in the City of Waukegan from 2000 to 2015 was the 13.23% increase in the proportion of residents who identify as “Other Groups” (52,428 persons, or 60.54% in 2000 to 65,338 persons, or 73.77% in 2015).



Age

The following chart illustrates age distribution in the City of Waukegan at the time of the 2000 U.S. Census and 2011-2015 ACS. The Census shows that, children under 20 years of age represent 30.2% of the population; 38.2% of the population is between 20 and 44 years of age; 20.5% of the population is 45 to 64; and 11.2% of the population is 65 years of age and older. The ACS data shows that, children under the age of 20 represents 31.7% of the population; 36.8% of the population between 20 and 44 years of age; 23.0% of the population is between 45 and 64 years of age; and 8.60% of the population is 65 years of age and older.

Source: 2010 U.S. Census and 2013-2017 ACS

Religion

The U.S. Census does not collect data on the religious affiliations of the population in the United States. In an effort to better understand the religious affiliations of the residents of Waukegan, the Lake County data was made available by The Association of Religion Data Archives (ARDA). ARDA surveys the congregation members, their children, and other people who regularly attend religious services across the country. Although this data appears to be the most comprehensive data that is available, it is unfortunately not entirely complete as it does not accurately include traditional African American denominations, as well as a listing of non-Christian religions. The total number of regular attendees was



adjusted in 2010 (the most recent year for which data is available) to represent the population including historic African American denominations. However, the total value cannot be disaggregated to determine the distribution across denominational groups.

The table below shows the distribution of residents of Waukegan across various denominational groups, as a percentage of the population which reported affiliation with a church.

Religious Affiliation in Waukegan

	1980		1990		2000		2010	
	#	%	#	%	#	%	#	%
Evangelical Protestant	22,986	5.2%	38,822	7.5%	47,745	7.4%	84,501	12.0%
Black Protestant	NA	NA	NA	NA	NA	NA	7,824	1.1%
Mainline Protestant	50,825	11.5%	49,487	9.6%	48,105	7.5%	36,967	5.3%
Catholic	131,478	29.5%	243,350	27.7%	253,000	39.3%	211,380	30.0%
Orthodox	29	0.1%	783	0.1%	1,508	.2%	4,610	0.7%
Other	7,914	1.8%	3,444	1.5%	30,976	4.8%	33,822	4.8%
Total Adherents:	213,232	48.4%	335,886	65.0%	381,334	59.2%	379,104	53.9%
Unclaimed (% of total population)	227,140	51.6%	180,632	35%	263,022	40.8%	324,358	46.1%
Total Population	440,372	-	516,418	-	644,356	-	703,462	-

Source: The Association of Religion Data

The most common religious affiliation identified in Lake County in 1980 was “Unclaimed” with 227,140 non-adherents comprising of 51.6% of the population. The second most common religious affiliation identified in Lake County in 1980 was “Catholic” with 131,478 adherents comprising of 29.5 % of the population. The “Mainline Protestant” religious affiliation, although technically the third largest, should be noted as well as 50,825 adherents comprising of 11.5% of the population identified as “Mainline Protestant”.

The most common religious affiliation identified in Lake County in 2010 was “Unclaimed” with 324,358 non-adherents comprising of 46.1% of the population. The second most common religious affiliation identified in Lake County in 2010 was “Catholic” with 211,380 adherents comprising of 30.0% of the population. The “Evangelical Protestant” religious affiliation, although technically the third largest, should be noted as well as 84,501



adherents comprising of 12.0% of the population identified as “Evangelical Protestant”.

There were two changes in proportional representation of the religious groups in Lake County from 1980 to 2010 that were larger than 5%. First, there was a 5.5% decrease in the number of residents who identify as “Unclaimed” which included 227,140 persons, or 51.6%, in 1980 to 324,538 persons, or 46.1%, in 2010. Second, there was a 6.8% increase in the number of residents who identify as “Evangelical Protestant” which included 22,986 persons, or 5.2% in 1980 to 84,501 persons, or 12.0%, in 2010. Third, there was a 6.2% decrease in the number of residents who identify as “Mainline Protestant” which included 50,825 persons, or 11.5%, in 1980 to 36,967 persons, or 5.2%, in 2010. It is important to note that although the nominal number of “Unclaimed” and “Mainline Protestants” in Lake County increased from 1980 to 2010, the percentage of Lake County residents who identify as either “Mainline Protestant” or “Unclaimed” decreased.

B. Households:

The following table highlights the changes in the number of households and population in the area from the Year 2000 to the Year 2015.

Year	HOUSEHOLDS		POPULATION	
	#	Change	#	Change
2000	27,787	-	87,091	-
2010	28,079	1.1%	89,078	2.3%
2015	28,826	2.7%	88,570	-0.6%

Source: 2000 U.S. Census, 2010 U.S. Census, and 2010-2015 ACS

Household Tenure

According to the 2000 U.S. Census, there were 29,243 housing units in the City of Waukegan. Of these housing units, 27,787 (95.0%) were occupied and 1,456 (5.0%) were unoccupied. Of the occupied housing units, 15,697 (56.5%) were owner-occupied and 12,090 (43.5%) were renter-occupied.

According to the 2010 U.S. Census, the total number of housing units increased to 30,746; a 5.1% increase. Of the total housing units, 28,079

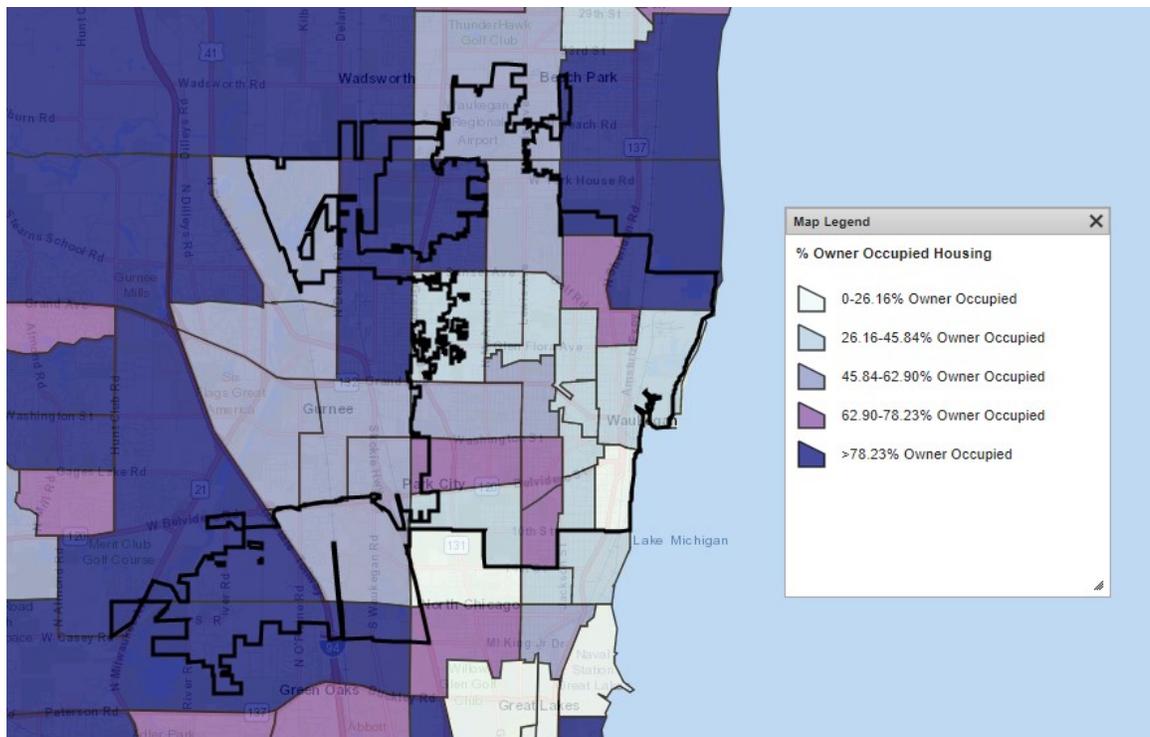


(91.3%) units were occupied and 2,667 (8.7%) were unoccupied. Of the occupied housing units in 2010, 14,959 (53.3%) were owner-occupied and 13,120 (46.7%) were renter-occupied. The increase in housing units between 2000 and 2010 was 1,030 units.

According to the 2015 ACS 5-Year estimates, there were 31,835 housing units in the City of Waukegan; a 3.5% increase. Of the total housing units, 28,826 (90.5%) were occupied and 3,009 (9.5%) were unoccupied. Of the occupied housing units, 14,067 (48.8%) were owner-occupied and 15,422 (51.2%) were renter-occupied. From 2010 to 2015 there was: a 1,089 unit increase in the total number of housing units; a 747 unit increase (3.6%) in the number of occupied units; and a 342 unit increase (12.6%) in the number of unoccupied housing units. The number of owner-occupied units decreased by 892 units (6.3%) and the number of renter-occupied units increased by 2,302 (15.1%).

The maps below illustrate the concentrations of owner-occupied and renter-occupied housing units. Higher concentrations of a particular housing type are accentuated by a darker color. In Waukegan, owner-occupied units increase towards the outskirts of the city and renter-occupied units increase towards the city center.

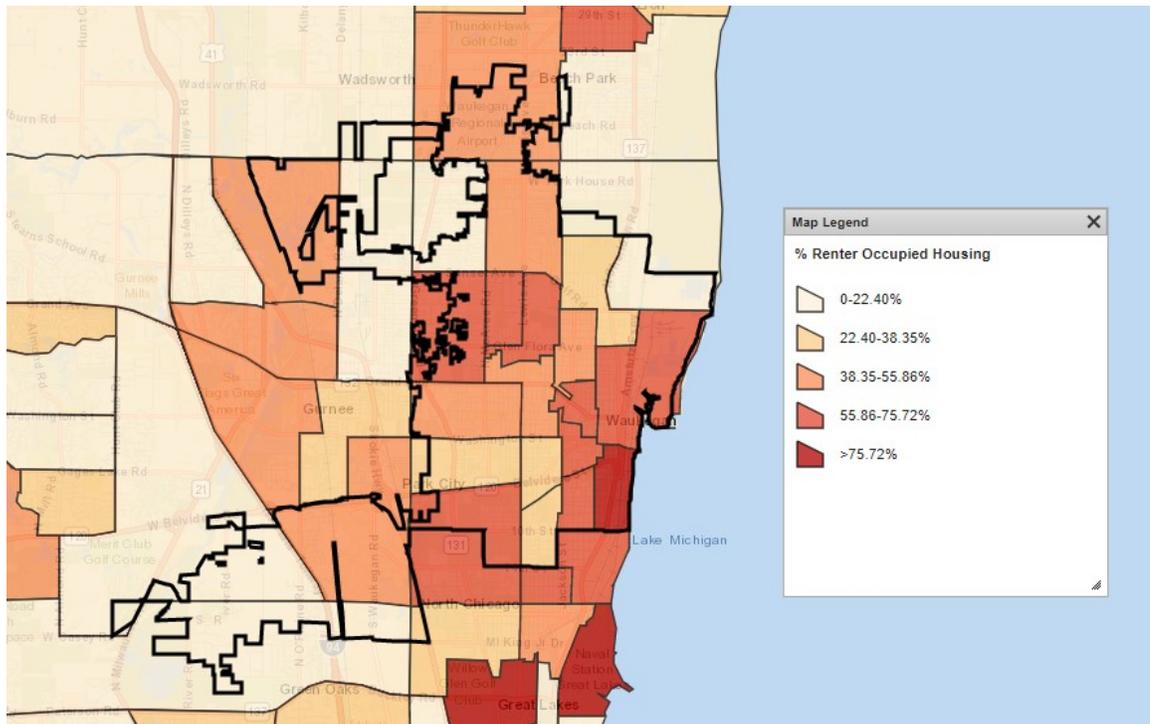
Percentage Owner-Occupied Housing



Source: HUD CPD Maps



Percentage Renter-Occupied Housing



Source: HUD CPD Maps

In 2000, the average household size was 3.09 persons and the average family size was 3.68 persons. In 2010, the average household size was 3.10 persons and the average family size was 3.66 persons. In 2015, the average household size was 3.00 persons and the average family size was 3.62 persons.



Source: 2011-2015 ACS

Significant household shifts in Waukegan included the 2,121 unit decrease in owner-occupied units from 2000 to 2015 and the 3,513 unit increase in renter-occupied units from 2000 to 2015. Family and household sizes have remained relatively constant since 2000. While owner-occupancy rates are declining, for an urban city, there still is a healthy balance between owner-occupied and renter-occupied housing units. The number of households has been slightly increasing from 2000 to 2015 at the same time as the population has also slightly increased. The increase in households and increase in population has put more housing supply pressure on the renter-occupied housing market.

Household Tenure by Race and Ethnicity

The table below compares homeowners and renters by race and ethnicity in Waukegan. White households represent 64.8% of all households, 72.7% of homeowners, and 57.2% of renters. Black or African American households represent 21.0% of all households, 13.1% of homeowners, and 28.5% of renters. Hispanic or Latino households represent 42.7% of all households, 41.9% of homeowners, and 43.4% of renters.

**Household Tenure by Race and Ethnicity in the City of Waukegan**

Cohort	2000 U.S. Census		2011-2015 ACS	
	Owner	Renter	Owner	Renter
Householder who is White alone	64.4%	46.0%	72.7%	57.2%
Householder who is Black or African American alone	14.3%	30.1%	13.1%	28.5%
Householder who is American Indian and Alaska Native alone	0.4%	0.6%	0.1%	0.6%
Householder who is Asian alone	3.6%	3.3%	4.2%	5.2%
Householder who is Native Hawaiian and Other Pacific Islander alone	0.1%	0.1%	0.0%	0.0%
Householder who is some other race alone	15.0%	16.8%	7.8%	6.3%
Householder who is two or more races	2.3%	3.1%	2.0%	2.3%
Householder who is Hispanic or Latino	29.2%	32.7%	41.9%	43.4%

Source: 2010 U.S. Census and 2013-2017 ACS

Homeownership rates continue to decline in the City. Homeowners represented 56.5% (15,697 households) of all households in 2000, 53.3% (14,959 households) of all households in 2010, and 48.8% (14,067 households) of all households in 2015. In response, rental rates increased in the City. Renters represented 43.5% (12,090 households) of all households in 2000, 46.7% (13,120 households) of all households in 2010, and 52.2% (15,422 households) of all households in 2015.



Significant shifts in Waukegan include the 1,630 unit decrease in owner-occupied units from 2000 to 2015 was a 10.3% decrease and the 3,332 unit increase in renter-occupied units from 2000 to 2015 was a 21.6% increase. Additionally, there was a 1,311 unit (28.6% increase) increase in the number of Hispanic or Latino Householder owner-occupied units, a 2,576 unit (31.6% decrease) decrease in the number of not Hispanic or Latino Householder owner-occupied units, a 2,456 unit (62.1% increase) increase in the number of Hispanic or Latino Householder renter-occupied units, and a 646 unit (27.3% decrease) decrease in the number of Hispanic or Latino Householder renter-occupied units.

Families

In 2000, there were a total of 27,787 households in Waukegan. Non-family households comprised 30.0% (8,342 households) of all households. In 2010, there were a total of 28,079 households, an increase of 292 households, and the percentage of non-family households had decreased to 28.6% (8,034 households). In 2015, there were a total of 28,826 households, of which 30.3% (8,737 households) were non-family households. The total number of households in Waukegan increased by 747 households from 2010 to 2015, as did the total number of non-family households, an increase of 3.2% (703 households). A non-family household is defined as a householder living alone or with others not related by family.

In 2015, married-couple family households comprised 43.4% of all households, Nonfamily households comprised 30.3% of all households, female householders with no husband present comprised 19.3% of all households, and male householders with no wife present comprised 6.9% of all households in the City. The chart below illustrates the breakdown of households by type in the City of Waukegan as of 2015 using data from the 2011-2015 ACS.



Source: 2011-2015 ACS

C. Income and Poverty:

Household Income

The median household income for the City of Waukegan increased by 8.3% over the time period of 2000 to 2015 from \$42,335 in 2000 to \$45,845 in 2015.

The median household income for Lake County increased by 16.5% over the same time period from \$66,953 in 2000 to \$78,026 in 2015

The median household income for the State of Illinois increased by 24.3% over the same time period from \$46,304 in 2010 to \$57,574 in 2015.

The table below compares the distribution of household income according to the 2000 Census and the 2011-2015 American Community Survey.

**Household Income in Waukegan, IL**

Items	2000 Census		2011-2015 ACS	
	Number of Households	Percentage	Number of Households	Percentage
Total Households	27,787	-	28,826	-
Less than \$10,000	522	3.7%	2,459	8.5%
\$10,000 to \$19,999	799	5.6%	3,282	11.4%
\$20,000 to \$34,999	2,014	14.2%	5,554	19.3%
\$35,000 to \$49,999	2,543	18.0%	4,217	14.6%
\$50,000 to \$74,999	3,838	27.1%	5,685	19.7%
\$75,000 to \$99,999	2,214	15.6%	3,147	10.9%
\$100,000 to \$149,999	1,637	11.6%	2,770	9.6%
\$150,000 or more	586	4.1%	1,712	5.9%
Median Household Income	\$42,335	-	\$45,845	-

Source: 2000 Census and 2011-2015 ACS

The Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs including the Public Housing, Section 8 project-based, Section 8 Housing Choice Voucher, Section 202 housing for the elderly, and Section 811 housing for persons with disabilities programs. HUD develops income limits based on Median Family Income estimates and Fair Market Rent area definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county.

The Median Income for a family income in the City of Waukegan was \$45,845 for 2015.

The table below identifies the FY 2019 HUD Income Limits applicable to the City of Waukegan which is a part of the Chicago-Joliet-Naperville, IL HUD Metro FMR Area.

**FY 2019 Income Limits for Chicago-Joliet-Naperville, IL HUD Metro FMR Area**

Income Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low (30%) Income Limits	\$18,750	\$21,400	\$24,100	\$26,750	\$30,170	\$34,590	\$39,010	\$43,430
Very Low (50%) Income Limits	\$31,200	\$35,650	\$40,100	\$44,550	\$48,150	\$51,700	\$55,250	\$58,850
Low (80%) Income Limits	\$49,950	\$57,050	\$64,200	\$71,300	\$77,050	\$82,750	\$88,450	\$94,150

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

On February 14, 2019, HUD CPD-19-02 Notice that updated the Department's Low- and Moderate-Income Summary Data (LMISD) based on the American Community Survey 2011-2015 5-year estimates (2015 ACS). These data will replace the prior LMISD based on the American Community Survey 2006-2010 5-year estimates (2010 ACS) for the purposes of demonstrating compliance with the CDBG National Objective of providing benefit to low- and moderate-income persons on an area basis ("Area Benefit" or LMA). The table below highlights the current low- and moderate-income population in the City of Waukegan. The block groups that have a population of more than 51% low- and moderate-income are **highlighted and bold**. The City of Waukegan has an overall low- and moderate-income population of 54.85%.



Low- and Moderate-Income Population FY 2019 for Waukegan, IL

PLACE	COUNTY	CT	BG	LMI	TOT POP	PERCENT
Waukegan	Lake County	860400	1	1215	2780	43.71%
Waukegan	Lake County	860400	2	950	1100	86.36%
Waukegan	Lake County	860400	3	310	1425	21.75%
Waukegan	Lake County	860600	1	1240	1990	62.31%
Waukegan	Lake County	860600	2	80	1590	5.03%
Waukegan	Lake County	860600	3	775	980	79.08%
Waukegan	Lake County	860600	4	1090	2465	44.22%
Waukegan	Lake County	861504	1	1305	2660	49.06%
Waukegan	Lake County	861504	2	835	1325	63.02%
Waukegan	Lake County	861504	3	440	1670	26.35%
Waukegan	Lake County	861504	4	750	2160	34.72%
Waukegan	Lake County	861506	1	905	1465	61.77%
Waukegan	Lake County	861506	2	725	3229	22.45%
Waukegan	Lake County	861506	3	340	820	41.46%
Waukegan	Lake County	861507	1	645	1870	34.49%
Waukegan	Lake County	861507	2	390	1120	34.82%
Waukegan	Lake County	861509	1	220	1240	17.74%
Waukegan	Lake County	861509	2	1455	2580	56.40%
Waukegan	Lake County	861510	1	310	820	37.80%
Waukegan	Lake County	861510	2	470	1280	36.72%
Waukegan	Lake County	861510	3	1090	2800	38.93%
Waukegan	Lake County	861603	1	325	2140	15.19%
Waukegan	Lake County	861603	2	345	2885	11.96%
Waukegan	Lake County	861603	3	160	630	25.40%
Waukegan	Lake County	861701	1	575	1300	44.23%
Waukegan	Lake County	861701	2	245	575	42.61%
Waukegan	Lake County	861702	1	620	1005	61.69%
Waukegan	Lake County	861702	2	680	2575	26.41%
Waukegan	Lake County	861702	3	320	570	56.14%
Waukegan	Lake County	861803	1	1080	2710	39.85%
Waukegan	Lake County	861803	2	2015	3340	60.33%
Waukegan	Lake County	861803	3	275	425	64.71%
Waukegan	Lake County	861804	1	1905	2310	82.47%
Waukegan	Lake County	861804	2	645	1090	59.17%
Waukegan	Lake County	861901	1	1020	1635	62.39%
Waukegan	Lake County	861901	2	485	965	50.26%
Waukegan	Lake County	861901	3	805	1530	52.61%
Waukegan	Lake County	861902	1	2185	2875	76.00%



Waukegan	Lake County	861902	2	300	515	58.25%
Waukegan	Lake County	861902	3	1210	1600	75.63%
Waukegan	Lake County	861902	4	940	980	95.92%
Waukegan	Lake County	862000	1	660	915	72.13%
Waukegan	Lake County	862000	2	675	1105	61.09%
Waukegan	Lake County	862000	3	1095	1630	67.18%
Waukegan	Lake County	862000	4	1225	1665	73.57%
Waukegan	Lake County	862100	1	935	1210	77.27%
Waukegan	Lake County	862100	2	925	1190	77.73%
Waukegan	Lake County	862100	3	505	945	53.44%
Waukegan	Lake County	862100	4	1190	1585	75.08%
Waukegan	Lake County	862200	1	755	1585	47.63%
Waukegan	Lake County	862200	2	1150	1670	68.86%
Waukegan	Lake County	862300	1	695	815	85.28%
Waukegan	Lake County	862300	2	1090	1285	84.82%
Waukegan	Lake County	862300	3	980	1060	92.45%
Waukegan	Lake County	862401	1	1525	1850	82.43%
Waukegan	Lake County	862401	2	1620	1905	85.04%
Waukegan	Lake County	862402	1	750	885	84.75%
Waukegan	Lake County	862402	2	995	1250	79.60%
Waukegan	Lake County	862402	3	940	1230	76.42%
Waukegan	Lake County	862501	1	1505	2335	64.45%
Waukegan	Lake County	862501	2	840	1210	69.42%
Waukegan	Lake County	862502	1	760	1080	70.37%
Waukegan	Lake County	862502	2	835	1120	74.55%
Waukegan	Lake County	862603	1	920	1065	86.38%
Waukegan	Lake County	862603	2	2385	2730	87.36%
Waukegan	Lake County	862603	3	540	1595	33.86%
Waukegan	Lake County	862603	4	955	1835	52.04%
Waukegan	Lake County	862603	5	525	1240	42.34%
Waukegan	Lake County	862604	1	1540	2345	65.67%
Waukegan	Lake County	862604	2	730	1015	71.92%
Waukegan	Lake County	862604	3	945	1520	62.17%
Waukegan	Lake County	862605	1	1380	1590	86.79%
Waukegan	Lake County	862605	2	820	1190	68.91%
Waukegan	Lake County	862605	3	1250	1395	89.61%
Waukegan	Lake County	862700	1	430	515	83.50%
Waukegan	Lake County	862700	2	1380	1715	80.47%
Waukegan	Lake County	862700	3	660	800	82.50%
Waukegan	Lake County	862700	4	530	745	71.14%
Waukegan	Lake County	862800	1	1575	1990	79.15%

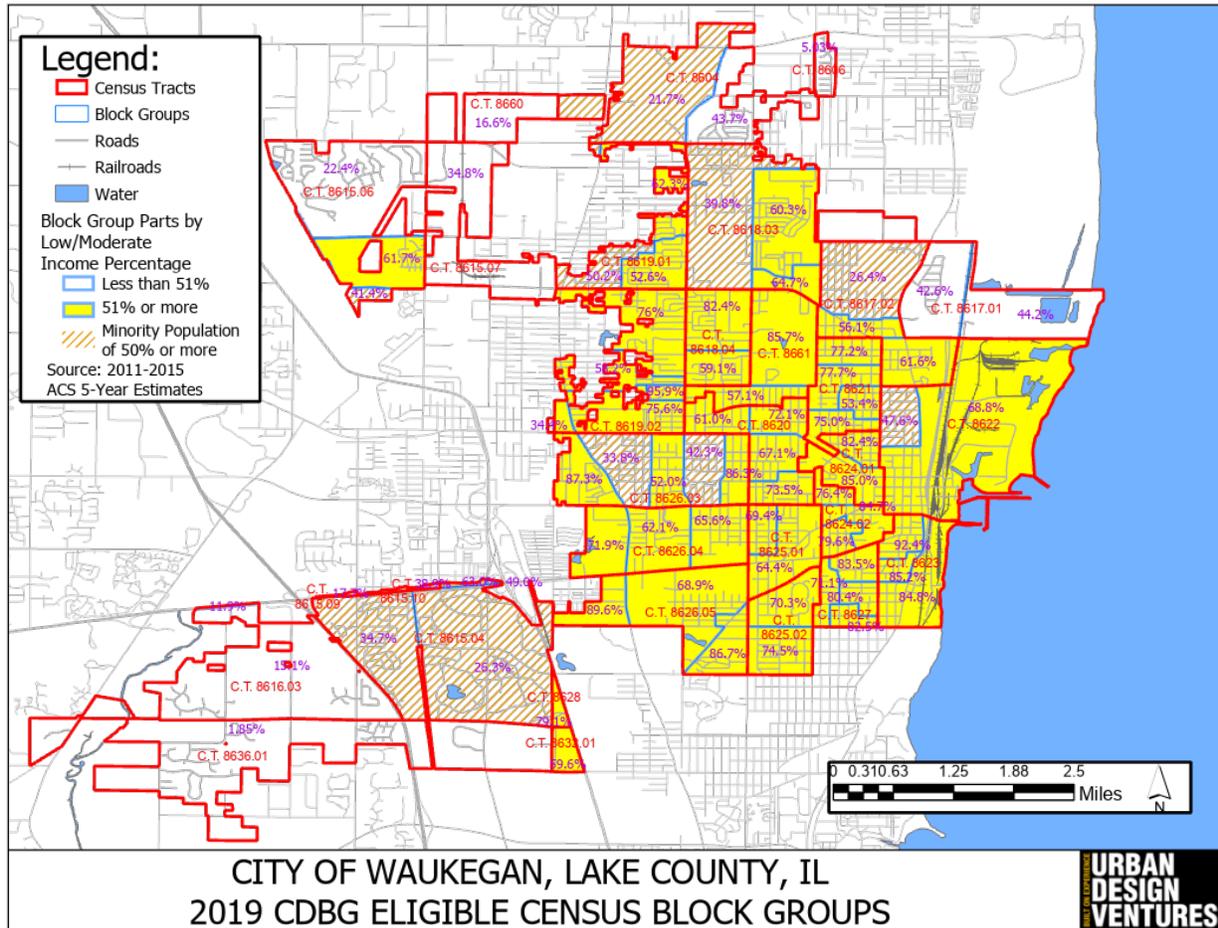


Waukegan	Lake County	863201	1	695	975	71.28%
Waukegan	Lake County	863201	2	590	955	61.78%
Waukegan	Lake County	863201	3	1145	1920	59.64%
Waukegan	Lake County	863601	1	45	2432	1.85%
Waukegan	Lake County	863601	2	190	960	19.79%
Waukegan	Lake County	866000	1	960	4229	22.70%
Waukegan	Lake County	866000	2	215	1265	17.00%
Waukegan	Lake County	866000	3	215	1295	16.60%
Waukegan	Lake County	866100	1	1505	1755	85.75%
Waukegan	Lake County	866100	2	875	1530	57.19%

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



Low- and Moderate-Income Population 2019 for Waukegan



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

The low- and moderate-income census tracts are generally located in the core of the City. There is some overlap of higher minority concentrations in the low- and moderate income census tracts in the central and sections of the City.

The percentage of families living in poverty experienced an increase from 10.7% in 2000 to 20.1% in 2015, according to U.S. Census and ACS data. Female head of household, no husband present, families with related children under the age of 18 whose income was below poverty level was 47.6% in 2010 and 48.0% in 2015, according to U.S. Census and ACS data.

There was an increase in all people whose income level was below poverty level from 13.9 % in 2000 and to 21.7% in 2015, according to U.S. Census and ACS data. Individuals under the age of 18 whose income was below the poverty level was 40.3% in 2000 and 32.7% in 2015, according to U.S. Census and ACS data.



Family and Household Poverty

City of Waukegan poverty statistics for families with children are highlighted in the chart below

Source: 2000 Census and 2011-2015 ACS



Occupation

According to the Census, in 2000, the total number of eligible workers (population 16 years and over) in the City of Waukegan was 63,367 persons. In 2000, 67.6% (42,994 persons) of eligible workers were active in the labor force and 9.7% (4,134 persons) of eligible workers in the work force were unemployed.

According to 2015 ACS Estimates, the total number of eligible workers (population 16 years and over) in Waukegan City was 66,148 persons. In 2015, 61.9% (40,934 persons) of eligible workers were active in the labor force and 7.5% (4,984 persons) of eligible workers in the work force were unemployed.

Workers in 2015 had a mean travel time to work of 25.8 minutes.

According to the 2011-2015 ACS an estimated 20.8% (5,982 households) of households in the City of Waukegan receive income from Social Security. The mean Social Security Income for 2017 was \$16,257.

The following charts outline the distribution of Waukegan workers by occupation.

Source: 2010-2015 ACS



Source: 2000 Census and 2011-2015 ACS

Source: 2011-2015 ACS



Unemployment Rate

Unemployment data covers January 2015 to April 2019. The unemployment rates for the City of Waukegan, is represented by the grey line. The unemployment rate for the State of Illinois is represented by the blue “State” line. The State data was provided by the Bureau of Labor Statistics as seasonally adjusted, so manual adjustment was not required for comparison. The national unemployment rate is represented by the aqua “National” line. The national data was provided by the Bureau of Labor Statistics as seasonally adjusted, so manual adjustment was not required for comparison.

Source: Bureau of Labor Statistics

From January 2015 to July 2019, the City of Waukegan’s unemployment rate was slightly higher (an average of 1.2%) than the State’s unemployment rate and was almost two percentage points (1.9%) higher than the average national unemployment rate (4.4%). The City of Waukegan’s unemployment rate steadily decreased until it hit its lowest point (5.1%) in January 2018. From January 2018 to March 2019 the unemployment rate slowly rose to 6.9%, but this was followed by a back to 5.5% in September 2019.

In general, Waukegan has experienced slightly higher rates of unemployment compared to the state. The trends suggest that since January 2015, the economic situation in the State of Illinois and in the City of Waukegan lagged the national average. Unemployment in Illinois and the City of Waukegan remained higher than the national average through September 2019.



D. Housing Profile:

Housing Profile

Less than one-fifth (18.5%, 5,899 units) of the City of Waukegan’s housing stock was built prior to 1939, which is now over 80 years old. The largest grouping (27.9%, 8,894 units) of the City of Waukegan’s housing stock was built from 1980 to 1999.

The following table chart details the year that housing structures were built in the City of Waukegan in 2015.

Year Structure Built in Waukegan

Year Structure Built	Number	Percentage
Built 2014 or Later	0	0.0%
Built 2010 to 2013	88	0.3%
Built 2000 to 2009	1,917	6.0%
Built 1980 to 1999	6,899	21.7%
Built 1960 to 1979	8,894	27.9%
Built 1940 to 1959,	8,138	25.6%
Built 1939 or Earlier	5,899	18.5%
Total	31,835	-

Source: 2011-2015 ACS

The majority of housing units in the City of Waukegan are 1-unit detached comprising 53.4% (15,626 units) of housing units. Multifamily residential structures of 10 or more units represent 22.2% (6,466 units) of housing units.

The following graph illustrates the composition of the housing stock in the City of Waukegan as of 2015.



Source: 2011-2015 ACS

The Area has seen a major overall decrease in the total number of new units constructed in the City of Waukegan. After an initial growth across spanning 2000-2005, a major decline of buildings constructed following that period.

There were no 5+ Units built after the year 2006, and the other minimum points in the data were all between the years of 2016 and 2017. The year with the highest number of units authorized was 2001 and the year with the highest number of single-family units was also 2001. The years preceding the 2008-2009 housing crash are vastly different from the years post-crash. The average number of total units authorized per year in the years following the housing crash was 25.2 buildings and, the average number of total units authorized per year in the years preceding the housing crash was 192.5. In general, this data would suggest that the City of Waukegan housing market has not recovered from the 2008-2009 market collapse.

The table and chart below contains data on the number of permits for residential construction issued by jurisdictions in the City of Waukegan.

**Units Authorized by Building Permits Waukegan**

YEAR	Total	Single Family	Multi-Family	5+ Units
2018	17	17	0	0
2017	3	3	0	0
2016	5	5	0	0
2015	44	28	16	0
2014	41	27	14	0
2013	37	29	8	0
2012	31	21	10	0
2011	22	16	6	0
2010	27	17	10	0
2009	21	15	6	0
2008	22	18	4	0
2007	51	51	0	0
2006	66	66	0	0
2005	297	217	80	72
2004	76	76	0	0
2003	91	85	6	6
2002	166	146	20	20
2001	486	121	365	353
2000	373	162	211	207

Source: SOCDS Building Permits Database, HUD



Source: SOCDs Building Permits Database, HUD

According to the 2011-2015 American Community Survey, 33.1% (10,531) of the City's housing stock are two-bedroom units, 32.5% (10,349) of City's housing stock are 3 bedroom units, 16.1% (5,123) of the City's housing stock are 1 bedroom units, 12.8% of the City's housing stock are 4 bedroom units, and 3.4% (1,077) of the City's housing stock are 5 or more bedroom units. Considering 33.9% of all households in the City consist of 4 or more persons, there is a need for large family houses.



E. Housing Costs:

Owner Costs

The median monthly housing cost for owner-occupied households was \$887 in 2000; \$1,013 in 2010; and \$1,252 in 2015. The median monthly housing cost for owner-occupied households increased by 14.2% (\$126) from 2000 to 2010, increased by 19.1% (\$239) from 2010 to 2015, and overall increased by 29.2% (\$365) from 2000 to 2015.

The following table illustrates mortgage status and selected monthly owner costs in 2010 and 2015.

Monthly Owner Costs in Waukegan

Monthly Owner Cost	2000 Census		2011-2015 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	14,153	49.9%	14,055	48.8%
Less than \$300	645	4.6%	224	1.6%
\$300 to \$499	2,257	15.9%	1,253	8.9%
\$500 to \$799	1,529	10.8%	2,152	15.3%
\$800 to \$999	2,104	14.8%	1,383	9.8%
\$1,000 to \$1,499	4,813	34.0%	3,992	28.4%
\$1,500 to \$1,999	1,873	13.2%	2,780	19.8%
\$2,000 or more	925	6.5%	2,271	16.2%
No Cash Rent	-	-	-	-
Median (dollars)	\$887	-	\$1,252	-

Source: 2000 Census and 2011-2015 American Community Survey

The following table illustrates housing costs for owner-households in 2000 and 2015 according to the 2000 Census and the 2011-2015 ACS.

Monthly Owner Costs as a Percentage of Household Income in Waukegan

Owner Costs as a % of Income	2000 Census		2011-2015 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	14,153	49.9%	14,055	48.8%
Less than \$20,000	1,321	9.3%	963	6.9%



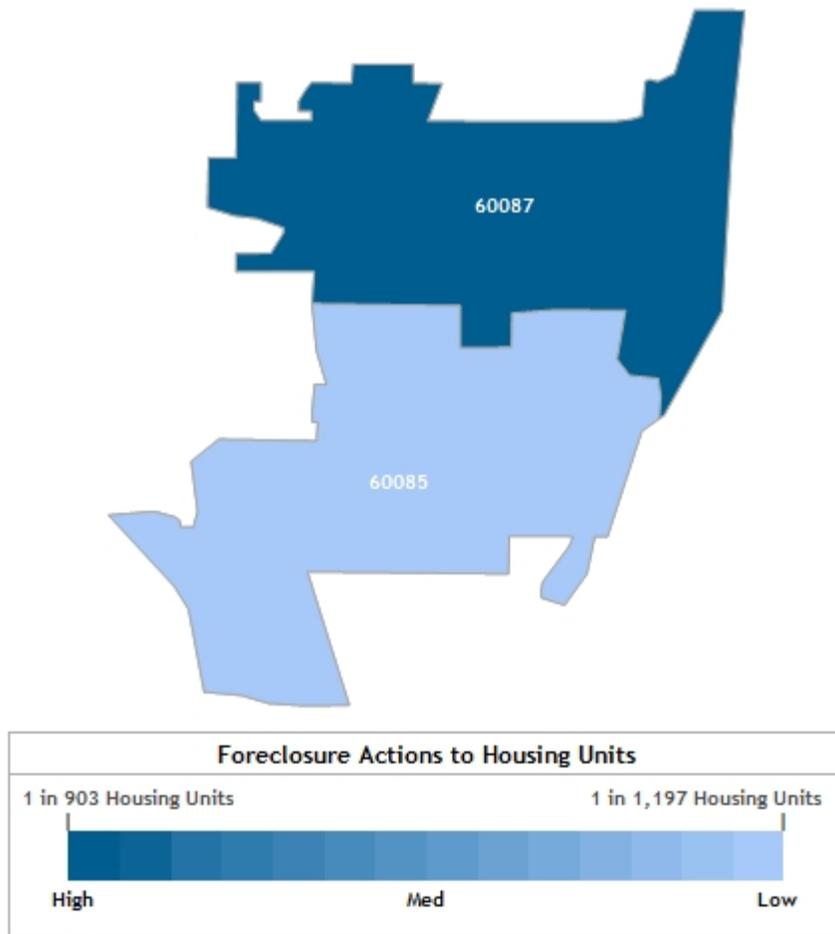
Less than 20 percent	72	0.5%	15	0.1%
20 to 29 percent	215	1.5%	9	0.1%
30 percent or more	940	6.6%	862	6.1%
\$20,000 to \$34,999	2,014	14.2%	1,918	13.6%
Less than 20 percent	541	3.8%	630	4.5%
20 to 29 percent	252	1.8%	305	2.2%
30 percent or more	1,213	8.6%	1,305	9.3%
\$35,000 to \$49,999	3,753	17.2%	2,034	14.5%
Less than 20 percent	717	5.1%	630	4.5%
20 to 29 percent	712	5.0%	255	1.8%
30 percent or more	1,114	7.9%	1,149	8.2%
\$50,000 to \$74,999	3,838	27.1%	3,392	24.1%
Less than 20 percent	1,612	11.4%	1,083	7.7%
20 to 29 percent	1,593	11.3%	1,315	9.4%
30 percent or more	633	4.5%	994	7.1%
\$75,000 or more	4,437	31.4%	5,748	40.1%
Less than 20 percent	3,240	22.9%	4,001	28.4%
20 to 29 percent	973	6.9%	1,283	9.1%
30 percent or more	224	1.6%	464	3.3%
No cash rent	-	-	-	-

Source: 2000 Census and 2011-2015 American Community Survey

HUD defines a housing cost burden as a household that pays over 30% or more of its monthly income on housing costs. In 2000, 29.1% (4,124 units) of owner-occupied units were cost burdened and 34.0% (4,774 units) of owner-occupied households in 2015 were cost burdened.

Foreclosures

According to RealtyTrac, the City of Waukegan had 218 properties in some stage of foreclosure in October 2019; a foreclosure rate of 1 in every 1,096 housing units. In September 2019, the number of properties that received a foreclosure filing in Waukegan was 3% higher than the previous month and 68% higher than the same time last year. During the past twelve months, foreclosures have averaged 29 with a high of 36 foreclosures in January 2019 and a low of 22 foreclosures in December 2019.



Source: WWW.REALTYTRAC.COM

Renter Costs

The median monthly housing cost for renter-occupied households was \$647 in 2000; and \$883 in 2015. The median monthly housing cost for renter-occupied households increased by 26.7% (\$236) from 2000 to 2015.

The following table illustrates mortgage status and selected monthly renter costs in 2010 and 2015.



Selected Monthly Renter Costs in Waukegan

Monthly Renter Cost	2000 Census Data		2011-2015 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	12,021	41.1%	14,271	51.2%
Less than \$500	2,488	20.7%	1,465	10.3%
\$500 to \$999	8,616	71.7%	7,750	54.3%
\$1,000 to \$1,499	630	5.2%	4,194	29.4%
\$1,500 to 2,000	83	0.8%	762	5.3%
\$2,000 or more	110	0.5%	100	0.7%
No Cash Rent	204	1.7%	500	3.4%
Median (dollars)	\$647	-	\$938	-

Source: 2000 Census and 2011-2015 American Community Survey

The following table illustrates housing costs for owner-households in 2000 and 2015 according to the 2000 Census and the 2011-2015 ACS.

Selected Monthly Renter Costs as a Percentage of Household Income in Waukegan

Renter Costs as a % of Income	2000 Census		2011-2015 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	12,021	41.1%	14,771	51.2%
Less than \$20,000	3,841	32.0%	4,098	27.7%
Less than 20 percent	293	2.4%	71	0.5%
20 to 29 percent	408	3.1%	641	2.7%
30 percent or more	2,757	22.9%	3,630	24.6%
\$20,000 to \$34,999	5,326	24.3%	3,539	24.0%
Less than 20 percent	346	2.9%	79	0.5%
20 to 29 percent	1,252	10.4%	641	4.3%
30 percent or more	1,488	12.4%	2,819	19.1%
\$35,000 to \$49,999	2,399	20.0%	2,134	14.4%
Less than 20 percent	1,054	8.8%	282	1.9%
20 to 29 percent	1,192	9.9%	1,001	6.8%
30 percent or more	131	1.1%	851	5.8%
\$50,000 to \$74,999	1,756	14.6%	2,249	15.2%
Less than 20 percent	1,503	12.5%	924	6.6%
20 to 29 percent	214	1.8%	1,135	7.7%



30 percent or more	21	0.2%	190	1.3%
\$75,000 or more	884	7.4%	1,868	12.6%
Less than 20 percent	815	6.8%	1,458	9.9%
20 to 29 percent	31	0.3%	388	2.6%
30 percent or more	0	0.0%	22	0.1%
No cash rent	-	-	500	3.4%

Source: 2000 Census and 2011-2015 American Community Survey

Gross Rent as a Percentage of Household Income in Waukegan

Rental Cost as a % of Income	2000 Census		2011-2015 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Rental Units paying rent	12,021	41.1	14,771	51.2
Less than 20 percent	4,011	33.4%	2,814	19.1%
20 to 24 percent	1,851	15.4%	1,897	12.8%
25 to 29 percent	1,246	10.4%	1,665	11.3%
30 to 34 percent	974	8.1%	1,589	10.8%
35 percent or more	3,423	28.5%	5,923	40.1%
Not computed	516	4.3%	883	6.0%

Source: 2000 Census and 2011-2015 American Community Survey

HUD defines a housing cost burden as a household that pays over 30% or more of its monthly income on housing costs. In 2000, 28.5% (3,423 units) of renter-occupied units were cost burdened and 40.1% (5,923 units) of renter-occupied households in 2015 were cost burdened.

In 2000, 29.1% (4,124 units) of owner-occupied households were cost burdened whereas 28.5% (3,423 units) of renter-occupied households were cost burdened.

In 2015, 34.0% (4,774 units) of owner-occupied households were cost burdened whereas 40.1% (5,923 units) of renter-occupied households were cost burdened.

F. Household Housing Problems:

Summary of Housing Needs

There was a 12.2% increase in the City of Waukegan population between the 2000 Census and 2011-2015 American Community Survey. Households grew by 11.2% and household income significantly increased by 34.8%. According to the Bureau of Labor Statistics Consumer Price Index (CPI), prices in 2015 are 37.6% higher than average prices as



compared to prices in 2000. The dollar experienced an average inflation rate of 2.15% per year during this period. This relationship equated to a decrease in housing unit supply and an increase in housing demand. Unfortunately, even with the increase in median household incomes, housing became more expensive in terms of real dollars for the average household in the City.

General Demographics for Lake County

Demographics	Base Year: 2000	Most Recent Year: 2015	% Change
Population	87,091	88,570	1.7%
Households	27,787	28,826	3.6%
Median Income	\$42,335	\$45,845	7.7%

Source: 2000 Census (Base Year) and 2011-2015 ACS (Most Recent Year)

The following data was provided by the U.S. Department of Housing and Urban Development (HUD) based on the 2011-2015 ACS data. The tables disaggregate households and housing problems based on the area's median household income (HAMFI).

Household Types

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	5,835	5,590	3,600	7,885	28,825
Small Family Households	1,357	2,052	4,274	3,843	27,625
Large Family Households	154	318	908	720	4,381
Household contains at least one person 62-74 years of age	1,355	1,847	3,870	2,535	9,602
Household contains at least one person age 75 or older	1,631	3,244	2,986	1,095	3,706
Households with one or more children 6 years old or younger	632	982	1,537	1,079	5,274

Source: 2011-2015 CHAS

Housing Problems (Households with one of the listed needs)



	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	80	29	20	0	129	0	10	94	44	163
Severely Overcrowded - With >1.51 people per room (and none of the above problems)	89	97	14	48	261	25	24	42	14	121
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	433	300	344	20	1,139	96	382	163	244	1,034
Housing cost burden greater than 50% of income (and none of the above problems)	3,509	878	33	0	4,445	1,278	998	695	98	3,245
Housing cost burden greater than 30% of income (and none of the above problems)	790	2,385	918	230	4,285	173	1,028	1,479	755	4,345
Zero/negative Income (and none of the above problems)	450	0	0	0	450	133	0	0	0	133

Source: 2011-2015 CHAS



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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	4,889	3,660	1,319	298	10,260	1,574	2,455	2,479	534	8,920
Having none of four housing problems	1,079	939	2,740	1,758	9,565	119	780	2,585	2,440	18,050
Household has negative income, but none of the other housing problems	450	0	0	0	450	133	0	0	0	133

Source: 2011-2015 CHAS

Cost Burden Greater Than 30% But Less Than 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	405	1,144	383	2,062	20	357	777	1,608
Large Related	235	334	90	669	22	293	290	639
Elderly	35	52	49	171	69	201	112	556
Other	138	858	349	1,410	10	55	214	428
Total need by income	813	2,388	871	4,312	121	907	1,393	3,231

Source: 2011-2015 CHAS

Cost Burden Greater Than 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	1,730	442	15	630	532	359	430	1,430
Large Related	463	74	10	577	188	196	33	417
Elderly	94	15	8	117	147	259	79	539
Other	1,073	230	14	1,317	171	108	69	1,440
Total need by income	3,360	761	47	2,641	1,038	922	611	3,826

Source: 2011-2015 CHAS

**Crowding (More than one person per room)**

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	15	235	219	20	488	88	333	73	165	659
Multiple, unrelated family households	0	35	130	0	275	8	49	77	79	228
Other, non-family households	300	0	0	0	310	0	0	0	0	0
Total need by income	315	270	349	954	231	96	382	150	244	887

Source: 2011-2015 CHAS

The largest housing problem in the City of Waukegan is housing affordability. According to the 2011-2015 ACS, 29.2% of all renter households are cost burdened by 30% or more and 27.2% of owner households with a mortgage are cost burdened by 30% or more.

Additional housing problems that were recorded in consultations and citizen comments included handicap accessible housing, availability of senior housing, availability of group homes or communal living arrangement housing, housing density issues, and code compliance for housing. Lower income households and renter households are more likely to be affected by these housing problems.

G. Racial and Ethnic Housing Problems:

Housing needs disaggregated by racial and ethnic cohorts were analyzed to determine if a racial or ethnic group disproportionately experienced a housing need as compared to the City's overall housing needs. A disproportionately greater need was identified when a racial or ethnic group experienced a 10 percentage points or higher occurrence rate of housing problems. A housing problem is defined as one of the four following housing problems: 1. housing lacks complete kitchen facilities; 2. housing lacks complete plumbing facilities; 3. housing has more than 1 person per room; and 4. housing cost burden is over 30%. The following tables comprised of 2011-2015 CHAS and ACS data identify the disproportionate housing needs in the City of Waukegan.

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

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,463	1,198	568
White	2,936	304	233
Black / African American	2,255	510	183
Asian	173	35	10
American Indian, Alaska Native	14	0	0
Pacific Islander	0	0	0
Hispanic	2,476	341	119

Source: 2011-2015 CHAS

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,115	1,719	0
White	1,526	681	0
Black / African American	1,251	233	0
Asian	113	24	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	3,118	717	0

Source: 2011-2015 CHAS

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,798	5,325	0
White	1,359	1,826	0
Black / African American	554	733	0
Asian	143	226	0
American Indian, Alaska Native	55	0	0
Pacific Islander	0	0	0
Hispanic	1,653	2,444	0

Source: 2011-2015 CHAS

**80%-100% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,438	4,198	0
White	669	1,707	0
Black / African American	129	819	0
Asian	50	177	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	572	1,329	0

Source: 2011-2015 CHAS

The racial/ethnic household composition of the City of Waukegan according to the 2011-2015 ACS was 64.8% White, 21.6% Black/African American, 4.7% Asian, 0.4% American Indian Alaska Native, 0.0% Pacific Islander and 42.7% Hispanic or Latino. There were one (1) disproportionately impacted group in terms of housing problems; the 0%-30% of Area Median Income Black/African American group that experienced 34.3% of the housing problems of the income group.

0%-30% of Area Median Income

Housing Problems	Has one or more of four severe housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,517	2,161	568
White	1,226	552	232
Black / African American	1,891	863	183
Asian	163	45	10
American Indian, Alaska Native	4	10	0
Pacific Islander	0	0	0
Hispanic	2,176	645	24

Source: 2011-2015 CHAS

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

Housing Problems	Has one or more of four severe housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,745	5,094	0
White	687	1,495	0
Black / African American	475	1,016	0
Asian	84	52	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	1,467	2,390	0

Source: 2011-2015 CHAS

50%-80% of Area Median Income

Housing Problems	Has one or more of four severe housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,411	7,680	0
White	463	2,727	0
Black / African American	169	1,112	0
Asian	0	369	0
American Indian, Alaska Native	45	10	0
Pacific Islander	0	0	0
Hispanic	708	3,389	0

Source: 2011-2015 CHAS

80%-100% of Area Median Income

Housing Problems	Has one or more of four severe housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	452	5,174	0
White	89	2,288	0
Black / African American	24	925	0
Asian	25	202	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0



Housing Problems	Has one or more of four severe housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Hispanic	307	1,595	0

A severe housing problem is defined as one of the four following housing problems: 1. housing lacks complete kitchen facilities; 2. housing lacks complete plumbing facilities; 3. housing has more than 1.5 persons per room; and 4. housing cost burden is over 50%. There were three (3) disproportionately impacted groups in terms of severe housing problems; the 0%-30% of Area Median Income Black/African American group that experienced 34.3% of the housing problems of the income group, the 30%-50% of Area Median Income Hispanic group that experienced 53.4% of the housing problems of the income group, and the 80%-100% of Area Median Income Hispanic group that experienced 67.9% of the housing problems of the income group.

Racial and Ethnic Housing Cost Burden

Housing needs disaggregated by racial and ethnic cohorts were analyzed to determine if a group disproportionately experienced a housing cost burden as compared to the City's overall housing cost burdens. A disproportionately greater need was identified when a racial or ethnic group experienced a 10 percentage points or higher occurrence rate of housing cost burdens. A housing cost burden is defined as household paying over 30% of household AMI on housing costs. The following table evaluating the 2011-2015 CHAS and ACS data address housing cost burdens in Waukegan.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	18,587	4,596	3,427	127
White	11,000	2,207	1,417	64
Black / African American	1,910	509	533	29
Asian	862	163	113	10
American Indian, Alaska Native	45	0	4	0
Pacific Islander	0	0	0	0
Hispanic	4,770	1,717	1,360	24

Source: 2011-2015 CHAS

The racial/ethnic household composition of the City of Waukegan according to the 2011-2015 ACS was 64.8% White, 21.6% Black/African

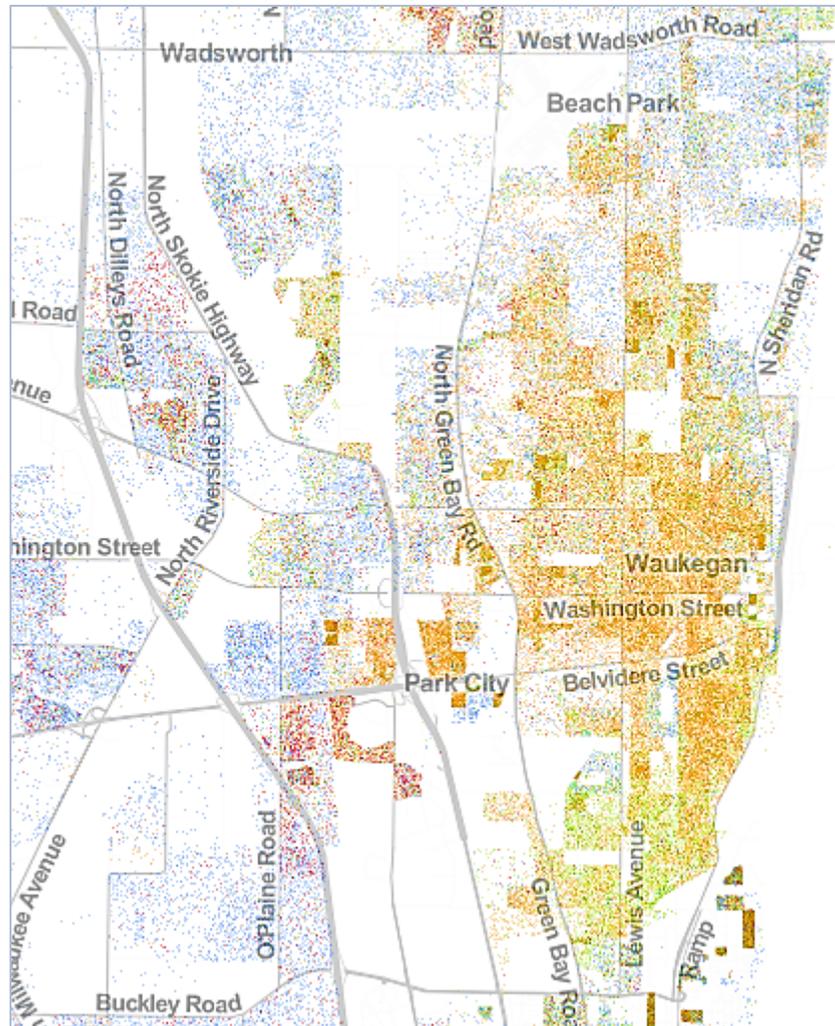


American, 4.7% Asian, 0.4% American Indian Alaska Native, 0.0% Pacific Islander and 42.7% Hispanic or Latino. None (0) of the racial/ethnic groups were disproportionately affected by housing cost burdens.

H. Segregation

The following map is a racial dot map representing one dot for every person counted during the 2010 Census. Each dot is color-coded by the individual's race and ethnicity. Whites are coded as blue; African-Americans, green; Asians, red; Hispanics, orange; and all other racial categories are coded as brown. The map was created by the University of Virginia Weldon Cooper Center for Public Service Demographics Research Group. The map provides a picture of any areas that may have a grouping of non-White residents. The central part City of Waukegan has a high concentration of Hispanics. Additionally, there is a high concentration of Black/African American individuals in the southern part of the City. There are concentrations of white persons outside of the City's jurisdictions.

Racial Dot Map

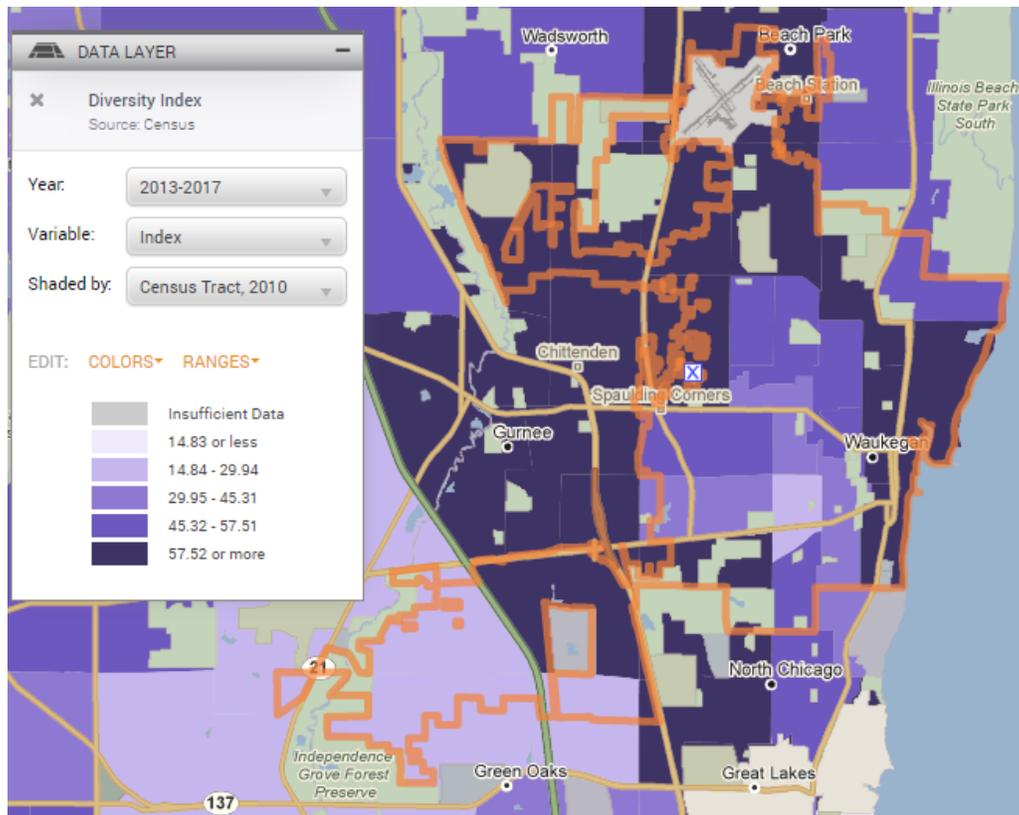


Source: <https://demographics.coopercenter.org/racial-dot-map>

The following map calculates the diversity index per Census Tract in Waukegan. “The diversity index is an index ranging from 0 to 87.5 that represents the probability that two individuals, chosen at random in the given geography, would be of different races or ethnicities between 2013-2017. Lower index values between 0 and 20 suggest more homogeneity and higher index values above 50 suggest more heterogeneity. Racial and ethnic diversity can be indicative of economic and behavioral patterns. For example, racially and ethnically homogenous areas are sometimes representative of concentrated poverty or concentrated wealth. They could also be indicative of discriminatory housing policies or other related barriers. Data were obtained from the Census' American Community Survey 2013-2017 estimates and calculated by PolicyMap.” (Source: PolicyMap.com) The majority of Waukegan has a diversity index over 30 and in some parts over 50. The map represents a high level of heterogeneity. The northern parts of the City appear to be the most

diverse, while the south western most part of the City appears to be less diverse.

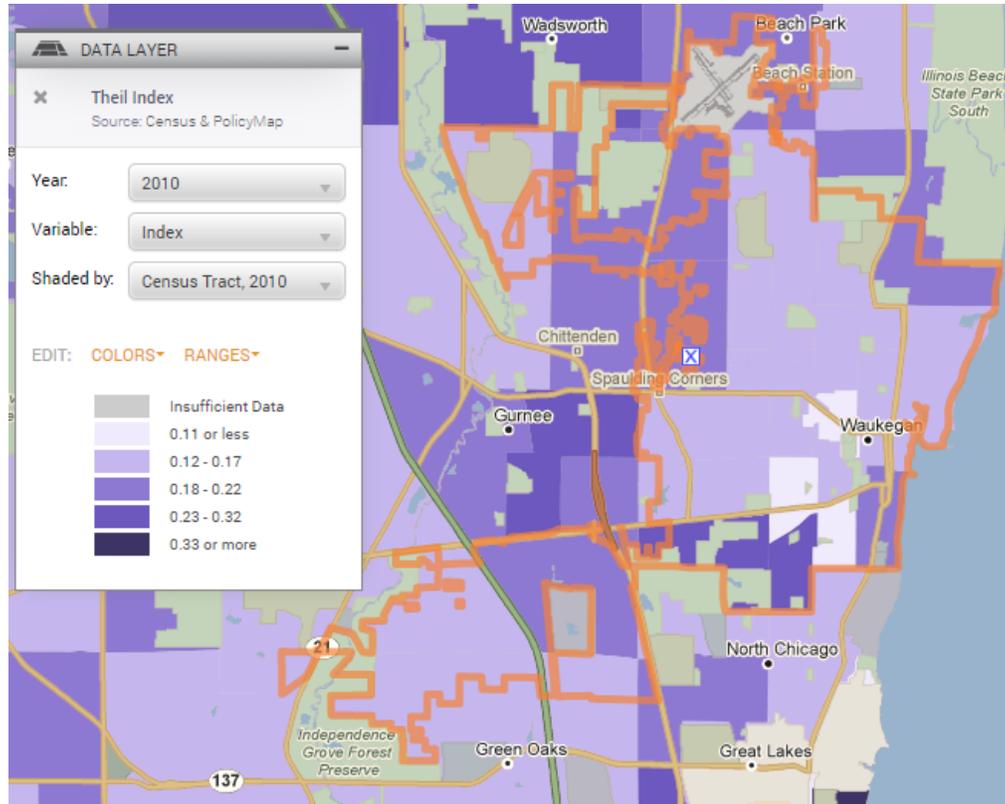
Diversity Index



Source: <https://www.policymap.com/maps>

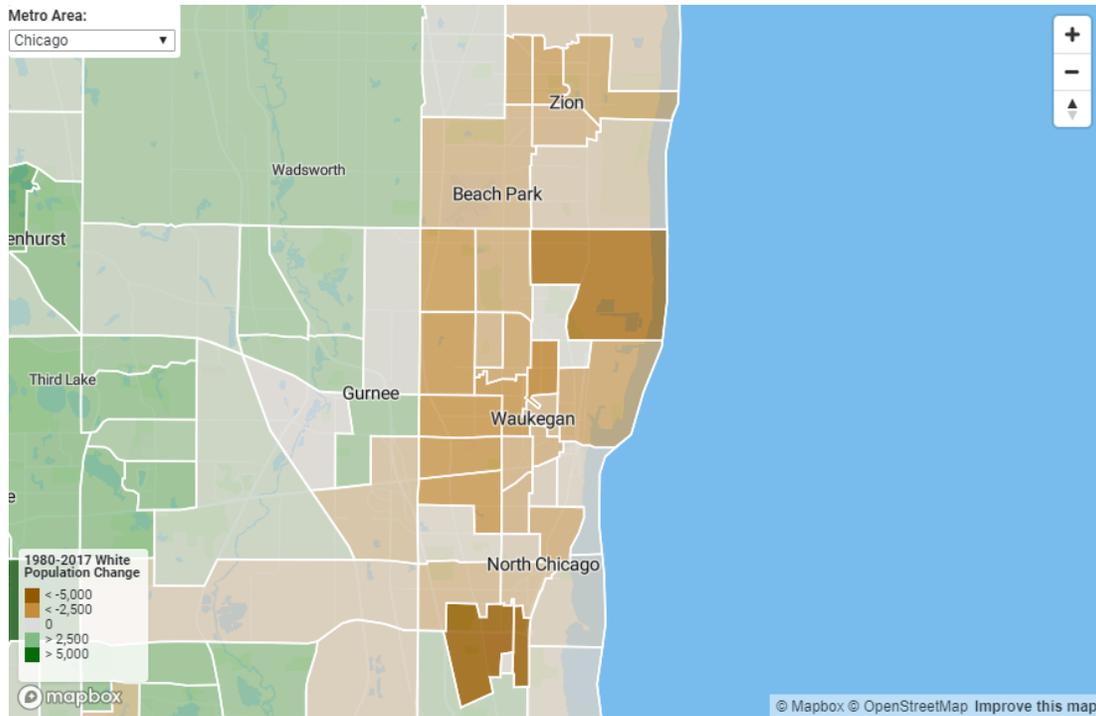
The following map provides the Theil Index calculations per Census Tract in Waukegan. "The Theil Index is an index ranging from 0 to 1 that displays information about racial segregation. Lower index values below .20 suggest less segregation and higher index values above .40 suggest more segregation. The Theil Index is a measure of how evenly members of racial and ethnic groups are distributed within a region, calculated by comparing the diversity of all sub-regions (Census Blocks) to the region as a whole. Patterns of racial segregation can emerge as a result of systemic barriers and opportunities or localized individual preferences. For example, highly segregated areas may be indicative of discriminatory housing practices or other related barriers. Data used in the calculation of this index were derived from the U.S. Census Bureau's 2010 Decennial Census." (Source: PolicyMap.com) The Theil Index for all areas of the City reveal a low level of segregation in Waukegan.

Theil Index



Source: <https://www.policymap.com/maps>

“Governing” is a research media company that focuses on state and local governing issues. In 2019, “Governing” released a series of research reports focusing on segregation in the state of Illinois. A part of the series provided maps that tracked the movement of White population shifts in the state of Illinois from 1980 to 2017. Areas that appear brown have lost White residents over that time frame; while areas that are green are areas where the number of White residents increased. The map specific to Waukegan documents the decrease of the White population in the City and an increase in the White population in the surrounding area.



Source: <https://www.governing.com/gov-data/illinois-white-flight-map.html>

I. Disabled Households:

The following table includes the 2011-2015 ACS estimates for the number individuals with disabilities in the City of Waukegan. The total population of individuals with disabilities in the City of Waukegan is estimated to be 21,511 persons which represents 18.3% of the total population of the City. The two largest disability types are cognitive and ambulatory difficulties. The U.S. Census defines “Disabilities” as a long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business. (Source: factfinder.census.gov/help/en/index.htm#glossary.htm) Additionally, ambulatory difficulty is defined as having serious difficulty walking or climbing stairs (DPHY) and a cognitive difficulty is defined as because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions (DREM). (Source: www.census.gov/topics/health/disability/about/glossary.html)

Persons with Disabilities in Waukegan

Disability Status of the Civilian Non-Institutional Population	2011-2015 ACS
--	---------------



	#	%
Total Civilian Population	86,807	-
Total Population with a disability	8,209	9.5%
Population under 5 years		
Population under 5 years	6,757	7.8%
With a hearing difficulty	72	1.1%
With a vision difficulty	56	0.8%
Population 5 to 17 years		
Population 5 to 17 years	18,417	21.2%
With a hearing difficulty	63	0.3%
With a vision difficulty	166	0.9%
With a cognitive difficulty	911	4.9%
With an ambulatory difficulty	114	0.6%
With a self-care difficulty	156	0.8%
Population 18 to 64 years		
Population 18 to 64 years	54,645	62.9%
With a hearing difficulty	746	1.4%
With a vision difficulty	869	1.6%
With a cognitive difficulty	1,722	3.2%
With an ambulatory difficulty	2,318	4.2%
With a self-care difficulty	1,034	1.9%
With an independent living difficulty	1,758	3.2%
Population 65 years and over		
Population 65 years and over	6,988	8.1%
With a hearing difficulty	933	13.4%
With a vision difficulty	468	6.7%
With a cognitive difficulty	587	8.4%
With an ambulatory difficulty	1,861	26.6%
With a self-care difficulty	767	11.0%
With an independent living difficulty	1,203	17.2%
SEX		
Male	4,084	9.6%
Female	4,125	9.4%
HISPANIC/LATINO ORIGIN		
White alone	5,071	9.0%
Black or African American alone	2,196	15.0%
American Indian and Alaska Native alone	53	22.7%
Asian alone	243	5.7%
Native Hawaiian and Other Pacific Islander alone	0	0%
Some other race alone	422	5.2%
Two or more races	224	7.2%
White alone, not Hispanic or Latino	3,095	17.1%
Hispanic or Latino (of any race)	2,588	5.3%

Source: 2011 – 2015 American Community Survey



III. Review/Update to Original Plan

Waukegan’s current “Regional Analysis of Impediments to Fair Housing Choice” was dated November 2014 and included all of Lake County. The participants reviewed their progress in addressing the goals of the AI twice a year during the participants’ preparation of the Annual Action Plan and the Consolidated Annual Performance Evaluation Reports (CAPER). The Regional Analysis of Impediments to Fair Housing Choice identified the following impediments, as well as created goals and strategies to address each impediment.

A. Summary of Impediments Waukegan:

Impediment 1: The County does not have a comprehensive, long term fair housing education for existing residents, potential residents, businesses, and officials in Lake County. Consequently, there is a lack of awareness of fair housing laws.

Impediment 2: The County has not developed a fair housing policy statement or fair housing ordinance that applies to incorporated and unincorporated areas.

Impediment 3: Developments that require approval from the County or municipalities are not asked to demonstrate any actions taken to affirmatively further fair housing.

Impediment 4: Zoning laws can limit the number of options for members of the protected classes.

Impediment 5: There is not a dedicated Lake County staff person responsible for fair housing.

Impediment 6: There is not a long-term process in place for receiving and addressing housing discrimination complaints.

Impediment 7: There is limited information on fair housing on the Lake County Website.

Impediment 8: The County government does not maintain a comprehensive log of incidents of discrimination that occur within the county.

Impediment 9: CDBG, HOME, and ESG funding applicants are not required to provide information on the applicant’s efforts to affirmatively further fair housing.



Impediment 10: In general, Lake County municipalities lack initiatives that affirmatively further fair housing.

Impediment 11: It is difficult to ascertain whether households have equal access to public housing and Housing Choice Vouchers.

Impediment 12: Public transportation is not accessible by all county residents, in particular seniors and persons with disabilities.

Impediment 13: County information should expand its affirmative marketing materials.

Impediment 14: The cost of both purchasing and renting housing in the county is relatively unaffordable for racial and ethnic minorities.

Impediment 15: Racial and ethnic minorities are denied home purchase mortgages at a higher rate than white applicants.

Impediment 16: Housing designated for moderate- and low-income families is concentrated in certain communities, not spread throughout the county.

Impediment 17: "Fair housing" and "affordable housing" may often be used interchangeably by individuals in the private and public sectors.

Impediment 18: Protected classes may not have equal access to housing opportunities.

Impediment 19: There is a limited understanding of federal and state protected classes, in particular persons with a disability.

Impediment 20: Throughout the county, there is a strong housing-jobs-transit mismatch.

FY 2016 Accomplishments

The City of Waukegan has a documented population of more than 89,078. The supply of affordable housing does not meet the demand. The Waukegan Housing Authority (WHA) has 832 housing choice vouchers of which 34 are portable, and 448 Public Housing Units of which 25 are scattered sites. There are other subsidized/affordable housing developments in Waukegan and yet there does not seem to be enough to supply the needs of the population. Affordable housing in Waukegan is a necessity for the population. Many of the residents are low to moderate



income individuals/families and need affordable housing and/or assisted housing. There is an increasing population of homeless families and individuals; an increasing number of “special need population” groups (i.e. veterans, mentally disabled, etc.) who cannot find the needed housing for their situations; and, due to the housing market, lost of jobs increased replacement expenses, increase in City ordinance enforcement and changes in population demographics and NIMBY, the barrier remains and the affordable housing supply is affected. Local zoning is also a barrier which is being addressed through zoning changes instituted by City Council and the City’s Planning Department. Another barrier is lack of adequate financial resources. The Community Development Block Grant Department could offer more innovative approaches to meet the supply and demand for affordable housing if their own revenue resources were increased.

FY 2017 Accomplishments

In partnership with Prairie State Legal Services (PSLS) the City has addressed the following actions to overcome the identified impediments to fairing housing. PSLS provided education and outreach, counseling and referrals, investigation and testing, negotiation and legal services, communication and marketing and fundraising. During the program period the agency conducted 27 housing tests and trained 13 new testers to assist with future testing; provided 14 presentations to a total of 226 individuals on how to identify potential discrimination and understand rights and responsibilities; received 94 cases involving housing discrimination; and distributed a total of 817 flyers and brochures regarding fair housing. The agency also maintains social media sites as a means of distributing information to the public.

FY 2018 Accomplishments

In partnership with Prairie State Legal Services (PSLS), the City has addressed the following actions to overcome the identified impediments to fairing housing. PSLS provided education and outreach, counseling and referrals, investigation and testing, negotiation and legal services, communication, marketing and fundraising. During the program period the agency conducted 27 housing tests and trained 6 new testers to assist with future testing; provided 9 presentations to a total of 186 individuals on how to identify potential discrimination and understand rights and responsibilities; received 45 cases involving housing discrimination; and distributed a total of 1000 English and 246 Spanish flyers and brochures regarding fair housing. The agency also maintains social media sites as a means of distributing information to the public.



IV. Impediments to Fair Housing 2019

Impediments to fair housing choice are defined as:

- 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 choice
- Any actions, omissions, or decisions that have this effect. In order to determine if any impediments to fair housing choice exist, interviews and meetings were conducted, surveys were distributed, Census data was reviewed, and an analysis of the fair housing complaints in the City of Waukegan was undertaken.

A. Fair Housing Complaints:

1. Prairie State Legal Services

Prairie State Legal Services (PSLS) is a nonprofit organization providing civil legal aid to low-income residents of Illinois. PSLS provides legal assistance so that people can know their rights and receive free legal representation in non-criminal matters such as eviction from housing, discrimination, family law, and consumer protection issues. The mission of Prairie State Legal Services (PSLS) is to provide civil legal representation to low-income people and ensure equal access to justice for all.

Prairie State Legal Services
325 W. Washington Street Suite
100
Waukegan, IL 60085
847-662
<https://pslegal.org/>

PSLS is the designated area fair housing agency and is a subrecipient of CDBG funds for fair housing activities from all of the entitlements. The partners direct all fair housing complaints to PSLS for consultation.

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



Source: Prairie State Legal 2016 Annual Report

2. Illinois Department of Human Rights

The Illinois Department of Human Rights (DoHR) enforces state laws that prohibit discrimination under the Illinois Human Rights Act. The Illinois Human Rights Act prohibits certain discriminatory practices based on race, color, religion, sex, national origin, citizenship status (with regard to employment) ancestry, age (40 and over), order of protection status, marital status, familial status (with regard to housing), physical or mental disability, arrest record, military status, sexual orientation, and unfavorable discharge from military service.

Illinois Department of Human Rights

100 West Randolph Street
Chicago, IL 60601
(312) 814-6200

<https://www2.illinois.gov/DHR/Pages/default.aspx>

The DoHR main office is in Springfield, doubling as a regional office, along with one regional office in Chicago. DoHR investigates employment discrimination complaints on behalf of the U.S. Equal Employment Opportunity Commission (EEOC) and housing discrimination complaints on behalf of the U.S. Department of Housing and Urban Development (HUD). These partnerships protect the rights of complainants under both state and federal law.

The law also empowers the commission to educate the public in order to prevent discrimination and foster equal opportunity; and to address incidents of bias that may lead to tension between racial, ethnic and other groups.



From 2014-2019 there were 0 complaints filed against the City of Waukegan. However, there were 3 complaints that were docketed and closed between the years of 2014-2019. The basis of each of those complaints was disability.

3. Fair Housing Assistance Program (FHAP) Agencies

The Fair Housing Assistance Program offers grants to state and local agencies that have sufficiently demonstrated to HUD that they support or enforce a fair housing law that is substantially equivalent to the Fair Housing Act. FHAP agencies carryout fair housing activities such as enforcement and education in order to protect families and individuals who believe that they have been the victims of housing discrimination.

The City of Waukegan is supported by the Illinois Department of Human Rights.

4. Fair Housing & Equal Opportunity (FHEO-HUD)



The U.S. Department of Housing and Urban Development’s (HUD’s) Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Fair Housing Act. According to the HUD FHEO complaint tracking system (TEAPOTS) the following complaints were filed from January 1, 2009 until May 30, 2019:

HUD REPORTED FAIR HOUSING COMPLAINTS 2013 - 2019

City of Waukegan - January 1, 2013 - May 30, 2019						
Violation City	Violation State and County	Filing Date	Closure Date	Closure Reason	Basis	Issues
Waukegan	Illinois - Lake County	04/03/13	08/30/13	No Cause	Race, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities
Waukegan	Illinois - Lake County	12/03/13	07/01/14	No Cause	Disability	Failure to make reasonable accommodation
Waukegan	Illinois - Lake County	04/14/14	09/02/14	Complaint withdrawn by complainant without resolution	Race	Discrimination in terms/conditions/privileges relating to rental
Waukegan	Illinois - Lake County	04/14/14	09/02/14	Complaint withdrawn by complainant without resolution	Race	Discrimination in terms/conditions/privileges relating to rental
Waukegan	Illinois - Lake County	08/14/14	10/08/14	Withdrawn after Resolution	Disability	Failure to make reasonable accommodation



Waukegan	Illinois - Lake County	09/09/14	02/04/15	No Cause	Disability	Discrimination in terms/conditions/privileges relating to rental
Waukegan	Illinois - Lake County	09/30/14	11/26/14	Conciliation/ Settlement	Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities
Waukegan	Illinois - Lake County	11/12/14	01/25/16	No Cause	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
Waukegan	Illinois - Lake County	05/22/15	07/24/15	Withdrawn after Resolution	Disability	Discrimination in terms/conditions/privileges relating to rental
Waukegan	Illinois - Lake County	08/24/15	06/27/16	No Cause	Sex, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
Waukegan	Illinois - Lake County	08/16/18	12/14/18	Complainant failed to cooperate	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices
Waukegan	Illinois - Lake County	09/21/18	12/28/18	Complainant failed to cooperate	Race	Discrimination in terms/conditions/privileges relating to rental
Waukegan	Illinois - Lake County	04/16/19	05/30/19	No Cause	Disability	Discriminatory terms, conditions, privileges, or services and facilities
Waukegan	Illinois - Lake County	09/19/19			Race	Discriminatory refusal to rent



The fair housing complaints over the past five years in the City of Waukegan covered disability and race. The majority of reported issues were on the basis of disability; in particular, “failure to make reasonable accommodations.”

Lake County - January 1, 2013 - May 30, 2019						
Violation City	Violation State and County	Filing Date	Closure Date	Closure Reason	Basis	Issues
Antioch	Illinois - Lake County	08/26/14	01/23/15	No Cause	Disability	Discrimination in terms/conditions/privileges relating to rental
Antioch	Illinois - Lake County	08/26/14	01/21/15	No Cause	Disability	Discriminatory acts under Section 818 (coercion, Etc.)
Antioch	Illinois - Lake County	12/06/18	12/28/18	Withdrawn after Resolution	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities
Beach Park	Illinois - Lake County	09/27/13	11/20/13	Complainant failed to cooperate	Race	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices; Otherwise deny or make housing unavailable
Buffalo Grove	Illinois - Lake County	10/31/17	02/28/18	Complainant failed to cooperate	Race	Discriminatory terms, conditions, privileges, or services and facilities
Chicago	Illinois - Lake County	03/28/18	05/22/18	Complainant failed to cooperate	Sex, Familial Status	Discriminatory refusal to rent
Crystal Lake	Illinois - Lake County	05/24/19	08/08/19	Dismissed for lack of jurisdiction	National Origin	Discrimination in terms/conditions/privileges relating to rental
Deer Park	Illinois - Lake County	12/09/14	12/23/14	Withdrawn after Resolution	Sex, Disability, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities
Deer Park	Illinois - Lake County	03/12/19	06/05/19	Conciliation/ Settlement	Disability	Non-compliance with design and construction requirements (handicap)
Deer Park	Illinois - Lake County	04/23/19	06/05/19	Conciliation/ Settlement	Disability	Non-compliance with design and construction requirements (handicap)
Deerfield	Illinois - Lake County	02/21/14	04/08/14	Complainant failed to cooperate	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification; Failure to make reasonable accommodation
Deerfield	Illinois - Lake County	05/06/15	03/25/16	No Cause	Disability	Discriminatory terms, conditions, privileges, or services and facilities
Fox Lake	Illinois - Lake County	09/14/17	12/04/17	Complainant failed to cooperate	Disability	Discriminatory refusal to rent



Fox Lake	Illinois - Lake County	10/18/19			Disability	Failure to make reasonable accommodation
Grayslake	Illinois - Lake County	08/07/13	12/13/13	Dismissed for lack of jurisdiction	Sex, Disability, Retaliation	Discriminatory refusal to rent; Discriminatory acts under Section 818 (coercion, Etc.)
Grayslake	Illinois - Lake County	03/17/14	06/24/14	Complainant failed to cooperate	Disability	Failure to make reasonable accommodation
Grayslake	Illinois - Lake County	12/15/14	06/02/15	Conciliation/ Settlement	Disability	Discriminatory terms, conditions, privileges, or services and facilities
Grayslake	Illinois - Lake County	05/18/17		Charged or FHAP Caused	Familial Status	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)
Grayslake	Illinois - Lake County	02/27/18	06/27/18	No Cause	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities
Grayslake	Illinois - Lake County	04/04/19	09/19/19	Conciliation/ Settlement	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
Grayslake, IL	Illinois - Lake County	09/27/19			Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation
Great Lakes	Illinois - Lake County	01/31/17	06/22/17	No Cause	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable
Gurnee	Illinois - Lake County	01/31/13	05/24/13	No Cause	Race	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities
Gurnee	Illinois - Lake County	01/30/13	04/24/13	Complaint withdrawn by complainant without resolution	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities
Gurnee	Illinois - Lake County	04/26/13	08/19/13	Withdrawn after Resolution	National Origin	Discrimination in the brokering of residential real property; Discrimination in terms/conditions/privileges relating to sale
Gurnee	Illinois - Lake County	10/24/14	05/27/15	Dismissed for lack of jurisdiction	Race	Discriminatory terms, conditions, privileges, or services and facilities
Gurnee	Illinois - Lake County	11/19/14	05/08/15	No Cause	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
Gurnee	Illinois - Lake County	01/30/15	06/11/15	Withdrawn after Resolution	Disability	Discriminatory terms, conditions, privileges, or services and facilities
Gurnee	Illinois - Lake County	05/27/15	11/17/15	Conciliation/ Settlement	Race	Discriminatory refusal to rent



Gurnee	Illinois - Lake County	07/18/17	09/13/17	Withdrawn after Resolution	Disability	Failure to make reasonable accommodation
Gurnee	Illinois - Lake County	09/19/19			Race	Discrimination in terms/conditions/privileges relating to sale
Highland Park	Illinois - Lake County	01/23/18	05/23/18	No Cause	Familial Status	Discriminatory refusal to rent
Highland Park	Illinois - Lake County	02/27/18	05/31/18	No Cause	Race	Discriminatory refusal to rent
Kildeer	Illinois - Lake County	10/23/14	02/27/15	No Cause	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities
Lake Bluff	Illinois - Lake County	03/15/19			Race, National Origin, Sex, Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)
Lake Forest	Illinois - Lake County	07/11/15	11/30/15	No Cause	Disability	Discriminatory terms, conditions, privileges, or services and facilities
Lake Villa	Illinois - Lake County	03/04/14	04/30/14	No Cause	National Origin	Discrimination in terms/conditions/privileges relating to sale
Lake Zurich	Illinois - Lake County	07/17/14	12/12/14	No Cause	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
Lake Zurich	Illinois - Lake County	02/26/15		Charged or FHAP Caused	Race	Discriminatory refusal to rent; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental
Lake Zurich	Illinois - Lake County	10/23/15	01/27/17	No Cause	Race, Disability, Retaliation	Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Using ordinances to discriminate in zoning and land use
Libertyville	Illinois - Lake County	06/05/14	07/29/14	Complaint withdrawn by complainant without resolution	Disability	Discrimination in terms/conditions/privileges relating to rental
Libertyville	Illinois - Lake County	12/29/14	07/29/15	No Cause	Race	Discriminatory terms, conditions, privileges, or services and facilities
Lincolnshire	Illinois - Lake County	03/15/13	10/01/13	No Cause	Sex	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)



Lindenhurst	Illinois - Lake County	04/14/16	10/31/16	No Cause	Disability	Discriminatory terms, conditions, privileges, or services and facilities
Moline	Illinois - Lake County	05/10/19	07/30/19	Complainant failed to cooperate	Race, Disability	Discrimination in terms/conditions/privileges relating to rental
Mt. Zion	Illinois - Lake County	04/12/13	07/26/13	Withdrawn after Resolution	Familial Status	Discriminatory refusal to negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable
Mundelein	Illinois - Lake County	02/13/18	05/24/18	Complainant failed to cooperate	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
Mundelein	Illinois - Lake County	02/22/19	07/31/19	Withdrawn after Resolution	Race	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable
North Chicago	Illinois - Lake County	08/09/17	10/11/17	Complainant failed to cooperate	Disability	Failure to make reasonable accommodation
Oswego	Illinois - Lake County	05/15/14	11/20/14	Conciliation/ Settlement	Disability	Failure to make reasonable accommodation
Park City	Illinois - Lake County	09/02/13	01/13/14	Conciliation/ Settlement	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Failure to make reasonable accommodation
Park City	Illinois - Lake County	03/02/16	03/28/16	Withdrawn after Resolution	Race, National Origin	Discrimination in terms/conditions/privileges relating to rental
Park City	Illinois - Lake County	08/15/19			National Origin	Discriminatory refusal to rent
Rockford	Illinois - Lake County	07/07/16	05/30/17	Withdrawn after Resolution	Race, National Origin	Discrimination in the making of loans; Discrimination in the terms/conditions for making loans; Otherwise deny or make housing unavailable
Rockford	Illinois - Lake County	07/07/16	02/28/17	Conciliation/ Settlement	Race, National Origin	Discrimination in the making of loans; Discrimination in the terms/conditions for making loans; Otherwise deny or make housing unavailable
Rockford	Illinois - Lake County	08/02/16	06/01/17	No Cause	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
Round Lake	Illinois - Lake County	02/21/14	02/20/15	Conciliation/ Settlement	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities
Round Lake	Illinois - Lake County	09/22/14	12/19/14	Complainant failed to cooperate	Sex	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and



						facilities
Round Lake	Illinois - Lake County	02/11/19			Sex	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities
Round Lake	Illinois - Lake County	05/23/19			Race	Discrimination in terms/conditions/privileges relating to rental
Round Lake Beach	Illinois - Lake County	03/15/13	05/24/13	No Cause	Race	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities
Round Lake Beach	Illinois - Lake County	11/14/13	06/20/14	No Cause	National Origin, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
Round Lake Beach	Illinois - Lake County	06/02/14	06/30/14	Withdrawn after Resolution	Race	Discriminatory refusal to rent
Round Lake Beach	Illinois - Lake County	11/04/14	05/12/15	Conciliation/ Settlement	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental
Round Lake Beach	Illinois - Lake County	10/19/17	01/26/18	No Cause	Race	Discriminatory terms, conditions, privileges, or services and facilities
Round Lake Park	Illinois - Lake County	02/07/13	08/29/13	Conciliation/ Settlement	Race, Disability	Discriminatory refusal to sell and negotiate for sale; Discrimination in terms/conditions/privileges relating to sale; Discriminatory acts under Section 818 (coercion, Etc.)
Tinley Park	Illinois - Lake County	02/28/17	06/08/17	No Cause	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
Vernon Hills	Illinois - Lake County	05/14/13	12/13/13	Withdrawn after Resolution	Race, National Origin	Discrimination in terms/conditions/privileges relating to rental
Vernon Hills	Illinois - Lake County	05/14/13	12/13/13	Withdrawn after Resolution	Race	Discrimination in terms/conditions/privileges relating to rental
Vernon Hills	Illinois - Lake County	06/18/14	12/09/14	No Cause	Race	Discriminatory terms, conditions, privileges, or services and facilities
Vernon Hills	Illinois - Lake County	12/09/14	01/22/15	Complainant failed to cooperate	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
Wauconda	Illinois - Lake County	02/03/15	04/13/15	Withdrawn after Resolution	Disability	Failure to make reasonable accommodation
Wauconda	Illinois - Lake County	07/22/15	02/17/16	No Cause	Religion, Familial Status	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges



						relating to rental
Waukegan	Illinois - Lake County	04/03/13	08/30/13	No Cause	Race, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities
Waukegan	Illinois - Lake County	12/03/13	07/01/14	No Cause	Disability	Failure to make reasonable accommodation
Waukegan	Illinois - Lake County	04/14/14	09/02/14	Complaint withdrawn by complainant without resolution	Race	Discrimination in terms/conditions/privileges relating to rental
Waukegan	Illinois - Lake County	04/14/14	09/02/14	Complaint withdrawn by complainant without resolution	Race	Discrimination in terms/conditions/privileges relating to rental
Waukegan	Illinois - Lake County	08/14/14	10/08/14	Withdrawn after Resolution	Disability	Failure to make reasonable accommodation
Waukegan	Illinois - Lake County	09/09/14	02/04/15	No Cause	Disability	Discrimination in terms/conditions/privileges relating to rental
Waukegan	Illinois - Lake County	09/30/14	11/26/14	Conciliation/Settlement	Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities
Waukegan	Illinois - Lake County	11/12/14	01/25/16	No Cause	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
Waukegan	Illinois - Lake County	05/22/15	07/24/15	Withdrawn after Resolution	Disability	Discrimination in terms/conditions/privileges relating to rental
Waukegan	Illinois - Lake County	08/16/18	12/14/18	Complainant failed to cooperate	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices
Waukegan	Illinois - Lake County	09/21/18	12/28/18	Complainant failed to cooperate	Race	Discrimination in terms/conditions/privileges relating to rental
Waukegan	Illinois - Lake County	08/23/18	09/26/18	Complainant failed to cooperate	Race	Discrimination in terms/conditions/privileges relating to rental
Waukegan	Illinois - Lake County	04/16/19	05/30/19	No Cause	Disability	Discriminatory terms, conditions, privileges, or services and facilities
Waukegan	Illinois - Lake County	09/19/19			Race	Discriminatory refusal to rent
Waukegan	Illinois - Lake County	05/22/15	07/24/15	Withdrawn after Resolution	Disability	Discrimination in terms/conditions/privileges relating to rental



Winnetka	Illinois - Lake County	02/16/18		Charged or FHAP Caused	Disability	Discriminatory terms, conditions, privileges, or services and facilities
Woodstock	Illinois - Lake County	04/14/15	10/09/15	No Cause	Race	Discrimination in terms/conditions/privileges relating to rental
Woodstock	Illinois - Lake County	07/31/18	11/08/18	Complainant failed to cooperate	Disability	Failure to make reasonable accommodation
Zion	Illinois - Lake County	04/17/13	08/16/13	No Cause	Race	Discriminatory refusal to sell; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
Zion	Illinois - Lake County	08/20/13	10/01/15	Charged or FHAP Caused	Familial Status	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental
Zion	Illinois - Lake County	02/24/14	10/02/15	Charged or FHAP Caused	Familial Status	Discriminatory advertising, statements and notices
Zion	Illinois - Lake County	01/26/15	07/31/15	No Cause	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)
Zion	Illinois - Lake County	08/28/15	10/27/15	Complainant failed to cooperate	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities
Zion	Illinois - Lake County	12/23/15	09/30/16	No Cause	Retaliation	Discriminatory refusal to rent and negotiate for rental
Zion	Illinois - Lake County	05/20/19	10/09/19	No Cause	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities

The fair housing complaints over the past five years in Lake County covered disability and race. The majority of reported issues were on the basis of disability; in particular, “failure to make reasonable accommodations.”

National Trends

The U.S. Department of Housing and Urban Development (HUD) funds the Office of Fair Housing and Equal Opportunity (FHEO), whose mission is to eliminate discrimination, promote economic opportunity, and achieve diversity. FHEO leads the nation in the enforcement, administration, development, and public understanding of Federal fair housing policies



and laws. FHEO enforces laws that protect people from discrimination on the basis of race, color, religion, sex, national origin, disability, and familial status. FHEO releases annual reports to Congress, which provide information regarding complaints received during the particular year. The following table highlights the frequency of such housing complaints for the years of 2014, 2015, 2016, and 2017 (most recent year available) organized by basis of complaint.

HUD and FHAP Housing Complaints Nationwide

Basis	FY 2014		FY 2015		FY 2016		FY 2017	
	Number of Complaints	% of Total						
Disability	4,621	41%	4,605	42%	4,908	45%	4,865	59%
Race	2,383	21%	2,291	21%	2,154	20%	2,132	26%
Familial Status	1,051	9%	1,031	9%	882	8%	871	11%
National Origin	1,067	9%	898	8%	917	8%	834	10%
Sex	879	8%	915	8%	800	7%	826	10%
Religion	223	2%	225	2%	204	2%	800	10%
Color	146	1%	151	1%	143	1%	232	3%
Retaliation	867	8%	832	8%	785	7%	192	2%
Number of Complaints filed	11,237		10,948		10,793		8,186	

Source: HUD FY 2014-2017 Annual Reports on Fair Housing

Note: Complaints often allege more than one (1) basis of discrimination, and each base is counted as a complaint.

The majority of the HUD complaints filed nationwide in 2017 were on the basis of disability, making up 59% of all complaints received. Race was next, making up 26% of all complaints, followed by familial status at 11%.

The housing complaints filed in the City of Waukegan were primarily based on disability and race, which are consistently the most common causes for complaints across the nation. Note, the percentages for each year do not equal 100% and the number of complaints each year do not equal the total complaints across all areas. This is because there is often more than one basis for the filing of a fair housing complaint.



5. Local Human Rights Commissions

The City of Waukegan has ordinances covering discrimination. The City of Waukegan recognizes the following protected classes, “race, color, religion, national origin, sex, creed, ancestry, physical and mental handicap, age, marital status, familial status and unfavorable discharge from military service...” (Source: City of Waukegan, Code of Ordinances Chapter Twelve Section 12-26)

6. Housing and Human Services Agencies

The City of Waukegan interviewed agencies offering housing and human services within the City in order to obtain their input and gain insight into potential impediments to fair housing. The following agencies participated in the information gathering through roundtable discussions, individual meetings, or through surveys:

- A Safe Place
- Arden Shore
- Black Chamber of Commerce
- CASA Lake County
- City of Waukegan Staff
- Elder CARE Lake County
- Habitat for Humanity
- Lake County Housing Authority
- Lake County Staff
- Little City Foundation
- Northern Illinois Foodbank
- PADS Lake County
- Salvation Army – Waukegan Corps
- Staben House
- Trinity Church
- UMMA Center
- Waukegan Housing Authority
- Waukegan Park District
- Waukegan Public Library
- Youth Build Lake County
- Youth Conservation Corps
- YWCA Lake County
- Zacharias Sexual Abuse Center

Each of these agencies provided feedback on their and their clients’ experiences concerning housing-related issues in the City of Waukegan. Below is a list of key points from each of the meetings.



- Need for affordable housing
- Need for supportive services
- Need for employment opportunities
- Need for public transportation

Many agencies also provided suggestions of how to address the identified areas of inequality or discrimination in the City. Commonly suggested strategies to further fair housing in the City are included below:

- Provide more affordable housing
- Provide financial assistance to make housing more affordable
- Provide education and outreach on fair housing

B. Public Sector:

The Analysis of Impediments examines public policies of the jurisdiction and the impact of those policies on fair housing choice. The City government controls land use and development through its comprehensive plan, zoning regulations, subdivision regulations, and other laws and ordinances passed by the City Council. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and the various residential uses in a community. Local officials and policies determine the community's commitment to affordable housing goals and objectives, as well as affirmatively furthering fair housing choice.

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

1. CDBG Program

The City of Waukegan receives Community Development Block Grant (CDBG) funds from HUD under the CDBG program. The City will receive approximately \$799,322 in CDBG funds for FY 2020. The City anticipates that CDBG funding levels will remain in flux for the foreseeable future.

The City annually allocates its CDBG funds to a number of eligible projects such as: public facility/infrastructure improvements, public services, the removal of slum and blight, and housing activities. For FY 2020, the City has proposed to allocate its estimated CDBG funds to the projects listed in the table below.



FY 2020 Estimated CDBG Allocation for the City of Waukegan

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM	
Housing Rehabilitation Program	\$190,000.00
Rehab Administration	\$175,000.00
Code Compliance Program	\$30,000.00
PADS Lake County	\$5,000.00
Victory Park	\$25,458.00
Public Services	\$114,000.00
Façade Improvement Program	\$100,000.00
Program Administration	\$159,864.00

The majority of the activities listed above are undertaken in low/mod income areas of the City, as this is a high priority for the City. The Direct Homeownership Assistance Loans are available to qualified low-mod income clientele city-wide. Additionally, each activity meets the National Objectives by primarily benefiting low- and moderate- income (LMI) persons. Many activities in each funding category specifically work to increase the supply of quality affordable housing units, as well as promote fair housing choice in the City.

The City of Waukegan’s FY 2020-2024 Five Year Consolidated Plan identified the following six (6) strategies to address the priority needs in the City:

Housing Strategy –

Priority Need: There is a need for decent, safe, sanitary, and affordable housing for homebuyers, homeowners, and renters.

Goals:

- HS-1 Housing Support – Assist low- and moderate-income households to access decent, safe and sanitary housing that is affordable and accessible for rent or for sale through housing counseling and down payment/closing cost assistance with opportunity in close proximity to public transportation, employment, and community services
- HS-2 Housing Rehabilitation - Conserve and rehabilitate existing affordable housing units occupied by owners by addressing code violations, emergency repairs and handicap accessibility.

Homeless Strategy –



Priority Need: There is a need for housing for homeless persons and persons at-risk of becoming homeless.

Goals:

- HO-1 Housing – Support the Continuum of Care's efforts to provide emergency shelter and transitional housing.
- HO-2 Operation/Support – Support social service programs, permanent supportive housing service programs, and facilities for the homeless and persons at-risk of becoming homeless.

Other Special Needs Strategy –

Priority Need: There is a need for housing, services, and facilities for persons with special needs.

Goals:

- SN-1 Housing – Support an increase in the supply of decent, safe and sanitary housing that is affordable and accessible for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs, through rehabilitation of housing units.
- SN-2 Social Services – Support social service programs and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, persons with mental health needs, and persons with other special needs.

Community Development Strategy –

Priority Need: There is a need to improve the community facilities, infrastructure, public services, and quality of life in the City.

Goals:

- CD-1 Community Facilities and Infrastructure – Improve the City's public facilities and infrastructure through rehabilitation, reconstruction, and new construction. Provide an opportunity for broadband access in conjunction with other projects.
- CD-2 Public Services – Invest in community services that promote and enhance targeted populations to improve quality of life.
- CD-3 Accessibility – Improve public and common use areas to be readily accessible and usable by persons with disabilities.

Economic Development Strategy –



Priority Need: There is a need to encourage employment and to promote economic opportunities in the City.

Goals:

- ED-1 Employment – Support and promote job creation, retention, and skills training programs.
- ED-2 Redevelopment – Plan and promote the development, redevelopment, and revitalization by investing in economic growth initiatives to develop and promote small commercial business.

Administration, Planning, and Management Strategy –

Priority Need: There is a need for planning, administration, management, and oversight of federal, state, and local funded programs.

Goals:

- AM-1 Overall Coordination – Provide program management and oversight for the successful administration of federal, state, and local funded programs, including planning services for special studies, environmental clearance, fair housing activities, and compliance with all federal, state, and local laws and regulations.

2. HOME Program

The City of Waukegan receives HOME funds through the Lake County Consortium.

3. Emergency Solutions Grant (ESG) Funds

The City of Waukegan does not receive ESG funds.

4. Housing Opportunity for Persons with AIDS (HOPWA) Funds

The City of Waukegan does not receive HOPWA funds.

5. Public Housing, HUD Assisted Housing, and Low Income Housing Tax Credits

The City of Waukegan has a variety of affordable housing options, including public housing managed by the Waukegan Housing Authority. There are also several privately managed HUD-assisted developments throughout the City. These affordable housing developments and Section 8 Vouchers are located across the City in areas of varying income, demographics, and housing tenure.



Housing Authority

The Waukegan Housing Authority (WHA) is the Public Housing Authority serving the City of Waukegan. WHA owns and manages public housing units and administers housing choice vouchers.

The Housing Authority administers the following programs:

- Low Income Public Housing Program
- Rental Assistance Demonstration (RAD) Program
- Capital Fund Program
- Housing Choice Vouchers Program

The Housing Authority owns and manages the following Public Housing Units:

- 1701 N McAree Rd Waukegan, IL - 75 units general occupancy
- 300 Lake St, Waukegan, Illinois 60085 - 155 units general
- 200 S Martin Luther King Jr Ave, Waukegan, Illinois 60085 – 98 units general
- 565 S Genesee St, Waukegan, Illinois 60085 – 120 units general
- Scattered Sites - 25 units general occupancy

According to WHA's website the mission of the Housing Authority is to promote adequate and affordable housing, economic opportunity, and a suitable living environment free from discrimination for low-income families, very low-income families, persons with disabilities, or the elderly.

The largest demand for affordable housing on the waiting list is for affordable housing for extremely low-income households. The most immediate needs of the families on the waiting list include: decent, safe, sanitary and affordable housing; supportive services such as employment training; access to transportation for commuting to work, shopping, and medical services; and living wage job opportunities.

Homeless Facilities

The Lake County Coalition for the Homeless works to meet the requirements of a Continuum of Care (CoC) Program including coordination of homeless services, promotion of efforts to end homelessness and the submission of an annual funding application.

The following organizations are members of the Lake County Coalition for the Homeless:

A Safe Place - 2710 17th St Suite 100, Zion, IL 60099
Administrative Office of the 19th Judicial Court –18 N County St,
Waukegan, IL 60085



- Alexian Brothers** - 826 North Ave, Waukegan, IL 60085
- Catholic Charities** - 671 S Lewis Ave, Waukegan, IL 60085
- City of Waukegan** - 100 N Martin Luther King Jr Ave, Waukegan, IL 60085
- Community Youth Network** - 18640 Belvidere Rd, Grayslake, IL 60030
- COOL Ministries** - 800 W Glen Flora Ave, Waukegan, IL 60085
- Habitat for Humanity Lake County** - 315 N Martin Luther King Jr Ave, Waukegan, IL 60085
- Independence Center** - 2025 Washington St, Waukegan, IL 60085
- Lake County Community Development** - 18 N County St, Waukegan, IL 60085
- Lake County Haven** - PO Box 127, Libertyville, IL 60048
- Lake County Health Department** – 3010 Grand Avenue, Waukegan IL 60085
- Lake County Housing Authority** - 33928 N. Rte. 45, Grayslake, IL 60030
- Lake County Regional Office of Education** - 800 Lancer Ln # E128, Grayslake, IL 60030
- Lake County Residential Development Corporation** - 1280 Blackburn St, Gurnee, IL 60031
- Most Blessed Trinity House of Peace** – 671 South Lewis Ave. Waukegan, IL 60085
- Nicasa** – 113 Greenwood Ave. Waukegan, IL 60085
- PADS Lake County** – 1800 Grand Ave, Waukegan, IL 60085
- Prairie State Legal Services** - 325 West Washington Street - Suite 100 Waukegan, IL 60085
- United Way Lake County** - 330 S Greenleaf St, Gurnee, IL 60031
- Thresholds** - 300 Grand Ave B, Waukegan, IL 60085
- TLS Veterans** - 5330 W Elm St, McHenry, IL 60050
- Waukegan Township** - 149 S Genesee Street Waukegan, IL 60085
- Youth Conservation Corps** - 1020 W Greenwood Ave, Waukegan, IL 60087
- Zion Township** - 1015 27th St. Zion, IL 60099

Low Income Housing Tax Credit (LIHTC) Housing

The following is a list of Low Income Housing Tax Credit housing in the City of Waukegan.

LIHTC PROJECTS in Waukegan

HUD ID Number	Project Name	Project Address	Project City	Project State	Project ZIP Code	Total Number of Units	Total Low-Income Units
ILA19950230	WAUKEGAN APTS	102 Washington Ter	Waukegan	IL	60085	72	72
ILA19930135	LAKESIDE TOWER APTS	200 Julian St	Waukegan	IL	60085	150	150



ILA20020030	GREEN BAY MANOR APTS	206 N Green Bay Rd	Waukegan	IL	60085	75	75
ILA19970155	BUCKINGHAM PLACE APTS	3040 W Eighth St	Waukegan	IL	60085	166	166
ILA19980040	CINNAMON LAKE TOWERS	2701 W Glen Flora Ave	Waukegan	IL	60085	274	274
ILA19980175	KINGS COURT APTS	2801 W Grandville Ave	Waukegan	IL	60085	168	168
ILA19990095	CHAPEL GARDEN SENIOR APTS	1605 N Mcaree Rd	Waukegan	IL	60085	22	22
ILA20070180	BROOKSTONE APTS	4247 Hickory Hills Dr	Waukegan	IL	60087	168	160
ILA20090935	WHISPERING OAKS APTS	2443 W Dugdale Rd	Waukegan	IL	60085	405	405
ILA20110904	THE RESIDENCES AT FOUNTAIN SQUARE	3960 S Casmir Pulaski Rd	Waukegan	IL		75	75
ILA20110934	VILLAGE PARK APTS	2520 Village Park Dr	Waukegan	IL	60087	126	100
ILA20120808	KARCHER ARTSPACE LOFTS	405 Washington St	Waukegan	IL	60085	36	32

Source: <https://lihtc.huduser.gov/>

There are twelve (12) LIHTC projects with 1,699 units of affordable rental housing in the City.

Multifamily Housing

The following is a list of HUD Multifamily housing in the City of Waukegan:

HUD ID	PROPERTY NAME	ADDRESS	CITY	STATE	ZIP	TOTAL ASSISTED UNITS	TOTAL UNITS	ASSISTANCE
800006466	WAUKEGAN TERRACE APTS	1607 BERWICK BLVD	WAUKEGAN	IL	60085	0	140	Subsidized - Previously Insured
800220585	Lake Park Center	919 Wasington Park	Waukegan	IL	60085	0	102	Insured- Unsubsidized
800226111	JLM10-The Terrace	1615 Sunset Ave.	Waukegan	IL	60087	0	54	HUD Held
800234975	KINGS COURTS APARTMENTS	2801 W Grandville Ave	Waukegan	IL	60085	0	168	Insured- Unsubsidized
800243619	Pavilion of Waukegan	2217 Washington Street	Waukegan	IL	60085	0	43	Insured- Unsubsidized
800005793	CINNAMON LAKE TOWERS	2725 W GLEN FLORA AVE	WAUKEGAN	IL	60085	115	274	Subsidized - Previously Insured
800005980	HICKORY ROAD MANOR	4160 Continental Drive	WAUKEGAN	IL	60087	120	120	Insured- Subsidized
800006032	LAKESIDE TOWER APARTMENTS	200 Julian St.	Waukegan	IL	60085	150	150	Subsidized, No HUD Financing
800006038	Lilac Ledge Apartments	542 Washington Street	WAUKEGAN	IL	60085	203	203	Insured- Subsidized
800006481	WHISPERING OAKS APARTMENTS	2401 W DUGDALE RD	WAUKEGAN	IL	60085	404	404	Subsidized - Previously Insured



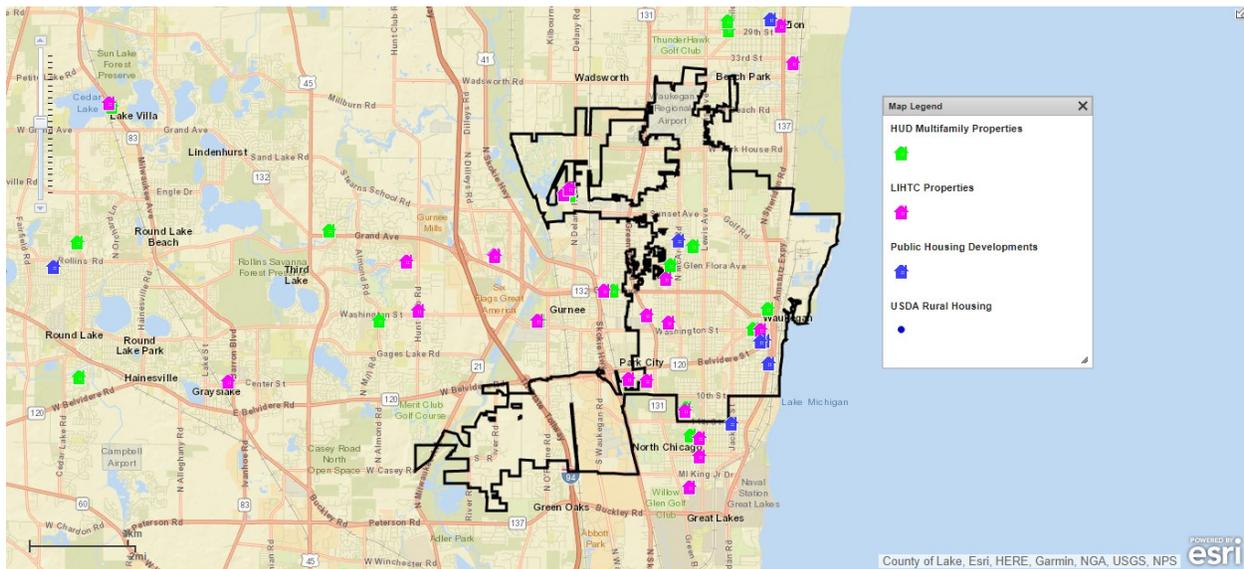
800219522	WAUKEGAN SUPPORTIVE HOUSING	2700 Block of Sunset Avenue	Waukegan	IL	60087	23	23	202/811
-----------	-----------------------------	-----------------------------	----------	----	-------	----	----	---------

Source: https://www.hud.gov/program_offices/housing/mfh/presrv/mfhpreservation

There are eleven (11) active HUD Multifamily Housing projects with 1,681 units of affordable rental housing in the City.

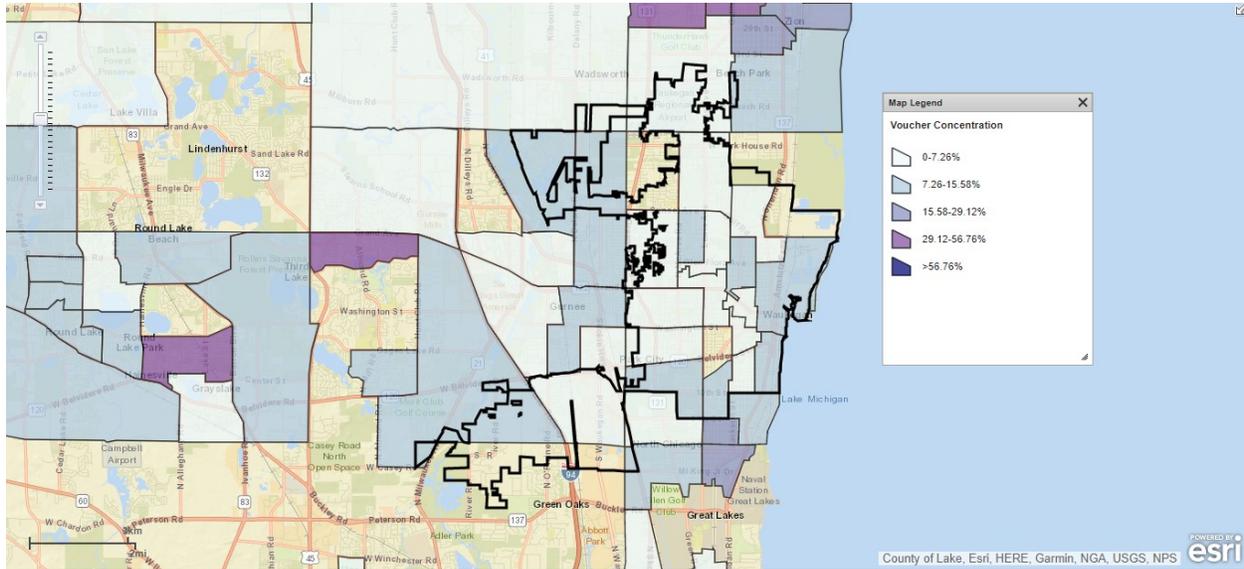
Housing Choice Voucher usage, Public Housing developments, and Low Income Housing Tax Credit (LIHTC) developments are distributed throughout the City. Illustrated in the maps below, there are no distinct patterns of concentration of HUD assisted housing units. The City, as well as the Housing Authority, is aware of the concerns of concentrating low-income housing units within close proximity of each other. Both entities encourage new affordable housing developments outside of areas of existing HUD assisted housing but are also providing financial investments into the existing HUD assisted affordable housing units.

Location of Assisted Housing



Source: HUD CPD Maps

Voucher Concentration



Source: HUD CPD Maps

6. City of Waukegan Codes & Policy

The City should consider adopting a written reasonable accommodation policy that allows for changes in rules and procedures to afford persons with disabilities equal opportunity to housing, as required by the Fair Housing Act. A reasonable accommodation policy would allow the City flexibility in the application of zoning and land use, as well as providing housing developers guidance in requesting reasonable accommodations.

City Policy

The Policy has codified its ordinances. The City last amended its zoning code on November 4, 2019 with the amending of Ordinance No. 19-0-109.

The City is currently in the process of updating its Comprehensive Plan.

The City has applied for a grant from Chicago Metropolitan Agency for Planning (CMAP), which is a combined zoning and subdivision ordinance.

The Planning Department encourages low to moderate income persons, minority, and protected class resident participation on the various City boards and Commissions.

City of Waukegan Building Codes

The City of Waukegan uses the following building codes:



- 2012 International Building Code (IBC)
- 2011 National Electrical Code (NFPA 70) – NEC
- 2014 Illinois Plumbing Code
- 2012 International Property Maintenance Code (IPMC)
- 2015 International Energy Conservation Code (IECC)
- 2012 International Fuel Gas Code (IFGC)
- 2012 International Mechanical Code (IMC)
- 2012 International Fire Code (IFC)
- 2012 International Residential Code (IRC)

The International Building Code is a model code and is in compliance with the federal laws and regulations governing fair housing and accessibility.

Building inspections are administered by the Building Department. The Building Codes are enforced through plan review and inspections. Interviews with the Building Department staff indicated that developers and contractors are abiding by the State and Federal accessibility regulations and there does not appear to be any blatant violations.

Accessibility Regulations

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

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

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



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

The Fair Housing Act prohibits discrimination in the sale or rental of housing. It also requires that landlords must make reasonable modifications dwellings and common use areas to accommodate persons who have a disability. For all new residential buildings of four or more units built after March 13, 1991: public and common areas must be accessible to persons with disabilities; doors and hallways must be wide enough for wheelchairs; all housing units must have accessible routes into and through the unit; there must be accessible light switches, outlets, thermostats; bathroom walls must be reinforced to allow for the installation of grab bars; and kitchens and baths must be accessible so they can be used by persons in wheelchairs.

7. Limited English Proficiency (LEP) Persons

Section 601 of Title VI the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs or activities that receive federal financial assistance. One type of national origin discrimination is discrimination based on a person’s inability to speak, read, write, or understand English. In certain situations, failure to ensure that persons who are LEP can effectively participate in, or benefit from, federally assisted programs may violate the Civil Rights Act.

According to the 2011-2015 American Community Survey for the City of Waukegan, 55.5% of residents speak a language other than English at home. Of those residents, 43.7% report that they speak English less than “very well.” The following languages are spoken at home:

English	44.5%
Spanish	49.9%
Other Indo-European languages	2.1%
Asian and Pacific Island languages	3.3%
Other languages	0.2%

The two largest non-English speaking populations in the City are Spanish and Asian and Pacific Island language speakers.

8. Four Factor Analysis



The City as a CDBG entitlement community is required to develop a plan for persons of different national origins that cannot speak, read, write, or understand English to ensure that LEP persons have meaningful access to CDBG funded programs and services, as well as all City programs and services. As such, the City has updated its Four Factor Analysis. The purpose of the Four Factor Analysis is to determine the reasonableness of language assistance for LEP persons based on the following:

1. Number or Proportion of LEP persons in the population to be served. It is estimated that the County has one non-English speaking populations that exceed the 5% or 1,000 person LEP limit. Those non-English speaking populations are Spanish speakers. There are additional non-English speakers in the City but in limited numbers.

2. Frequency with which LEP persons come into contact with the program activity or service. The City of Waukegan Community Development Block Grant Department uses CDBG funds for activities that directly assist City residents, such as housing and public service activities, primarily through subrecipient non-profit provider agencies. Additionally, the City uses CDBG funds for public infrastructure and facility improvements, projects that do not directly assist City residents. However, the City encourages public participation in the identification and implementation of public infrastructure and facility improvement activities.

According to the FY 2019 CAPER and Report PR-23, the total beneficiaries of CDBG assistance in PY 2019 were 1,691 individuals: 737 were White; 721 were Black/African American; 177 were Other Multi-racial; 29 were Asian; 13 were Black/African American & White; 8 were Asian & White; 4 were American Indian/Alaskan native & Black/African; 2 were American Indian/Alaskan Native; and 308 were Hispanic.

3. Importance of the service, information, program, and/or activity. The City's CDBG housing and public service activities are critical to the City's residents for access to decent, safe, sanitary, and affordable housing, as well as necessary in terms of supportive services to maintaining residents' quality of life. The City, local advocacy groups and organizations, and its subrecipient agencies must be able to outreach and interact with LEP persons to make CDBG programs and services accessible to LEP persons.

4. Resources, financial and human, available to the recipient. Translation and interpretive services are vital for housing and public services activities and would be provided by the City, either through City staff or a community liaison, to any beneficiary that requires those services. Additionally, CDBG citizen participation materials and public notices will be published with the statement, "Any non-English speaking



person wishing to attend the public hearing should contact (Name) at least seven (7) calendar days prior to the meeting and a (Language) interpreter will be provided. This document and program materials are available in (Language) upon request.” These statements will be translated in Haitian Creole and Spanish.

The City is a part of the 19th Judicial Circuit Court of Illinois’ Language Access Plan, and Richard A. Krause is the Language Access Plan contact. Specific to the CDBG Program, its staff and subrecipients, utilize the following language assistance plan to assist LEP persons:

- Engaging advocacy groups to promote services available through the CDBG Program
- Interpretation and translation services by partnering with LEP groups, faith based organizations, and schools
- Referrals to community liaisons proficient in the language of LEP persons
- Notices and training to staff of the availability of LEP services
- Advertising language services in outreach documents
- Utilize HUD translated documents found at: https://www.hud.gov/program_offices/fair_housing_equal_opp/17lep

9. Taxes

While real estate tax rates may not be an impediment to fair housing choice, the amount and method of calculation of taxes impacts the affordability of housing especially as it relates to housing in the surrounding area.

The following table shows the millage rates for the City of Waukegan

	City	School	County	Predominant Rate 2018
Waukegan	3.030271	7.653503	0.611675	13.272616

Source: Lake County Office of the County Clerk

Real estate tax rates are the highest in the Cities as compared to the County. Studies have shown that property values tend to appreciate slower in areas of higher effective property tax rates as compared to areas



of lower effective property tax rates. This is of course contingent on the real tax rate as it relates to assessed home values.

10. Comprehensive Plan

In 2019, the City of Waukegan began the process of updating its Comprehensive Plan. This is the first update to the City's Comprehensive Plan in 30 years.

11. Section 504 Plan

The City is in the process of updating its Section 504 Plan.

12. Section 3 Plan

The City of Waukegan will include the following Section 3 language in its contracts and is in the process of updating its Section 3 Plan Goals.

HUD's definition of Section 3 is:

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

A. The work to be performed under this contract is subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u (Section 3). The purpose of Section 3 is to ensure that employment and other economic opportunities generated by HUD assistance or HUD-assisted projects covered by Section 3, shall, to the greatest extent feasible, be directed to low- and very low-income persons, particularly persons who are recipients of HUD assistance for housing.

B. The parties to this contract agree to comply with HUD's regulations in 24 CFR part 135, which implement Section 3. As evidenced by their execution of this contract, the parties to this contract certify that they are under no contractual or other impediment that would prevent them from complying with the part 135 regulations.



C. The contractor agrees to send to each labor organization or representative of workers with which the contractor has a collective bargaining agreement or other understanding, if any, a notice advising the labor organization or workers' representative of the contractor's commitments under this Section 3 clause, and will post copies of the notice in conspicuous places at the work site where both employees and applicants for training and employment positions can see the notice. The notice shall describe the Section 3 preference, shall set forth minimum number and job titles subject to hire, availability of apprenticeship and training positions, the qualifications for each; and the name and location of the person(s) taking applications for each of the positions; and the anticipated date the work shall begin.

D. The contractor agrees to include this Section 3 clause in every subcontract subject to compliance with regulations in 24 CFR part 135, and agrees to take appropriate action, as provided in an applicable provision of the subcontract or in this Section 3 clause, upon a finding that the subcontractor is in violation of the regulations in 24 CFR part 135. The contractor will not subcontract with any subcontractor where the contractor has notice or knowledge that the subcontractor has been found in violation of the regulations in 24 CFR part 135.

E. The contractor will certify that any vacant employment positions, including training positions, that are filled (1) after the contractor is selected but before the contract is executed, and (2) with persons other than those to whom the regulations of 24 CFR part 135 require employment opportunities to be directed, were not filled to circumvent the contractor's obligations under 24 CFR part 135.

F. Noncompliance with HUD's regulations in 24 CFR part 135 may result in sanctions, termination of this contract for default, and debarment or suspension from future HUD assisted contracts.

G. With respect to work performed in connection with Section 3 covered Indian housing assistance, Section 7(b) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450e) also applies to the work to be performed under this contract. Section 7(b) requires that to the greatest extent feasible (i) preference and opportunities for training and employment shall be given to Indians, and (ii) preference in the award of contracts and subcontracts shall be given to Indian organizations and Indian-owned Economic Enterprises. Parties to this contract that are subject to the provisions of Section 3 and Section 7(b) agree to comply with Section 3 to the maximum extent feasible, but not in derogation of compliance with Section 7(b).

13. Transportation



Renting or owning an affordable home is not the only factor in a resident’s quality of life and access to fair housing. Having access to transportation, whether it is a private vehicle or a public bus, is just as important as the price of a rent or mortgage. Mobility determines whether a resident can access work, education, services, or healthcare.

PACE Bus

The City of Waukegan’s local bus system is administered by PACE Bus. PACE operates in 284 municipalities in Cook, Will, DuPage, Kane, Lake, and McHenry Counties, with approximately 200 ADA accessible, fixed bus routes. There are currently 21 fixed routes in Lake County they typically run as early as 6 AM to as late as 6 or 7 PM. PACE offers paratransit and on demand services however, they are not currently available in Waukegan. PACE offers Reduced Fair and Ride Free programs to disabled, low income, and elderly riders. Participants in these programs are required to go through an interview process.



Metra

Metra is a commuter rail system that offers transit to downtown Chicago. The Metra line is made up of 241 stations from Chicago to the six-county northeast Illinois. Trains are frequent during rush hour and arrive roughly every hour during off-peak times.



Lake County is served by four Metra commuter rail lines, totaling 32 train stations in Lake County:

- **Union Pacific / North Line (UP-N)** - travels along the lakefront from Kenosha, WI to Ogilvie Transportation Center in Chicago
- **North Central Service (NCS)** - goes from Antioch, IL in northwest Lake County to Union Station in Chicago;
- **Milwaukee District North (IL-N)** - travels from Fox Lake in northwest Lake County to Union Station in Chicago;
- **Union Pacific / Northwest Line (UP-NW)** - This line goes through Lake County and services the Barrington residents in Cook and McHenry Counties. The UP-NW travels from Harvard (McHenry County) to Ogilvie Transportation Center in Chicago.

RTA – Regional Transportation Authority



The Regional Transportation Authority (RTS) serves as the Metropolitan Planning Organization (MPO) for Chicago and Northeastern Illinois. The RTA is responsible for funding, financial oversight, and regional transit planning for the Chicago Transit Authority, Metra, and Pace Bus and Pace Paratransit. The RTA system is used by over two million riders on each work-day throughout 6 counties in Northeastern Illinois.

The Regional Transportation Authority Travel Training Program is used to educate individuals with disabilities and other adults of ways to use the CTA, Metra, and Pace. These trainings are free with exception to the costs of the transit fees during the classes. The program offers the following three trainings:

- **Trip Training**
- **Individual Transit Orientation**
- **Group Transit Orientation**

The RTA Travel Training Coordinator will help participants select the most appropriate training for their individual need. The sessions are provided by professionals that are knowledgeable about transportation accessibility and have experience working with individuals with disabilities and elderly individuals.

The 2018-2023 Regional Transit Strategic Plan for Chicago and Northeastern Illinois

The plan's goals describe the key areas of focus for the Transit Agencies from 2018-2023. According to the Plan, safety, security, and accessibility are core responsibilities of the Transit Agencies and stretch across all of the Plan's goals.

The Plan outlines the following Goals:

- **Deliver Value on our investment:** Transit is the backbone of the Chicago region's transportation network. Public investments in mass transit that began 70 years ago with the creation of the CTA, and continued with the creation of Metra Commuter Rail and Pace Suburban Bus in the 1980s, have helped the region withstand the test of time as one of the nation's premier freight, banking, and commerce hubs. That legacy of investment has continued for decades since and needs to continue for decades to come, benefiting both those who ride and those who don't.
- **Build on the strengths of our network:** Our diverse transit system, consisting of a traditional network of buses, commuter rail,



elevated rapid transit, and subway lines as well as unique services such as a fleet of vanpools, ADA and paratransit, on-demand services, and express bus lines, provides over 2 million passenger rides each weekday. This makes us the second largest transit system in the country — a position that reflects the size, functionality, and effectiveness of our interconnected system.

- **Stay Competitive:** Mobile devices, cultural trends toward shared mobility, and private mobility services are all disrupting traditional public transit paradigms. Transit agencies across the country are responding by adding enhanced trip planning, real-time availability, and mobile payment capabilities. These are small, but impactful improvements that change the customer experience. Transit's competitive advantage is its low cost, comfortable trips that allow riders to be productive en route, and fast service that is (or should be) largely removed from general traffic congestion. Continued investment is required to maintain that edge.

Source: "Invest in Transit" The 2018-2023 Regional Transit Strategic Plan for Chicago and Northeastern Illinois

14. Education

School districts, particularly "good" school districts, is an oft-cited reason for families to move to an area. The City of Waukegan's school district has a total of twenty-two (22) schools.

The Illinois State Board of Education (IBE) used the Illinois Report Card (IRC) to assess a school's performance. The purpose of IRC's website allows individuals to find school data, including academic performance, school environment, educators, students, and highlights provided by principals.

City of Waukegan Schools

- 16,234 District Enrollment
- 22 Schools
 - 1 Exemplary School
 - 12 Commendable Schools
 - 8 Underperforming Schools
 - 0 Lowest Performing Schools
- 73% Graduation Rate
- 78.2% Hispanic, 14.0% Black, 3.7% White, 1.2% Asian
- 65% Low Income



According to a report by Governing, “school segregation across metro areas is prevalent throughout Illinois. Eight of the state’s 10 metro [areas] ranked among the highest third nationally for black-white school segregation. On the Black-White School Dissimilarity Index a 1 represents a high segregation. The Chicago metro Area has a Black-White School Dissimilarity Index of .778 which is significantly higher than the US median (for areas with 2,000+ black students) of .545. There are many potential reasons as to why this is a problem in the Chicago Metro Area. Governing attributes much of this segregation to a white flight problem.

C. Private Sector:

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

1. Real Estate Practices

Illinois Realtors (LCPRA) is a trade organization of real estate brokers operating out of Springfield, but they have 50,000 members statewide. Illinois Realtors members are bound by the Code of Ethics of the National Association of Realtors (NAR). Under the Code of Ethics, members must maintain professional standards including efforts to affirmatively furthering fair housing. Realtors must complete annual continuing education on topics that focus on protecting the rights of persons covered under the Fair Housing Act, the Civil Rights Act, and ADA laws. While there were no direct impediments to fair housing choice attributable to real estate agents and Realtors, their commitment to fair housing choice is vital to the City’s success in affirmatively furthering fair housing choice. The City should continue to develop relationships with local real estate agents and realtors to promote fair housing choice.

2. Real Estate Advertising

Under Federal Law, no advertisement with respect to the sale or rental of a dwelling unit may indicate any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin. Under the Fair Housing Act Amendments, descriptions are listed in



regard to the use of words, photographs, symbols or other approaches that are considered discriminatory.

Real estate advertisements were reviewed from several electronic sources such as: Facebook, Craigslist, Realtor.com, Rent.com, and Zillow.com. Some of the sources included a disclaimer from the publisher indicating that each advertisement is subject to the Federal Fair Housing Act and that all dwellings advertised are available on an equal opportunity basis. Most of the sources included the Fair Housing logo. None of the publications appeared to contain discriminatory language nor prohibited occupancy by any protected class.

3. Private Financing

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The annual HMDA data can be found online at www.ffiec.gov/hmda/. The most recent HMDA Data is that of 2017, which is the data that was used for this analysis. The following tables provide an analysis of the HMDA data in the Metropolitan Statistical Area (MSA). The MSA includes all of Lake County and Kenosha County, Wisconsin. The home loans included in this report represent loans on 1- to 4-family and manufactured homes from the following loan types: 1) FHA, FSA/RHS and VA; 2) Conventional; 3) Refinancings; and 4) Home Improvement.



The table below lists the lending activity that occurred during 2015 in the area.

Home Loans Purchased by Location of Property and Type of Loan								
Area	FHA, FSA/RHS & VA		Conventional		Refinancing		Home Improvement Loans	
	#	Amount	#	Amount	#	Amount	#	Amount
City of Waukegan	424	53,428	125	20,821	217	37,024	3	410
City of Waukegan Loans as a % of MSA Loans	21.87%	17.30%	7.08%	4.77%	8.67%	6.12%	3.36%	3.71%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2015/PA/10900>

The table below lists the lending activity that occurred during 2017 in the area.

Home Loans Purchased by Location of Property and Type of Loan						
Loan		Loans Originated	Approved, Not Accepted	Applications Denied	Applications Withdrawn	File Closed for Incompleteness
FHA, FSA/RHS & VA	Waukegan	434	43	74	71	12
	MSA	2,721	129	530	396	94
Conventional	Waukegan	507	34	94	75	16
	MSA	7,265	315	873	874	194
Refinancings	Waukegan	836	76	396	236	116
	MSA	11,231	614	3,568	2,195	994
Home Improvement Loans	Waukegan	64	5	108	10	5
	MSA	647	54	487	83	42

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2015/PA/10900>

The table below lists the lending activity by income group to establish a baseline for lending activity per income.



Disposition of Loan Applications by Income of Applicant												
Loan	Income	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	Less than 50% of MSA/IL median	3,063	1,937	63.24%	126	4.11%	580	18.94%	317	10.35%	103	3.36%
	50-79% of MSA/IL median	3,842	2,841	73.95%	174	4.53%	464	12.08%	294	7.65%	69	1.80%
	80-99% of MSA/IL median	1,742	1,309	75.14%	30	1.72%	210	12.06%	168	9.64%	25	1.44%
	100-119% of MSA/IL median	981	728	74.21%	24	2.45%	112	11.42%	94	9.58%	23	2.34%
	120% or more of MSA/IL median	1,600	1,163	72.69%	23	1.44%	160	10.00%	218	13.63%	36	2.25%
Conventional	Less than 50% of MSA/IL median	2,843	1,881	66.16%	131	4.61%	556	19.56%	205	7.21%	70	2.46%
	50-79% of MSA/IL median	4,674	3,471	74.26%	199	4.26%	532	11.38%	390	8.34%	82	1.75%
	80-99% of MSA/IL median	2,939	2,334	79.41%	87	2.96%	214	7.28%	249	8.47%	55	1.87%
	100-119% of MSA/IL median	2,608	2,105	80.71%	62	2.38%	176	6.75%	201	7.71%	64	2.45%
	120% or more of MSA/IL median	14,227	11,120	78.16%	423	2.97%	1,009	7.09%	1,393	9.79%	282	1.98%
Refinance	Less than 50% of MSA/IL median	4,372	1,792	40.99%	174	3.98%	1,600	36.60%	616	14.09%	190	4.35%
	50-79% of MSA/IL median	7,398	3,870	52.31%	294	3.97%	1,959	26.48%	885	11.96%	390	5.27%
	80-99% of MSA/IL median	5,521	3,214	58.21%	205	3.71%	1,188	21.52%	649	11.76%	265	4.80%



	100-119% of MSA/IL median	5,097	3,119	61.19%	153	3.00%	992	19.46%	595	11.67%	238	4.67%
	120% or more of MSA/IL median	24,700	16,968	68.70%	778	3.15%	3,375	13.66%	2,486	10.06%	1,093	4.43%
Home Improvement	Less than 50% of MSA/IL median	679	225	33.14%	25	3.68%	375	55.23%	34	5.01%	20	2.95%
	50-79% of MSA/IL median	710	269	37.89%	34	4.79%	361	50.85%	28	3.94%	18	2.54%
	80-99% of MSA/IL median	455	217	47.69%	23	5.05%	177	38.90%	18	3.96%	20	4.40%
	100-119% of MSA/IL median	358	174	48.60%	6	1.68%	115	32.12%	42	11.73%	21	5.87%
	120% or more of MSA/IL median	1517	947	62.43%	65	4.28%	347	22.87%	114	7.51%	44	2.90%
Total	Less than 50% of MSA/IL median	10,957	5,835	53.25%	456	4.16%	3,111	28.39%	1,172	10.70%	383	3.50%
	50-79% of MSA/IL median	16,624	10,451	62.87%	701	4.22%	3,316	19.95%	1,597	9.61%	559	3.36%
	80-99% of MSA/IL median	10,657	7,074	66.38%	345	3.24%	1,789	16.79%	1,084	10.17%	365	3.42%
	100-119% of MSA/IL median	9,044	6,126	67.74%	245	2.71%	1,395	15.42%	932	10.31%	346	3.83%
	120% or more of MSA/IL median	42,044	30,198	71.82%	1,289	3.07%	4,891	11.63%	4,211	10.02%	1,455	3.46%
	TOTAL	89,326	59,684	66.82%	3,036	3.40%	14,502	16.23%	8,996	10.07%	3,108	3.48%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2015/PA/10900>



The table below lists the lending activity by racial/ethnic group.

Disposition of Loan Applications by Race/Ethnicity of Applicant													
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		
		#	#	%	#	%	#	%	#	%	#	%	
FHA, FSA/RHS, and VA	American Indian/Alaska Native	11	9	81.82%	0	0.00%	2	18.18%	-	-	-	-	
	Asian	107	72	67.29%	5	4.67%	16	14.95%	12	11.21%	2	1.87%	
	Black or African American	224	148	66.07%	11	4.91%	37	16.52%	18	8.04%	10	4.46%	
	Native Hawaiian or Other Pacific Islander	13	9	69.23%	0	0.00%	3	23.08%	-	-	1	7.69%	
	White	3,175	2,257	71.09%	104	3.28%	417	13.13%	323	10.17%	74	2.33%	
	2 or more minority races	-	-	-	-	-	-	-	-	-	-	-	-
	Joint (White/Minority Race)	66	52	78.79%	1	1.52%	3	4.55%	9	13.64%	1	1.52%	
	Race Not Available	274	174	63.50%	8	2.92%	52	18.98%	34	12.41%	6	2.19%	
	Hispanic or Latino	1,005	651	64.78%	47	4.68%	174	17.31%	111	11.04%	22	2.19%	
Conventional	American Indian/Alaska Native	26	20	76.92%	-	-	4	15.38%	2	7.69%	-	-	
	Asian	938	709	75.59%	26	2.77%	89	9.49%	86	9.17%	28	2.99%	
	Black or African American	145	99	68.28%	9	6.21%	13	8.97%	20	13.79%	4	2.76%	
	Native Hawaiian or Other Pacific Islander	12	9	75.00%	-	-	1	8.33%	2	16.67%	-	-	



	White	7,498	5,801	77.37%	244	3.25%	659	8.79%	659	8.79%	135	1.80%
	2 or more minority races	5	2	40.00%	-	-	2	40.00%	1	20.00%	-	-
	Joint (White/Minority Race)	149	112	75.17%	7	4.70%	12	8.05%	15	10.07%	3	2.01%
	Race Not Available	748	513	68.58%	29	3.88%	93	12.43%	89	11.90%	24	3.21%
	Hispanic or Latino	665	440	66.17%	29	4.36%	114	17.14%	67	10.08%	15	2.26%
Refinance	American Indian/Alaska Native	52	23	44.23%	2	3.85%	11	21.15%	11	21.15%	5	9.62%
	Asian	1,121	732	65.30%	37	3.30%	181	16.15%	113	10.08%	58	5.17%
	Black or African American	491	195	39.71%	21	4.28%	160	32.59%	80	16.29%	35	7.13%
	Native Hawaiian or Other Pacific Islander	52	21	40.38%	4	7.69%	16	30.77%	5	9.62%	6	11.54%
	White	14,589	9,054	62.06%	469	3.21%	2,672	18.32%	1,683	11.54%	711	4.87%
	2 or more minority races	14	4	28.57%	1	7.14%	6	42.86%	3	21.43%	-	-
	Joint (White/Minority Race)	241	160	66.39%	6	2.49%	35	14.52%	21	8.71%	19	7.88%
	Race Not Available	2,042	1,042	51.03%	74	3.62%	487	23.85%	279	13.66%	160	7.84%
	Hispanic or Latino	1,029	449	43.63%	42	4.08%	287	27.89%	164	15.94%	87	8.45%
Home Improvement	American Indian/Alaska Native	5	2	40.00%	-	-	3	60.00%	-	-	-	-
	Asian	56	29	51.79%	1	1.79%	21	37.50%	3	5.36%	2	3.57%
	Black or African American	78	23	29.49%	2	2.56%	45	57.69%	4	5.13%	4	5.13%



	Native Hawaiian or Other Pacific Islander	2	-	-	-	-	2	100.00%		-	-	-
	White	1,003	515	51.35%	42	4.19%	347	34.60%	66	6.58%	33	3.29%
	2 or more minority races	1	1	100.00%	-	-	-	-	-	-	-	-
	Joint (White/Minority Race)	12	6	50.00%	-	-	5	41.67%	1	8.33%	-	-
	Race Not Available	156	71	45.51%	9	5.77%	64	41.03%	9	5.77%	3	1.92%
	Hispanic or Latino	161	39	24.22%	6	3.73%	105	65.22%	9	5.59%	2	1.24%
Total	American Indian/Alaska Native	94	54	57.45%	2	2.13%	20	21.28%	13	13.83%	5	5.32%
	Asian	2,222	1,542	69.40%	69	3.11%	307	13.82%	214	9.63%	90	4.05%
	Black or African American	938	465	49.57%	43	4.58%	255	27.19%	122	13.01%	53	5.65%
	Native Hawaiian or Other Pacific Islander	79	39	49.37%	4	5.06%	22	27.85%	7	8.86%	7	8.86%
	White	26,265	17,627	67.11%	859	3.27%	4,095	15.59%	2,731	10.40%	953	3.63%
	2 or more minority races	20	7	35.00%	1	5.00%	8	40.00%	4	20.00%	0	0.00%
	Joint (White/Minority Race)	468	330	70.51%	14	2.99%	55	11.75%	46	9.83%	23	4.91%
	Race Not Available	3,220	1,800	55.90%	120	3.73%	696	21.61%	411	12.76%	193	5.99%
	Hispanic or Latino	2,860	1,579	55.21%	124	4.34%	680	23.78%	351	12.27%	126	4.41%
	Total	36,166	23,443	64.82%	1,236	3.42%	6,138	16.97%	3,899	10.78%	1,450	4.01%

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2015/IL/41540>



The following tables will compare denial rates per racial/ethnic group and income to identify any group that may have higher denial rates than another. Higher denial rates are highlighted.

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
Less than 50% of MSA/IL Median - Waukegan												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	2	1	50.00%	-	-	1	50.00%	-	-	-	-
	Asian	13	8	61.54%	-	-	2	15.38%	2	15.38%	1	7.69%
	Black or African American	48	26	54.17%	1	2.08%	13	27.08%	3	6.25%	5	10.42%
	Native Hawaiian or Other Pacific Islander	4	2	50.00%	-	-	2	50.00%	-	-	-	-
	White	906	582	64.24%	39	4.30%	165	18.21%	91	10.04%	29	3.20%
	2 or more minority races	-	-	-	-	-	-	-	-	-	-	-
	Joint (White/Minority Race)	2	2	100.00%	-	-	-	-	-	-	-	-
	Race Not Available	67	34	50.75%	3	4.48%	16	23.88%	14	20.90%	-	-
	Hispanic or Latino	500	306	61.20%	26	5.20%	97	19.40%	57	11.40%	14	2.80%
Conventional	American Indian/Alaska Native	1	1	100.00%	-	-	-	-	-	-	-	-
	Asian	30	19	63.33%	1	3.33%	8	26.67%	2	6.67%	-	-
	Black or African American	24	12	50.00%	1	4.17%	5	20.83%	6	25.00%	-	-



	Native Hawaiian or Other Pacific Islander	1	1	100.00%	-	-	-	-	-	-	-	-
	White	839	568	67.70%	39	4.65%	155	18.47%	56	6.67%	21	2.50%
	2 or more minority races	1	-	-	-	-	1	100.00%	-	-	-	-
	Joint (White/Minority Race)	4	1	25.00%	-	-	3	75.00%	-	-	-	-
	Race Not Available	68	36	52.94%	4	5.88%	18	26.47%	6	8.82%	4	5.88%
	Hispanic or Latino	233	145	62.23%	7	3.00%	51	21.89%	24	10.30%	6	2.58%
Refinance	American Indian/Alaska Native	7	4	57.14%	1	14.29%	1	14.29%	1	14.29%	-	-
	Asian	36	9	25.00%	1	2.78%	17	47.22%	4	11.11%	5	13.89%
	Black or African American	48	8	16.67%	3	6.25%	24	50.00%	11	22.92%	2	4.17%
	Native Hawaiian or Other Pacific Islander	7	2	28.57%	1	14.29%	3	42.86%	1	14.29%	-	-
	White	1188	521	43.86%	42	3.54%	418	35.19%	165	13.89%	42	3.54%
	2 or more minority races	1	-	-	1	100.00%	-	-	-	-	-	-
	Joint (White/Minority Race)	12	3	25.00%	1	8.33%	4	33.33%	2	16.67%	2	16.67%
	Race Not Available	225	71	31.56%	12	5.33%	94	41.78%	30	13.33%	18	8.00%
	Hispanic or Latino	214	88	41.12%	4	1.87%	84	39.25%	26	12.15%	12	5.61%
Home Improvement	American Indian/Alaska Native	1	-	-	-	-	1	100.00%	-	-	-	-
	Asian	3	2	66.67%	-	-	1	33.33%	-	-	-	-
	Black or African American	36	14	38.89%	-	-	20	55.56%	-	-	2	5.56%



	Native Hawaiian or Other Pacific Islander	-	-	-	-	-	-	-	-	-	-	-
	White	166	53	31.93%	7	4.22%	92	55.42%	10	6.02%	4	2.41%
	2 or more minority races	-	-	-	-	-	-	-	-	-	-	-
	Joint (White/Minority Race)	2	1	50.00%	-	-	1	50.00%	-	-	-	-
	Race Not Available	26	7	26.92%	2	7.69%	14	53.85%	2	7.69%	1	3.85%
	Hispanic or Latino	58	10	17.24%	3	5.17%	41	70.69%	3	5.17%	1	1.72%
Total	American Indian/Alaska Native	11	6	54.55%	1	9.09%	3	27.27%	1	9.09%	-	-
	Asian	82	38	46.34%	2	2.44%	28	34.15%	8	9.76%	6	7.32%
	Black or African American	156	60	38.46%	5	3.21%	62	39.74%	20	12.82%	9	5.77%
	Native Hawaiian or Other Pacific Islander	12	5	41.67%	1	8.33%	5	41.67%	1	8.33%	0	0.00%
	White	3099	1724	55.63%	127	4.10%	830	26.78%	322	10.39%	96	3.10%
	2 or more minority races	2	0	0.00%	1	50.00%	1	50.00%	-	-	-	-
	Joint (White/Minority Race)	20	7	35.00%	1	5.00%	8	40.00%	2	10.00%	2	10.00%
	Race Not Available	386	148	38.34%	21	5.44%	142	36.79%	52	13.47%	23	5.96%
	Hispanic or Latino	1005	549	54.63%	40	3.98%	273	27.16%	110	10.95%	33	3.28%
	Total	4773	2537	53.15%	199	4.17%	1352	28.33%	516	10.81%	169	3.54%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2015/IL/41540>

For loan applicants under 50% of MSA/IL Median income the following groups had denial rates that were 10% higher than the average denial rate:



- American Indian/Alaska Native FHA, FSA/RHS, and VA loan denial rates of 50% (19.20% Average)
- Native Hawaiian or Other Pacific Islander FHA, FSA/RHS, and VA loan denial rates of 50% (19.20% Average)
- Two or more minority races conventional loan denial rates of 100.00% (20.00% Average)
- Joint Minority Race conventional loan denial rate of 75.00% (20.00% Average)
- Asian refinance loan denial rate of 47.22% (37.11% Average)
- American Indian/Alaska Native refinance loan denial rate of 100.00% (58.21% Average)
- Hispanic or Latino Home improvement loan denial rate of 100.00% (70.69% Average)

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
50-79% of MSA/IL Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	5	4	80.00%	-	-	1	20.00%	-	-	-	-
	Asian	33	22	66.67%	3	9.09%	5	15.15%	3	9.09%	-	-
	Black or African American	92	65	70.65%	9	9.78%	10	10.87%	6	6.52%	2	2.17%
	Native Hawaiian or Other Pacific Islander	3	2	66.67%	-	-	1	33.33%	-	-	-	-
	White	1072	802	74.81%	43	4.01%	123	11.47%	85	7.93%	19	1.77%
	2 or more minority races	-	-	-	-	-	-	-	-	-	-	-
	Joint (White/Minority Race)	12	10	83.33%	-	-	2	16.67%	-	-	-	-
	Race Not Available	93	61	65.59%	4	4.30%	18	19.35%	7	7.53%	3	3.23%
	Hispanic or Latino	346	238	68.79%	19	5.49%	50	14.45%	34	9.83%	5	1.45%



Con venti onal	American Indian/Alaska Native	1	1	100.00%	-	-	-	-	-	-	-	-
	Asian	30	19	63.33%	1	3.33%	8	26.67%	2	6.67%	-	-
	Black or African American	24	12	50.00%	1	4.17%	5	20.83%	6	25.00%	-	-
	Native Hawaiian or Other Pacific Islander	1	1	100.00%	-	-	-	-	-	-	-	-
	White	839	568	67.70%	39	4.65%	155	18.47%	56	6.67%	21	2.50%
	2 or more minority races	1	-	-	-	-	1	100.00%	-	-	-	-
	Joint (White/Minority Race)	4	1	25.00%	-	-	3	75.00%	-	-	-	-
	Race Not Available	68	36	52.94%	4	5.88%	18	26.47%	6	8.82%	4	5.88%
	Hispanic or Latino	233	145	62.23%	7	3.00%	51	21.89%	24	10.30%	6	2.58%
Refinance	American Indian/Alaska Native	7	4	57.14%	1	14.29%	1	14.29%	1	14.29%	-	-
	Asian	36	9	25.00%	1	2.78%	17	47.22%	4	11.11%	5	13.89%
	Black or African American	48	8	16.67%	3	6.25%	24	50.00%	11	22.92%	2	4.17%
	Native Hawaiian or Other Pacific Islander	7	2	28.57%	1	14.29%	3	42.86%	1	14.29%	-	-
	White	1188	521	43.86%	42	3.54%	418	35.19%	165	13.89%	42	3.54%
	2 or more minority races	1	-	-	1	100.00%	-	-	-	-	-	-
	Joint (White/Minority Race)	12	3	25.00%	1	8.33%	4	33.33%	2	16.67%	2	16.67%
	Race Not Available	225	71	31.56%	12	5.33%	94	41.78%	30	13.33%	18	8.00%
	Hispanic or Latino	214	88	41.12%	4	1.87%	84	39.25%	26	12.15%	12	5.61%



Home Impr	American Indian/Alaska Native	1	1	100.00%	-	-	-	-	-	-	-	-
	Asian	3	1	33.33%	-	-	2	66.67%	-	-	-	-
	Black or African American	18	4	22.22%	2	11.11%	12	66.67%	-	-	-	-
	Native Hawaiian or Other Pacific Islander	-	-	-	-	-	-	-	-	-	-	-
	White	193	79	40.93%	8	4.15%	92	47.67%	8	4.15%	6	3.11%
	2 or more minority races	-	-	-	-	-	-	-	-	-	-	-
	Joint (White/Minority Race)	1	-	-	-	-	1	100.00%	-	-	-	-
	Race Not Available	29	7	24.14%	2	6.90%	18	62.07%	2	6.90%	-	-
	Hispanic or Latino	52	12	23.08%	3	5.77%	34	65.38%	3	5.77%	-	-
Total	American Indian/Alaska Native	14	10	71.43%	1	7.14%	2	14.29%	1	7.14%	-	-
	Asian	102	51	50.00%	5	4.90%	32	31.37%	9	8.82%	5	4.90%
	Black or African American	182	89	48.90%	15	8.24%	51	28.02%	23	12.64%	4	2.20%
	Native Hawaiian or Other Pacific Islander	11	5	45.45%	1	9.09%	4	36.36%	1	9.09%	0	0.00%
	White	3292	1970	59.84%	132	4.01%	788	23.94%	314	9.54%	88	2.67%
	2 or more minority races	2	-	-	1	50.00%	1	50.00%	-	-	-	-
	Joint (White/Minority Race)	29	14	48.28%	1	3.45%	10	34.48%	2	6.90%	2	6.90%
	Race Not Available	415	175	42.17%	22	5.30%	148	35.66%	45	10.84%	25	6.02%
	Hispanic or Latino	845	483	57.16%	33	3.91%	219	25.92%	87	10.30%	23	2.72%



	Total	4892	2797	57.17%	211	4.31%	1255	25.65%	482	9.85%	147	3.00%
--	--------------	-------------	-------------	---------------	------------	--------------	-------------	---------------	------------	--------------	------------	--------------

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2015/IL/41540>

For loan applicants 50-79% of MSA/IL Median income the following groups had denial rates that were 10% higher than the average denial rate:

- American Indian/Alaska Native FHA, FSA/RHS, and VA loan denial rate of 33.33% (12.68% Average)
- Two or More Minority Races conventional loan denial rate of 100.00% (20.06% Average)
- Joint conventional loan denial rate of 75.00% (20.06% Average)
- Asian refinance loan denial rate of 47.22% (37.11% Average)
- Black or African American refinance loan denial rate of 50.00% (37.11% Average)
- Native Hawaiian or Other Pacific Islander refinance loan denial rate of 71.43% (25.12% Average)
- Joint refinance loan denial rate of 66.67% (25.12% Average)
- Asian home improvement loan denial rate of 66.67% (53.54% Average)
- Black or African American home improvement loan denial rate of 66.67% (53.54% Average)
- Joint home improvement loan denial rate of 100.00% (53.54% Average)
- Hispanic or Latino home improvement loan denial rate of 65.38% (53.54% Average)

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
80-99% of MSA/IL Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	1	1	100.00%	-	-	-	-	-	-	-	-
	Asian	22	14	63.64%	-	-	3	13.64%	5	22.73%	-	-
	Black or African American	43	33	76.74%	-	-	8	18.60%	2	4.65%	-	-
	Native Hawaiian or Other Pacific Islander	3	3	100.00%	-	-	-	-	-	-	-	-
	White	482	363	75.31%	10	2.07%	56	11.62%	46	9.54%	7	1.45%



	2 or more minority races	-	-	-	-	-	-	-	-	-	-	-
	Joint (White/Minority Race)	5	5	100.00%	-	-	-	-	-	-	-	-
	Race Not Available	38	26	68.42%	-	-	5	13.16%	5	13.16%	2	5.26%
	Hispanic or Latino	85	63	74.12%	1	1.18%	16	18.82%	5	5.88%	-	-
Conventional	American Indian/Alaska Native	1	1	100.00%	-	-	-	-	-	-	-	-
	Asian	93	72	77.42%	2	2.15%	10	10.75%	7	7.53%	2	2.15%
	Black or African American	12	10	83.33%	-	-	-	-	2	16.67%	-	-
	Native Hawaiian or Other Pacific Islander	-	-	-	-	-	-	-	-	-	-	-
	White	818	661	80.81%	23	2.81%	52	6.36%	69	8.44%	13	1.59%
	2 or more minority races	-	-	-	-	-	-	-	-	-	-	-
	Joint (White/Minority Race)	14	10	71.43%	1	7.14%	3	21.43%	-	-	-	-
	Race Not Available	63	38	60.32%	4	6.35%	9	14.29%	7	11.11%	5	7.94%
	Hispanic or Latino	69	44	63.77%	4	5.80%	8	11.59%	8	11.59%	5	7.25%
Refinance	American Indian/Alaska Native	6	3	50.00%	-	-	2	33.33%	1	16.67%	-	-
	Asian	85	49	57.65%	4	4.71%	19	22.35%	10	11.76%	3	3.53%
	Black or African American	51	18	35.29%	1	1.96%	20	39.22%	7	13.73%	5	9.80%
	Native Hawaiian or Other Pacific Islander	7	1	14.29%	1	14.29%	4	57.14%	-	-	1	14.29%
	White	1539	927	60.23%	55	3.57%	310	20.14%	177	11.50%	70	4.55%
	2 or more minority races	2	1	50.00%	-	-	1	50.00%	-	-	-	-
	Joint (White/Minority Race)	19	12	63.16%	2	10.53%	4	21.05%	-	-	1	5.26%
	Race Not Available	199	92	46.23%	8	4.02%	55	27.64%	32	16.08%	12	6.03%
	Hispanic or Latino	95	40	42.11%	5	5.26%	30	31.58%	15	15.79%	5	5.26%
Home Improvement	American Indian/Alaska Native	-	-	-	-	-	-	-	-	-	-	-



	Asian	11	7	63.64%	-	-	3	27.27%	1	9.09%	-	-
	Black or African American	5	1	20.00%	-	-	3	60.00%	1	20.00%	-	-
	Native Hawaiian or Other Pacific Islander	1		-	-	-	1	100.00%	-	-	-	-
	White	124	61	49.19%	7	5.65%	46	37.10%	4	3.23%	6	4.84%
	2 or more minority races	-	-	-	-	-	-	-	-	-	-	-
	Joint (White/Minority Race)	-	-	-	-	-	-	-	-	-	-	-
	Race Not Available	17	5	29.41%	1	5.88%	10	58.82%	-	-	1	5.88%
	Hispanic or Latino	20	7	35.00%	-	-	13	65.00%	-	-	-	-
Total	American Indian/Alaska Native	8	5	62.50%	0	0.00%	2	25.00%	1	12.50%	-	-
	Asian	211	142	67.30%	6	2.84%	35	16.59%	23	10.90%	5	2.37%
	Black or African American	111	62	55.86%	1	0.90%	31	27.93%	12	10.81%	5	4.50%
	Native Hawaiian or Other Pacific Islander	11	4	36.36%	1	9.09%	5	45.45%	0	0.00%	1	9.09%
	White	2963	2012	67.90%	95	3.21%	464	15.66%	296	9.99%	96	3.24%
	2 or more minority races	2	1	50.00%	-	-	1	50.00%	-	-	-	-
	Joint (White/Minority Race)	38	27	71.05%	3	7.89%	7	18.42%	0	0.00%	1	2.63%
	Race Not Available	317	161	50.79%	13	4.10%	79	24.92%	44	13.88%	20	6.31%
	Hispanic or Latino	269	154	57.25%	10	3.72%	67	24.91%	28	10.41%	10	3.72%
	Total	3930	2568	65.34%	129	3.28%	691	17.58%	404	10.28%	138	3.51%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/IL/41540>

For loan applicants 80-99% of MSA/IL Median income the following groups had denial rates that were 10% higher than the average denial rate:

- Joint conventional loan denial rate of 21.43% (7.66% Average)
- Native American/Alaska Native refinance loan denial rate of 33.33% (22.21% Average)
- Black or African American refinance loan denial rate of 39.22% (22.21% Average)



- Native Hawaiian or Other Pacific Islander refinance loan denial rate of 100.00% (22.21% Average)
- 2 or more minority races refinance loan denial rate of 50.00% (22.21% Average)
- Black or African American home improvement loan denial rate of 60.00% (42.70% Average)
- Native Hawaiian or Other Pacific Islander home improvement loan denial rate of 100.00% (42.70% Average)
- Race Not Available improvement loan denial rate of 58.82% (42.70% Average)
- Hispanic or Latino home improvement loan denial rate of 65.00% (42.70% Average)

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
100-119% of MSA/IL Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	2	2	100.00%	-	-	-	-	-	-	-	-
	Asian	17	12	70.59%	1	5.88%	2	11.76%	2	11.76%	-	-
	Black or African American	18	13	72.22%	-	-	1	5.56%	4	22.22%	-	-
	Native Hawaiian or Other Pacific Islander	-	-	-	-	-	-	-	-	-	-	-
	White	254	187	73.62%	6	2.36%	31	12.20%	23	9.06%	7	2.76%
	2 or more minority races	-	-	-	-	-	-	-	-	-	-	-
	Joint (White/Minority Race)	18	15	83.33%	1	5.56%	1	5.56%	1	5.56%	-	-
	Race Not Available	28	20	71.43%	-	-	4	14.29%	3	10.71%	1	3.57%
	Hispanic or Latino	26	18	69.23%	1	3.85%	4	15.38%	1	3.85%	2	7.69%
Conventional	American Indian/Alaska Native	2	2	100.00%	-	-	-	-	-	-	-	-
	Asian	110	85	77.27%	2	1.82%	12	10.91%	8	7.27%	3	2.73%
	Black or African American	13	13	100.00%	-	-	-	-	-	-	-	-



	Native Hawaiian or Other Pacific Islander	1	1	100.00%	-	-	-	-	-	-	-	-
	White	693	564	81.39%	18	2.60%	42	6.06%	55	7.94%	14	2.02%
	2 or more minority races	-	-	-	-	-	-	-	-	-	-	-
	Joint (White/Minority Race)	12	11	91.67%	-	-	-	-	-	-	1	8.33%
	Race Not Available	58	39	67.24%	1	1.72%	7	12.07%	6	10.34%	5	8.62%
	Hispanic or Latino	43	32	74.42%	3	6.98%	5	11.63%	1	2.33%	2	4.65%
Refinance	American Indian/Alaska Native	2	1	50.00%	-	-	-	-	1	50.00%	-	-
	Asian	115	78	67.83%	2	1.74%	15	13.04%	11	9.57%	9	7.83%
	Black or African American	44	21	47.73%	3	6.82%	14	31.82%	4	9.09%	2	4.55%
	Native Hawaiian or Other Pacific Islander	2	1	50.00%	-	-	1	50.00%	-	-	-	-
	White	1407	867	61.62%	44	3.13%	270	19.19%	164	11.66%	62	4.41%
	2 or more minority races	4	2	50.00%	-	-	2	50.00%	-	-	-	-
	Joint (White/Minority Race)	19	12	63.16%	1	5.26%	3	15.79%	3	15.79%	-	-
	Race Not Available	157	89	56.69%	2	1.27%	36	22.93%	21	13.38%	9	5.73%
	Hispanic or Latino	79	34	43.04%	3	3.80%	22	27.85%	15	18.99%	5	6.33%
Home Improvement	American Indian/Alaska Native	-	-	-	-	-	-	-	-	-	-	-
	Asian	8	2	25.00%	-	-	5	62.50%	1	12.50%	-	-
	Black or African American	9	2	22.22%	-	-	4	44.44%	2	22.22%	1	11.11%
	Native Hawaiian or Other Pacific Islander	1	-	-	-	-	1	100.00%	-	-	-	-
	White	92	47	51.09%	2	-	26	28.26%	11	11.96%	6	-
	2 or more minority races	1	1	100.00%	-	-	-	-	-	-	-	-
	Joint (White/Minority Race)	2	1	50.00%	-	-	1	50.00%	-	-	-	-
	Race Not Available	9	6	66.67%	-	-	3	33.33%	-	-	-	-



	Hispanic or Latino	11	5	45.45%	-	-	5	45.45%	1	9.09%	-	-
Total	American Indian/Alaska Native	6	5	83.33%	0	0.00%	0	0.00%	1	16.67%	-	-
	Asian	250	177	70.80%	5	2.00%	34	13.60%	22	8.80%	12	4.80%
	Black or African American	84	49	58.33%	3	3.57%	19	22.62%	10	11.90%	3	3.57%
	Native Hawaiian or Other Pacific Islander	4	2	50.00%	0	0.00%	2	50.00%	0	0.00%	0	0.00%
	White	2446	1665	68.07%	70	2.86%	369	15.09%	253	10.34%	89	3.64%
	2 or more minority races	5	3	60.00%	-	-	2	40.00%	-	-	-	-
	Joint (White/Minority Race)	51	39	76.47%	2	3.92%	5	9.80%	4	7.84%	1	1.96%
	Race Not Available	252	154	61.11%	3	1.19%	50	19.84%	30	11.90%	15	5.95%
	Hispanic or Latino	159	89	55.97%	7	4.40%	36	22.64%	18	11.32%	9	5.66%
	Total	3257	2183	67.02%	90	2.76%	517	15.87%	338	10.38%	129	3.96%

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2017/IL/41540>

For loan applicants 100-119% of MSA/IL Median income the following groups had denial rates that were 10% higher than the average denial rate:

- Black or African American refinance loan denial rate of 31.82% (19.85% Average)
- Native Hawaiian or Other Pacific Islander refinance loan denial rate of 50.00% (19.85% Average)
- 2 or more minority races refinance loan denial rate of 50.00% (19.85% Average)
- Asian home improvement loan denial rate of 62.50% (36.29% Average)
- Native Hawaiian or Other Pacific Islander home improvement loan denial rate of 100.00% (36.29% Average)
- Joint home improvement loan denial rate of 50.00% (36.29% Average)



Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
120% or More of MSA/IL Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	1	1	100.00%	-	-	-	-	-	-	-	-
	Asian	20	15	75.00%	1	5.00%	4	20.00%	-	-	-	-
	Black or African American	20	11	55.00%	1	5.00%	4	20.00%	2	10.00%	2	10.00%
	Native Hawaiian or Other Pacific Islander	2	2	100.00%	-	-	-	-	-	-	-	-
	White	432	318	73.61%	5	1.16%	39	9.03%	61	14.12%	9	2.08%
	2 or more minority races	-	-	-	-	-	-	-	-	-	-	-
	Joint (White/Minority Race)	29	20	68.97%	-	-	-	-	8	27.59%	1	3.45%
	Race Not Available	45	32	71.11%	1	2.22%	9	20.00%	3	6.67%	-	-
	Hispanic or Latino	38	24	63.16%	-	-	6	15.79%	8	21.05%	-	-
Conventional	American Indian/Alaska Native	14	10	71.43%	-	-	2	14.29%	2	14.29%	-	-
	Asian	617	466	75.53%	18	2.92%	52	8.43%	60	9.72%	21	3.40%
	Black or African American	57	39	68.42%	3	5.26%	5	8.77%	8	14.04%	2	3.51%
	Native Hawaiian or Other Pacific Islander	6	4	66.67%	-	-	-	-	2	33.33%	-	-
	White	3703	2937	79.31%	108	2.92%	247	6.67%	346	9.34%	65	1.76%
	2 or more minority races	4	2	50.00%	-	-	1	25.00%	1	25.00%	-	-



	Joint (White/Minority Race)	108	83	76.85%	4	3.70%	5	4.63%	14	12.96%	2	1.85%
	Race Not Available	360	257	71.39%	12	3.33%	36	10.00%	49	13.61%	6	1.67%
	Hispanic or Latino	117	89	76.07%	4	3.42%	12	10.26%	11	9.40%	1	0.85%
Refinance	American Indian/Alaska Native	15	9	60.00%	-	-	1	6.67%	3	20.00%	2	13.33%
	Asian	728	522	71.70%	26	3.57%	91	12.50%	64	8.79%	25	3.43%
	Black or African American	94	37	39.36%	4	4.26%	33	35.11%	16	17.02%	4	4.26%
	Native Hawaiian or Other Pacific Islander	20	11	55.00%	1	5.00%	3	15.00%	2	10.00%	3	15.00%
	White	6,725	4,692	69.77%	206	3.06%	872	12.97%	669	9.95%	286	4.25%
	2 or more minority races	4	1	25.00%	-	-	2	50.00%	1	25.00%	-	-
	Joint (White/Minority Race)	131	103	78.63%	1	0.76%	16	12.21%	4	3.05%	7	5.34%
	Race Not Available	784	428	54.59%	31	3.95%	163	20.79%	105	13.39%	57	7.27%
	Hispanic or Latino	159	95	59.75%	7	4.40%	29	18.24%	16	10.06%	12	7.55%
Home Improvement	American Indian/Alaska Native	3	1	33.33%	-	-	2	66.67%	-	-	-	-
	Asian	31	17	54.84%	1	3.23%	10	32.26%	1	3.23%	2	6.45%
	Black or African American	10	2	20.00%	-	-	6	60.00%	1	10.00%	1	10.00%
	Native Hawaiian or Other Pacific Islander	-	-	-	-	-	-	-	-	-	-	-
	White	413	268	64.89%	18	4.36%	84	20.34%	32	7.75%	11	2.66%
	2 or more minority races	-	-	-	-	-	-	-	-	-	-	-



	Joint (White/Minority Race)	7	4	57.14%	-	-	2	28.57%	1	14.29%	-	-
	Race Not Available	64	37	57.81%	4	6.25%	17	26.56%	5	7.81%	1	1.56%
	Hispanic or Latino	17	4	23.53%	-	-	10	58.82%	2	11.76%	1	5.88%
Total	American Indian/Alaska Native	33	21	63.64%	0	0.00%	5	15.15%	5	15.15%	2	6.06%
	Asian	1,396	1,020	73.07%	46	3.30%	157	11.25%	125	8.95%	48	3.44%
	Black or African American	181	89	49.17%	8	4.42%	48	26.52%	27	14.92%	9	4.97%
	Native Hawaiian or Other Pacific Islander	28	17	60.71%	1	3.57%	3	10.71%	4	14.29%	3	10.71%
	White	11,273	8,215	72.87%	337	2.99%	1,242	11.02%	1108	9.83%	371	3.29%
	2 or more minority races	8	3	37.50%	-	-	3	37.50%	2	25.00%	-	-
	Joint (White/Minority Race)	275	210	76.36%	5	1.82%	23	8.36%	27	9.82%	10	3.64%
	Race Not Available	1,253	754	60.18%	48	3.83%	225	17.96%	162	12.93%	64	5.11%
	Hispanic or Latino	331	212	64.05%	11	3.32%	57	17.22%	37	11.18%	14	4.23%
	Total	14,778	10,541	71.33%	456	3.09%	1,763	11.93%	1497	10.13%	521	3.53%

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2017/IL/41540>

For loan applicants 120% and over MSA/IL Median income the following groups had denial rates that were 10% higher than the average denial rate:

- 2 or more minority races conventional loan denial rate of 25.00% (7.22% Average)
- Black or African American refinance loan denial rate of 35.11% (13.97% Average)
- 2 or more minority races refinance loan denial rate of 50.00% (13.97% Average)
- American Indian/Alaskan Native home improvement loan denial rate of 66.67% (24.03% Average)



- Black or African American home improvement denial rate of 60.00% (24.03% Average)
- Hispanic or Latino home improvement loan denial rate of 58.82% (23.03% Average)

Disposition of Loan Applications by Characteristics of Census Tract												
FHA, FSA/RHS and VA Loans												
	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
Racial/Ethnic Composition	Less than 10% minority	446	306	68.61%	15	3.36%	64	14.35%	46	10.31%	15	3.36%
	10-19% minority	1,098	815	74.23%	19	1.73%	123	11.20%	109	9.93%	32	2.91%
	20-49% minority	1,465	1,051	71.74%	44	3.00%	209	14.27%	141	9.62%	20	1.37%
	50-79% minority	649	430	66.26%	33	5.08%	98	15.10%	71	10.94%	17	2.62%
	80-100% minority	212	119	56.13%	18	8.49%	36	16.98%	29	13.68%	10	4.72%
Income Characteristics	Low income	175	103	58.86%	6	3.43%	31	17.71%	27	15.43%	8	4.57%
	Moderate income	929	631	67.92%	47	5.06%	128	13.78%	98	10.55%	25	2.69%
	Middle income	2,137	1,540	72.06%	62	2.90%	286	13.38%	197	9.22%	52	2.43%
	Upper income	629	447	71.07%	14	2.23%	85	13.51%	74	11.76%	9	1.43%
Low Income	Less than 10% minority	-	-	-	-	-	-	-	-	-	-	-
	10-19% minority	-	-	-	-	-	-	-	-	-	-	-
	20-49% minority	44	30	68.18%	2	4.55%	7	15.91%	4	9.09%	1	2.27%
	50-79% minority	80	46	57.50%	2	2.50%	14	17.50%	14	17.50%	4	5.00%



	80-100% minority	51	27	52.94%	2	3.92%	10	19.61%	9	17.65%	3	5.88%
Moderate Income	Less than 10% minority	-	-	-	-	-	-	-	-	-	-	-
	10-19% minority	107	89	83.18%	1	0.93%	4	3.74%	8	7.48%	5	4.67%
	20-49% minority	245	175	71.43%	9	3.67%	33	13.47%	26	10.61%	2	0.82%
	50-79% minority	416	275	66.11%	21	5.05%	65	15.63%	44	10.58%	11	2.64%
	80-100% minority	161	92	57.14%	16	9.94%	26	16.15%	20	12.42%	7	4.35%
Middle Income	Less than 10% minority	349	245	70.20%	13	3.72%	49	14.04%	28	8.02%	14	4.01%
	10-19% minority	821	605	73.69%	16	1.95%	100	12.18%	77	9.38%	23	2.80%
	20-49% minority	814	581	71.38%	23	2.83%	118	14.50%	79	9.71%	13	1.60%
	50-79% minority	153	109	71.24%	10	6.54%	19	12.42%	13	8.50%	2	1.31%
	80-100% minority	349	245	70.20%	13	3.72%	49	14.04%	28	8.02%	14	4.01%
Upper Income	Less than 10% minority	97	61	62.89%	2	2.06%	15	15.46%	18	18.56%	1	1.03%
	10-19% minority	170	121	71.18%	2	1.18%	19	11.18%	24	14.12%	4	2.35%
	20-49% minority	362	265	73.20%	10	2.76%	51	14.09%	32	8.84%	4	1.10%
	50-79% minority	-	-	-	-	-	-	-	-	-	-	-
	80-100% minority	-	-	-	-	-	-	-	-	-	-	-
	Total	3,870	2,721	70.31%	129	3.33%	530	13.70%	396	10.23%	94	2.43%



Disposition of Loan Applications by Characteristics of Census Tract												
Conventional Loans												
	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
Racial/Ethnic Composition	Less than 10% minority	1,956	1,477	75.51%	67	3.43%	180	9.20%	185	9.46%	47	2.40%
	10-19% minority	3,436	2,663	77.50%	107	3.11%	280	8.15%	316	9.20%	70	2.04%
	20-49% minority	3,391	2,629	77.53%	108	3.18%	290	8.55%	305	8.99%	59	1.74%
	50-79% minority	628	435	69.27%	25	3.98%	98	15.61%	57	9.08%	13	2.07%
	80-100% minority	110	61	55.45%	8	7.27%	25	22.73%	11	10.00%	5	4.55%
Income Characteristics	Low income	152	118	77.63%	6	3.95%	16	10.53%	8	5.26%	4	2.63%
	Moderate income	1,146	807	70.42%	43	3.75%	170	14.83%	101	8.81%	25	2.18%
	Middle income	3,932	2,979	75.76%	130	3.31%	374	9.51%	367	9.33%	82	2.09%
	Upper income	4,291	3,361	78.33%	136	3.17%	313	7.29%	398	9.28%	83	1.93%
Low Income	Less than 10% minority	-	-	-	-	-	-	-	-	-	-	-



	10-19% minority	-	-	-	-	-	-	-	-	-	-	-
	20-49% minority	72	59	81.94%	4	5.56%	6	8.33%	3	4.17%		0.00%
	50-79% minority	55	45	81.82%		0.00%	6	10.91%	2	3.64%	2	3.64%
	80-100% minority	25	14	56.00%	2	8.00%	4	16.00%	3	12.00%	2	8.00%
Moderate Income	Less than 10% minority	-	-	-	-	-	-	-	-	-	-	-
	10-19% minority	210	162	77.14%	5	2.38%	19	9.05%	19	9.05%	5	2.38%
	20-49% minority	413	304	73.61%	15	3.63%	54	13.08%	32	7.75%	8	1.94%
	50-79% minority	438	294	67.12%	17	3.88%	76	17.35%	42	9.59%	9	2.05%
	80-100% minority	85	47	55.29%	6	7.06%	21	24.71%	8	9.41%	3	3.53%
Middle Income	Less than 10% minority	690	503	72.90%	31	4.49%	67	9.71%	65	9.42%	24	3.48%
	10-19% minority	1,532	1,169	76.31%	46	3.00%	150	9.79%	136	8.88%	31	2.02%
	20-49% minority	1,575	1,211	76.89%	45	2.86%	141	8.95%	153	9.71%	25	1.59%
	50-79% minority	135	96	71.11%	8	5.93%	16	11.85%	13	9.63%	2	1.48%



	80-100% minority	-	-	-	-	-	-	-	-	-	-	-
Upper Income	Less than 10% minority	1,266	974	76.94%	36	2.84%	113	8.93%	120	9.48%	23	1.82%
	10-19% minority	1,694	1,332	78.63%	56	3.31%	111	6.55%	161	9.50%	34	2.01%
	20-49% minority	1,331	1,055	79.26%	44	3.31%	89	6.69%	117	8.79%	26	1.95%
	50-79% minority	-	-	-	-	-	-	-	-	-	-	-
	80-100% minority	-	-	-	-	-	-	-	-	-	-	-
	Total	9,521	7,265	76.31%	315	3.31%	873	9.17%	874	9.18%	194	2.04%



Disposition of Loan Applications by Characteristics of Census Tract												
Refinancing Loans												
	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
Racial/Ethnic Composition	Less than 10% minority	1,956	1,477	75.51%	67	3.43%	180	9.20%	185	9.46%	47	2.40%
	10-19% minority	3,436	2,663	77.50%	107	3.11%	280	8.15%	316	9.20%	70	2.04%
	20-49% minority	3,391	2,629	77.53%	108	3.18%	290	8.55%	305	8.99%	59	1.74%
	50-79% minority	628	435	69.27%	25	3.98%	98	15.61%	57	9.08%	13	2.07%
	80-100% minority	110	61	55.45%	8	7.27%	25	22.73%	11	10.00%	5	4.55%
Income Characteristics	Low income	152	118	77.63%	6	3.95%	16	10.53%	8	5.26%	4	2.63%
	Moderate income	1,146	807	70.42%	43	3.75%	170	14.83%	101	8.81%	25	2.18%
	Middle income	3,932	2,979	75.76%	130	3.31%	374	9.51%	367	9.33%	82	2.09%
	Upper income	4,291	3,361	78.33%	136	3.17%	313	7.29%	398	9.28%	83	1.93%
Low Income	Less than 10% minority	-	-	-	-	-	-	-	-	-	-	-



	10-19% minority	-	-	-	-	-	-	-	-	-	-	-
	20-49% minority	72	59	81.94%	4	5.56%	6	8.33%	3	4.17%		0.00%
	50-79% minority	55	45	81.82%		0.00%	6	10.91%	2	3.64%	2	3.64%
	80-100% minority	25	14	56.00%	2	8.00%	4	16.00%	3	12.00%	2	8.00%
Moderate Income	Less than 10% minority	-	-	-	-	-	-	-	-	-	-	-
	10-19% minority	210	162	77.14%	5	2.38%	19	9.05%	19	9.05%	5	2.38%
	20-49% minority	413	304	73.61%	15	3.63%	54	13.08%	32	7.75%	8	1.94%
	50-79% minority	438	294	67.12%	17	3.88%	76	17.35%	42	9.59%	9	2.05%
	80-100% minority	85	47	55.29%	6	7.06%	21	24.71%	8	9.41%	3	3.53%
Middle Income	Less than 10% minority	690	503	72.90%	31	4.49%	67	9.71%	65	9.42%	24	3.48%
	10-19% minority	1,532	1,169	76.31%	46	3.00%	150	9.79%	136	8.88%	31	2.02%
	20-49% minority	1,575	1,211	76.89%	45	2.86%	141	8.95%	153	9.71%	25	1.59%
	50-79% minority	135	96	71.11%	8	5.93%	16	11.85%	13	9.63%	2	1.48%



	80-100% minority	-	-	-	-	-	-	-	-	-	-	-
Upper Income	Less than 10% minority	1,266	974	76.94%	36	2.84%	113	8.93%	120	9.48%	23	1.82%
	10-19% minority	1,694	1,332	78.63%	56	3.31%	111	6.55%	161	9.50%	34	2.01%
	20-49% minority	1,331	1,055	79.26%	44	3.31%	89	6.69%	117	8.79%	26	1.95%
	50-79% minority	-	-	-	-	-	-	-	-	-	-	-
	80-100% minority	-	-	-	-	-	-	-	-	-	-	-
	Total	9,521	7,265	76.31%	315	3.31%	873	9.17%	874	9.18%	194	2.04%



Disposition of Loan Applications by Characteristics of Census Tract												
Home Improvement Loans												
	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
Racial/Ethnic Composition	Less than 10% minority	238	148	62.18%	9	3.78%	50	21.01%	22	9.24%	9	3.78%
	10-19% minority	403	211	52.36%	21	5.21%	133	33.00%	23	5.71%	15	3.72%
	20-49% minority	428	207	48.36%	16	3.74%	162	37.85%	28	6.54%	15	3.50%
	50-79% minority	162	58	35.80%	4	2.47%	94	58.02%	5	3.09%	1	0.62%
	80-100% minority	82	23	28.05%	4	4.88%	48	58.54%	5	6.10%	2	2.44%
Income Characteristics	Low income	76	26	34.21%	3	3.95%	40	52.63%	3	3.95%	4	5.26%
	Moderate income	232	84	36.21%	8	3.45%	126	54.31%	12	5.17%	2	0.86%
	Middle income	563	267	47.42%	23	4.09%	211	37.48%	38	6.75%	24	4.26%
	Upper income	442	270	61.09%	20	4.52%	110	24.89%	30	6.79%	12	2.71%
Low Income	Less than 10% minority	-	-	-	-	-	-	-	-	-	-	-



	10-19% minority	-	-	-	-	-	-	-	-	-	-	-
	20-49% minority	15	4	26.67%	1	6.67%	7	46.67%		0.00%	3	20.00%
	50-79% minority	33	10	30.30%	1	3.03%	21	63.64%	1	3.03%		0.00%
	80-100% minority	28	12	42.86%	1	3.57%	12	42.86%	2	7.14%	1	3.57%
Moderate Income	Less than 10% minority	-	-	-	-	-	-	-	-	-	-	-
	10-19% minority	28	17	60.71%	1	3.57%	9	32.14%	1	3.57%		0.00%
	20-49% minority	62	24	38.71%	1	1.61%	31	50.00%	6	9.68%		0.00%
	50-79% minority	88	32	36.36%	3	3.41%	50	56.82%	2	2.27%	1	1.14%
	80-100% minority	54	11	20.37%	3	5.56%	36	66.67%	3	5.56%	1	1.85%
Middle Income	Less than 10% minority	109	61	55.96%	2	1.83%	29	26.61%	10	9.17%	7	6.42%
	10-19% minority	200	82	41.00%	14	7.00%	81	40.50%	13	6.50%	10	5.00%
	20-49% minority	213	108	50.70%	7	3.29%	78	36.62%	13	6.10%	7	3.29%
	50-79% minority	41	16	39.02%		0.00%	23	56.10%	2	4.88%		0.00%



	80-100% minority	-	-	-	-	-	-	-	-	-	-	-
Upper Income	Less than 10% minority	129	87	67.44%	7	5.43%	21	16.28%	12	9.30%	2	1.55%
	10-19% minority	175	112	64.00%	6	3.43%	43	24.57%	9	5.14%	5	2.86%
	20-49% minority	138	71	51.45%	7	5.07%	46	33.33%	9	6.52%	5	3.62%
	50-79% minority	-	-	-	-	-	-	-	-	-	-	-
	80-100% minority	-	-	-	-	-	-	-	-	-	-	-
	Total	1,313	647	49.28%	54	4.11%	487	37.09%	83	6.32%	42	3.20%

The following tables list reasons for denial by race, ethnicity, gender, and income.

Reasons for Denial of Applications by Race, Ethnicity, Gender, and Income																				
FHA, FSA/RHS and VA Loans																				
	Cohort	Total	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Application Incomplete		Mortgage Insurance Denied		Other	
		#	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Race	American Indian/Alaska Native	2	1	50	-	-	1	50	-	-	-	-	-	-	-	-	-	-	-	-
	Asian	18	7	39	-	-	5	28	2	11	1	6	-	-	-	-	-	-	3	17



Race	Black or African American	37	11	30	1	3	6	16	3	8	3	8	5	14	4	11	-	-	4	11
	Native Hawaiian or Other Pacific Islander	2	1	50	1	50	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	White	393	91	23	18	5	84	21	70	18	28	7	28	7	29	7	1	-	44	11
	2 or more minority races	4	2	50	-	-	1	25	-	-	-	-	1	25	-	-	-	-	-	-
	Joint (White/Minority Race)	49	8	16	4	8	8	16	11	22	3	6	3	6	5	10	-	-	7	14
	Race Not Available	151	39	26	10	7	28	19	21	14	12	8	16	11	9	6	-	-	16	11
Ethnicity	Hispanic or Latino	295	71	24	10	3	67	23	53	18	20	7	17	6	23	8	1	-	33	11
	Not Hispanic or Latino	8	3	38	-	-	2	25	1	13	-	-	-	-	1	13	-	-	1	13
	Joint (Hispanic or Latino/Not Hispanic or Latino)	51	8	16	4	8	8	16	11	22	3	6	4	8	5	10	-	-	8	16
	Ethnicity Not Available	231	50	22	7	3	53	23	48	21	16	7	11	5	19	8	1	0	26	11
Minority Status	White Non-Hispanic	219	62	28	11	5	43	20	27	12	16	7	22	10	14	6	-	-	24	11
	Others, Including Hispanic	232	53	23	13	6	42	18	45	19	12	5	22	9	20	9	1	0	24	10
Gender	Male	124	34	27	3	2	24	19	18	15	13	10	6	5	12	10	-	-	14	11
	Female	122	30	25	6	5	34	28	18	15	7	6	6	5	5	4	-	-	16	13



	Joint (Male/Female)	27	4	15	2	7	5	19	5	19	3	11	3	11	1	4	-	-	4	15
	Gender Not Available	191	59	31	14	7	27	14	28	15	14	7	15	8	15	8	-	-	19	10
Income	Less than 50% of MSA/IL median	152	36	24	2	1	34	22	30	20	10	7	11	7	9	6	-	-	20	13
	50-79% of MSA/IL median	67	14	21	3	4	15	22	11	16	6	9	6	9	5	7	-	-	7	10
	80-99% of MSA/IL median	42	4	10	4	10	9	21	9	21	3	7	3	7	2	5	1	2	7	17
	100-119% of MSA/IL median	47	5	11	1	2	19	40	8	17	1	2	1	2	7	15	-	-	5	11
	120% or more of MSA/IL median	6	3	50	-	-	1	17	-	-	1	17	1	17	-	-	-	-	-	-
	Income Not Available	2	1	50	-	-	1	50	-	-	-	-	-	-	-	-	-	-	-	-

Reasons for Denial of Applications by Race, Ethnicity, Gender, and Income																				
Conventional Loans																				
	Cohort	Total	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Application Incomplete		Mortgage Insurance Denied		Other	
		#	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Race	American Indian/Alaska Native	1	20	-	-	1	20	-	-	-	-	-	-	1	20	-		2	40	1
	Asian	17	21	1	1	13	16	21	26	7	9	4	5	11	13	1	1	7	9	17



Race	Black or African American	2	15	-	-	3	23	2	15	1	8	-	-	2	15	-	-	3	23	2
	Native Hawaiian or Other Pacific Islander	1	100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1
	White	165	25	22	3	102	16	129	20	42	6	47	7	93	14	3	0	52	8	165
	2 or more minority races	1	33	-	-	1	33	-	-	-	-	-	-	-	-	-	-	1	33	1
	Joint (White/Minority Race)	3	38	-	-	2	25	1	13	1	13	-	-	1	13	-	-	-	-	3
	Race Not Available	20	22	2	2	13	15	19	21	4	4	5	6	15	17	-	-	11	12	20
Ethnicity	Hispanic or Latino	33	28	3	3	23	20	17	15	6	5	11	9	13	11	-	-	11	9	33
	Not Hispanic or Latino	156	24	17	3	98	15	140	22	46	7	40	6	94	14	4	1	54	8	156
	Joint (Hispanic or Latino/Not Hispanic or Latino)	4	22	3	17	3	17	2	11	1	6	1	6	4	22	-	-	-	-	4
	Ethnicity Not Available	17	24	2	3	11	15	13	18	2	3	4	6	12	17	-	-	11	15	17
Minority Status	White Non-Hispanic	132	25	16	3	78	15	111	21	37	7	35	7	77	15	3	1	41	8	132
	Others, Including Hispanic	61	25	7	3	45	18	43	18	15	6	16	7	32	13	1	-	24	10	61
Gender	Male	84	25	13	4	50	15	65	19	30	9	21	6	45	13	1	-	26	8	84
	Female	43	24	2	1	29	16	44	25	8	4	12	7	20	11	2	1	18	10	43



	Joint (Male/Female)	70	24	8	3	47	16	52	18	16	6	20	7	50	17	1	-	24	8	70
	Gender Not Available	13	24	2	4	9	16	11	20	1	2	3	5	8	15	-	-	8	15	13
Income	Less than 50% of MSA/IL median	58	32	6	3	37	21	31	17	11	6	8	4	16	9	1	1	12	7	58
	50-79% of MSA/IL median	40	25	6	4	23	15	32	20	9	6	10	6	20	13	1	1	17	11	40
	80-99% of MSA/IL median	13	17	4	5	12	16	19	25	3	4	3	4	13	17	1	1	8	11	13
	100-119% of MSA/IL median	14	23	3	5	10	17	6	10	6	10	7	12	7	12	1	2	6	10	14
	120% or more of MSA/IL median	81	23	5	1	50	14	79	22	24	7	26	7	66	18	-	-	29	8	81
	Income Not Available	4	18	1	5	3	14	5	23	2	9	2	9	1	5	-	-	4	18	4
Reasons for Denial of Applications by Race, Ethnicity, Gender, and Income																				
Refinancing Loans																				
	Cohort	Total	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Application Incomplete		Mortgage Insurance Denied		Other	
		#	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Race	American Indian/Alaska Native	4	-	-	-	-	1	25	2	50	1	25	-	-	-	-	-	-	-	-
	Asian	158	38	24	2	1	21	13	34	22	3	2	15	9	20	13	-	-	25	16



Race	Black or African American	133	13	10	1	1	26	20	45	34	3	2	9	7	20	15	-		16	12
	Native Hawaiian or Other Pacific Islander	14	3	21	-	-	2	14	2	14	-	-	-	-	4	29	-		3	21
	White	2,230	491	22	29	1	402	18	555	25	75	3	125	6	310	14	3	0	240	11
	2 or more minority races	5	1	20	-	-	3	60	-	-	-	-	-	-	-	-	-	-	1	20
	Joint (White/Minority Race)	26	6	23	-	-	4	15	6	23	2	8	4	15	2	8	-	-	2	8
	Race Not Available	427	90	21	3	1	70	16	109	26	16	4	32	7	62	15	1	0	44	10
Ethnicity	Hispanic or Latino	257	59	23	4	2	57	22	42	16	14	5	23	9	32	12	-	-	26	10
	Not Hispanic or Latino	2,329	499	21	28	1	407	17	601	26	77	3	130	6	321	14	3	-	263	11
	Joint (Hispanic or Latino/Not Hispanic or Latino)	39	6	15			6	15	13	33	1	3	2	5	6	15	-	-	5	13
	Ethnicity Not Available	372	78	21	3	1	59	16	97	26	8	2	30	8	59	16	1	0	37	10
Minority Status	White Non-Hispanic	1,963	433	22	25	1	349	18	502	26	65	3	101	5	274	14	3	0	211	11
	Others, Including Hispanic	624	123	20	7	1	114	18	142	23	24	4	52	8	84	13	-	-	78	13
Gender	Male	905	190	21	16	2	138	15	215	24	32	4	65	7	132	15	2	0	115	13
	Female	565	125	22	3	1	118	21	127	22	23	4	33	6	82	15	-	-	54	10



	Joint (Male/Female)	1,235	263	21	14	1	228	18	335	27	38	3	68	6	156	13	2	0	131	11
	Gender Available Not Available	292	64	22	2	1	45	15	76	26	7	2	19	7	48	16	-	-	31	11
Income	Less than 50% of MSA/IL median	530	173	33	6	1	106	20	85	16	15	3	38	7	54	10	1	0	52	10
	50-79% of MSA/IL median	568	146	26	7	1	122	21	107	19	29	5	30	5	82	14	-	-	45	8
	80-99% of MSA/IL median	343	73	21	4	1	65	19	94	27	8	2	24	7	45	13	-	-	30	9
	100-119% of MSA/IL median	292	56	19	3	1	60	21	83	28	6	2	12	4	39	13	1	0	32	11
	120% or more of MSA/IL median	1,047	155	15	13	1	138	13	361	34	32	3	70	7	151	14	2	0	125	12
	Income Available Not Available	217	39	18	2	1	38	18	23	11	10	5	11	5	47	22	-	-	47	22



Reasons for Denial of Applications by Race, Ethnicity, Gender, and Income																					
Home Improvement Loans																					
	Cohort	Total	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Application Incomplete		Mortgage Insurance Denied		Other		
		#	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
Race	American Indian/Alaska Native	-	-	-	-	3	75	-	-	-	-	-	-	-	-	-	-	-	1	25	
	Asian	12	43	-	-	10	36	1	4	-	-	1	4	-	-	-	-	-	4	14	
	Black or African American	8	16	-	-	38	75	1	2	-	-	-	-	1	2	-	-	-	3	6	
	Native Hawaiian or Other Pacific Islander	-	-	-	-	2	100												-	-	
	White	150	34	3	1	214	49	29	7	-	-	6	1	8	2	-	-	-	29	7	
	2 or more minority races	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Joint (White/Minority Race)	2	40	-	-	1	20	2	40	-	-	-	-	-	-	-	-	-	-	-	
	Race Available Not	18	24	1	1	37	50	4	5	-	-	2	3	4	5	-	-	-	8	11	
Ethnicity	Hispanic or Latino	52	37	-	-	79	56	4	3	-	-	1	1	1	1	-	-	-	5	4	
	Not Hispanic or Latino	120	31	3	1	190	49	29	7	-	-	6	2	8	2	-	-	-	32	8	



	Joint (Hispanic or Latino/Not Hispanic or Latino)	2	50	-	-	2	50	-	-	-	-	-	-	-	-	-	-	-	-	-
	Ethnicity Not Available	16	23	1	1	34	49	4	6	-	-	2	3	4	6	-	-	-	8	12
Minority Status	White Non-Hispanic	98	33	3	1	138	46	25	8	-	-	5	2	7	2	-	-	-	24	8
	Others, Including Hispanic	76	32	-	-	133	57	8	3	-	-	2	1	2	1	-	-	-	13	6
Gender	Male	82	35	2	1	123	53	6	3	-	-	2	1	4	2	-	-	-	15	6
	Female	57	33	1	1	88	51	9	5	-	-	4	2	3	2	-	-	-	10	6
	Joint (Male/Female)	39	27	1	1	68	47	18	13	-	-	1	1	3	2	-	-	-	14	10
	Gender Not Available	12	23	-	-	26	49	4	8	-	-	2	4	3	6	-	-	-	6	11
Income	Less than 50% of MSA/IL median	64	39	2	1	77	47	5	3	-	-	4	2	1	1	-	-	-	11	7
	50-79% of MSA/IL median	54	35	-	-	84	55	4	3	-	-	1	1	2	1	-	-	-	9	6
	80-99% of MSA/IL median	19	26	-	-	44	60	2	3	-	-	1	1	4	5	-	-	-	3	4
	100-119% of MSA/IL median	13	30	-	-	28	64	2	5	-	-	1	2	-	-	-	-	-	-	-
	120% or more of MSA/IL median	34	22	-	-	67	44	24	16	-	-	1	1	6	4	-	-	-	22	14
	Income Not Available	6	43	2	14	5	36	-	-	-	-	1	7	-	-	-	-	-	-	-



4. Insurance

There was not suitable data available to determine if discrepancies existed in the rates and amounts of insurance coverage available to minority households in the City of Waukegan. Further investigation and assessment are needed to determine if there is a barrier to fair housing choice.



D. Citizen Participation:

The City of Waukegan developed the Analysis of Impediments with input received through individual meetings and public meetings with a variety of stakeholders and representatives of the community which included representatives from: the City and County; Housing Authority; community, social service, and advocacy agencies; and non-profit and for profit entities.

The City held three (3) Public Hearings on October 8, 2019, October 9, 2019, and April 6, 2020 concerning the Analysis of Impediments to Fair Housing Choice. On April 6, 2020, City Council passed a Resolution authorizing the Mayor to submit the AI to HUD. A "Draft Plan" was placed on display on the City's website at: <https://www.waukeganil.gov/> under the Community Development Block Grant Department web page and copies of the plan were available at the Community Development Block Grant Department, 100 N. Martin Luther King Jr. Avenue, Waukegan, IL 60085 from March 2, 2020 until April 3, 2020 for review and comment. In the "Citizen Participation" section of the Appendix is a summary of the input received.



V. Actions and Recommendations

The following impediments to fair housing choice and recommendations are presented to assist the City of Waukegan to affirmatively further fair housing in the community. The previously identified impediments to fair housing choice were discussed in Section III and progress was reported for each impediment.

The City of Waukegan's FY 2020-2024 Analysis of Impediments to Fair Housing Choice has identified the following impediments, goals, and strategies to affirmatively further fair housing.

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

There is a need to improve the knowledge and understanding concerning the rights of individuals, families, and members of the protected classes in regard to the Fair Housing Act (FHA) and awareness of discriminatory practices.

Goal: Improve the knowledge and awareness of both the public and the local officials of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing in the community.

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

- **1-A:** Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-B:** Continue to educate and make realtors, bankers, and housing providers aware of their responsibilities under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-C:** Continue to support Fair Housing organizations and legal advocacy groups to assist persons who may be victims of housing discrimination and/or not aware of how to file a housing complaint.
- **1-D:** Continue to identify LEP persons to provide the specific language assistance that is needed.
- **1-E:** Continue to partner with regional jurisdictions and housing providers to encourage fair housing choice throughout the City.

- **Impediment 2: Continuing Need for Affordable Housing**

One out of every two renter households in the City is paying over 30% of their monthly incomes on housing costs. One out of every three owner



households with a mortgage is paying over 30% of their monthly income on housing costs.

Goal: Increase the supply of affordable housing by new construction and rehabilitation of various types of housing that is affordable to lower income households.

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

- **2-A:** Continue to support and encourage private developers and non-profit housing providers to create, through construction or rehabilitation, affordable and mixed-income housing located outside of areas of lower income and minority concentrations.
- **2-B:** Continue to support and encourage the rehabilitation of existing housing units in the City to become decent, safe, sound and affordable housing for households below 80% AMI.
- **2-C:** Continue to support homebuyer education and training programs to improve homebuyer awareness.
- **2-D:** Provide federal, state and local funding in response to HMDA data discrimination patterns to support a higher loan to value ratio for minority homebuyers.
- **2-E:** Encourage affordable housing developers to prioritize the development of housing for families of 5+ members.

• **Impediment 3: Continuing Need for Accessible Housing**

There is a lack of accessible housing units in the City of Waukegan as the supply of accessible housing has not kept pace with the demand of individuals desiring to live independently.

Goal: Increase the supply of accessible housing by new construction and rehabilitation of accessible housing for persons with disabilities.

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

- **3-A:** Continue to promote the need for accessible housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is accessible to persons with disabilities.
- **3-B:** Continue to provide financial assistance for accessibility improvements to owner-occupied housing units to enable the



elderly and/or persons with disabilities to remain in their existing homes.

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

- **Impediment 4: Public Policy**

The City Zoning Ordinance needs additional definitions and provisions concerning Fair Housing.

Goal: Revise the City Zoning Ordinance to promote the development of various types of affordable housing throughout the City.

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

- **4-A:** Revise the City Zoning Ordinance to include additional definitions, statements, and revisions.
- **4-B:** Adopt a written Reasonable Accommodation Policy for housing developers and the Planning/Zoning Commission to follow when reasonable accommodation requests are made concerning zoning and land use as it applies to protected classes under the Fair Housing Act.
- **4-C:** Develop financial incentives to encourage developers and housing providers to offer more affordable housing options in the City.
- **4-D:** Encourage LMI, minority, and protected class resident participation in the various City Boards and Commissions.

- **Impediment 5: Regional Approach to Fair Housing**

There is a need for a regional collaborative approach to affirmatively further fair housing in the area.

Goal: Form a regional cooperative fair housing consortium to affirmatively further fair housing in the area.

Strategies: In order to meet this goal, the following actions should be undertaken:

- **5-A:** Form a regional fair housing consortium to encourage fair housing choice throughout the area.



- **5-B:** Through the regional fair housing consortium create regional fair housing activities and projects.
- **5-C:** Work collaboratively with affordable housing developers/providers to ensure affirmative fair marketing plans and deconcentration policies are created and implemented.



VI. Maps

The following maps are attached:

- Percent White Population by Block Group
- Percent Minority Population by Block Group
- Percent Population Age 65 and Over by Block Group
- Housing Density by Block Group
- Percent Owner Occupied Housing Units by Block Group
- Percent Renter Occupied Housing Units by Block Group
- Low- and Moderate-Income Percentage by Block Group
- Low- and Moderate-Income and Minority Percentage by Block Group