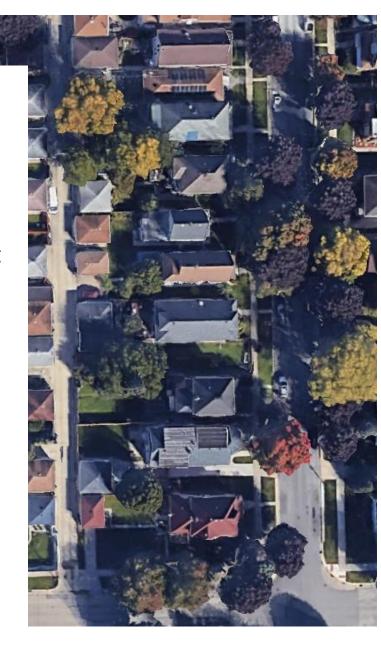


Town of Cicero Larry Dominick – Town President

Analysis of Impediments to Fair Housing Choice



2025

Town of Cicero
Department of Housing

Tom M. Tomschin, MPA Executive Director

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Executive Summary

The Town of Cicero, Department of Housing performed an Analysis of Impediments to Fair Housing, as part of their 5-Year Consolidated Plan Process for the Community Development Block Grant Program. In order to conduct this analysis, data had to be gathered from a variety of sources. The sources of data include:

- 1. Secondary Participation
 - a. On-Line Survey
- 2. In-Person Observations
 - a. Community and Agency Meetings
- 3. Case Studies and Content Analysis:
 - a. Fair Housing Complaint Data
 - b. Town of Cicero Building Codes
 - c. Town of Cicero Unified Development Code
 - d. Town of Cicero Housing Needs Study
 - e. Town of Cicero Taxing Bodies
 - f. Cicero Lending Trends and Demographics

Overall, The Town of Cicero has done a good job addressing several identified impediment from the last analysis, including:

- 1. Amending their building codes, and adopting an updated Unified Development Code (replaced Zoning Code),
- 2. Expanded grant programs for homeowners, to relieve some burden on the costs of homeownership,
- 3. Implemented coordinated translation services for town-related documents and advertisements,
- 4. Performing a housing needs study to get a better idea of current and future concerns, and to develop strategies to address them,
- 5. Increased partnerships with the Cicero Housing Authority, and other local service providers that specialize in housing issues and concerns.

There is always more work to be completed, to continue to affirmatively further fair housing. At the conclusion of this process, the Town of Cicero Department of Housing did identify potential impediments to Fair Housing Choice. The impediments to Fair Housing Choice and the suggested recommendations are:

Impediments to Fair Housing identified through this Analysis are:

- 1. The demographics of the Cicero Housing Authority do not reflect the overall demographics of the town as a whole. This can be an impediment to fair housing choice.
 - a. A majority of households receiving a voucher are single occupant houses.
 - b. A vast majority of Cicero households are 2 person or more.
 - c. This can be a concern for fair housing, if households with children do not have equal access to needed vouchers.
- 2. Lack of employee training regarding Fair Housing Laws, and discriminatory practices.
- 3. Lack of knowledge regarding Fair Housing Laws and Protective Classes and where victims can report their issues.
- 4. Lack of local government/community service agency participation in community outreach regarding education to Fair Housing.
- 5. The substantial difference in bank investments in majority white neighborhoods, places Cicero at a disadvantage for residents to access housing.
- 6. The substantial difference in bank investments in majority white neighborhoods limits the amount of new housing units that can be created. The law of supply and demand is not working.

The Town of Cicero Department of Housing recommends:

- 1. The Cicero Housing Authority should advertise their programs where families have access to the information, or perform outreach to educate families on the existence of their program.
- 2. The Cicero Housing Authority should perform an internal evaluation of their program, including policies and procedures to determine any potential impediments to fair housing choice.
- 3. The Town of Cicero employees should complete Fair Housing Training, to ensure all employees are aware of Fair Housing and Discrimination Laws.
- 4. The Town of Cicero should sponsor workshops and events on Fair Housing, tailored to renters, purchasers, landlords, local government, and social service workers.
- 5. Create a department, or instruct a current department to field mortgage lending questions, concerns, and complaints, and develop policies and procedures to address. The Town of Cicero should have a Certified Fair Housing Investigator; this certification can be received from the National Fair Housing Training Academy.
- The Town should review permits issued over time, under the updated zoning code, compared to previous zoning codes, to look for possible impediments not seen or considered previously.

The Town of Cicero identified concerns as impediments to affordable housing:

1. Cicero offers numerous owner-occupied housing repair programs, but there is a lack of programs for rental units.

- 2. Cicero has a gap in needed affordable rental units and available affordable rental units.
- 3. Code requirements like zoning or building codes add costs to deliver housing could reduce affordable housing.
- 4. The Town's ordinance on basement and attic dwelling units may be an impediment, if all building code requirements for life safety are met. The Town should develop a streamlined process to properly identify and document these accessory dwelling units, so they may become legally-rented units.
- 5. The demand for housing is high in Cicero, but the amount of decent, affordable housing units is not keeping pace with demand. Cicero has a gap in needed affordable rental units and available affordable rental units.
- 6. The age of Cicero's current housing stock places a greater burden on upkeep and maintenance, thus raising the price of decent housing, and also adding to financial burden from issuance of tickets/violations.
- 7. Cost-Burden in homeownership is rising in the Town of Cicero.
- 8. Town ordinance of requiring licensed/bonded contractors for most work that can be done by a handy homeowner adds to the cost of maintaining a home in Cicero.
- 9. A once highly industrial town, industrial zoning districts can still abut residential zoning districts, and lead to a lack of decent affordable housing.

The Town of Cicero Department of Housing recommends:

- 1. Looking into the feasibility of funding a program like we had with Neighborhood Stabilization Program, where we could subsidize down payment for qualified home buyers, to make housing access more affordable and achievable.
- 2. Promote multi-family developments on large town-owned parcels to spark development of new affordable units.
- 3. Offer funding, to subsidize new residential unit construction, to be used to compel banks to lend to prospective clients (reduce their "perceived" risk).
- 4. Create a department, or instruct a current department to field mortgage lending questions, concerns, and complaints, and develop policies and procedures to address.
- 5. Investigate the possibility of offering an incentive program to install energy efficient appliances/windows, insulation, etc., in properties to reduce the cost burden.
- 6. Continue, or expand the Keep Cicero CLEAN event.
- 7. The Town should explore additional funding sources, or internally subsidize/offer incentives for a developer to build on all "Town-Owned" property zoned for residential purposes, with a clause that these units be made "affordable", and made available to current Town of Cicero Residents to attempt to alleviate the population density, and increase the number of affordable units.
- 8. The Town Board needs to work with the Building Department to ensure internal policies do not add to the cost burden already facing the residents of Cicero.
- 9. The Town should investigate the possibility of developing a process to inspect, verify, and document naturally-occurring existing accessory dwelling units for safety, and formally recognize as a dwelling unit, if all safety codes are met

On February 27th 2025, HUD Secretary Scott Turner announced that the Affirmatively Furthering Fair Housing Rule (AFFH) would be terminated. A locality's certification that it has affirmatively furthered fair housing, in accordance with the Fair Housing Act, would be deemed sufficient. The Town of Cicero was nearly complete and in the process of this analysis of impediments to Fair Housing when this was announced.

The Town of Cicero certifies that it will further fair housing in accordance with the Fair Housing Act. The Fair Housing Act was passed as part of the Civil Rights Act of 1968. The law prohibits housing discrimination based on race, color, religion, sex, disability, familial status or national origin. It also requires federal agencies and recipients of federal housing funds to affirmatively further fair housing.

Introduction

The Town of Cicero is committed to eliminating racial and ethnic segregation, illegal physical and other barriers to persons with disabilities and other discriminatory practices in housing. Overall, The Town of Cicero, under the leadership of Larry Dominick, Town President and the

Cicero Board of Trustees, has done an exemplary job with Fair Housing Choice, and should be commended.

Provisions to affirmatively further fair housing (AFFH) are principal and long-standing components of HUD's housing and community development programs. These provisions flow from the mandate of Section 808(e)(5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department's housing and urban development programs in a manner to affirmatively further fair housing.

HUD's housing and community development program regulations, handbooks, and notices interpret the statutory requirement in specific standards that State and Entitlement jurisdictions and HUD-assisted/insured housing providers must meet or actions they must take. Depending on the HUD housing or community development program, HUD interpretations include:

- Site and neighborhood standards
- Affirmative fair housing marketing requirements
- The equal housing opportunity component of the Administrative Plan in the Section 8
 Certificate and Housing Voucher Programs
- Tenant selection and assignment criteria (including criteria relating to the operation of preferences)
- Fair housing advertising
- Program accessibility, including physical accessibility for persons with disabilities
- Accessible communications
- Reasonable accommodations

In its community development (CD) programs (For Example, CDBG), HUD has strongly encouraged:

- The adoption and enforcement of State and local fair housing laws
- The reduction of separation by race, ethnicity, or disability status.

The CDBG program contains a regulatory requirement to affirmatively further fair housing based upon HUD's obligation under Section 808 of the Fair Housing Act. The CDBG regulation also reflects the CDBG statutory requirement that the grantees certify that they will affirmatively further fair housing.

Through its CPD programs, HUD's goal is to expand mobility and widen a person's freedom of choice. The Department also requires CPD grantees (those State and Entitlement jurisdictions that administer the above identified CPD Programs) to document AFFH actions in the CDBG and CHAS annual performance reports that are submitted to HUD.

In 1995, HUD published a rule consolidating the CHAS, the community development plan (required for the CDBG program), and the submission and reporting requirements for the four community development formula grant programs (CDBG, HOME, ESG, and HOPWA) into a single plan—the Consolidated Plan.

As part of the Consolidated Plan, grantees will submit an AFFH certification which requires them to undertake FHP through:

- 1. The completion of an Al
- 2. Actions to eliminate any identified impediments
- 3. Maintenance of AFFH records.

Federal law (Fair Housing Act) has 7 protected classes which are:

- 1. Race
- 2. Color
- 3. National Origin
- 4. Sex
- 5. Religion
- 6. Familial Status
- 7. Handicap

State of Illinois law (Illinois Human Rights Act) has 15 protected classes which are:

- 1. Race, color, ancestry, and national origin,
- 2. Religion
- 3. Sex, including sexual harassment,
- 4. Pregnancy
- 5. Age (40 and over)
- 6. Order of Protection Status
- 7. Marital Status
- 8. Sexual Orientation, including gender-related identity
- 9. Military Status
- 10. Unfavorable Discharge from Military Service
- 11. Source of Income
- 12. Disability
- 13. Immigration Status
- 14. Retaliation
- 15. Arrest Records

The Fair Housing Laws:

https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_rights_and_oblig_ations

Statutes

Fair Housing Act

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability).

Title VI of the Civil Rights Act of 1964

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

Section 504 of the Rehabilitation Act of 1973

Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 508 of the Rehabilitation Act of 1973

Section 508 requires federal agencies to ensure that the electronic and information technology they develop, procure, or use allows individuals with disabilities to have ready access to and use of the information and data that is comparable to that of individuals without disabilities.

<u>Section 109 of Title I of the Housing and Community Development Act of 1974</u> Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant Program.

Title IX of the Education Amendments Act of 1972

Title IX prohibits discrimination on the basis of sex (including gender identity and sexual orientation) in any education programs and activities that receive federal financial assistance. HUD enforces Title IX when it relates to housing affiliated with an educational institution.

Title II of the Americans with Disabilities Act of 1990

Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

<u>Title III of the Americans with Disabilities Act of 1990</u>

Title III of the ADA prohibits discrimination based on disability in the goods, services, facilities, privileges, advantages, and accommodations of places of public accommodations owned, leased, or operated by private entities. The Department of Justice enforces Title III of the ADA, but certain HUD recipients and private entities operating housing and community development programs are covered by Title III of the ADA.

Architectural Barriers Act of 1968

The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by handicapped persons.

Violence Against Women Act

VAWA provide housing protections for victims of domestic violence, dating violence, sexual assault, and stalking in many of HUD's housing programs. VAWA also requires the establishment of emergency transfer plans for facilitating the emergency relocation of certain tenants who are victims of domestic violence, dating violence, sexual assault, or stalking.

Age Discrimination Act of 1975

The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Title IX of the Education Amendments Act of 1972

Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.

Executive Orders:

Executive Order 11063

Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

Executive Order 11246

Executive Order 11246, as amended, bars discrimination in federal employment because of race, color, religion, sex, or national origin.

Executive Order 12892

Executive Order 12892, as amended, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

Executive Order 12898

Executive Order 12898 requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

Executive Order 13166

Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a

barrier to full and meaningful participation by beneficiaries in all federally-assisted and federally conducted programs and activities.

Executive Order 13217

Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

Executive Order 13988

Executive Order 13988, issued on January 20, 2021, requires HUD to administer and fully enforce the Fair Housing Act to prohibit discrimination because of sexual orientation and gender identity.

Regulations

- 1) <u>Accessibility Standards for Design, Construction, and Alteration of Publicly Owned</u> Residential Structures
 - a) 24 C.F.R. part 40
- 2) Affirmative Fair Housing Marketing
 - a) 24 C.F.R. part 108
 - b) 24 C.F.R. part 110
 - c) 24 C.F.R. part 200, subpart M
 - d) 24 C.F.R. § 203.12(b)(3)
- 3) Affirmatively Furthering Fair Housing
 - a) 24 C.F.R. §§ 5.150 5.168
- 4) Certification and Funding of State and Local Fair Housing Enforcement Agencies
 - a) 24 C.F.R. part 115
- 5) Collection of Data
 - a) 24 C.F.R. part 121
- 6) <u>Discriminatory Conduct Under the Fair Housing Act</u>
 - a) 24 C.F.R. part 100
- 7) Equal Access Rule
 - a) 24 C.F.R. § 5.105
 - b) 24 C.F.R. § 5.106
- 8) Fair Housing Act Complaint Processing
 - a) 24 C.F.R. part 103
- 9) Fair Housing Poster

- a) 24 C.F.R. part 110
- 10) Fair Housing Initiatives Program
 - a) 24 C.F.R. part 125
- 11) Information and Communication Technology Standards and Guidelines
 - a) 36 C.F.R. part 1194
- 12) Nondiscrimination and Equal Opportunity in Housing Under Executive Order 11063
 - a) 24 C.F.R. part 107
- 13) Nondiscrimination Based on Handicap in Federally-Assisted Programs and Activities of the Department of Housing and Urban Development
 - a) 24 C.F.R. part 8
- 14) Nondiscrimination in Federally-Assisted Programs of the Department of Housing and Urban Development Effectuation of Title VI of the Civil Rights Act of 1964
 - a) 24 C.F.R. part 1
- 15) Nondiscrimination in Programs and Activities Receiving Assistance under Title I of the Housing and Community Development Act of 1974
 - a) 24 C.F.R. part 6
- 16) Nondiscrimination on the Basis of Age in HUD Programs or Activities Receiving Federal Financial Assistance
 - a) 24 C.F.R. part 146
- 17) Nondiscrimination on the Basis of Disability in State and Local Government Services
 - a) 28 C.F.R. part 35
- 18) Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance
 - a) 24 C.F.R. part 3
- 19) Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking
 - a) 24 C.F.R. §§ 5.2001 5.2011

Summary of the Previous Analysis of Impediments

The Town of Cicero performed their last Analysis of Impediments to Fair Housing in 2015. The Town, on an annual basis, certified to HUD that they took efforts to further Fair Housing.

The objectives of the analysis were to:

- Overcome the historical problems of the past, and
- Heighten the awareness of the definition of fair housing impediments among the general public as well as lenders, and those involved in the housing industry.

To meet the educational objective, the Town was to conduct meetings for the general public, lenders, and those involved in the housing industry, as well as Town Officials and employees. These meetings will promote awareness that:

- Cicero is an open community
- Cicero offers housing on an equal opportunity basis
- All persons are welcome in Cicero
- Cicero is a melting pot of diversity
- The Town and its officials will not tolerate discriminatory practices
- The requirement of fair housing laws
- Define impediments to fair housing
- Dispel fictions or prejudices against groups, homes, or residential neighborhoods

The analysis from 2015 identified the following impediments within the Town of Cicero:

- Lack of employee training regarding Fair Housing Laws, and discriminatory practices.
- Lack of Knowledge regarding Fair Housing Laws and Protective Classes.
- Lack of local government/community service agency participation in community outreach regarding Fair Housing.
- Language barriers and information asymmetry an impediment to fair housing.

The analysis also identified impediments to decent affordable housing:

- The demand for housing is high in Cicero, but the amount of decent, affordable housing units is not keeping pace with demand.
- The age of Cicero's current housing stock places a greater burden on upkeep and maintenance, thus raising the price of decent housing, and also adding to financial burden from issuance of tickets/violations.
- The Foreclosure crisis may have forced families to "double-up" in homes/apartments.
- Illegal Apartments located in the Town, are impediments to safe, affordable housing.
- Cost-Burden in homeownership is rising in the Town of Cicero.
- Local infrastructure (Streets/Alleys/Sewer) is deteriorating, and with high cost-burden, need to be invested in.
- Town policy of requiring licensed/bonded contractors for most work that can be done by a handy homeowner adds to the cost of maintaining a home in Cicero.
- Town building permit requirements are "too strict".

The previous Analysis recommended, in response to the identified impediments, that:

- The Town of Cicero Employees should complete Fair Housing Training, to ensure all employees are aware of Fair Housing and Discrimination Laws.
- The town should sponsor workshops and events on Fair Housing, tailored to both renters, purchasers, landlords, local government, and social service workers.
- The Town of Cicero should conduct informative seminars with private business, non-profit agencies, and public to Affirmatively Further Fair Housing.
- The Town of Cicero should publish information regarding protective classes, and fair housing laws in their monthly Town News Letter.

- The Town of Cicero needs to ensure that bilingual materials, services, and outreach are available to communities across the state. The Town of Cicero agrees with both their identification of the impediments, and their recommendation.
- The Town of Cicero should have a Certified Fair Housing Investigator; this certification can be received from the National Fair Housing Training Academy.

And:

- The Town needs to perform outreach to educate the public on the safety issues related to illegal apartments.
- The Town needs to strictly enforce zoning and building codes, to ensure illegal apartments are identified and remediated accordingly.
- The Town should expand the CDBG Housing Rehabilitation Program to include a program for homeowners to correct violations that they receive from the Town's Building Department.
- The Town should investigate the possibility of offering a reimbursement incentive through the CDBG Housing Rehabilitation Program to offer incentives for homeowners to make improvements to their properties.
- Investigate the possibility of offering an incentive program to install energy efficient appliances/windows, insulation, etc... in properties.
- Continue, or expand the Keep Cicero CLEAN event.
- Increase investments in Town Road and Alley pavement projects, to maintain the safety and livability of our neighborhoods.
- The Town should explore additional funding sources, or internally subsidize/offer incentives for a developer to build on all "Town-Owned" property zoned for residential purposes, with a clause that these units be made "affordable", and made available to current Town of Cicero Residents to attempt to alleviate the population density.
- The Town of Cicero through the Comprehensive Plan they are currently performing should determine community goals and aspirations in terms of community development. This Comprehensive Plan will dictate public policy in terms of transportation, utilities, land use, recreation, infrastructure and housing, and be a cooperative process between local government, the private sector, and the general public.
- The Town of Cicero needs to perform a land-use assessment/needs assessment, to
 determine creative ways to alleviate the overcrowding issue in regards to people-per-unit,
 illegal basement apartments, parking congestion, traffic congestion, school congestion,
 etc...
- The Town Board needs to work with the Building Department to ensure internal policies do not add to the cost burden already facing the residents of Cicero.

Jurisdictional History

Cicero: An American Town --by John S. Kociolko (http://www.thetownofcicero.com/aboutthetown/contentview.asp?c=220219)

The Town of Cicero is one of the oldest and largest municipalities in the State of Illinois and the only incorporated town in Cook County. It bears the name of the great Roman statesman of the

First Century B.C., Marcus Tullius Cicero.

Cicero was one of the greatest statesmen of Rome and an advocate of constitutional government. He died in the political turmoil which followed the assassination of Julius Caesar, but his writings and beliefs survived. Centuries later, the principles Cicero espoused would flourish again in a young republic with a new constitution, capitol and senate, the United States of America.

Illinois, part of the old Northwest Territory which the United States had acquired from Great Britain in 1783, joined the Union as the 21st state in 1818. Most of the early Illinoisans were from the South, where counties were the basis of local government and so the new state was divided into counties. Cook County was established in 1831, comprising what is today Cook, DuPage, Iroquois, Lake, McHenry and Will Counties.

Later settlers from the Northeast preferred their traditional township government and a new state constitution in 1848 authorized the creation of townships. In the following year, Cook County voters approved the new jurisdictions.

Among the townships created by the County Board in 1849 was a 36 square mile tract bounded by what are today Western, North and Harlem Avenues and Pershing Road. On June 23, 1857, 14 electors met to organize a local government for the district, which they named "The Town of Cicero." Railroads, immigration and the Civil War contributed to economic growth in the new township, which by 1867 numbered 3,000 residents. In that year the state legislature incorporated the Town of Cicero as a municipality with a special charter, which was revised in 1869. Township and municipal functions have subsequently been discharged by a single board of elected officials.

Cicero's rapid development in these early years now collided with the expanding political power of its neighbor, the City of Chicago. By 1889, Chicago had annexed more than half of the original Town. An 1899 referendum ceded the Austin neighborhood to the city and in the following year land containing a race track was transferred to Stickney Township.

On July 21, 1899, Ernest Hemingway, winner of both the Pulitzer and Nobel prizes, was born within the Town of Cicero, in what is today the Village of Oak Park.

In 1901, the three remaining components of the old township - today's Oak Park, Berwyn and Cicero - voted to separate. The surviving Town of Cicero retained less than six of the 36 square miles carved out in 1849. Immigrants and their families swelled the Town's population, and housing construction boomed within its diminished territory.

Served by the Burlington, Illinois Central, Belt Line, and other railroads, Cicero attracted many

industries in the Twentieth Century and became the largest manufacturing center in the state after Chicago. It was also the site of an early airfield in 1911. W. Edwards Deming began his pioneering work on management techniques in the 1920's at the Western Electric Hawthorne Works, an industrial colossus which employed more than 40,000 people during World War II and was the dominant business in Town for eight decades.

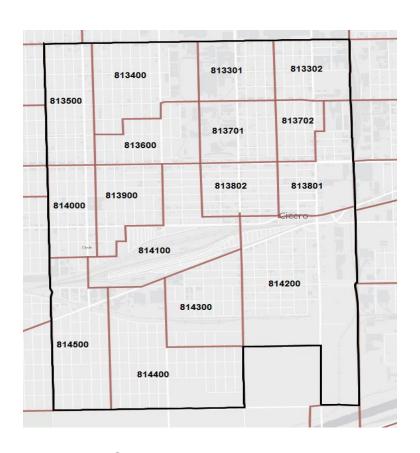
From the early townsmen who fought in the Union Army during the Civil War, Ciceronian's have proudly served in the armed forces. Their bravery is exemplified by Boatswain's Mate Joseph P. Steffan, who died aboard the USS Arizona in the attack on Pearl Harbor, and Capt. Edward C. Krzyzowski, who was posthumously, awarded the Medal of Honor for heroism in Korea.

Cicero is composed of eight neighborhoods, with their own district names and characteristics. Two were named for businesses-Grant Works after an 1890 locomotive factory and Hawthorne for an 1850's quarry, the first Cicero industry. Two others bear the family names of local landowners, Warren Park and Drexel, while two more were christened by prominent residents, Clyde, recalling a river in Scotland and Morton Park honoring Julius Sterling Morton, a Nebraskan who served as Agriculture Secretary to President Cleveland. Morton also gave his name to the local high school and college, yet he never lived in the town. Boulevard Manor derives its name from Austin Boulevard. The origin of the title of Parkholme is unknown.

The Town of Cicero has a colorful history, which forms a part of the larger stories of the county, state and nation. Three Presidents, Eisenhower, Reagan, and Bush-visited Cicero on their roads to the White House. We can better understand the present and plan for the future, if we know the achievements of the past.

Jurisdictional Demographics

Town of Cicero Census Tract Map



Census Tract Income Data

CDBG ID	CDBG NAME	TRACT #	% Low/Mod
171332	CICERO	8133	78.02
171332	CICERO	8134	67.5
171332	CICERO	8135	56.42
171332	CICERO	8136	71.5
171332	CICERO	8137	66.62
171332	CICERO	8138	72.55
171332	CICERO	8139	68.46
171332	CICERO	8140	63.72
171332	CICERO	8141	71.9
171332	CICERO	8142	66.78
171332	CICERO	8143	65.63
171332	CICERO	8144	55.2
171332	CICERO	8145	48.83

Population and Households

The population and household tables include general demographic, social, and economic characteristics summarized for Cicero.

General Population Characteristics, 2022

	Cicero	Cook County	CMAP Region
Total Population	84,189	5,225,367	8,527,041
Total Households	24,600	2,066,248	3,250,640
Average Household Size	3.4	2.5	2.6
Percent Population Change, 2000-10	-2.0	-3.4	3.5
Percent Population Change, 2010-22	0.4	0.6	1.1
Percent Population Change, 2000-22	-1.7	-2.8	4.7

Source: 2000 and 2010 Census, 2018-2022 American Community Survey five-year estimates.

Race and Ethnicity, 2018-2022

	Cicero		Cook County		CMAP Region	
	Count	Percent	Count	Percent	Count	Percent
White (Non-Hispanic)	6,681	7.9	2,148,173	41.1	4,211,527	49.4
Hispanic or Latino (of Any Race)	73,974	87.9	1,352,482	25.9	2,023,572	23.7
Black (Non-Hispanic)	2,732	3.2	1,170,790	22.4	1,380,647	16.2
Asian (Non-Hispanic)	367	0.4	398,558	7.6	648,059	7.6
Other/Multiple Races (Non-Hispanic)	435	0.5	155,364	3.0	263,236	3.1

Source: 2018-2022 American Community Survey five-year estimates.

Universe: Total population

Age Cohorts, 2018-2022

(Cicero		Cook County		CMAP Region	
Count	Percent	Count	Percent	Count	Percent	
4,565	5.4	299,893	5.7	484,947	5.7	
20,686	24.6	948,855	18.2	1,634,226	19.2	
18,854	22.4	1,169,230	22.4	1,773,356	20.8	
17,647	21.0	1,047,123	20.0	1,709,186	20.0	
14,200	16.9	966,335	18.5	1,638,073	19.2	
5,371	6.4	463,408	8.9	760,750	8.9	
2,221	2.6	227,214	4.3	367,111	4.3	
645	0.8	103,309	2.0	159,392	1.9	
33.4		37.5		38.1		
	Count 4,565 20,686 18,854 17,647 14,200 5,371 2,221 645	Count Percent 4,565 5.4 20,686 24.6 18,854 22.4 17,647 21.0 14,200 16.9 5,371 6.4 2,221 2.6 645 0.8	Count Percent Count 4,565 5.4 299,893 20,686 24.6 948,855 18,854 22.4 1,169,230 17,647 21.0 1,047,123 14,200 16.9 966,335 5,371 6.4 463,408 2,221 2.6 227,214 645 0.8 103,309	Count Percent Count Percent 4,565 5.4 299,893 5.7 20,686 24.6 948,855 18.2 18,854 22.4 1,169,230 22.4 17,647 21.0 1,047,123 20.0 14,200 16.9 966,335 18.5 5,371 6.4 463,408 8.9 2,221 2.6 227,214 4.3 645 0.8 103,309 2.0	Count Percent Count Percent Count 4,565 5.4 299,893 5.7 484,947 20,686 24.6 948,855 18.2 1,634,226 18,854 22.4 1,169,230 22.4 1,773,356 17,647 21.0 1,047,123 20.0 1,709,186 14,200 16.9 966,335 18.5 1,638,073 5,371 6.4 463,408 8.9 760,750 2,221 2.6 227,214 4.3 367,111 645 0.8 103,309 2.0 159,392	

Source: 2018-2022 American Community Survey five-year estimates.

Universe: Total population

Population with a Disability, 2018-2022

	Cicero		Cook C	Cook County		CMAP Region	
	Count	Percent	Count	Percent	Count	Percent	
Number of People with a Disability	4,820	5.7	558,448	10.7	854,027	10.0	
One Type of Disability Only	2,246	2.7	290,196	5.6	455,218	5.3	
Two or More Types of Disability	2,574	3.1	268,252	5.1	398,809	4.7	

Source: 2018-2022 American Community Survey five-year estimates.

Universe: Total population

Disability by Type, 2018-2022

	Cicero		Cook	Cook County		CMAP Region	
	Count	Percent	Count	Percent	Count	Percent	
Hearing Difficulty	960	1.1	124,986	2.4	206,018	2.4	
Vision Difficulty	1,185	1.4	111,984	2.1	162,914	1.9	
Cognitive Difficulty	1,572	1.9	203,127	3.9	309,494	3.6	
Ambulatory Difficulty	2,766	3.3	293,501	5.6	430,263	5.0	
Self-Care Difficulty	1,282	1.5	114,842	2.2	170,477	2.0	
Independent Living Difficulty†*	1,777	2.9	219,055	5.4	323,527	4.9	

Source: 2018-2022 American Community Survey five-year estimates.

Click here to learn more about how disability is defined for this dataset.

 $^{\dagger}\text{Does}$ not include residents of nursing homes or skilled nursing facilities that provide long-term, nonacute care.

Universe: Total population

*Universe: Total population over 18

Disability by Age Cohorts, 2018-2022

	Cicero		Cook	Cook County		CMAP Region	
	Count	Percent	Count	Percent	Count	Percent	
0-17 with a Disability	629	0.7	37,324	0.7	62,109	0.7	
18-64 with a Disability	2,293	2.7	273,981	5.2	413,884	4.9	
65-74 with a Disability	1,184	1.4	104,281	2.0	157,796	1.9	
75 and Over with a Disability	714	0.8	142,862	2.7	220,238	2.6	

Source: 2018-2022 American Community Survey five-year estimates.

Universe: Total population

Housing Type, 2018-2022

	Cicero		Cook	Cook County		CMAP Region	
	Count	Percent	Count	Percent	Count	Percent	
Single Family, Detached	10,961	41.6	906,452	40.1	1,743,736	49.8	
Single Family, Attached	593	2.2	121,327	5.4	264,078	7.5	
2 Units	8,028	30.4	211,609	9.4	235,558	6.7	
3 or 4 Units	3,556	13.5	235,831	10.4	273,909	7.8	
5 to 9 Units	1,835	7.0	222,163	9.8	271,861	7.8	
10 to 19 Units	873	3.3	107,397	4.7	156,360	4.5	
20 or More Units	432	1.6	438,147	19.4	525,369	15.0	
Mobile Home/Other*	89	0.3	18,393	0.8	30,157	0.9	

Source: 2018-2022 American Community Survey five-year estimates.

*"Other" includes boats, recreational vehicles (RVs), vans, etc.

Universe: Housing units

Housing Age, 2018-2022

	Cicero		Cook	Cook County		CMAP Region	
	Count	Percent	Count	Percent	Count	Percent	
Built 2010 or Later	72	0.3	84,003	3.7	145,701	4.2	
Built 1990 to 2009	811	3.1	318,560	14.1	767,059	21.9	
Built 1970 to 1989	1,713	6.5	446,632	19.8	814,595	23.3	
Built 1940 to 1969	6,229	23.6	775,570	34.3	1,039,675	29.7	
Built Before 1940	17,542	66.5	636,554	28.1	733,998	21.0	
Median Year Built	1938		1960		1969		

Source: 2018-2022 American Community Survey five-year estimates.

Universe: Housing units

Household Size, 2018-2022

	Cicero		Cook County		CMAP Region	
	Count	Percent	Count	Percent	Count	Percent
1-Person Household	5,028	20.4	698,796	33.8	966,470	29.7
2-Person Household	5,336	21.7	618,745	29.9	1,001,567	30.8
3-Person Household	3,789	15.4	303,832	14.7	504,680	15.5
4-or-More-Person Household	10,447	42.5	444,875	21.5	777,923	23.9

Source: 2018-2022 American Community Survey five-year estimates.

Universe: Occupied housing units

Household Type, 2018-2022

	С	Cicero		Cook County		CMAP Region	
	Count	Percent	Count	Percent	Count	Percent	
Family	18,469	75.1	1,210,670	58.6	2,069,033	63.7	
Single Parent with Child	3,421	13.9	171,972	8.3	257,105	7.9	
Non-Family	6,131	24.9	855,578	41.4	1,181,607	36.3	

Source: 2018-2022 American Community Survey five-year estimates.

Universe: Occupied housing units

Household Income, 2018-2022

	C	Cicero		Cook County		CMAP Region	
	Count	Percent	Count	Percent	Count	Percent	
Less than \$25,000	3,386	13.8	346,484	16.8	453,945	14.0	
\$25,000 to \$49,999	5,799	23.6	347,719	16.8	496,759	15.3	
\$50,000 to \$74,999	5,463	22.2	301,969	14.6	466,365	14.3	
\$75,000 to \$99,999	3,593	14.6	255,350	12.4	407,838	12.5	
\$100,000 to \$149,999	3,728	15.2	346,116	16.8	591,558	18.2	
\$150,000 and Over	2,631	10.7	468,610	22.7	834,175	25.7	
Median Income	\$64,325		\$78,304		\$87,766		
Per Capita Income*	\$23,597		\$45,646		\$47,125		

Source: 2018-2022 American Community Survey five-year estimates.

Universe: Occupied housing units *Universe: Total population

Housing Occupancy and Tenure, 2018-2022

	Ci	Cicero		Cook County		CMAP Region	
	Count	Percent	Count	Percent	Count	Percent	
Occupied Housing Units	24,600	93.3	2,066,248	91.4	3,250,640	92.8	
Owner-Occupied*	13,432	54.6	1,188,945	57.5	2,097,657	64.5	
Renter-Occupied*	11,168	45.4	877,303	42.5	1,152,983	35.5	
Vacant Housing Units	1,767	6.7	195,071	8.6	250,388	7.2	

Source: 2018-2022 American Community Survey five-year estimates.

Universe: Housing units *Universe: Occupied housing units

Housing Costs as a Percentage of Household Income*, 2018-2022

	Cicero		Cook C	Cook County		CMAP Region	
	Count	Percent	Count	Percent	Count	Percent	
Less than \$20,000	1,956	8.2	224,418	11.2	291,062	9.2	
Less than 20 Percent	10	0.0	4,765	0.2	6,388	0.2	
20 to 29 Percent	127	0.5	15,678	0.8	18,975	0.6	
30 Percent or More	1,819	7.7	203,975	10.2	265,699	8.4	
\$20,000 to \$49,999	6,482	27.3	415,359	20.8	589,442	18.6	
Less than 20 Percent	615	2.6	41,285	2.1	58,595	1.9	
20 to 29 Percent	1,462	6.2	72,136	3.6	101,424	3.2	
30 Percent or More	4,405	18.6	301,938	15.1	429,423	13.6	
\$50,000 to \$74,999	5,410	22.8	297,892	14.9	460,764	14.6	
Less than 20 Percent	2,063	8.7	78,453	3.9	119,205	3.8	
20 to 29 Percent	2,029	8.5	102,858	5.1	156,453	4.9	
30 Percent or More	1,318	5.6	116,581	5.8	185,106	5.8	
\$75,000 or More	9,891	41.7	1,063,181	53.1	1,823,474	57.6	
Less than 20 Percent	7,308	30.8	694,497	34.7	1,193,060	37.7	
20 to 29 Percent	1,973	8.3	265,597	13.3	458,009	14.5	
30 Percent or More	610	2.6	103,087	5.2	172,405	5.4	

Source: 2018-2022 American Community Survey five-year estimates.

*Excludes households with zero/negative income, and renting households paying no cash rent.

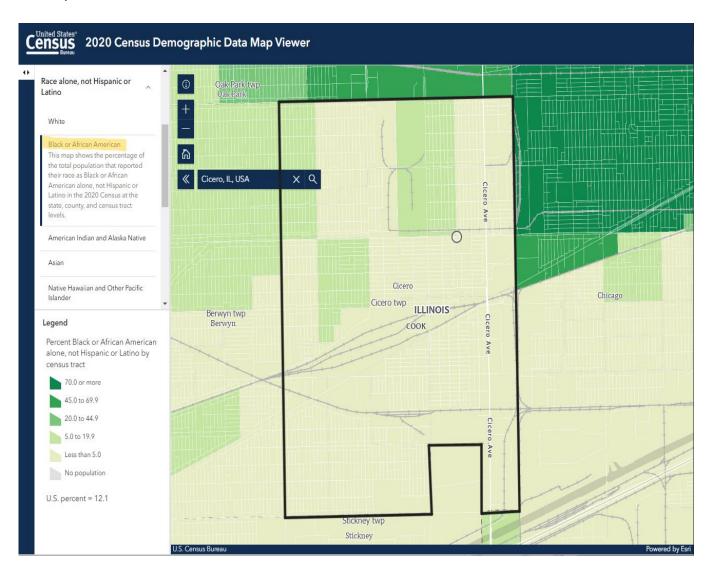
Universe: Occupied housing units

Population Growth

Population Growth 2000-2020 Town of Cicero, Cook County, State of Illinois							
	2000	2010	% Change	2020	% Change		
Cicero	85,616	81,716	-4.6%	82,330	1.0%		
Cook County	5,376,741	5,103,582	-5.1%	5,198,275	1.01%		
State of Illinois	12,419,293	12,581,313	-1.3%	12,671,821	1.0%		

Town of Cicero Geographic Demographic Distribution

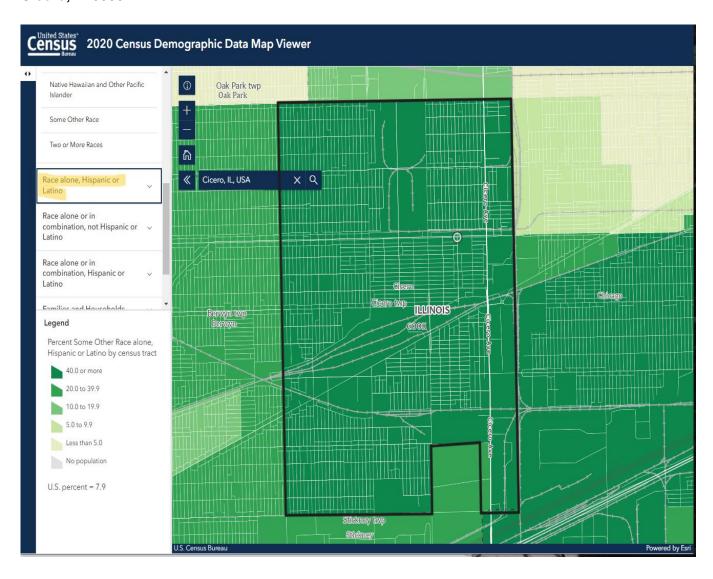
Percent of Persons Who Are Black or African American Alone: 2020 Census Cicero, IL 60804



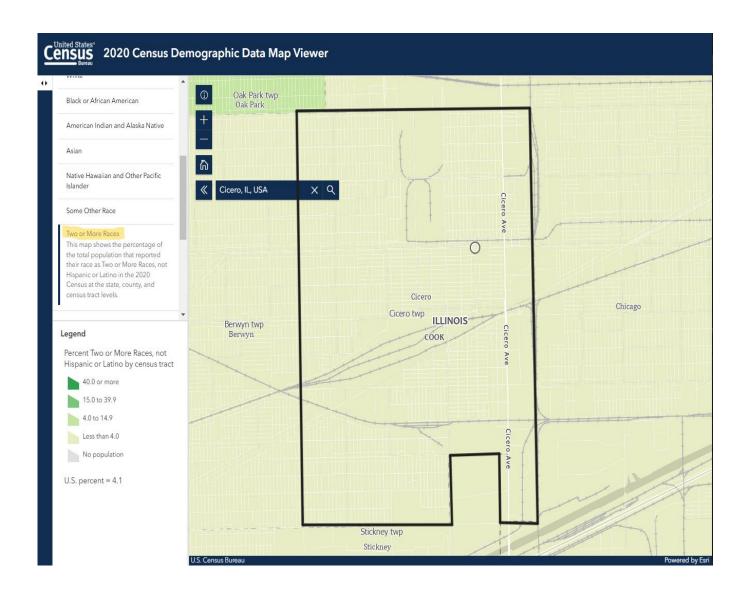
Percent of Persons Who Are White Alone: 2020 Census Cicero, IL 60804



Percent of Persons Who Are Hispanic or Latino: 2020 Census Cicero, IL 60804



Percent of Persons Who Are Two or more other Races: 2020 Census Cicero, IL 60804



Employment

Employment Status, 2018-2022

	Ci	Cicero		Cook County		CMAP Region		
	Count	Percent	Count	Percent	Count	Percent		
In Labor Force	41,280	62.9	2,800,467	66.2	4,610,142	67.3		
Employed†*	39,602	95.9	2,600,619	92.9	4,310,832	93.5		
Unemployed*	1,621	3.9	198,262	7.1	286,166	6.2		
Not in Labor Force	24,303	37.1	1,431,053	33.8	2,243,854	32.7		

Source: 2018-2022 American Community Survey five-year estimates.

[†]Does not include employed population in the Armed Forces.

Universe: Population 16 years and older *Universe: In labor force

Private Sector Employment*, 2023

	Cicero		Cook	County	6-County Region**	
	Count	Percent	Count	Percent	Count	Percent
Private Sector Employment	16,671	N/A	2,231,978	N/A	3,559,560	N/A
Job Change, 2013-23	1,288	8.4	136,445	6.5	245,298	7.4
Job Change, 2003-23	-756	-4.3	61,271	2.8	247,631	7.5
Private Sector Jobs per Household***	0.68		1.08		1.10	

Source: Illinois Department of Employment Security, Where Workers Work report (2023).

Employment of Cicero Residents*, 2021

TOP INDUSTRY SECTORS	Count	Percent
1. Manufacturing	4,132	15.9
2. Retail Trade	3,169	12.2
3. Health Care	3,095	11.9
4. Administration	2,855	11.0
5. Accommodation and Food Service	2,177	8.4
TOP EMPLOYMENT LOCATIONS		
1. Chicago	9,136	35.2
2. Cicero	2,454	9.5
3. Berwyn	570	2.2
4. Elk Grove Village	474	1.8
5. Oak Brook	334	1.3
Source: LLS, Conque Burgou, Longitudine	al Employer Househa	old Dynamica

Employment in Cicero*, 2021

Employment in Oldero , 2021		
TOP INDUSTRY SECTORS	Count	Percent
1. Retail Trade	3,118	18.6
2. Education	2,701	16.1
3. Manufacturing	2,492	14.9
4. Administration	2,010	12.0
5. Wholesale Trade	1,446	8.6
TOP RESIDENCE LOCATIONS		
1. Chicago	5,064	30.3
2. Cicero	2,454	14.7
3. Berwyn	768	4.6
4. Oak Park	212	1.3
5. Joliet	193	1.2

Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics program (2021).

 $^{^{\}star}$ Excludes residents working outside of, and workers living outside of, the seven-county CMAP region.

Major Employers in Cicero						
Employer	Established	Product/Service	Employees			
Burlington Northern	1884	Railroad Services	800			
Amazon	1994	Technology Company	600			
Walmart	1962	Department Store	507			
The Royal Bay	1922	Fulfillment/Distribution	315			
The Home Depot	1996	Retail Home Improvement	220			
Corey Steel	1924	Manufacturer Steel Bars	204			
Menards	1960	Home Improvement	200			

^{*}Figures exclude employees not covered by unemployment insurance. Data not available for all communities in the CMAP region.

^{**}Data is not available for Kendall County.

^{***}Based on households from 2018-2022 American Community Survey five-year estimates.

Cicero Housing Authority

The Town of Cicero Department of Housing also collaborated with the Cicero Housing Authority to obtain valuable data regarding the Housing Voucher Program (also known as Section 8 Voucher Holders) in the Town of Cicero.

The following information was received from the Cicero Housing Authorities' Administrative Plan Submitted to HUD on September 25, 2024:

The Public Housing Authority (PHA) receives its funding for the Housing Voucher Program (HVP) (also known as Section 8) from the Department of Housing and Urban Development. The PHA is not a federal department or agency. A PHA is a governmental or public body, created and authorized by state law to develop and operate housing and housing programs for low-income families. The PHA enters into an Annual Contributions Contract with HUD to administer the program requirements on behalf of HUD. The PHA must ensure compliance with federal laws, regulations and notices and must establish policy and procedures to clarify federal requirements and to ensure consistency in program operation.

The Housing Voucher Program (HVP) (also known as Section 8) is funded by the federal government and administered by the Cicero Housing Authority for the jurisdiction of the Town of Cicero/County of Cook.

The officials of a PHA are known as commissioners or, collectively, as the board of commissioners. Commissioners are appointed in accordance with state housing law and generally serve in the same capacity as the directors of a corporation, establishing policies under which the PHA conducts business, ensuring that policies are followed by PHA staff and ensuring that the PHA is successful in its mission.

The board is responsible for preserving and expanding the agency's resources and assuring the agency's continued viability. Formal actions of the PHA are taken through written resolutions, adopted by the board of commissioners and entered into the official records of the PHA.

The principal staff member of the PHA is the executive director (ED), appointed by the town president and board of commissioners. The executive director is directly responsible for carrying out the policies established by the commissioners and is delegated the responsibility for hiring, training and supervising the remainder of the PHA's staff in order to manage the day-to-day operations of the PHA to ensure compliance with federal and state laws and directives for the programs managed. In addition, the executive director's duties include budgeting and financial planning for the agency.

The purpose of a mission statement is to communicate the purpose of the agency to people inside and outside of the agency. It provides guiding direction for developing strategy, defining critical success factors, searching out key opportunities, making resource allocation choices, satisfying clients and stakeholders, and making decisions. The Cicero Housing Authority's mission is to provide safe, decent and sanitary housing conditions for very low-income families and to manage resources efficiently. The Cicero Housing Authority will promote personal, economic and social upward mobility to provide families the opportunity to make the transition from subsidized to non-subsidized housing. The Cicero Housing Authority is also the Town's Lead Agency in charge of handling and reporting Fair Housing Complaints.

Over the past several years, the Town of Cicero Department of Housing has built a stronger working relationship with their local Housing Authority. Both agencies are housed in the same building and collaborative efforts have been made to ensure consistency across these two separate agencies.

The following data was received from the Cicero Housing Authority, and shows demographics of the Cicero Housing Authority, compared to the overall demographics of Housing authorities located in the State of Illinois. You will notice, The Cicero Housing Authority is unique when compared to the State.

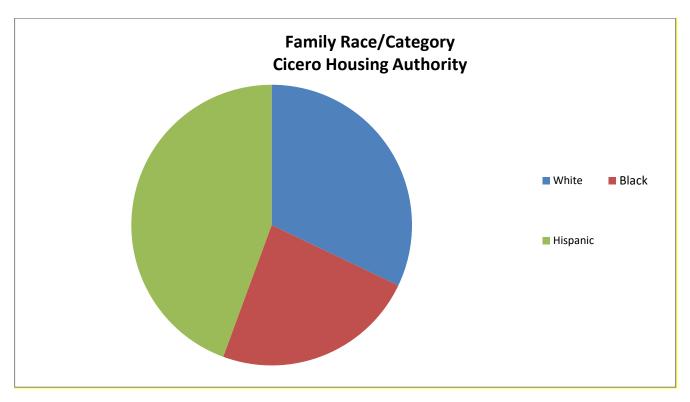
The demographics of the Cicero Housing Authority do not reflect the overall demographics of the town as a whole. This can be an impediment to fair housing choice.

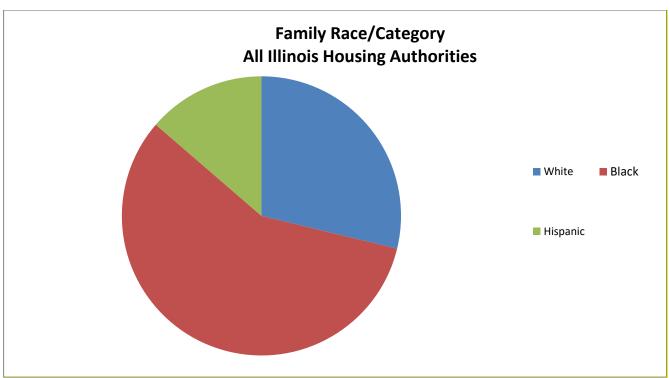
- A majority of households receiving a voucher are single occupant houses.
- A vast majority of Cicero households are 2 person or more.
- This can be a concern for fair housing, if households with children do not have equal access to needed vouchers.

The Town of Cicero Department of Housing recommends:

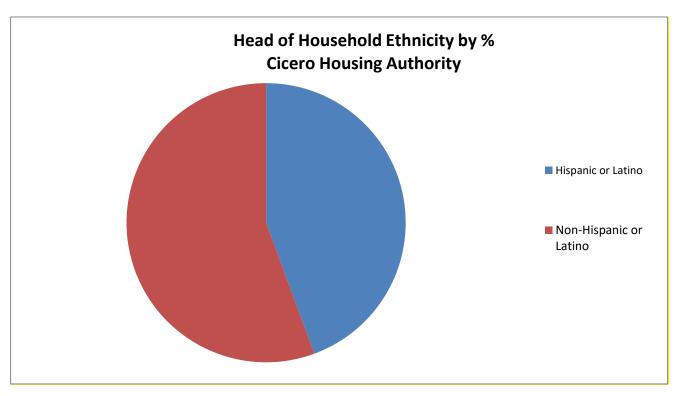
- The Cicero Housing Authority should advertise their programs where families have access to the information, or perform outreach to educate families on the existence of their program.
- 2. The Cicero Housing Authority should perform an internal evaluation of their program, including policies and procedures to determine any potential impediments to fair housing choice.
- 3. The Cicero Housing Authority should actively seek landlords with larger apartments (3 Bedroom or more), to meet needs of larger families in need.

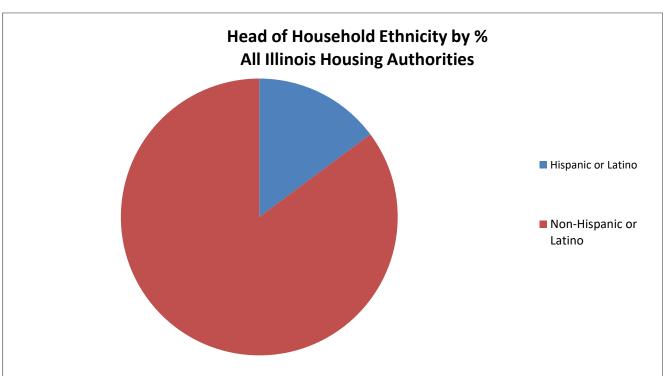
Family/Race Categories



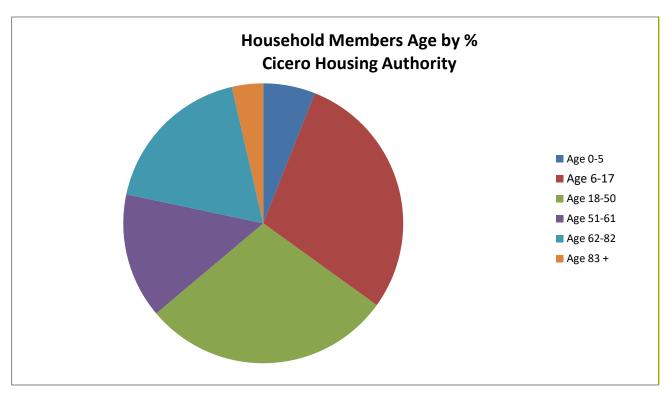


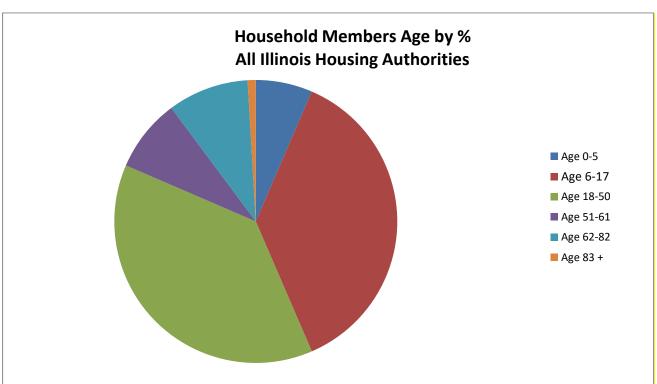
Head of Household Ethnicities



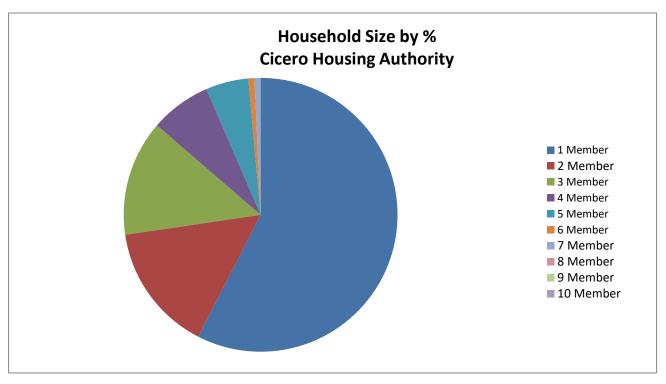


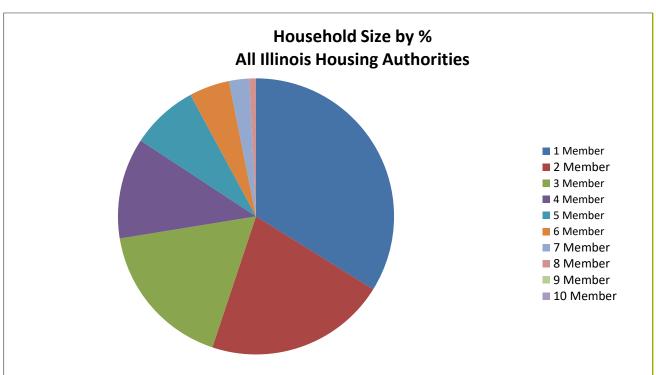
Household Members Ages





Household Sizes





Total Household Members and Average Size						
Housing Authorities Total Allotted Average Size Total Households						
Illinois	75,235					
Cicero						

Data Collection

Data collection processes can be relatively simple depending on the type of data collection tools required and used during the research. Data collection tools are instruments used to collect information for performance assessments, self-evaluations, and external evaluations. The data collection tools need to be strong enough to support what the evaluations find during research. The Town of Cicero utilized 3 main types of data collection:

- 1) Secondary Participation
 - a) On-Line Survey
- 2) In-Person Observations
 - a) Community and Agency Meetings
- 3) Case Studies and Content Analysis:
 - a) Fair Housing Complaint Data
 - b) Town of Cicero Building Codes
 - c) Town of Cicero Unified Development Code
 - d) Town of Cicero Housing Needs Study
 - e) Town of Cicero Taxing Bodies
 - f) Cicero Lending Trends and Demographics

1) Secondary Participation

The Town of Cicero conducted a non-scientific survey (SEE EXHIBIT 1). The Town of Cicero Department of Housing Staff developed a multiple choice and narrative survey. The Town of Cicero Department of Housing registered with "www.surveymonkey.com". Survey Monkey is an easy-to-use tool for the creation of on-line surveys. Its primary strength is its intuitive Web interface, which makes it easy for even non-technical users to create surveys and export collected data. Survey Monkey also helps get people to your surveys. You can create email lists with custom invitations.

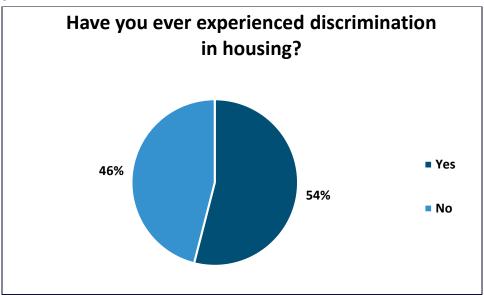
The Town also promoted the survey with a web link attached in their Facebook page.

This is a non-scientific survey, since we didn't use "random sampling" and we are not certain that the population surveyed actually represents the population of the Town of Cicero.

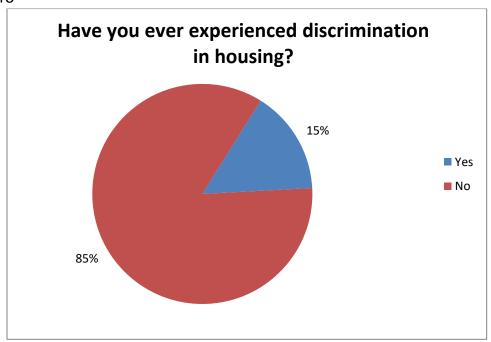
154 people took the Fair Housing Survey that was created using the Survey Monkey website. The survey focused on discrimination in fair housing, issues with Town services, economic status and neighborhood conditions. The following summarizes the results of the survey.

Of the people surveyed, 54% of the respondents answered "Yes" that they have experienced discrimination in housing compared to 46% that answered "No". This is a large difference from those respondents from 2015, where 85% of people responded "No", and 15% responded "Yes". We expected having this survey advertised to the general public on Facebook, and not limited to a town listsery, which played a role in the responses.

Analysis 2025

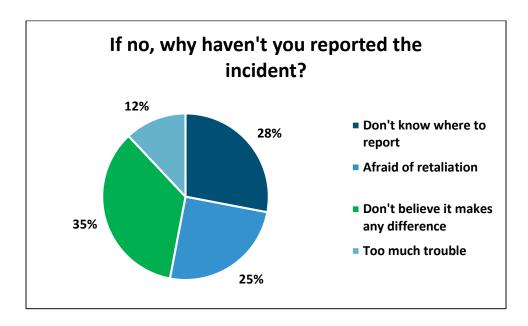


Analysis 2015



From the individuals who did experience discrimination, it came in the form of a landlord or property manager. On the basis of discrimination, "Race" was the highest at 20% and "Family Status" was the second highest at 18%, for the reasons for being discriminated against.

Of the individuals that believe they have been discriminated against, 92% of those who did experience discrimination did not report the incident to anyone. The highest reason for not reporting the incident was because they believed it wouldn't make a difference.

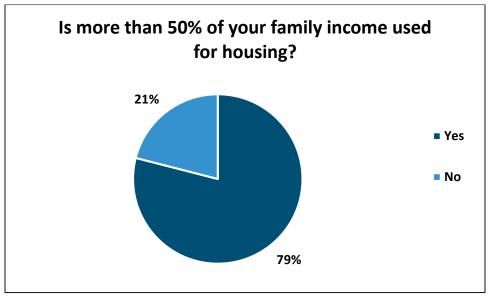


When asked if they had any concerns about fair housing in Cicero, most (59%) of the survey takers answered "Yes". Of those who did have concerns, high rents, availability of affordable housing and property taxes were the main concerns.

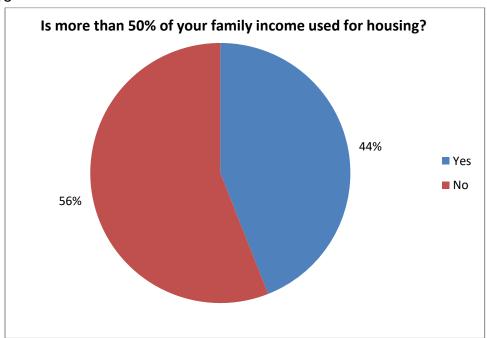
When it came to the economic status of survey takers, almost 45% did not agree that they were at risk of being homeless, while 33% said yes to be at risk of being homeless. Another 22% said that they did not know if they were at risk or not of being homeless.

When asked if 50% of their family income was used for housing, 79% of respondents said yes, while 21% said no. If more affordable housing was available in the Town of Cicero this wouldn't be a barrier for many property owners or renters. This is also a large difference from 2015. Housing Affordability is a greater concern in 2025 than it was in 2015.

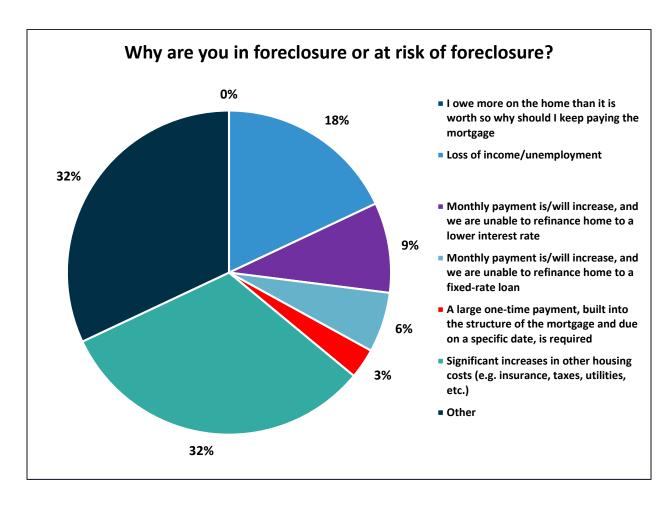
Analysis 2025



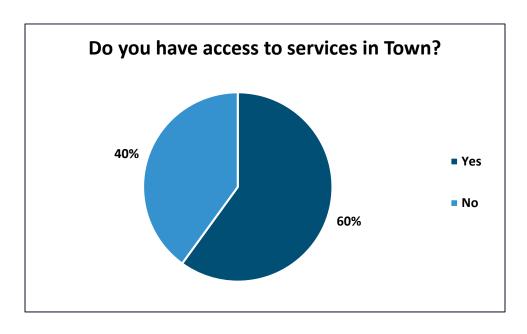
Analysis 2015



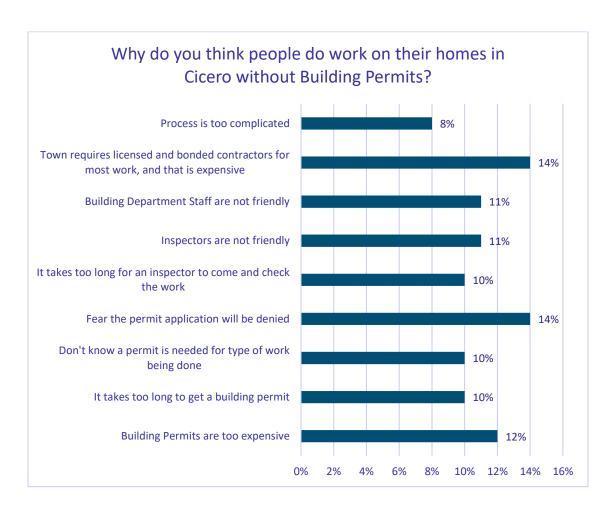
When asked if they are in the foreclosure process or at risk of foreclosure, 97% said no. Of those who answered "yes" to this question, 32% indicated that a significant increase in other housing costs (e.g. insurance, taxes, utilities, etc.) or other were the main reasons for the risk of foreclosure. The following pie chart shows the other reasons survey takers were at risk of foreclosure.



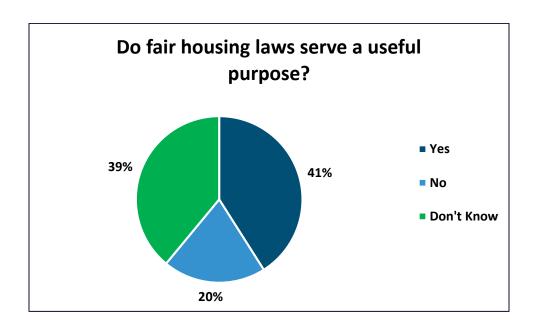
When it came to Town services, 60% said they have access to Town services. The majority (52%) agreed that their neighborhoods are diverse, that they have their homes up to building code (54%) and that they feel safe in their neighborhood (54%).



Of those who have applied for a building permit before, 45% said they had a positive experience. 71% believed it was not easy to get a building permit. Of those, the majority (14%) believed that people do work on their homes without a building permit because the Town requires license and bonded contractors for most work, and that is expensive, as well as, fear the permit application will be denied. The following column chart shows the other reasons people chose why it's not easy in obtaining a building permit.



When asked if fair housing laws served a purpose, 41% said "yes". Of those surveyed, 62% said they didn't know if there was any training process available for them to learn the fair housing laws. Many would refer individuals who have been victims of fair housing violations to the Town Hall. Of those who took the survey, 96% answered "no" or "don't know" of any fair housing non-compliance issues with any public housing authority.



When it came to demographics of those who took the survey, 76% were female. The majority of the survey takers were married (54%), Hispanic (83%), from the ages of 36 to 49 (54%) and earned a Bachelor's Degree (18%). The majority family size was over 5 per household (39%), and the majority income level was \$20,000 to \$40,000 (26%).

Most (62%) people who took the survey choose "renter" as the primary role in the housing industry.

Overall the survey gave an understanding of what issues people face in the Town of Cicero. Most individuals answered similarly when asked to elaborate on a certain questions. Most had concerns of cost of rents, overcrowding and property taxes. Many didn't know much about fair housing laws, but when asked where they would refer people who were discriminated against, the most responded answer was the Town Hall.

Many issues need to be addressed to better educate the residents. There are concerns that can be eliminated if there are educational programs available to educate the residents. These educational programs would help in many ways to help make the Town a better place to live.

2) In-Person Observations

The Town of Cicero conducted several community and agency meetings in order to research CDBG/Fair Housing Concerns in the Town of Cicero.

The schedule of meetings is as follows:

- 1. Town Department Heads February 11th 2025
- 2. Service and Housing Agencies February 18th 2025

The minutes of these meetings can be found at *Exhibit 2*.

The Sign-In sheets (to see attendance) for these meetings can be found at *Exhibit 3*.

3) Case Studies and Content Analysis: Town of Cicero Building Codes

As part of this analysis, The Town of Cicero Department of Housing reviewed all local Building Codes, and Zoning Ordinances. The Town of Cicero publishes their Municipal Code on their website (www.thetownofcicero.com). It is extremely easy for a person with Internet access to access and navigate through the codes of the Town of Cicero. The Building Department maintains its own webpage, and information is clearly organized. Of particular interest were:

- 1. Chapter 22: BUILDING & BUILDING REGULATION (EXHIBIT 5), and
- 2. Universal Development Code (UDC) (EXHIBIT 6).

Through the review of the current Town Code, it was determined that The Town of Cicero currently operates under the following building codes:

- 1. 2009 International Building Code
- 2. 2009 International Residential Code (With Local Amendments)*
- 3. 2009 International Mechanical Code
- 4. 2009 International Existing Buildings Code
- 5. 2012 International Energy Code
- 6. 2009 101 Life Safety Code
- 7. 2009 International Fire Code (With Local Amendments)*
- 8. 2008 National Electric Code (With Local Amendments)*
- 9. 2014 Illinois Plumbing Code (With Local Amendments)*
- 10.2010 ADA Standards for Accessible Design
- 11. Cicero, Illinois, Code of Ordinances
- 12. Town of Cicero Universal Development Code (UDC)

Negative Effects of High Population Densities and Overcrowding

Within the Town of Cicero, overcrowding has placed a tremendous burden on the already insufficient infrastructure, utilities, roads, water supply, electricity, parking places, schools, and public services including health and education. The social and psychological effects of overcrowding are immediate, long-term, cumulative, and mutually reinforcing. Overcrowding affects all segments of the population. Social and psychological effects of overcrowding are experienced among individuals and within relationships at the following levels:

- Lack of Personal Privacy
- Exposure to Other's Behaviors, and
- Personal Activities Between Families and Households

The health, social and psychological effects of overcrowding can be summarized as follows:

Health Effect

Overcrowding poses serious direct and indirect health risks to all segments of the population, particularly the elderly, young children, and the disabled. Overcrowding results in insufficient

ventilation in homes, causing or exacerbating respiratory illnesses, susceptibility to disease, the severity of diseases, and the spreading of illness. This was exacerbated during the Covid-19 Pandemic, where families and extended families were placed at a greater risk.

Social Effects

Overcrowding contributes to far-reaching social problems: it places a strain on social relations within the home and community, overcrowding in schools and homes is linked to substandard education and functional illiteracy, overcrowding affects women's access to social and economic resources; it increases their responsibilities in the home and burdens their time.

Psychological Effects

Direct and indirect psychological effects resulting from overcrowding include the lack of privacy, which is linked to depression, and other negative psychological outcomes. Finally, overcrowding contributes to psychological frustrations which, in turn, have a bearing on behavioral responses and residents' ability to cope with the conditions.

Anything that adds to the cost or increases the regulations upon housing adds to the expense of purchasing or owning housing. To acquire property whether for rent or for direct occupancy, every person must have a minimum down payment and income sufficient to meet lending institutions loan guidelines. Given the paperwork involved in documenting a loan and obtaining title, the process is generally complex enough to require a purchaser to obtain an attorney to aid in the closing of the loan and the purchase, which only adds to the cost.

Generally a purchaser will require title insurance, a survey, a termite inspection, and in The Town of Cicero, a Town Compliance Certificate in order to purchase and/or sell a property. All these costs can be considered to be subsumed within the purchase price.

Once a property is purchased or rented, insurance, taxes, and utilities must be paid and the housing must be maintained, all of which present some level of a barrier to affording the housing. The Town of Cicero requires an inspection of the property of all homes, prior to the sale, to determine code compliance. This process is done at a minimal expense to offset the cost of the inspection. The properties not "up to code" are cited with a list of code violations, which must be corrected in order to obtain a Certificate of Compliance. The Town believes that the minimal costs are outweighed by the benefits of providing safe and sanitary housing that meets minimum codes.

All code requirements add to the cost of producing and maintaining homes, but costs are outweighed by the benefits of safe, sanitary housing. Building codes are necessary to ensure some standard and average livability. An example of one of these codes, which is deemed to be essential, is the requirement that every dwelling unit must have two (2) safe unobstructed exits, and the requirement of having smoke and carbon monoxide detectors.

Overall, the Town of Cicero Department of Housing did not find any outstanding issues, or impediments to Fair Housing in the Town of Cicero's Building Code. As current, the Town's building code is neutral, and was in compliance with the Federal Government's Consent Decree.

The Town of Cicero identified the Town's Building Codes to be a potential impediment to affordable housing.

- 1. Code requirements that add costs to deliver housing could reduce affordable housing.
- 2. The Town's ordinance on basement and attic dwelling units may be an impediment, if all building code requirements for life safety are met. The Town should develop a streamlined process to properly identify and document these accessory dwelling units, so they may become legally-rented units.

The Town of Cicero Department of Housing also learned that several codes are State Mandates, including:

- 1. The Plumbing Code,
- 2. The Americans With Disabilities Act Code, and
- 3. The Energy Efficiency Code

Case Studies and Content Analysis: Town of Cicero Zoning Ordinances

The scope of this code (2009 I-Code) covers all buildings except detached one and two family dwellings and townhouses not more than 3 stories in height. This comprehensive code features time-tested safety concepts, structural, and fire and life safety provisions covering means of egress, interior finish requirements, comprehensive roof provisions, seismic engineering provisions, innovative construction technology, occupancy classifications, and the latest industry standards in material design. It is founded on broad-based principles that make possible the use of new materials and new building designs.

The Town of Cicero updated its previous Zoning Code in 2023. This new Unified Development Code divides The Town into twelve districts, seven of which permit residential uses by right, and four which permit residential uses with a Special Use Permit:

- 1. Traditional Neighborhood (TN)
- 2. Neighborhood Infill (NI)
- 3. Multiple-Family (MF)
- 4. Mixed-Use Transit Orientated (MTO)
- 5. <u>Business Corridor Pedestrian- Orientated (BC-P)</u>
- 6. Business Corridor Transitional (BC-T)
- 7. Business Corridor Auto Orientated (BC-A)
- 8. Business Destination (BD)
- 9. Industrial Commercial (IC)
- 10. Light Industrial (LI)
- 11. General Industrial (GI)
- 12. Institutional Open Space

Within the residential districts are provisions between single family and multiple family uses. One of the purposes of a Zoning Ordinance is to protect residential uses from commercial and industrial encroachment and to preserve the sanctity of housing districts.

The UDC is strictly enforced and attempts to intensify the use of residential property allowed in the new "transit-orientated" districts. The application process used is simple and the required hearings are promptly scheduled. The Town has struggled to maintain itself as a desirable place to live and believes that all of its codes are necessary in order to further that desire.

Zoning Codes can have result in impediments to fair housing when they discriminate against people based on protected characteristics, or when they discourage community growth or multifamily housing development:

Discrimination

Zoning codes that discriminate against people based on race, color, national origin, sex, disability, family status, or religion violate the Fair Housing Act.

Discouraging growth

Zoning codes that limit permits or discourage multifamily housing development can impede fair housing.

Treating people with disabilities less favorably

Zoning codes that treat groups of people with disabilities less favorably than similar groups without disabilities violate the Fair Housing Act

After review of the Town of Cicero's UDC, the Town of Cicero Department of Housing did not identify any impediments to fair housing. The UDC appears neutral in intent. The updated code also allows for increased residential densities in newly created "transit-orientated" districts, which did not exist in the past, thus encouraging growth, but also restricts residential construction in industrial zones that may pose a threat to health and safety.

The Town of Cicero also identified the Town's UDC to be a potential impediment to decent affordable housing.

- 1. Code requirements that add costs to deliver housing could reduce affordable housing.
- 2. A once highly industrial town, industrial zoning districts can still abut residential zoning districts.

The Town of Cicero Department of Housing recommends:

1. The Town review permits issued over time, under the updated zoning code, compared to previous zoning codes, to look for possible impediments not seen or considered previously.

Case Studies and Content Analysis: Fair Housing Compliance

This section provides a review of the fair housing complaints or compliance reviews where a charge or a finding of discrimination has been made. Additionally, this section will review the existence of any fair housing discrimination suits filed and/or pending in the Town of Cicero.

It should be noted, that a lack of filed complaints does not necessarily indicate a lack of a problem. As will be discussed later in this analysis, some people may not file complaints due to language barriers. Other reasons could be, lack of knowledge of the process, a lack of knowledge that there is a process, or even distrust that anything will be done with the complaint. With this in mind, education, information, and referral regarding fair housing issues remain critical to the success of reducing impediments to fair housing.

Existence of Fair Housing Complaints

U.S. Department of Housing and Community Development

The Town of Cicero requested from HUD (Region 5 Office) a list of fair housing complaints, and the nature of those complaints. On March 20, 2025, The Town of Cicero was notified that after review of HUD's case tracking system, zero (0) complaints were filed in the Town of Cicero.

Cicero Housing Authority/Town of Cicero

The Town of Cicero, Department of Housing, requested from The Town of Cicero Legal Department, a list of fair housing complaints, and the nature of those complaints.

The Town of Cicero Legal Department previously noted a fair housing complaint filed with the Illinois Department of Human Rights received by the Cicero Housing Authority from 2010, which was eventually withdrawn and closed by the complainant on October 2, 2014 and approved by the Illinois Department of Human Rights.

Also, in 2014, a complaint was also filed by a resident with the Illinois Department of Human Rights alleging racial discrimination after she was removed from the housing program for failing to keep an updated address on file. This complaint was dismissed.

In addition, on October 29, 2024, a resident filed a lawsuit against the Housing Authority related to her termination from receiving benefits due to fraud. The Housing Authority is being represented by the Del Galdo Law Group, LLC. This Lawsuit is still pending.

Case Studies and Content Analysis: Town of Cicero Taxing Bodies

Property taxes add to housing costs. In the Town of Cicero, all property is assessed by the Cook County Assessor's Office and the assessed value of the property is multiplied by the sum of the tax rates for all taxing bodies having authority within the corporate limits of The Town of

Cicero, to arrive at the annual tax bill. As property values increase, taxes may increase even if the rates do not change. The Town of Cicero has adopted a program of minimizing its tax rate increase at no more than five (5%) percent over the previous year's rate. Commercial and industrial property is taxed at a higher rate than residential and commerce and industry; in effect subsidizing home ownership.

The Town of Cicero has the following taxing districts:

- 1. Town of Cicero
- 2. County of Cook
- 3. Forest Preserve District
- 4. Consolidated Elections
- 5. Town of Cicero Library Fund
- 6. General Assistance
- 7. Cicero Community Mental Health District
- 8. Cook County Public Safety
- 9. School District 99
- 10. High School District 201
- 11. Community College District 527
- 12. Clyde Park District
- 13. Metropolitan Water Reclamation District
- 14. Cook County Health Facilities

After review of the Town of Cicero's taxing bodies, no apparent impediments to Fair Housing were identified; however these bodies may affect access to decent affordable housing due to additional costs associated with housing in general.

Case Studies and Content Analysis: Homes for a Changing Region: Town of Cicero Action Plan

Homes for a Changing Region ("Homes") is a program supported by the Metropolitan Mayors Caucus and the Chicago Metropolitan Agency for Planning (CMAP) and is funded by the Illinois Housing Development Authority (IHDA). Homes is designed to help localities in the greater Chicago region analyze, diagnose, and develop market and evidence-based solutions for the housing challenges each locality faces. The Homes team identified several key housing challenges:

- Cicero's houses, 2-flats, and apartment buildings all need rehabilitation. 80% of Cicero's housing stock was constructed before 1959, and many homes have long-deferred maintenance and upkeep needs. The Town operates a rehab program, but only homeowners are eligible.
- Almost half of Cicero renters struggle with their housing costs. 45 percent of Cicero renters pay at least 30% of their monthly income on housing.
 20 percent pay more than half.
- Cicero lacks affordable rental units for lower income households. More than 2,000 Cicero renters earn less than \$20,000 per year, but the Town only has 738 rental units considered affordable at that income level. This leaves Cicero with a gap of nearly 1,500 affordable rental units.

- There are many illegal and hazardous basement and attic units. Some Cicero renters live in illegally converted attics or basements. These units provide crucial housing for new migrants and extended families, but also create health and safety hazards for tenants.
- Cicero is mostly built out, but has identified infill sites through other planning. The Town has identified sites near its CTA and Metra lines that could serve as locations for new, infill housing.

As part of the data analysis, the following items were documented:

- 1. Cicero needs more resources to maintain its older housing units,
- 2. Cicero needs more affordable rental housing units, and
- 3. New affordable rental housing can help Cicero address affordability issues and meet key Town goals.

The study also recommended several strategies

Strategy 1: Comprehensively address rehab needs through available funding programs for single- and multifamily housing.

The Town of Cicero manages an internal Home Repair Program with Community Development Block Grant Dollars. In 2024, the Town expanded this Home Repair Program when they applied for, and were awarded funds from the Illinois Housing Development Authority (IHDA). The updated program addresses critical home repairs, including flood control systems.

Strategy 2: Conduct outreach to improve health and safety in basement and attic units.

The Town of Cicero is currently looking at their local town ordinances and is considering the following changes to the town code:

1. Allow for full bathrooms to be installed where the ceiling height is within 2 inches of 7 feet.

- 2. Allow for ½ bathrooms to be installed where the ceiling height is within 1 inch of 6'8"
- 3. Allow for bedrooms to be installed where the ceiling height is within 2 inches of 7 feet.

These minor changes to the town code, could allow hundreds, if not thousands of new bedrooms and bathrooms in Town, and make hundreds if not thousands of existing spaces legal.

Strategy 3: Meet the need for affordable rental housing through new multifamily development.

As discussed previously, the Town created a new Unified Development Code, with new areas allowing greater density around public transportation hubs. The town is currently promoting these areas for development.

Housing Demand

The demand for low and moderate income housing in the Town of Cicero has never been greater. There are many factors that have created this situation:

- 1. High Population Density: The Town of Cicero is 5.85 square miles in area, approximately ½ of which is used for industrial and commercial purposes. Residential areas occupy 3.1 square miles in area. When one divides the estimated 85,000 residents by the 5.85 area of the Town, it results in a population density of 14,188 persons per square mile.
- 2. Lack of Available Financing: We are in a new era in mortgage lending, one that withholds mortgage loans from all but the most qualified applicants. In today's mortgage environment, to be considered credit worthy, is much more difficult than it has ever been. One needs a stable job history with sufficient income to service all of your current debt and future housing debt. Sufficient income often means at least 2.3 to 2.5 times your monthly debt payments. No-down payment loans aren't an option anymore. The closest thing is an FHA mortgage that requires 3.5 percent down. Otherwise, expect to be required to pay between 10 to 20 percent for a down payment. Many of Cicero's residents can no longer meet these strict requirements.
- 3. **Low Incomes:** Lack of affordability measured by the percentage of household income spent on housing--has emerged as the primary housing problem in most cities. Every census tract in Cicero qualifies under HUD's definition of low to moderate income. Per capita income in Cicero, in the last full census, was \$14,745. Per capita income in the U.S. was almost double that number at \$28,155.

4. Inflation:

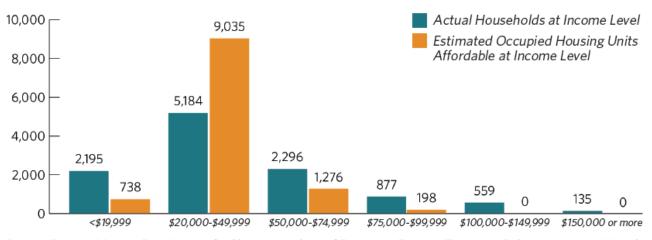
- a) Generally, rent keeps pace with inflation as measured by the Consumer Price Index, while home prices rise faster than inflation.
- b) Housing is a highly regional market, so some areas see price changes much more rapidly or to a greater extent.

 Home prices also tend to rise faster than incomes, meaning homes have become less affordable.

Many of the programs noted above support low- and moderate-income homeowners or owner-occupants of two flats. However, a greater share of Cicero households making below \$50,000 per year are renters. Most apartments in Cicero rent at prices affordable to households earning between \$20,000 and \$50,000 per year. Despite this, many renters struggle with affordability. 45 percent of renters pay at least 30 percent of their income toward housing costs and 20 percent pay more than half.

Many of those renters struggling with housing costs earn less than \$20,000 per year, and Cicero does not have enough rental units affordable at this income level. Roughly 2,195 Cicero renter households earn below \$20,000, but the Town only possesses 738 rental units that would be considered affordable at that income level. The Town would need to add nearly 1,500 new affordable housing units to fill this gap and help its renter households better meet their housing needs.

Figure 5.
Cicero comparison of Rental Household Incomes with Occupied Units Affordable at Each Income Level



Source: Chicago Metropolitan Agency for Planning analysis of Fregonese Envision Tomorrow Balanced Housing Model using American Community Survey 2016-2020

The Town of Cicero identified two concerns as impediments to affordable housing:

- Cicero offers numerous owner-occupied housing repair programs, but there is a lack of programs for rental units.
- Cicero has a gap in needed affordable rental units and available affordable rental units.

- The demand for housing is high in Cicero, but the amount of decent, affordable housing units is not keeping pace with demand. Cicero has a gap in needed affordable rental units and available affordable rental units.
- The age of Cicero's current housing stock places a greater burden on upkeep and maintenance, thus raising the price of decent housing, and also adding to the financial burden from issuance of tickets/violations.
- Cost-Burden in homeownership is rising in the Town of Cicero.
- The Town's ordinance on basement and attic dwelling units may be an impediment, if all building code requirements for life safety are met. The Town should develop a streamlined process to properly identify and document these accessory dwelling units, so they may become legally-rented units.

The Town of Cicero Department of Housing recommends:

- Looking into the feasibility of funding a program like we had with Neighborhood Stabilization Program, where we could subsidize down payment for qualified home buyers, to make housing access more affordable and achievable.
- Promote multi-family developments on large town-owned parcels to spark development of new affordable units.

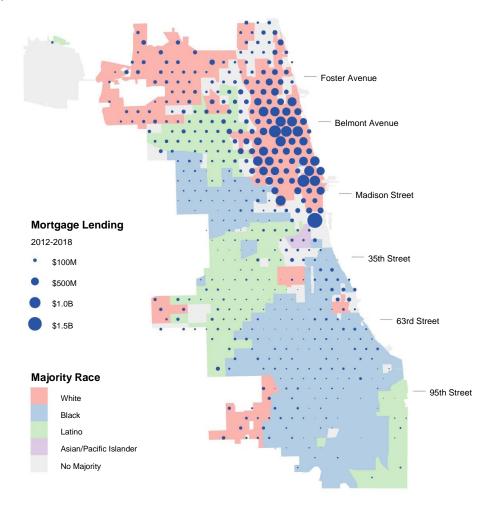
Case Studies and Content Analysis: Cicero Lending Trends and Demographics

WBEZ did an amazing study of mortgage trends and lending trends that shows the still ongoing disparity in lending when considering race and ethnicity. https://interactive.wbez.org/2020/banking/disparity/

In summary, WBEZ analyzed multiple data sets on lending that shows that banks invest substantially more funds in white neighborhoods than they do in minority neighborhoods. This can be clearly seen in the map below.

Where banks lend in Chicago — and where they don't

Plotting home purchase lending for Chicago neighborhoods on a map shows investment piled high over white neighborhoods, while lending in many black and Latino neighborhoods is hardly visible.



Source: WBEZ/City Bureau analysis of Home Mortgage Disclosure Act Data and United States Census Bureau data

Credit: Patrick Sier/City Bureau

This is particularly alarming, since Cicero has a documented gap in available affordable units, and need of affordable units. If banks are unwilling to invest dollars in communities like Cicero, this gap will be maintained, or possible grow wider, placing even higher cost burden on the community.

According to WBEZ, 68.1% of dollars loaned for housing purchases went to majority-white neighborhoods, while just 8.1% went to majority-black neighborhoods and 8.7% went to majority-Latino neighborhoods.

In other words, for every \$1 banks loaned in Chicago's white neighborhoods, they invested just 12 cents in the city's black neighborhoods and 13 cents in Latino areas.

That's despite the fact that there are similar numbers of majority-white, black and Latino neighborhoods in the city.

Amount of total loans by majority-type neighborhood.

White - \$39,099,529,000
Latino - \$5,008,973,000
Black - \$4,643,593,000
No majority - \$8,494,248,000

Source: WBEZ/City Bureau analysis of Home Mortgage Disclosure Act Data and United States Census Bureau data

Another item to note from the WBEZ study, was the disparity in lending by Chicago's top mortgage lenders.

	White	Black	Latino	Asian American	No majority
Guaranteed Rate Total lent: \$8.2B	73.05%	4.90%	6.34%	0.06%	15.65%
JPMorgan Chase Total lent: \$7.5B	79.57%	1.93%	4.94%	0.08%	13.48%
Wells Fargo Total lent: \$3.6B	76.45%	7.31%	4.49%	0.05%	11.70%
Wintrust Total lent: \$2.7B	63.95%	7.80%	9.00%	0.09%	19.16%
Perl Mortgage Total lent: \$2.1B	74.07%	3.76%	6.34%	0.10%	15.73%
Citigroup Total lent: \$1.9B	62.11%	16.06%	6.65%	1.50%	13.68%
Associated Bank Total lent: \$1.8B	71.72%	3.42%	5.85%	0.02%	18.99%
Bank of America Total lent: \$1.5B	83.01%	2.89%	3.86%	0.06%	10.17%
Fifth Third Bank Total lent: \$1.3B	70.45%	5.44%	7.98%	0.07%	16.06%
U.S. Bank Total lent: \$1.1B	69.64%	9.84%	6.96%	0.54%	13.02%
PNC Total lent: \$1.1B	67.34%	6.79%	6.60%	0.01%	19.26%
Draper and Kramer Mortgage Corp. Total lent: \$1.1B	74.04%	3.44%	6.90%	0.09%	15.54%
4					

Source: WBEZ/City Bureau analysis of Home Mortgage Disclosure Act Data and United States Census Bureau data Credit: WBEZ

The Town of Cicero identified lending trends as an impediments to both fair housing and affordable housing.

- The substantial difference in investments in majority white neighborhoods, places Cicero at a disadvantage for residents to access housing.
- The substantial difference in investments in majority white neighborhoods limits the amount of new housing units that can be created. The law of supply and demand is not working.

The Town of Cicero Department of Housing recommends:

- Develop a community outreach program, to educate residents on fair housing laws, lending discrepancies, and create a program to address these disparities
- Offer funding, to subsidize new residential unit construction, to be used to compel banks to lend to prospective clients (reduce their "perceived" risk).
- Create a department, or instruct a current department to field mortgage lending questions, concerns, and complaints, and develop policies and procedures to address. The Town of Cicero should have a Certified Fair Housing Investigator; this certification can be received from the National Fair Housing Training Academy.

Summary of Identified Impediments & Recommendations

Impediments to Fair Housing identified through this Analysis are:

- 1) The demographics of the Cicero Housing Authority do not reflect the overall demographics of the town as a whole. This can be an impediment to fair housing choice.
 - A majority of households receiving a voucher are single occupant houses.
 - A vast majority of Cicero households are 2 person or more.
 - This can be a concern for fair housing, if households with children do not have equal access to needed vouchers.
- 2) Lack of employee training regarding Fair Housing Laws, and discriminatory practices.
- 3) Lack of knowledge regarding Fair Housing Laws and Protective Classes and where victims can report their issues.
- 4) Lack of local government/community service agency participation in community outreach regarding education to Fair Housing.
- 5) The substantial difference in bank investments in majority white neighborhoods, places Cicero at a disadvantage for residents to access housing.
- 6) The substantial difference in bank investments in majority white neighborhoods limits the amount of new housing units that can be created. The law of supply and demand is not working.

The Town of Cicero Department of Housing recommends:

- 1) The Cicero Housing Authority should advertise their programs where families have access to the information, or perform outreach to educate families on the existence of their program.
- 2) The Cicero Housing Authority should perform an internal evaluation of their program, including policies and procedures to determine any potential impediments to fair housing choice.
- 3) The Town of Cicero employees should complete Fair Housing Training, to ensure all employees are aware of Fair Housing and Discrimination Laws.
- 4) The Town of Cicero should sponsor workshops and events on Fair Housing, tailored to renters, purchasers, landlords, local government, and social service workers.
- 5) Create a department, or instruct a current department to field mortgage lending questions, concerns, and complaints, and develop policies and procedures to address. The Town of Cicero should have a Certified Fair Housing Investigator; this certification can be received from the National Fair Housing Training Academy.
- 6) The Town should review permits issued over time, under the updated zoning code, compared to previous zoning codes, to look for possible impediments not seen or considered previously.

The Town of Cicero identified concerns as impediments to affordable housing:

- 1) Cicero offers numerous owner-occupied housing repair programs, but there is a lack of programs for rental units.
- 2) Cicero has a gap in needed affordable rental units and available affordable rental units.
- 3) Code requirements like zoning or building codes add costs to deliver housing could reduce affordable housing.
- 4) The Town's ordinance on basement and attic dwelling units may be an impediment, if all building code requirements for life safety are met. The Town should develop a streamlined process to properly identify and document these accessory dwelling units, so they may become legally-rented units.
- 5) The demand for housing is high in Cicero, but the amount of decent, affordable housing units is not keeping pace with demand. Cicero has a gap in needed affordable rental units and available affordable rental units.
- 6) The age of Cicero's current housing stock places a greater burden on upkeep and maintenance, thus raising the price of decent housing, and also adding to financial burden from issuance of tickets/violations.
- 7) Cost-Burden in homeownership is rising in the Town of Cicero.
- 8) Town ordinance of requiring licensed/bonded contractors for most work that can be done by a handy homeowner adds to the cost of maintaining a home in Cicero.
- 9) A once highly industrial town, industrial zoning districts can still abut residential zoning districts, and lead to a lack of decent affordable housing.

The Town of Cicero Department of Housing recommends:

- 1) Looking into the feasibility of funding a program like we had with Neighborhood Stabilization Program, where we could subsidize down payment for qualified home buyers, to make housing access more affordable and achievable.
- 2) Promote multi-family developments on large town-owned parcels to spark development of new affordable units.
- 3) Offer funding, to subsidize new residential unit construction, to be used to compel banks to lend to prospective clients (reduce their "perceived" risk).
- 4) Create a department, or instruct a current department to field mortgage lending questions, concerns, and complaints, and develop policies and procedures to address.
- 5) Investigate the possibility of offering an incentive program to install energy efficient appliances/windows, insulation, etc., in properties to reduce the cost burden.
- 6) Continue, or expand the Keep Cicero CLEAN event.
- 7) The Town should explore additional funding sources, or internally subsidize/offer incentives for a developer to build on all "Town-Owned" property zoned for residential purposes, with a clause that these units be made "affordable", and made available to current Town of Cicero Residents to attempt to alleviate the population density, and

increase the number of affordable units.

- 8) The Town Board needs to work with the Building Department to ensure internal policies do not add to the cost burden already facing the residents of Cicero.
- 9) The Town should investigate the possibility of developing a process to inspect, verify, and document naturally-occurring existing accessory dwelling units for safety, and formally recognize as a dwelling unit, if all safety codes are met

Signature Page



Department of Housing 1634 S. Laramie Avenue Cicero, Illinois 60804

Larry Dominick
Town President

Town of Cicero, Department of Housing

The Town of Cicero, Illinois, as a recipient of Community Development Block Grant Funds, and in order to comply with its certification to affirmatively further fair housing, has conducted an Analysis of Impediments to Fair Housing to assess the availability of fair housing choice within the Town of Cicero.

We affirm that the Town of Cicero will support activities to assure nondiscrimination in the provision of housing and its accompanying transactions.

The Town of Cicero certifies that it will further fair housing in accordance with the Fair Housing Act. The Fair Housing Act was passed as part of the Civil Rights Act of 1968. The law prohibits housing discrimination based on race, color, religion, sex, disability, familial status or national origin. It also requires federal agencies and recipients of federal housing funds to affirmatively further fair housing.

Honorable Larry Dominick President, Town of Cicero	Date
Tom M. Tomschin, MPA Executive Director	 Date

Exhibit 1: Town of Cicero Fair Housing Survey

Town of Cicero Fair Housing Survey

1. Discrimination

Fair housing is a right protected by Federal and State laws. Each resident is entitled to equal access to housing opportunities regardless of race, color, religion, sex, national origin, disability, familial status, marital status, age, ancestry, sexual orientation, source of income, or any other arbitrary reason.

The Town of Cicero Department of Housing is conducting a study concerning fair housing compliance and impediments to fair housing choice throughout the Town. This study will analyze mortgage application data, fair housing complaints, and the fair housing service delivery system, as well as media reports regarding fair housing. The study also depends on the opinions and experiences of people who are knowledgeable about housing and fair housing compliance issues – people like you.

The goal of the research is to identify whether barriers and adverse policies exist in a variety of areas, including housing rentals and sales, banking, insurance, and real estate industries. The study also examines public and administrative policies that may inadvertently lead to discrimination against protected classes. Please note that your answers are anonymous and will only be reported in a compilation with other people's responses. Again, thank you for your time.

1. Have you ever experienced discrimination in housing?

Yes No

2. Who do you believe discriminated against you?

A landlord/Property Manager A Real Estate Agent A Mortgage Lender A Town/County Staff Person

3. Where did the act of discrimination occur?

An Apartment Complex
A Condo Development
A Single-Family Neighborhood
A Public or Subsidized Housing Project
A Trailer or Mobile Home Park
When Applying for City/County Programs

4. On what basis do you believe you were discriminated against (check al that apply)?
Race Color Religion National Origin Ancestry Gender Marital Status Sexual Orientation Age Family Status (e.g. single-parent with children, family with children or expecting a child) Source of Income (e.g. welfare, unemployment insurance) Disability (either you or someone close to you) Other
5. Have you ever been denied "reasonable accommodation" (flexibility) in rules, policies, or practices to accommodate your disability?
Yes No N/A If yes, what was your request?
6. If you believe you have been discriminated against, have you reported the incident?
Yes No
If no, why haven't you reported the incident?
Don't know where to report Afraid of retaliation Don't believe it makes any difference Too much trouble

If yes, who did you report the incident to?

2. Fair Housing in Cicero

1. Do you have concerns about fair housing in Cicero?

If you answered	"Yes" to the previou	us question, what a	are your concerns?
Don't know			
No			
Yes			

2. Are you aware of anyone experiencing any of the following scenarios in your community? (Check all that Apply)

Housing provider refusing to rent, sell or deal with a person with a disability.

Lender refusing to sell or deal with a person.

Insurance provider refusing to sell or deal with a person.

Housing provider falsely denied housing was available.

Seen, read or heard discriminatory housing advertising.

Person was treated differently in the terms or conditions of sale or rental of housing.

Discrimination in the denial of a home mortgage.

Person was directed to certain neighborhoods by housing providers or lenders.

Person experienced harassment from a housing provider.

Person experienced harassment from a fellow tenant.

Person experienced harassment from a lender.

3. Housing

1. Do you think you are at risk of becoming homeless?

Yes

No

Don't know

2. Have you ever felt that you were being discriminated against?

Yes

No

Don't know

3. Is more than 50% of your family income used for housing?

Yes

Nο

4. What is the total number of	of people liv	ving in your	household?
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(1-2) (3-4) (5-6) (7-8) (9 or >)

5. Do you think Cicero has enough affordable housing?

Yes No Don't know

6. Do you think more housing is needed in Cicero?

Yes No Don't know

7. Do you feel you have been given the opportunity to obtain reasonable mortgage rates?

Yes No Don't know

8. If you own your home, are you in the foreclosure process or at risk of foreclosure?

Yes No

9. If yes, why are you in foreclosure or at risk of foreclosure? (Check all that apply):

I owe more on the home than it is worth so why should I keep paying the mortgage. Loss of income/unemployment.

Monthly payment is/will increase, and we are unable to refinance home to a lower interest rate. Monthly payment is/will increase, and we are unable to refinance home to a fixed-rate loan. A large one-time payment, built into the structure of the mortgage and due on a specific date, is required.

Significant increases in other housing costs (e.g. insurance, taxes, utilities, etc.).

4. Environment

1.	Do	you	have	access	to	services	in	Town?
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Yes No

2. Do you feel that your neighborhood is diverse?

Yes

No

Don't know

3. Would you say your home is up to town codes?

Yes

No

Don't know

4. Do you feel safe in your neighborhood?

Yes

No

Don't know

5. Do you feel historic and architectural properties are being saved in the Town?

Yes

No

Don't know

6. Have you ever applied for a building permit?

Yes No

If yes, was the experience positive?

Yes

No

7. Do you think the Town's requirements for building permits are:

Too Strict Strict

Just Right

Lenient

Too Lenient

8. Do you think it is easy to get a building permit?

Yes No

9. Why do you think people do work on their homes in Cicero without Building Permits (check all that apply)?

Building Permits are too expensive.

It takes too long to get a building permit.

Don't know a permit is needed for type of work being done.

Fear the permit application will be denied.

It takes too long for an inspector to come and check the work.

Inspectors are not friendly.

Building Department Staff is not friendly.

Town requires licensed and bonded contractors for most work, and that is expensive (Even if homeowner wants to do the work).

Process is too complicated.

5. Economic Opportunities

1. Do you feel there are enough job opportunities in Cicero?

Yes No

Don't know

2. Do you feel there are enough opportunities in Town to open a small business?

Yes

No

Don't know

6. Federal, State and Local Fair Housing Laws

1. Do fair housing laws serve a useful purpose?

Yes

No

Don't know

2. Are fair housing laws difficult to understand or follow?

Yes

No

Don't know

laws?
Yes No Don't know
4. If a person came to you alleging that they were a victim of fair housing violation and wanted to file a complaint, where would you refer them?
5. Do you feel that the state or local government may have taken planning, financing or administrative actions that may have adversely affected fair housing choice?
Yes No Don't know
If you answered "Yes" to the previous question, please cite and explain that action taken by state or local government in the box below.
6. Are you aware of any fair housing non-compliance issues with any public housing authorities?
Yes No Don't know
If you answered "Yes" to the previous question, please cite the public housing authority and the issue you are thinking about below.
7. Can you think of any state or local codes or regulations, including building, occupancy, health or safety codes that may represent barriers to fair housing choice in Cicero?

Yes No

Don't know

or regulations you are considering below.
8. Can you think of any public administrative actions or policies, including tax policy that may represent barriers to Affirmatively Furthering Fair Housing in Cicero?
Yes No Don't know
If you answered "Yes" in the previous question, please indicate which administrative actions or policies you are considering below.

7. Fair Housing Activities in Cicero

You are near the end of this survey. But before we conclude, let's talk a little about fair housing activities in Cicero.

Fair housing outreach and education activities are used to help people better understand their rights and obligations under fair housing laws.

1. Is there sufficient outreach and education regarding affirmatively furthering fair housing in Cicero?

Yes No Don't know

Fair housing testing is often used to assess the presence of fair housing non-compliance, such as evaluating building practices to determine compliance with the Americans with Disabilities Act or testing if a firm's property managers are advertising without discriminatory language.

Testing can also be used to evaluate an alleged violation of fair housing law, such as telling some people an apartment is available but telling others that it has been rented.

2. Are you aware of any fair housing testing of any sort in Cicero?

Yes No Don't know

8. Demographics

The information you share with us will be anonymous. No personal information about survey participants will be recorded or used. This survey will collect aggregate totals of user's responses with no personally identifying information. To be useful, the following information is critical:

1. Do you own or rent your home?

Own Rent Landlord Other

2. What is your age?

1-17

18-24

25-35

36-49

50-62

63-75

76 +

3. What is your education level?

- 1. Grammar School
- 2. Some High School
- 3. GED
- 4. High School Graduate
- 5. Some College
- 6. Associates Degree
- 7. Bachelor's Degree
- 8. Master's Degree
- 9. Doctorate
- 10. Other

4. What is your sex?

Male Female Other

5. What is your race?

White/Non-Hispanic African American Hispanic Asian/Pacific Islander Native American Other

6. What is your family size?

7. What is your total household income bracket?

Less than \$10,000 \$10,000 - \$20,000 \$20,000 - \$30,000 \$30,000 - \$40,000 \$40,000 - \$50,000 \$50,000 - \$60,000 \$70,000 - \$70,000 \$80,000 - \$90,000 \$90,000 - \$100,000 Over \$100,000

8. What is your current marital status?

Single, Never Been Married Married Separated Divorced Widowed

9. What is your religious affiliation?

Roman Catholic Protestant Christian Evangelical Christian Jewish Muslim Hindu Buddhist Other

10. Are you disabled?

Yes No

If yes, what is your disability?

Attention-Deficit/Hyperactivity Disorders
Blindness or Low Vision
Brain Injuries
Deaf/Hard-of-Hearing
Learning Disabilities
Medical Disabilities
Physical Disabilities
Psychiatric Disabilities
Speech and Language Disabilities

11. Are you a veteran?

Yes No

9. Thank you

You have completed the Town of Cicero's Fair Housing Survey!!! Thank you for your participation. For more information, please contact:

The Town of Cicero Department of Housing 1634 S. Laramie Cicero, IL 60804 708-656-8223

Exhibit 2: Meeting Minutes/Comment Sheets

Department Head Meeting Department of Housing Consultation February 11, 2025

Attendance: See Attached Sign-In Sheet

1:00 PM Meeting began

The purpose of this meeting was to consult with Department Heads of various departments from the Town of Cicero as we plan our:

- 1. Town's Assessment Needs,
- 2. Fair Housing,
- 3. 5-Year Consolidated Plan and,
- 4. The new CDBG-DR grant received by the Town of Cicero from the U.S. Department of Housing and Urban Development (HUD).

Comment sheets were available so that Department Heads can give feedback about the 5-Year Consolidated Plan, Fair Housing in Cicero, and the CDBG-DR grant.

While the department heads filled out their comment sheets, Tom quickly went over each type of grant that Cicero will be receiving: CDBG, ESG, & CDBG-DR.

The CDBG grant will include public services and public facilities projects, the ESG grant will help address homelessness in Cicero, and the CDBG-DR grant is the Disaster Recovery grant totaling over \$96 Million to address the flooding that occurred during the summer of 2023.

Tom also addressed that each grant has statutory caps that the Town must keep in mind while creating the budgets for the different grants.

A discussion on Fair Housing took place, and it was determined that Town Department Heads could benefit from training specifically on Fair Housing.

A discussion on the Flooding event of July 2023 took place, and most department heads want to see infrastructure projects to reduce flooding. Department Heads feel it would be somewhat wasteful to reimburse owners for flood damage, when the underlying problem would still exist. For example, reimbursing an owner for flood damage when they do not have a flood control system in place, and we get another major rain event, and they flood again.

Finally, links to the Needs Assessment Survey and Fair Housing Survey were provided at the meeting so that each Department Head can take the surveys and give feedback for the planning process for each grant.

Meeting ended at 2:00 PM.

Attachment: Sign-In Sheet, Comment Sheets

Public Service Agencies Meeting Department of Housing Consultation February 18, 2025

Attendance: See Attached Sign-In Sheet

1:00 PM Meeting began

The purpose of this meeting was to consult with Service Agencies and other Governmental Agencies to comment on:

- 1. The Town's Assessment Needs,
- 2. Fair Housing,
- 3. 5-Year Consolidated Plan and
- 4. The new CDBG-DR grant received by the Town of Cicero from the U.S. Department of Housing and Urban Development (HUD).

Comment sheets were available so that representatives of the Social Service Agencies can give feedback about the 5-Year Consolidated Plan, Fair Housing in Cicero, and the CDBG-DR grant.

While the agencies filled out their comment sheets, Tom quickly went over each type of grant that Cicero will be receiving: CDBG, ESG, & CDBG-DR.

The CDBG grant will include public services and public facilities projects, the ESG grant will help address homelessness in Cicero, and the CDBG-DR grant is the Disaster Recovery grant totaling over \$96 Million to address the flooding that occurred during the summer of 2023. Tom also addressed that each grant has statutory caps that the Town must keep in mind while creating the budgets for the different grants.

During this time, there was also discussion among the group regarding emergency management and planned county and state projects for mitigation.

Walter Rhoades and his team (Illinois Emergency Management) suggested a few grant opportunities to look into such as: FMA Swiftcurrent, Bric24, and HMGP.

It was mentioned that there may also be Green Alley and Flood Control grant opportunities that could be of help to the Town of Cicero, which has an Alley Repavement program. Also, Build up Cook was brought up. The Town is looking into all these suggested opportunities.

Finally, links to the Needs Assessment Survey and Fair Housing Survey were provided at the meeting so that each Public Service Agency can take the surveys and give feedback for the planning process for each grant.

Meeting ended at 2:05 PM.

Exhibit 3: Meeting Sign-In Sheets



Department of Housing Consultation February 11, 2025 Sign In Sheet

	Name	Department	Email
1	Kixin Porch	Admin Ventino	Kporod P the town of (16-10 ()~
2	THyan	B4, L13; NG	THISSINS QTHE TOWN COM
3	Derek Dominich	Pw	Dominick @ the tounct cresicon
4	Tsmal Vargas	Burners License	
5	Thomas P. Boyle	tolice Dept	Hoyle @ the terrof creeo arm
6	Lido Marett.	WATER.	LMANETT. Q. THE TOWN OF EICCE.
7	Katherine Deursku	CHD	Kokurski @ thetown of cicaron
8	Vanessa Pong	Health	VPARRITH @ thetundacen
9	Jose Alanis	TOC Dept. of Housing	jalanis @thetownofcicero.com
10	Lillian Gutternez	Housing Voucher	I gut 10000 00 the town of ciero
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Department of Housing Consultation February 18, 2025 Sign In Sheet

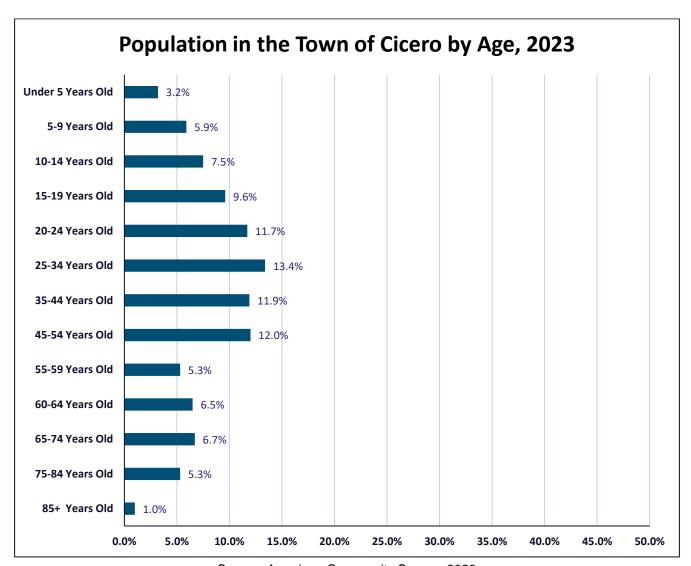
	Name	Department	Email
1	M'ACTER PHONIXS	FLINOIS EMERGENCY MENT	WALTER, RHOADES CILLINOIS GOV
2	MICHARC WUN.		unudo @ ucpseguin.ng
3	Jenny Gonzalez	Coda - Housing Counseling	1 . 9
4	Zuchan Kris	TEMA-OHS	Zachary. Krug O THINO'S. gov
5	PHILLIP MASON	COOK COUNTY EVER MONT & REGIONAL SEC.	AMILIP MASON DOOR COUNTYIL GOS
6	Katre Bartholomen	Cicero Family Services	Kbardholomana cicerofsup
7	Tom Tourste	Ciero Dept. of Hurry	Househup Retounfries a
8	Jose Alania	TOC Dept. of Housing	jalanis@thetownotcicero.com
9	Candy Cambray	Cook County Asset Management	Cindy Cambray Clook County light
10	Bina Mabibi	Children antes	b. habibiecab78.ong
11	Dronado Smit	Housa Found	A 5 mla how of fourd or

	Name	Department	Email
12	Argelia Harquez	TOC - Dept. of Housing	amarquez@thotaunotacero.com
13	Argelia Harquez Elvis Loneli	TOC-Dept. of Housing	elonel! Thousing forward or
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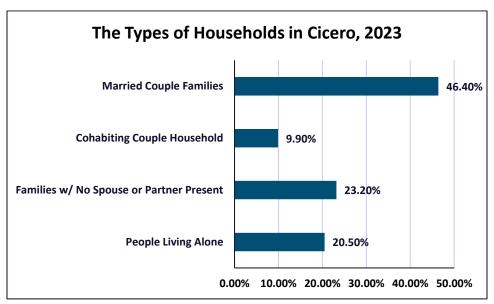
Exhibit 4: American Community Survey 5-Year Estimates

Town of Cicero, Illinois
Population and Housing Narrative Profile: 2023
2023 American Community Survey 5-Year Estimates

POPULATION OF THE TOWN OF CICERO: In 2023, there were a total of 81,006 people who lived in the Town of Cicero. Of those, 53.3 percent were male and 46.7 percent were female. The median age was 33 years old.



HOUSEHOLDS AND FAMILIES: In 2023 there were 25,031 households in The Town of Cicero. The average household size was 3.29 people.



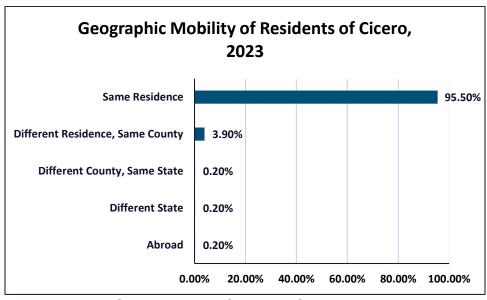
Source: American Community Survey, 2023

Families made up 79.5 percent of the households in the Town of Cicero. This figure includes both married-couple families (46.4 percent), cohabiting couples (9.9 percent) and families with no spouse or partners present (23.2 percent). Nonfamily households made up 20.5 percent of all households in The Town of Cicero. These nonfamily households were people living alone.

NATIVITY AND LANGUAGE: Forty percent of the people living in The Town of Cicero in 2023 were foreign born. Sixty percent were native born, including 52.4 percent who were born in Illinois.

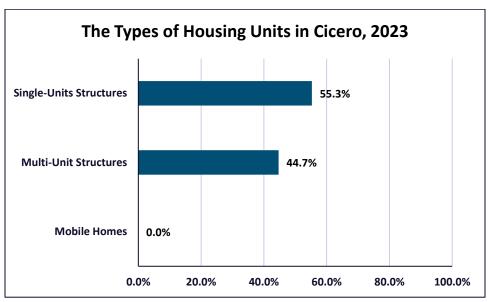
Among people at least five years old living in The Town of Cicero in 2023, 81.8 percent spoke a language other than English at home. Of those speaking a language other than English at home, 80.3 percent spoke Spanish and 1.5 percent spoke some other language; 18.2 percent reported that they spoke English only.

GEOGRAPHIC MOBILITY: In 2023, 95.5 percent of the people at least one year old living in the Town of Cicero were living in the same residence one year earlier; 3.9 percent had moved during the past year from another residence in the same county, 0.2 percent from another county in the same state, 0.2 percent from another state, and less than 0.2 percent from abroad.



Source: American Community Survey, 2023

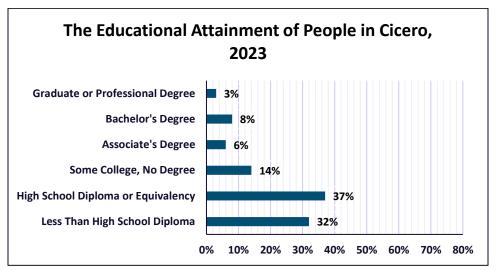
HOUSING CHARACTERISTICS: In 2023, the Town of Cicero had a total of 24,167 housing units of which 5.6 percent were vacant. Of the total housing units, 55.3 percent were single-unit structures, while 44.7 percent were multi-unit structures. Zero percent were mobile homes.



Source: American Community Survey, 2023

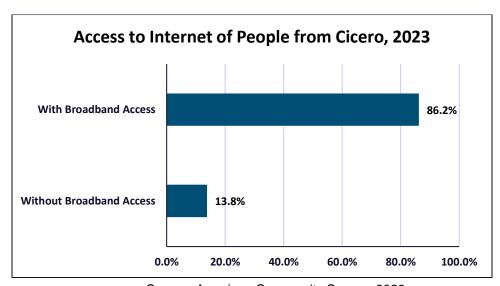
OCCUPIED HOUSING UNIT CHARACTERISTICS: In 2023, The Town of Cicero had 24,167 housing units – 12,156 (50.3 percent) were owner occupied and 12,011 (49.7 percent) were renter occupied.

EDUCATION: In 2023, 68 percent of people 25 years and over had at least graduated from high school and 11 percent had a bachelor's degree or higher. The total school enrollment in The Town of Cicero was 23,717 in 2023. Nursery school and kindergarten enrollment was 2,175 and elementary or high school enrollment was 15,637 children. College or graduate school enrollment was 5,905.

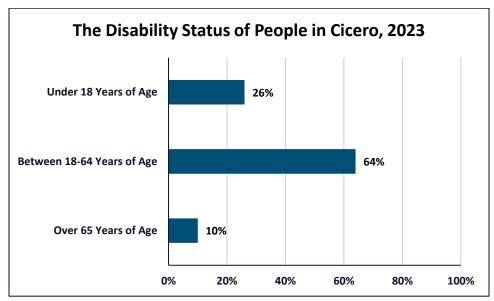


Source: American Community Survey, 2023

ACCESS TO INTERNET: Of the total population of households in Cicero 86.2 percent of households have access to the internet while 13.8 percent of the households are without any type of access to the internet.

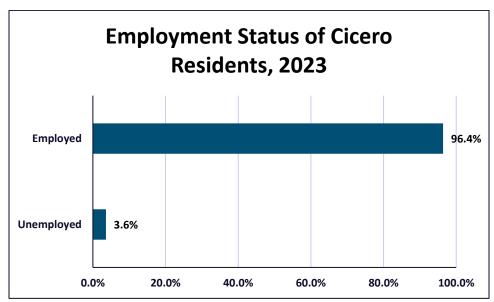


DISABILITY: In 2023, 6.5 percent of the people living in The Town of Cicero were living with a disability. Twenty-six percent of those residents were under the age of 18, sixty-four percent of those residents were from the ages of 18-64 and ten percent of disabled residents were over the age of 65.

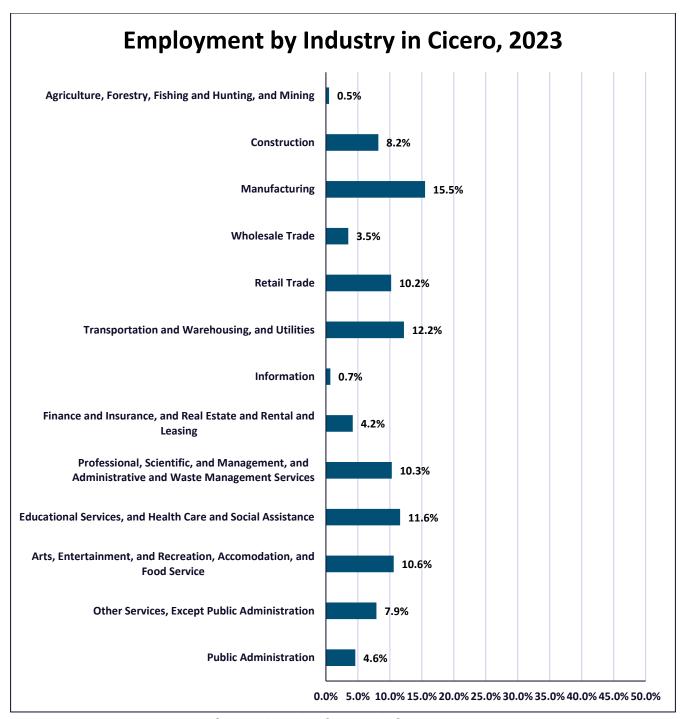


Source: American Community Survey, 2023

EMPLOYMENT STATUS: In 2023, there were 45,061 residents in Cicero who were eligible to be employed in the labor force. Of these residents, 43,439 were employed while 1,622 unemployed.



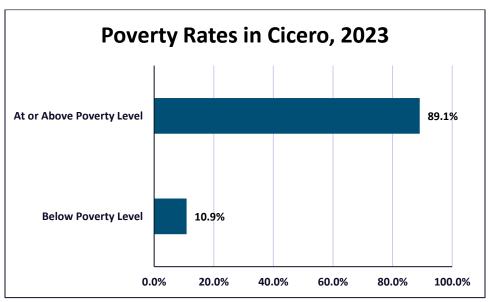
INDUSTRIES: In 2023, for the employed population 16 years and older, the leading industries in The Town of Cicero were Manufacturing at 15.5 percent, and Transportation and Warehousing, and Utilities with 12.2 percent.



TRAVEL TO WORK: In 2023, 65.4 percent of the Town of Cicero workers drove to work alone, 16 percent carpooled, 8.5 percent took public transportation, 3.5 percent walked to work and 1.1 percent used other means. The remaining 5.5 percent worked from home. Among those who commuted to work, it took them on average 28 minutes to get to work.

INCOME: The median income of households in The Town of Cicero was \$74,353. Eighty-nine percent of the households received earnings and 13.9 percent received retirement income other than Social Security. Twenty-five percent of the households received Social Security. The average income from Social Security was \$21,806. These income sources are not mutually exclusive; that is, some households received income from more than one source.

POVERTY AND PARTICIPATION IN GOVERNMENT PROGRAMS: In 2023, 10.9 percent of people were below the poverty level, while 89.1 percent were at or above the poverty level.



Source: American Community Survey, 2009-2013

MONTHLY HOUSING COSTS IN CICERO: The median monthly housing costs for mortgaged owners was \$1,912, nonmortgage owners was \$906, and renters was \$1,150.

EXHIBIT 5: BUILDING & BUILDING REGULATION

https://library.municode.com/il/cicero/codes/code_of_ordinances?nodeId=PTIICOOR_CH22B_UBURE

https://library.municode.com/il/cicero/codes/code_of_ordinances?nodeId=PTIICOOR_CH46H_ESA_ARTXMIHOCO

EXHIBIT 6: ZONING

https://thetownofcicero.com/wp-content/uploads/2024/09/UDC-Document-2024.pdf