FAIR HOUSING TASK FORCE REPORT VILLAGE OF OAK PARK APPROVED NOVEMBER 12, 2014

To the Honorable Village Board President Anan Abu-Taleb and Board of Trustees:

Background

The Village of Oak Park (the "Village") adopted a fair housing ordinance in 1968, which was among the first of its kind in the nation. It is codified as part of Chapter 13 (Human Rights) of the Oak Park Village Code (the "Fair Housing Ordinance"). The Fair Housing Ordinance protects the rights of individuals within the protected classes of race, sex, color, religion, ancestry, national origin, veteran status, sexual orientation, age, marital status, familial status, source of income, or disability in purchasing, leasing, securing a loan, renting or occupying housing or other real estate in the Village.

In January 2010, the Village updated the *Analysis of Impediments to Fair Housing Choice*, which is a report required as part of the Village's receipt of federal Community Development Block Grant ("CDBG") funds from the U.S. Department of Housing and Urban Development ("HUD"). The *Analysis of Impediments to Fair Housing Choice* included a recommendation that the Village conduct fair housing testing.

The Village subsequently contracted with HOPE Fair Housing Center ("HOPE") in September 2012 for the purpose of conducting fair housing testing in the local rental housing market. Until the HOPE testing was performed, the Village had not conducted or contracted for fair housing testing since 1999.

The Village Board of Trustees (the "Village Board") received a report by HOPE on February 18, 2014 describing evidence of discrimination by landlords and real estate agents in rental housing transactions. In response to HOPE's findings, the Village Board established the Fair Housing Task Force ("Task Force") pursuant to Resolution 2014-R-83 adopted on April 7, 2014. The Village Board specifically directed the Task Force to review and examine the following matters related to fair housing:

- (1) Enforcement of existing laws and ordinances,
- (2) Community education, and
- (3) Oversight of housing-related agencies in Oak Park.

The Task Force is required to make a report to the Village Board containing its findings and recommendations regarding the above matters by December 31, 2014. The Task Force shall be dissolved upon the submission of its final report.

The Task Force is comprised of the following thirteen (13) members:

- (1) Village Board Trustee Glenn Brewer (Task Force Chair)
- (2) Village Board Trustee Bob Tucker
- (3) Village Board Trustee Andrea Ott
- (4) Community Relations Commission Representative Patricia Myers
- (5) Disability Access Commission Representative Carol Southern
- (6) Housing Programs Advisory Committee Representative Meg Herman
- (7) At-Large Member Pat Cesario

- (8) At-Large Member Joi Cregler
- (9) At-Large Member Gloria Merrill
- (10) At-Large Member Bill Planek
- (11) At-Large Member Dawn Mueller
- (12) At-Large Member John Murtagh
- (13) At-Large Member Father George Omwando

The Task Force was supported by Village and housing partner agency staff who attended meetings and offered input at the request of the Task Force, including:

- Village Manager Cara Pavlicek
- Village Attorney Paul Stephanides
- Community Relations Director Cedric Melton
- Development Customer Services Director Tammie Grossman
- Neighborhood Services Manager Kristine Giornalista
- Executive Director of the Oak Park Residence Corporation and Executive Director of the Oak Park Housing Authority Maria Saldaña
- Executive Director of the Oak Park Regional Housing Center Rob Breymaier

This report is comprised of three sections: (1) a Summary of Fact-Finding Presentations, (2) an Acknowledgement of Limitations of the Task Force's Study, and (3) Recommendations by the Task Force to the Board of Trustees.

I. SUMMARY OF FACT-FINDING PRESENTATIONS TO THE TASK FORCE

The Task Force invited issue experts, representatives from housing partner agencies, as well as former and current Village staff to be interviewed at Task Force meetings.

A. Presentation Regarding Laws and Ordinances Relevant to Fair Housing

A range of laws at the federal, state and local level protect against fair housing discrimination and promote housing choice. The Task Force received a presentation by Village staff regarding applicable law, including:

- The federal Fair Housing Amendments Act ("FHAA");
- The Illinois Human Rights Act;
- The Cook County Human Rights Ordinance; and
- The Village of Oak Park's Human Rights Ordinance.

A synopsis of these laws is included in the Appendices.

B. Presentation Regarding Fair Housing Testing Results

Anne Houghtaling, the Executive Director of HOPE, presented the findings of HOPE's testing to the Task Force. Founded in 1968, HOPE is a non-profit organization that engages in education and outreach regarding fair housing laws, performs advocacy on public policy matters, conducts intake of fair housing complaints, and conducts investigations and testing.

HOPE conducted the following tests in the Village:

 14 paired rental fair housing tests designed to capture information on differences in treatment, terms and conditions, availability and steering based on race;

- 10 paired rental tests with deaf/hard of hearing testers using a relay system, such as a caption phone or video relay system; and,
- 8 reasonable accommodation tests where testers with a disability inquired about a reasonable accommodation under the FHAA.

According to Ms. Houghtaling, the fair housing tests were designed to mimic what takes place in an actual rental transaction. Testers contacted housing providers regarding advertised units. Depending on the directions provided for an advertised unit, testers contacted the housing provider by phone, email or in person. HOPE selected testers that it believed were identifiable as white, black, or Latino over the phone or email.

Ms. Houghtaling provided the following summary of their findings:

- **Denial of availability of a unit based on race.** In six of the 14 paired tests, African American testers were not able to view apartments while their white counterparts were able to see one or more apartments.
- **Unreturned phone calls based on race.** Two Oak Park companies did not return phone calls or make appointments for African Americans on multiple occasions. There was no instance in which an African American tester received a call back when their white counterpart did not.
- **Discriminatory statements.** In three tests, discriminatory statements were made by representatives of the rental unit to prospective renters related to familial status, age and marital status.
- Hang-ups on deaf or hard-of-hearing testers. In 20% of the calls made using a relay system, the housing providers hung up on testers.
- A lack of knowledge regarding reasonable accommodation requirements. In three of the completed tests, testers were denied their requested accommodations outright. In three other cases, representatives mistakenly believed a renter would need a certified service dog in order to receive a reasonable accommodation for a support animal.
- HOPE did not find evidence of racial steering.

Ms. Houghtaling recommended that the Village pursue a combination of investigation, education and enforcement. For investigations, Ms. Houghtaling recommended the Village retain a fair housing organization to conduct testing at least every three years. To effectively address fair housing education and enforcement issues, Ms. Houghtaling suggested the Village consider the Gross Pointe, Michigan model, which is a working group of sales agents, leasing agents, fair housing advocates and government partners.

C. Presentations Providing Historic Perspective on Fair Housing Policies in the Village

To gain a better understanding of Oak Park's past fair housing policies and practices, the Task Force invited key individuals and issue experts to discuss their experiences and provide insight.

• Sherlynn Reid, Former Director of the Community Relations Department Sherlynn Reid began working for the Village in 1973 as a Community Relations Representative, and then served as the Community Relations Director from 1977 to 2000. During her tenure, the Village's goal was to resolve housing discrimination complaints through conciliation. If conciliation was not successful (approximately 5% of the time), cases were assigned to a three-member panel of the Community Relations Commission ("CRC"). The three-member panel was required to review such cases and make recommendations to the full CRC board. The CRC had authority to impose various stipulations, such as rent concessions, on building owners who were found to be in violation of the Fair Housing Ordinance. Complainants had the option to pursue enforcement action through HUD if they believed a monetary award was appropriate. Ms. Reid cited confidentiality as a crucial element for effective education efforts, so that residents and property owners could feel they would not be penalized for asking questions about how to interpret fair housing law in real life situations.

During Ms. Reid's tenure in the Community Relations Department, she stated the Department was staffed with four commission representatives and two administrative assistants in addition to the Director. She described how the staff support for her Department allowed the Village to deploy resources toward a variety of fair housing issues, including working with local realtors to combat racial steering and working with local banks to combat discrimination in the mortgage lending industry. Ms. Reid offered various recommendations to the Task Force regarding the areas of enforcement and community education.

Camille Wilson-White

The Village's complaint and conciliation process is illustrated by Ms. Camille Wilson-White's experience in 1976. Ms. Wilson White and her husband were denied a unit while a white tester of similar financial standing and creditworthiness was approved for the same apartment. The complaint went through the CRC process and a hearing was conducted at which the landlord testified. The ultimate outcome of the complaint was that a public apology was ordered from the landlord and the landlord was deemed to be in violation of the Village's Fair Housing Ordinance for 10 days.

• Sandra Sokol, Former Village Clerk

Sandra Sokol worked for the Village as a Community Representative in the Community Relations Department between 1985 and 1993, and then served as the Village Clerk from 1993 until 2009. During Ms. Sokol's time in the Community Relations Department, the Department consisted of the Director and two or three Community Representatives. The main charge of the Commission and the Community Relations Department was fair housing. Ms. Sokol's primary duties as a Community Representative included dealing with fair housing issues, explaining Chapter 12 (Housing) and Chapter 13 (Human Rights) of the Village Code, and maintaining referral relationships with housing partner agencies. The Community Relations Department maintained data and maps to monitor community changes. Ms. Sokol offered recommendations to the Task Force regarding the areas of enforcement and community education, and she also suggested a recodification is necessary of local fair housing law.

Rey Heise, Former Village Attorney

Ray Heise, who served as the Village's Attorney from 1975 to 2011, spoke about the Village's fair housing enforcement mechanisms during the 1970s and 1980s. Mr. Heise stated that the Community Relations Department focused on reaching conciliation as the final step in enforcement, and Mr. Heise described in detail the conciliation process that occurred during his tenure. If needed, complainants turned to the hearing process, which is one of the functions of the CRC, per the Village Fair Housing Ordinance. To Mr. Heise's knowledge, only one Village fair housing case was ever pursued in Circuit Court. Mr. Heise noted that conciliation depends on the ability to build a solid case with strong

evidence gathering, which historically the Community Relations Department was able to handle internally due to the staff's training and experience as testers. Mr. Heise also noted that effective enforcement requires ongoing testing. Mr. Heise offered additional recommendations to the Task Force regarding the areas of community education and oversight of the Village's housing agency partners.

D. Presentations Providing Current Context on Fair Housing Policies in the Village

The Task Force also heard from current Village staff and representatives from housing partner agencies on current programs related to fair housing.

• Cedric Melton, Director of the Community Relations Department

Cedric Melton joined the Village as the Neighborhood Programs Manager in 2001 and became the Director of Community Relations in 2005. Currently, the Department's work falls into three categories: (1) landlord-tenant relations, (2) community outreach, and (3) special events and services. The Department's work related to fair housing involves:

- Investigating housing and public accommodation complaints;
- Mediating tenant-landlord disputes;
- Providing diversity counseling sessions for new and existing tenants, homeowners, and building owners;
- Providing diversity counseling and training on the Village's Human Rights Code at management seminars hosted by the Village throughout the year, and at quarterly new realtor indoctrination class of the Oak Park Area Association of Realtors;
- Handling inquiry calls regarding the sign ordinance regulations;
- Providing staff support to the CRC, including conducting cross-collaborative discussions with Oak Park, Austin and West Garfield Park communities;
- Coordinating the annual Day in Our Village Festival, which is designed to promote intergroup relations and celebrate diversity in Oak Park; and,
- Providing public information on diversity and fair housing through various mediums, such as the community profile, new resident information packet, tenant handbook, landlord handbook, and educational video segments on VOP-TV.

Presently, the Community Relations Department handles fair housing enforcement on a complaint-driven basis. Mr. Melton is currently the only staff person in the Community Relations Department. The 2014 budget for the Department is included in the Appendix. Mr. Melton's recommendations to the Task Force included the establishment of regular fair housing testing and a strong educational campaign dealing with fair housing issues.

• Tammie Grossman, Director of the Development Customer Services Department Tammie Grossman served as the Manager of Housing and Community Development Block Grant Programs from 2008 to 2013. In 2014, she became the Director of the newly formed Development Customer Services Department. With respect to activities that impact fair housing, Development Customer Services is responsible for:

- Licensing and inspecting all rental units in the Village under the Crime Free Housing Ordinance;
- Mapping the integration of multifamily buildings in the Village using racial data collected during the rental licensing process. The map is given to the Oak Park Regional Housing Center ("OPRHC") to guide its affirmative marketing efforts.

- Hosting annual management seminars for landlords regarding fair housing and community diversity efforts;
- Managing annual contracts with the OPRHC, the Oak Park Residence Corporation, and the Oak Park Housing Authority. These housing partner agencies receive funding from the Village, as determined in the annual budget process. The 2014 Housing Programs budget is included in the Appendix.
- Preparing the HUD-required report, *Analysis to Impediments to Fair Housing Choice*, and implementing the report's recommendations with direction from the Housing Programs Advisory Committee. Development Customer Services contracted with HOPE for fair housing testing to meet one of the report's recommendations.
- Maria Saldaña, Executive Director of the Oak Park Residence Corporation ("OPRC") and Executive Director of the Oak Park Housing Authority ("OPHA"), and Kenneth Southward, Director Housing Choice Voucher Program, OPHA Maria Saldaña serves as the Executive Director of both the Oak Park Residence Corporation and the Oak Park Housing Authority. The OPRC is a non-profit housing development corporation that was created by the Village in 1966 to acquire rental buildings to eliminate blight and promote diversity. Today, OPRC owns and manages 22 buildings consisting of approximately 500 units. OPRC has a contract with the Oak Park Housing Authority to manage the programs of the Housing Authority. OPHA's main programs are the HUD-funded Housing Choice Voucher (HCV) and one public housing apartment building that serves low-income senior citizens. The HCV program provides approximately 450 vouchers, which is tenant-based rental assistance that allows lowincome households to rent in the private market. Kenneth Southward provided further information regarding the HCV program to the Task Force, and noted that rental affordability is often an issue for renters in Oak Park, even for those who have a voucher. Rental prices in Oak Park exceed the fair market rent established by HUD, which can limit a voucher-holder's housing options.

The OPRC receives Village funding for the Small Condominium Management Program, which provides technical assistance to small condominium associations. The OPHA also receives Village funding to cover operational shortfalls for the HCV program; the shortfalls are a result of decreased HUD support for administrative overhead. Two of the buildings owned by OPRC are reserved exclusively for low income seniors (The Oaks) and low income disabled individuals (Ryan Farrelly), and all other OPRC buildings reserve a minimum of 20% of units for low income households. OPRC is the only non-profit organization in the Village that focuses on providing affordable housing to residents. With the exception of The Oaks and Ryan Farrelly, all of OPRC's units are marketed through the Oak Park Regional Housing Center.

• Rob Breymaier, Executive Director of the Oak Park Regional Housing Center ("OPRHC") Rob Breymaier is the Executive Director of OPRHC, a non-profit organization founded in 1972 to promote racial integration and racial diversity in Oak Park. OPRHC works to counteract racial steering and to promote housing choice through affirmative marketing. Currently, OPRHC assists prospective renters in identifying rental housing opportunities, supports landlords in marketing their units, and markets the Village broadly as an inclusive community. OPRHC also provides prospective tenants with education regarding their fair housing rights. With approximately one third of renters moving each year, Mr. Breymaier noted that its continued efforts are necessary to sustain an integrated housing market in Oak Park. OPRHC receives Village funding for administrative support, as well as CDBG funding through the Village. Mr. Breymaier offered various recommendations to the Task Force regarding the areas of enforcement and community education. He also suggested various ways in which OPRHC can assist with future Village fair housing efforts.

 Bill Planek, Co-Owner of Greenplan Management, Inc. and Representative of the Building Owners and Managers Association ("BOMA")

Bill Planek is the Co-Owner of Greenplan Management, one of the largest rental property owners in Oak Park. Doing business as OakParkApartments.com, his company owns approximately 1,200 apartment units in the Village of Oak Park, Village of Forest Park and the Austin community area of the City of Chicago. Mr. Planek stated the demand for rental housing in Oak Park is very strong as a result of Oak Park's high quality of life and public transit options. Mr. Planek explained that the main source for rentals is now online sites and services instead of newspapers, which has implications for monitoring fair housing. Speaking as a representative of Oak Park's Building Owners and Managers' Association (BOMA), Mr. Planek emphasized BOMAs members' interest in participating in ongoing discussions about fair housing enforcement and education. Mr. Planek offered recommendations to the Task Force regarding the areas of enforcement, community education and oversight of the Village's housing agency partners.

II. ACKNOWLEDGEMENT OF LIMITATIONS OF TASK FORCE STUDY

A. HOPE Report Findings

With the exception of the presentation by Ms. Houghtaling and a review of an executive summary of HOPE's findings, the Task Force did not engage in a detailed investigation of the results of the HOPE testing for various reasons. In the interest of confidentiality, the Village did not release information to the Task Force regarding the names of the individuals or companies that HOPE found to be in violation of fair housing law. Moreover, the Village did not pursue enforcement action itself. The Village's contract with HOPE provided the Village with a 120-day review period (upon conclusion of the testing) during which the Village could have elected to pursue enforcement action. After that time period passed, HOPE could, in its discretion, file administrative complaints with HUD against entities that it tested.

It is our understanding that HOPE's administrative complaints were filed in July 2014 against six property management companies: one case is based on race, two cases are based on improper treatment of testers who were deaf/hard of hearing, and three cases are based on improper treatment of reasonable accommodation requests for support animals. As of the date of this report, HOPE reported it has reached a resolution with a housing provider on one of the deaf/hard of hearing cases and will drop that complaint. The remaining five complaints are moving forward in HUD's dual track process of investigation and conciliation.

Given the circumstances, the Task Force was not charged with conducting a detailed investigation of the HOPE report. The Task Force focused on developing recommendations that would promote fair housing, improve existing laws and ordinances, increase public knowledge of fair housing law, and minimize, to the greatest extent possible, the risk of future acts of discrimination in the Village.

B. Fair Housing Outside of the Context of the Rental Market

Fair Housing Task Force Report Village of Oak Park Although the Village Human Rights Code prohibits discrimination in purchasing, leasing, securing a loan, renting or occupying housing or other real estate, the Task Force study and recommendations focused solely on discrimination in the context of rental housing. Our limited focus was due to a need to respond to the results of the Village's fair housing testing in the rental market, and due to time limitations established by the Village Board. Further study and review by Village staff is necessary to ensure that the Village is effectively working to combat discrimination and promote equal housing opportunity in the context of home mortgage lending and home buying in our community.

III. RECOMMENDATIONS TO THE BOARD OF TRUSTEES

Enforcement of existing laws and ordinances

- The implementation of fair housing enforcement and education should have a single organizational lead, which shall be designated and overseen by the Village Manager. Currently, fair housing enforcement and education activities of the Village are de-centralized.
- 2) The Village should conduct routine fair housing testing that consists of both random testing of landlords and targeted testing of landlords who are suspected of violating fair housing law. The methodology for Village testing should reflect nationally-recognized practices. Random testing should occur at least every two years, and the results of Village testing should be documented so that progress can be monitored.
- 3) The Village Manager and Village Attorney should review all Village Code, ordinances and policies relating to fair housing, and update them using the Model Fair Housing Ordinance and the Cook County Fair Housing Ordinance as examples. In addition, the Village Manager and Village Attorney should establish guidelines for hearings on fair housing grievances to be conducted pursuant to the Village Code.
- 4) Utilizing the Model Fair Housing Ordinance and the Cook County Fair Housing Ordinance as examples, the Village Manager should establish guidelines for penalties imposed upon property owners for fair housing violations. Currently the Village code is silent on this subject. The penalties that are established should reflect a "progressive" enforcement approach. First time violators should receive a warning and be required to attend additional fair housing training. Repeat violators should face increasingly severe penalties for each repeated violation, with revocation of their Village residential rental license as a penalty for the most egregious violators.
- 5) The Village enforcement process should continue to emphasize conciliation. If the Village conciliation and adjudication processes are unsuccessful, the Village should provide guidance to claimants as to how to proceed through county, state or HUD enforcement mechanisms.

Community Education

1) The Village should review and update Village-led fair housing educational programs and create a testing component to such programs. Existing fair housing training should be

updated to reflect current law, nationally-recognized research and effective practices, and should take into account the increasing use of the internet for rental activity. In addition, the Village should ensure that new Crime Free Housing training program incorporates the updated fair housing education. Specific topics that should be added to existing fair housing education programs include:

- a) Information regarding assistive technology for persons with disabilities;
- b) A checklist of unacceptable steering behaviors;
- c) Suggestions for more equitable tenant screening methods, such as those which focus on credit in comparison to an acceptable range, rather than on a precise credit score; and,
- d) Explanation of source of income as a protected class.
- 2) The Village should establish a fair housing working group that involves collaboration among the landlord/realty community, various Village departments dealing with fair housing issues, and representatives from the Village's housing agency partners. In addition to the goal of increased collaboration, the Village can utilize the working group to encourage various industry groups to promote fair housing awareness and compliance among their members.
- 3) The Village should conduct a Village-wide outreach and marketing campaign on fair housing. In connection with this campaign, the Village should review the Village website and determine whether additional educational materials should be made available online and are easily accessible, given that the majority of leasing activity now occurs online. Educational materials available online should include an easy-to-follow question & answer sheet for landlords and tenants on basic fair housing issues.

In connection with the foregoing recommendation, the Village Manager will need to make various determinations, including:

- a) Who will lead the Village-wide outreach and marketing campaign and what types of activities will be beneficial;
- b) Which local agencies/industry groups and Village commissions can effectively partner with the Village in carrying out an outreach and marketing campaign; and,
- c) How often community meetings will be held to discuss fair housing issues.
- 4) The Village should re-institute the services provided by the Community Relations Department for community education via block parties. There is value to extending education beyond landlords and tenants. The Village should ensure that the community, as a whole, focuses on fair housing and on improving community relations. The block party services provided by the Community Relations Department promote integration in our community and are important to fund.
- 5) The Village should re-institute the services provided by the Community Relations Department in the form of new resident welcome packets. Currently, new resident welcome packets are only provided via the Village website. The Community Relations Department needs additional resources to make materials available at Village Hall to help educate current and prospective residents about fair housing and Oak Park's commitment to diversity and inclusion. In preparing and distributing the welcome packets, the Village should partner with and collaborate with local community groups who are similarly involved with outreach to new and prospective residents.
- 6) In connection with the recommendations set forth herein, the Village Manager should review and make recommendations regarding increasing the staff capacity of the Community

Relations Department. Currently, this Department has only one staff member, and as such, may be unable to effectively carry out the new and re-instituted programs recommended herein.

7) The Village should prepare and provide a summary of the Village's current Fair Housing Ordinance to landlords to be used with applications for housing in Oak Park, in accordance with Section 13-5-1 of the Village Code. The purpose of the summary would be to inform tenants of their rights while at the same time promoting landlord awareness of fair housing issues.

Oversight of Housing-Related Agencies in Oak Park

- The Village should establish regular meetings with the Oak Park Residence Corporation, the Oak Park Housing Authority, and the Oak Park Regional Housing Center (collectively, the Village's "Housing Agency Partners"), the Community Relations Director, and the Neighborhood Services Manager. During these meetings, participants should regularly discuss trends, issues and problems that may indicate issues of housing discrimination. Participants should then work together to resolve or address problems.
- 2) The Village should review the current scope of services of the Housing Agency Partners as well as funding amounts to determine whether any updates or revisions should be made to address current fair housing concerns and the Village's commitment to promoting diversity. Housing Agency Partners should be required to provide information to the Village on how their organizations have benefited the Village over the past five years. As appropriate, the Village should oversee increased involvement of Housing Agency Partners in fair housing activities of the Village and efforts to promote affordable housing in the Village.

<u>General</u>

In addition to these recommendations, the Task Force would like to highlight the importance of affordable housing in providing fair housing opportunities to residents of the community.

Given that the 2010 *Analysis of Impediments to Fair Housing Choice* identified the relative lack of affordable housing in Oak Park as an impediment to fair housing, the Village should engage local organizations, industry groups and multifamily property owners to develop, sustain and promote affordable housing for low and moderate income residents of our community (who are disproportionately members of protected classes).

Respectfully submitted, Village of Oak Park, Fair Housing Task Force

APPENDICES

- A. Executive Summary of Analysis of Impediments to Fair Housing Choice, Village of Oak Park, IL; prepared by Mullin & Lonergan Associates, Inc., January 19, 2010.
- B. Synopsis of Key Laws and Ordinances Relevant to Fair Housing
- C. HOPE Fair Housing Center Report to the Village of Oak Park, January 23, 2014
- D. Village of Oak Park 2014 Budgets
 - Housing Programs Budget
 - Community Relations Budget

APPENDIX A

EXECUTIVE SUMMARY OF ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE, VILLAGE OF OAK PARK, IL PREPARED BY MULLIN & LONERGAN ASSOCIATES, INC., JANUARY 19, 2010.

Fair Housing Task Force Report Village of Oak Park

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

VILLAGE OF OAK PARK, IL





Approved by the Village Board of Trustees January 19, 2010

1. EXECUTIVE SUMMARY

A. Background

The Village of Oak Park is a HUD entitlement community and receives annual grants through the Community Development Block Grant (CDBG) Program. Receipt of these funds requires the Village to certify that it will "affirmatively further fair housing." As a result, the Village has specific fair housing planning responsibilities. These include:

- Conducting an Analysis of Impediments to Fair Housing Choice (AI)
- Developing actions to overcome the effects of identified impediments to fair housing, and
- Maintaining records to support the Village's initiatives to affirmatively further fair housing.

HUD defines an impediment to fair housing as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin. In Illinois, protection under state fair housing law is extended to include discrimination based on ancestry, age, marital status, military status, sexual orientation, or unfavorable discharge from military service. Beginning January 1, 2010, persons with an order of protection will become a protected class.

The AI is a comprehensive review of public and private sector policies that impact fair housing choice in the Village. Sources of information include census data, home mortgage industry data, federal, state and local housing complaint data, and surveys and interviews conducted with housing providers and fair housing advocates.

B. Findings

Based on the data collected and analyzed, and the interviews conducted for this report, the following findings and issues were identified.

- 1) The racial composition of Oak Park has changed dramatically since 1960.
- 2) Members of the protected classes residing in Oak Park have significantly lower incomes.
- 3) Minorities and females are more likely to be unemployed.
- 4) Minorities are less likely to own their homes in Oak Park.
- 5) Minority households tend to have larger households and require larger housing units.
- 6) The Village has lost over 3,300 affordable rental units since 2000.
- 7) Home buying opportunities are severely limited for Blacks and Hispanics.
- 8) Minority homeowners are more likely to experience housing problems.
- 9) More than half of all housing complaints filed in Oak Park since 1997 involved rental transactions.
- 10) The Village does not receive HOME Investment Partnership Program funds.
- 11) Minorities are under-represented on appointed citizen boards and commissions.



- 12) Advocacy groups have very lengthy waiting lists for clients seeking affordable housing.
- 13) The Village zoning ordinance does not clearly state the Village's emphasis on the provision of affordable housing.
- 14) Public transit is excellent throughout most of Oak Park, however, only one of the seven Oak Park CTA transit stations is handicapped accessible.
- 15) Rental ads in both local newspapers stated "no pets."
- 16) Some building owners and management agents may not fully appreciate the need for regular fair housing training.
- 17) Minorities were denied home mortgages at higher rates than Whites.
- 18) Minorities were more likely to receive high-cost mortgage loans than Whites.
- 19) The Oak Park Regional Housing Center, as the Village's designated marketing agent, provides the critical link between prospective renters and Oak Park's integration goals.
- 20) The Oak Park Community Relations Department is also an important link in the Village's efforts to achieve diversity and eliminate housing discrimination.
- 21) The Village's Multi-family Incentives Program (formerly known as the Diversity Assurance Program) appears to have successfully contributed to the integration of Oak Park.

C. Fair Housing Action Plan

Based on the findings and issues, the following ten potential impediments to fair housing choice in Oak Park were identified. Recommended actions to eliminate these impediments are also provided. More detail is included in section 7 of the report.

i. Public Sector

a. Minority households and other members of the protected classes have difficulty securing affordable housing in Oak Park.

Proposed Action 1: Include source of income as a protected class to the Village's fair housing ordinance.

Proposed Action 2: Develop an Affordable Housing strategy for the Village which may include actions such as adopting an Inclusionary Zoning Ordinance and Affordable Housing Trust Fund.

b. There is an inadequate supply of handicapped accessible housing in Oak Park.

Proposed Action 1: Institute a requirement, by local ordinance, that all new multi-family developments are to provide a minimum percentage of accessible rental units.

Proposed Action 2: Create and maintain a list of certified private and public rental units that are accessible to persons with physical disabilities.

Proposed Action 3: Work with the Oak Park Area Association of Realtors to expand their listing form to include accessibility features of available units.



Proposed Action 4 The Village should work with disability advocates to sponsor workshops and other educational opportunities for housing planning staff, developers, architects, builders, Realtors, and other housing professionals to increase knowledge of various accessibility and visitability design features and cost-effective ways of incorporating such features into newly constructed or substantially rehabilitated housing units.

c. Members of the protected classes are under-represented on appointed citizen boards and commissions.

Proposed Action: Annually the Village should schedule a recruitment period for new board and commission applicants, with an emphasis on recruiting members of the protected classes.

d. Affordable housing developers are being denied access to local HOME Program funds.

Proposed Action: Apply for HOME funds by either joining the Cook County HOME Consortium or pursuing a yearly State application.

e. Prospective developers of any new single-room occupancy (SRO) units will require a parking variance for the project, resulting in the need for a public hearing.

Proposed Action: The Village should proactively address this issue to eliminate the potential for not-in-my-back-yard (NIMBY) public opposition to any potential project.

f. More than half of the housing complaints filed in Oak Park involved rental transactions.

Proposed Action: Proactively conduct testing of sale and rental properties in Oak Park at a scale commensurate with the Village's financial capacity.

g. Only one of the seven Oak Park CTA transit stations is handicapped accessible.

Proposed Action: The Village should continue participating in the longrange planning efforts of the Chicago Metropolitan Agency for Planning, the metropolitan planning organization for the Chicago Metropolitan Urbanized Area, which includes the Village of Oak Park.

ii. Private Sector

a. Rental ads in one local newspaper stated "no pets."

Proposed Action: Discussions with the newspaper should be initiated with the recommendation that its policy be modified to require that all future rental real estate ads that state "no pets" (or seek to restrict the type of pet allowed) include the phrase or agree to the following exception: "except companion/service animals permitted under fair housing laws."



b. Mortgage loan denials and high-cost lending disproportionately affect minority applicants.

Proposed Action 1: Because credit history is a major reason for denial of home mortgage applications in Oak Park, there are opportunities for lenders to focus on the problem and work with applicants to address the concern.

Proposed Action 2: Engage HUD-certified housing counselors to target credit repair education through existing advocacy organizations that work with minority populations on a regular basis.

Proposed Action 3: Encourage the continued efforts of the Housing Center, and consider expansion of new initiatives, to recruit volunteers from local lending institutions to conduct home ownership workshops.

Proposed Action 4: Conduct a more in-depth analysis of HMDA data to determine if discrimination is occurring against minority applicant households.

Proposed Action 5: Engage in a communication campaign that would market homeownership opportunities to all minorities regardless of income including middle and higher income minorities. The campaign could show the value of living in a diverse community like Oak Park and could encourage homeowner investment. The campaign could also target lenders to show the high denial rates of mortgage applications for all minorities regardless of income.



APPENDIX B

SYNOPSIS OF KEY LAWS AND ORDINANCES RELEVANT TO FAIR HOUSING¹

Federal Fair Housing Amendments Act²

The federal Fair Housing Amendments Act ("FHAA") prohibits discrimination in housing against the protected classes of race, color, religion, sex, national origin, familial status and disabilities. The FHAA was signed into law in 1988 and amended Title VIII of the Civil Rights Act of 1968 (commonly known as the Fair Housing Act). The FHAA prohibits a number of practices related to residential housing, such as refusing to make housing available and refusing to make reasonable accommodations and modifications for persons with disabilities. Refusing to make housing available includes discrimination in the terms, conditions, or privileges of sale or rental housing; discrimination in the provision of services and facilities; discrimination in advertising practices; and misrepresentation of the availability of a dwelling unit.

The FHAA also requires certain multi-family dwellings designed or constructed for first occupancy after March 31, 1991, to be accessible to persons with disabilities. The U.S. Department of Housing and Urban Development's (HUD) *Fair Housing Act Design Manual* details the design requirements.

Lastly, the FHAA also requires federal agencies and sub-recipients of federal funding to *affirmatively further fair housing*. As a recipient of federal Community Development Block Grant (CDBG) funding, the Village is required to (1) conduct an *Analysis to Impediments to Fair Housing Choice*; (2) develop and implement actions that will overcome the effects of identified impediments to fair housing choice; and (3) maintain records to document the Village's efforts to affirmatively further fair housing. The Village completed a report in 2010; an executive summary of the report is also included as an Appendix. Currently, HUD is seeking feedback on a proposed rule that aims to strengthen the implementation of affirmative fair housing requirements through data-driven, local assessments of fair housing.

Complaints regarding FHAA violations can be filed with HUD by any entity, including individuals and community groups. FHAA requires HUD to bring the applicable parties together to attempt conciliation for every fair housing complaint. If conciliation is unsuccessful and HUD determines there is reasonable cause, HUD will charge the respondent with violating fair housing law. A HUD Administrative Law Judge will hear the case unless either party elects to have the case heard in federal court.

Illinois Human Rights Act³

The Illinois Human Rights Act ("HRA"), initially passed in 1979, addresses fair housing in Article 3 – Real Estate Transactions. The HRA protects against discrimination based on race, color, religion, sex, national origin, ancestry, age, order of protection status, marital status, physical or mental disability, military status, sexual orientation and unfavorable discharge from military service. The Illinois Department of Human Rights ("IHDR") is the agency that accepts, investigates and addresses

¹ http://www.jmls.edu/fairhousing/pdf/fair-housing-primer.pdf

² http://www.law.cornell.edu/uscode/text/42/chapter-45/subchapter-I

³ http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=2266&ChapterID=64

complaints regarding discrimination in violation of the HRA. The Illinois Human Rights Commission is the state administrative agency responsible for adjudicating complaints after they have been investigated by the IDHR.

Cook County Human Rights Ordinance⁴

The Cook County Human Rights Ordinance, first adopted in 1993, prohibits discrimination in housing based on protected classes similar to those set forth in the HRA, with the additional protected classes of gender identity, parental status, housing status and source of income. The Cook County Commission on Human Rights enforces the County's ordinance by investigating, mediating and conducting hearings on complaints of discrimination.

Village's Human Rights Code, Chapter 135

The Village's Fair Housing Ordinance, adopted in 1968, provides protections for "a fair opportunity to purchase, lease, rent or occupy housing or other real estate" to all persons, and is codified as Chapter 13 (Human Rights), Article 2 (Unlawful Real Estate Practices) of the Village code. Like the Illinois Human Rights Act and the Cook County Human Rights Ordinance, the Village has a broader list of protected classes than the federal FHAA. With the addition of the source of income protection in late 2013, the Village prohibits discrimination based on lawful sources of income, including social security, federal or state public assistance, and federal or state housing and rental assistance. The Village's Fair Housing Ordinance does not apply to (1) rentals in buildings containing four of fewer independent dwelling units where the owner occupies one of the units; and (2) payment of rent through housing choice vouchers for single family or detached residences and owner-occupied two-to four-unit residential buildings.

Chapter 13, Article 2, gives the Village's Community Relations Commission (CRC) the authority to review and investigate sales and rentals of residential property to determine if these transactions comply with the Fair Housing Ordinance. The Community Relations Director is responsible for investigating complaints, and if a complaint has merit, attempting conciliation between the parties. If conciliation is not successful, the Code directs the CRC to hold a hearing on a complaint. Depending on the nature of the complaint and associated protected class, the complainant also has the option of pursuing the complaint in the Circuit Court, or with the Cook County Commission on Human Rights, IHDR or HUD.

⁴https://www.municode.com/library/il/cook_county/codes/code_of_ordinances?nodeId=PTIGEOR_ CH42HURE_ARTIIHURI

⁵ http://www.sterlingcodifiers.com/codebook/index.php?book_id=459&chapter_id=20380

APPENDIX C

HOPE FAIR HOUSING CENTER REPORT TO THE VILLAGE OF OAK PARK, JANUARY 23, 2014.

APPENDIX C



HOPE Fair Housing Center

Report for the Village of Oak Park January 23, 2014

HOPE Fair Housing Center 245 W. Roosevelt Road Suite 15-107 West Chicago, IL 60185 (630) 690-6500 www.hopefair.org

HOPE Fair Housing Testing 2013 - Village of Oak Park

This report presents the results of testing conducted by HOPE Fair Housing Center in the Village of Oak Park aimed at detecting racial discrimination in the rental housing market and potential barriers for persons with disabilities in residential properties. HOPE conducted:

- fourteen paired rental fair housing tests designed to capture information about differences in treatment, terms and conditions, availability and steering based on race;
- ten paired rental tests with deaf/hard of hearing testers using a relay system such as a Caption Phone or Video Relay System; and
- eight reasonable accommodation tests where testers with a disability inquired about a reasonable accommodation under the Fair Housing Act.

Information presented will include: (1) the background of the project; (2) the scope of the project; (3) the methodology utilized; (4) a summary of rental tests results, (5) results of calls placed by deaf Testers; 6) findings of the reasonable accommodation testing; and (7) recommendations.

Executive Summary

The level and egregiousness of the discrimination found in these tests were startling. Oak Park's reputation as one of the few truly integrated communities in the Chicago Metro area makes the level of discrimination against African-Americans particularly surprising. Perhaps not as surprising, but troubling nonetheless, was the level of discrimination based upon disability.

- In six paired tests, no African-American testers were able to view apartments while all of their counterparts saw one or more apartments.
- Two Oak Park companies refused to return phone calls or make appointments for African-Americans on multiple occasions. There was never an instance where an African-American received a call back where their white counterpart did not.
- One white tester was shown an available unit. Her African-American counterpart was told that the unit had been rented and nothing else was available. The white tester called back and was told that the unit was still available.
- After a white tester expressed interest in a predominantly African-American location, the resident manager told her she need to talk to the Oak Park Regional Housing Center.
- In several of these race based tests, agents made gratuitous discriminatory comments related to familial status, age and marital status.

- "Agent" said the youngest people in the building were in their 40s and there were no children in the building.
- "Agent" said that a single woman rented the unit before, there were lots of women, and it would be nice to have consistency.
- "Agent" said the building is mostly singles and young couples.
- Deaf or hard of hearing testers were hung up on 20% of the time. In one instance, a deaf tester was hung up on twice after the relay operator announced they were calling on behalf of a deaf person. In another instance, the deaf person was hung up on after the relay operator announced she was calling on behalf of a deaf person, the agent said she wasn't interested in telemarketing calls. The deaf tester called back and received no answer. After making a third attempt, the deaf person was able to speak with a different agent.
- After a tester with a disability asked for a reasonable accommodation to allow them to have an emotional support animal necessary with their disability, agents made the following comments.
- "[M]aybe you could put like a handicap sign on the front door or something?"
- The agent stated that there are no exceptions and that everyone has a situation. They are only required to make exceptions for the blind and even then only when there is no other assistance a blind person can use besides a dog.
- An agent told the person with a disability that they would have to have a certified service dog and that a doctor's recommendation wouldn't be enough.

Village of Oak Park

As a HUD entitlement community receiving annual Community Development Block Grant funds, Oak Park is required to certify that it will "affirmatively further fair housing." This includes specific fair housing planning responsibilities: 1) conducting an Analysis of Impediments to Fair Housing Choice; 2) developing and implementing actions that will overcome the effects of identified impediments; and 3) maintaining records to document the Village's efforts to affirmatively further fair housing.

In its 2010 Analysis of Impediments to Fair Housing Choice (AI), Oak Park developed a Fair Housing Action Plan based on its findings. One of the findings under the Public Sector category was that "More than half of the housing complaints filed in Oak Park involved rental transactions." The Action proposed to address the finding was to "proactively conduct testing of sale and rental properties in Oak Park at a scale commensurate with the Village's financial capacity." As it did in the 60s and 70s when it actively promoted integrated neighborhoods and established its Housing Center, Oak Park is again in the forefront of promoting fair housing by assessing discrimination in its housing market. Few if any cities or municipalities undertake this proactive self-testing unless pursuant to a settlement agreement or court order. This agreement between HOPE and Oak Park addresses the commitment made by the Village to Affirmatively Further Fair Housing through the specific activity of having fair housing testing conducted and is a testament to Oak Park's ongoing commitment to confront any housing discrimination in a robust manner.

HOPE Fair Housing Center

HOPE Fair Housing Center is a non-profit, 501(c)(3), tax-exempt organization. Founded in 1968, HOPE Fair Housing works to create greater housing opportunities for all. We want to ensure everyone has the chance to live in the community/home/apartment of their choice free from discrimination based on race, color, religion, national origin, sex, disability, familial status, or any other characteristics protected under state or local laws. HOPE accomplishes this through education, outreach, enforcement, training, and advocacy.

METHODOLOGY

After conducting research, the matched pair test begins with the creation of tester "profiles" or "assignments" by the test coordinator. When testing for differential treatment based on a protected characteristic, tester assignments will be matched on the relevant characteristics related to the transaction at issue (i.e., type of housing sought, date housing needed, current employment and employment history, etc.). However, there would be two key differences: (1) the race or disability (or other protected characteristic at issue) would vary between the testers with one representing the "control" tester and one representing the "protected" tester and (2) the protected tester would be slightly better qualified and have slightly better credentials than the control tester.

Testers called and/or visited an institution within the assigned time frame. Testers completed report forms and narratives and were debriefed by the test coordinator. Testers were given instructions about how to respond to any follow-up contacts made by the housing provider and reported any follow-up contacts.

Project staff analyzed tests for differences based on race or disability and/or compliance with reasonable accommodation requests. The testers themselves often are unaware of discrimination because they do not receive comparative information for analysis. HOPE staff reviewed reasonable accommodation tests to identify and document compliance with the Fair Housing Act's reasonable accommodation provisions for people with disabilities.

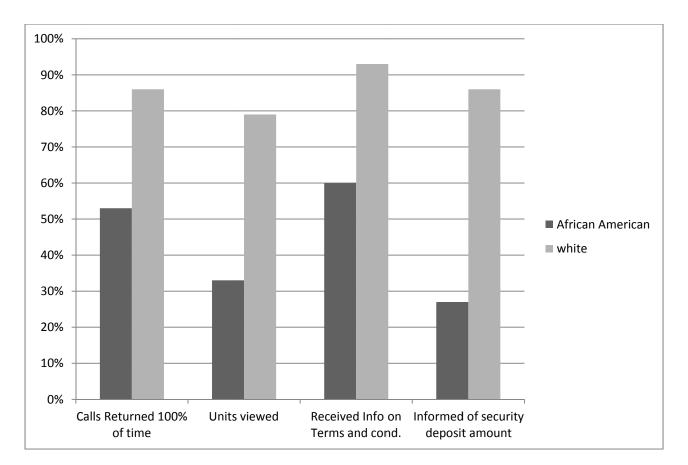
RENTAL RACE TEST RESULTS

HOPE conducted 14 paired rental tests of eight different management companies offering rental units within the Village of Oak Park. Fourteen of the tests were race-based, matched tests with a White Tester and an African-American Tester contacting the same office; an additional test was conducted with one African-American tester which was followed by two matched tests to the same management company.

The tests demonstrate that in Oak Park, in spite of its reputation, intention, and progress in maintaining diversity, there are ongoing instances of racial discrimination that warrant followup, through additional periodic testing as well as fair housing education for rental agents, management companies, and potential renters.

Testing was initially made difficult by the overall unprofessional, poor customer service offered by rental agents to potential housing consumers. In addition, the statistics show that compared to White Testers, African-American Testers were not treated nearly as well as their White counterparts. They received considerably fewer site visits to units, had to place more calls to get return calls, and in more instances their calls were never returned. They were offered less information on rental terms, and in some cases agents made discouraging statements to them rather than the encouraging and positive remarks made to White Testers.

Results are presented in four categories: Responsiveness, Number of Units Viewed, and Information Given on Terms & Conditions and Information Given on Security Deposit. The chart below demonstrates the differences noted in these tests.



Responsiveness

Seven of the 15 African-American Testers (47%) did not receive return calls after leaving messages, compared to just two of the 14 White Testers (14%). All but one of the seven companies contacted had at least one instance where testers did not receive a call back or had to call multiple times to speak with an agent. And the one company where this was not the case had an appointment to view a unit with an African-American tester, but the agent did not show up, even though the tester was told the agent was on the way. Some of the tests were not completed because callbacks were not received after multiple calls and voice mails on the part of the testers. In two paired tests to the same company, two white testers received call backs after one message each, while one African-American tester left two messages with no return call and the other placed three calls with two messages before receiving a return call.

In one paired test, the White Tester placed one call, was shown two units and given information on rent, security deposit, application fee, and credit checks. The African-American Tester placed three calls and left two messages over an eight-day period before receiving a return call. The agent said there were two available units that could be viewed on the weekend and to leave a message as to which day was convenient. The Tester left a message and did not receive a call back. Nor was a call received after another message was left the next week.

Units Viewed

Overall, 13 of 29 testers posing as qualified, interested renters desiring to view available units were not able to schedule appointments and view units. In other words, 45% of all Testers posing as potential, qualified renters contacting a management company to view available units were not able to do so. This happened in spite of numerous call and messages left by Testers to management companies.

In six paired tests, all White Testers, but no African-American Testers, were able to view units. Most disturbing about this is that two companies refused to return calls or make appointments for African-Americans in multiple paired tests. In five paired tests, both Testers viewed one or more units. In three paired tests, none of the testers was able to schedule a site visit to an available unit. More than twice as many White Testers were shown units: of the 16 Testers who viewed units, 11 were White and five were African-American. This represents 79% of White Testers, (11 of 14), versus just 33% of African-American Testers (5 of 15). This is a significant and insidious finding, as an African-American individual or family contacting an agent in Oak Park seeking rental housing would have no way of knowing that they were being treated differently because of their race.

There was one documented case of an African-American Tester being told that a unit was not available, when it was available to the White Tester previously as well as later in the same day that the agent told the African-American tester that is was not available.

In one paired test, the White Tester was shown four available units with an average rent of \$1,007. The African-American Tester, with comparable income and qualifications, viewed a total of three units with an average rent of \$842. This Tester was first shown two units, and the Tester reported that the agent "reluctantly" arranged for viewing of one other unit, but was told two applications were already pending.

Information on Units

Thirteen out of 14 White Testers (93%) and just nine of 15 African-American Testers (60%) received information from agents on the terms and conditions of the rental units. And even when given information, the African-American Testers received less complete information on rent, credit checks, security deposits, etc. The White Testers received an average of 4.8 pieces of information. African-American Testers who received information were given an average of 3.4 pieces of information. This is 29% fewer than the White Testers. Three White Testers were also offered a rental application by the agent and no African-American Testers, although one who requested an application did receive it.

Three times as many White Testers as African-American Testers were informed of security deposit amounts (12 of 14 White Testers, 4 of 15 African-American Testers). In the four instances where both Testers received security deposit information from a management company, they were told the same amount.

In four of the 14 paired tests, a management company that gave White Testers information on monthly rent failed to offer that information to the African-American counterpart. In seven paired tests, both testers were given the same or comparable rental amounts. When they were quoted rent for the same unit, the rents given were the same. In two of three instances where paired Testers were shown different units, the rent on the units shown to African-American testers was somewhat lower than on the units shown to White Testers.

<u>Encouragement</u>

In addition to more information on specific terms for the rental property, White Testers were more likely to receive encouraging statements, such as being told of amenities, favorable makeup of the buildings, the quiet street, and pending improvements to the units. Conversely, African-American testers received more discouraging statements, such as being told that the landlord and employer check is extensive and we "expect it to be a good report," or that a criminal background check is conducted. One African-American Tester was cautioned about occupancy restrictions, only two persons in the unit, while the White Tester was not.

Discriminatory Comments

In several tests, agents made comments indicating that families with children did not live in particular buildings. By stating that these apartments are for singles and couples, the agents were indicating an illegal preference or limitation based upon familial status.

RENTAL TESTS FOR DEAF/HARD OF HEARING TESTERS

HOPE conducted ten paired deaf/hard of hearing tests with ten different companies. HOPE used pairs of testers, one hearing and one a person with a hearing impairment. Half of these tests were conducted by a hearing impaired tester using a caption phone where the tester uses their voice to speak into the phone and the recipient's speech is translated into captions on a screen for the hearing impaired tester to read. The other half of the tests were conducted by a tester using a video relay system. A video relay service (VRS), also sometimes known as a video interpreting service (VIS), is a video telecommunication service that allows deaf and hard-of-hearing individuals to communicate over video telephones and similar technologies with hearing people in real-time, via a sign language interpreter. The equipment can be used to talk to others via a sign language interpreter, who uses a conventional telephone at the same time to communicate with the deaf person's party. Each of these types of testers was hung up on by

rental agents once. While this was a small number of tests, 20% of the time, the deaf/hard of hearing tester was hung up on even after being made aware that the tester was deaf. With VRS, the relay operator announces that they are calling on behalf of a deaf customer. In some instances, the rental agents have responded that they aren't interested in sales calls. For caption phone tests, it may take a moment for the rental agent's words to appear in caption on the hearing impaired users screen. Education about relay systems would be a public benefit and avoid those with hearing impairments from being hung up on.

When the deaf/hard of hearing testers were able to get through and speak with an agent, the tests demonstrated significant differences in availability and/or terms and conditions of rental housing. In three of the tests, there were significant differences in the amenities and information offered to the hearing testers. In three tests, there were differences in the security deposit amount or other fees told to the deaf tester. In half of the tests, the deaf or hard of hearing testers were told about fewer available units.

In seven instances where the deaf/hard of hearing testers each spoke with an agent¹, the hearing tester received more information in four of the tests, i.e. more than half of the time. This included being told about more available units, terms of rental, building amenities, and a special promotion. In another test, the hearing tester was told that the security deposit was one month's rent while the hard of hearing tester was told 1.5 times monthly rent.

REASONABLE ACCOMMODATION TESTS

The federal Fair Housing Act requires housing providers to make reasonable accommodations in rules or policies to allow a person with a disability the same use and enjoyment of the property. A common example of a reasonable accommodation would include allowing a visually-impaired person to use a service animal even if the apartment complex has a "no pet" policy. To test compliance with this requirement, HOPE utilized a tester posing as a person with a disability in need of an accommodation. The tester identified herself as a person with a disability and requested an accommodation to a rule or policy of the apartment complex for a support animal.

HOPE attempted reasonable accommodation tests with eight different realty or management companies. In four of the tests, testers were denied their requested accommodation. Also, in four tests, the tester was required to have multiple conversations with the housing provider to determine whether the reasonable accommodation would be granted. In two of these tests, the tester was ultimately denied her accommodation after multiple phone contacts with the provider.

¹ In one test, the hearing tester did not receive a call back after leaving two voicemails. The deaf tester did speak with an agent in this test.

In one instance, the unit was no longer available, so seven tests were completed. The request for a reasonable accommodation was granted in less than half of the completed tests.

In three of the seven tests, testers were denied their requested accommodation outright, and in another case the agent put the tester off, first by stating that he would have to check with his partner, then by saying the unit wasn't going to be available for three weeks, and finally by not returning the tester's final call. Two agents approved the request of the testers for a support animal after being told the tester had paperwork from a doctor. In addition, tentative consent was granted in a case pending approval by the property manager who was on vacation. This test required four separate communications, two calls and two text messages.

In three of the tests, agents mistakenly believed that a certified service dog would be required for a reasonable accommodation or at least to waive the standard pet fees.

RECOMMENDATIONS:

- Rental housing providers in the Village of Oak Park should receive training regarding the Fair Housing Act requirements and the failures noted in these tests. This training would include information about:
 - o Race discrimination and violations under the Fair Housing Act;
 - Provisions related to familial status;
 - Specific training related to reasonable accommodation and reasonable modification requests and recommended procedures; and
 - Training related to relay systems used by deaf and hard of hearing individuals.
- There should be future testing after the training to ensure that training was sufficient to ensure compliance. If training does not ensure compliance, the Village of Oak Park and/or HOPE should explore enforcement actions against non-compliant rental providers.
- The Village of Oak Park should continue to promote the Community Relations Commission and its complaint process.
- HOPE's reasonable accommodation tests where the agents made discriminatory comments should be referred to the Community Relations Commission for enforcement action.
- Owners and brokers should utilize a customer service report, similar to the National Association of Realtors[©] "Prospect Equal Service Report" to ensure that their agents are treating all potential renters equally.

APPENDIX D

VILLAGE OF OAK PARK 2014 BUDGETS

Fair Housing Task Force Report Village of Oak Park

Housing and CDBG Programs Division

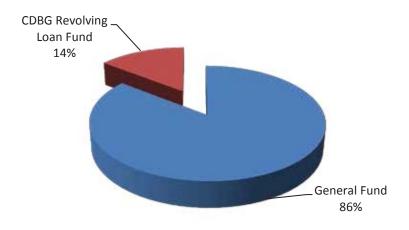


Chart 3-11: Total Housing Programs Expenditures, By Fund

Division Summary

Housing Programs consists of six staff: the Housing and CDBG Programs Manager, Housing Programs Supervisor, the Community Development Technician, the Account Clerk II, the Grants Supervisor and the Grants Coordinator. The Division works closely with the Housing Programs Advisory Committee (HPAC) to evaluate present programs in addressing the mission of the Division and to propose the creation of new programs or the enhancement of existing programs to meet the mission of the Division. Additionally, the Division works with the Community Development Citizens Advisory Committee (CDCAC) to award and monitor CDBG funds to community not-for-profits.

The division oversees the contract administration for the housing partner agencies: Oak Park Residence Corporation and the Oak Park Regional Housing Center. The Division also works with our neighboring communities to increase the housing and transportation options in west central Cook County. The Division works with the Oak Park Area Association of Realtors to train realtors on housing programs in Oak Park and to monitor the real estate market. The Division tracks foreclosures and real estate sales.

Multi-family Housing Incentives Program: One of Oak Park's important goals is to continue to develop and maintain racial diversity. A large portion of that goal focuses around integrating and supporting continued diversity in rental and owner occupied housing. The Multi-Family Housing Incentives Program is designed to further encourage fair housing practices, to expand housing options for all prospective renters and to improve the quality of multiple-family units and dwellings.

The program consists of two components: grants and rental reimbursement. The Owner is required to provide a 2:1 match to receive a grant to either improve the building or specific units to make the building more marketable to a diverse group of tenants. Under rental reimbursement, the Village covers a portion of the cost for a vacant unit, allowing an owner to maintain a rental vacancy for a

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longer period of time to allow an affirmative move to be made into the unit. Under both components, the Owner is required to enter into a Marketing Services Agreement (MSA) to affirmatively market their rental units with the cooperation and assistance of the Village of Oak Park and its designated Marketing Agent, the Oak Park Regional Housing Center.

Single Family Rehab Program: Oak Parkers with qualifying incomes who own and live in single-family houses are eligible for federally funded rehabilitation home repair loans. Designed to improve the Village's housing stock, the loans are intended to bring structures into compliance with housing and building codes and to eliminate health and safety hazards. Funds also may be used for weatherization and to provide accessibility for the disabled. Homeowners must earn less that 80% of the area median income. The loan programs include the following:

- Village deferred-payment no-interest loans: For low-income owners, loans of up to \$25,000 repayable after 20 years.
- Emergency loans: No-interest loans of up to \$5,000 repayable after five years; for correction
 of single emergencies and code violations of an emergency nature such as furnace
 replacement.

At present, funding for the single family rehab loan program is from the Village's Revolving Loan Fund. The Revolving Loan Fund consists of funds that were re-paid by prior homeowners. Additionally, we give homeowners with lead based paint hazards a grant using CDBG funds to correct the Lead Based hazards.

Small Rental Rehab Program: The Small Rental Rehab Program provides forgivable loans to small rental properties with fewer than eight units using Community Development Block Grant (CDBG) funds. A minimum CDBG project budget is \$2,000 per rental unit and the maximum is up to \$5,000 per rental unit inclusive of contingency. Priority is given to applications with units having three or more bedrooms. Property owners are required to commit or leverage a minimum 25 percent of the total project cost. Property owners must abide by all terms of the forgivable mortgage and the Small Rental Rehabilitation Program Loan Commitment and Agreement for two to five years. During this period, property owners agree that at least 51 percent of units will be rented to tenants with household incomes at or below 80 percent of the area median income for Cook County.

Sewer Backup Protection Grant Program: The Sewer Backup Protection Grant Program was established to provide financial assistance to homeowners who install systems to protect their homes from sewer backup during a heavy rain event. Funding for the program is from the Water and Sewer Fund but the program is administered by the Housing Programs Division. The program's intent is to offset a portion of the expense of modifying a building's plumbing system to prevent backflow when Village sewers are at capacity. Eligible homeowners may qualify for a grant of 50 percent of the total cost of sewer backup prevention improvements, up to a maximum of \$3,500 for installing either an overhead sewer system or a backflow prevention valve system.

West Cook County Housing Collaborative: The West Cook County Housing Collaborative (the "Collaborative") was created by the municipalities of Bellwood, Berwyn, Forest Park, Maywood and Oak Park for the purpose of the Collaborative to obtain Neighborhood Stabilization Program ("NSP") Funds and other funds to use in furtherance of the housing goals in the Member Communities. Since 2009, the Member Communities applied to the Chicago Community Trust and the Grand Victoria Foundation for funding to hire a consultant to act as the coordinator for the communities. The Collaborative hired IFF, a non-profit community development financial institution, to act as the coordinator. In the fall of 2011, the Village of Oak Park on behalf of the Collaborative received \$2.9 million from the HUD Sustainable Communities Challenge Grant to update the Comprehensive Plans for Oak Park, Bellwood, Forest Park and Maywood and to create a revolving loan fund to finance

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December 9, 2013

transit oriented development in the member communities. IFF has agreed to match the revolving loan fund with an additional \$1 million of private investment. IFF is receiving funds under both the DCEO and HUD to administer these projects. The Housing Programs Manager is responsible for the administrative support for the Collaborative and the HUD Sustainable Communities Challenge Grant.

Condo Corner Network: The Division sponsors educational presentations for condominium owners in order to learn skills to effectively manage their condominium associations. The Division sponsors a six-week training program to help associations increase their knowledge of proven practices of successful associations. The curriculum is designed for individuals who currently are on an association board, thinking of joining a board or want to understand how an association should operate. Additionally, the Division monitors the Oak Park Residence Corporation's contract to provide one-on-one assistance to small condominium associations with fewer than 12 units. The Residence Corporation will work with individual associations to assess their capacity to manage their association and to build their capacity. Services may include helping to learn how to budget for contingencies, how to conduct meetings and elections, and how to ensure the association is fully protected.

Multi-family Licenses: The Village of Oak Park licenses all rental properties of four or more units. The Division is responsible for issuance of the license and collection of license fees. Additionally, as part of the license process, building owners are required to report the racial composition of each unit in its building. The Division compiles the racial data and determines which blocks should be housing counseling locations. The goal for each block is to not have any predominant racial group. After the racial data is collected, the Division creates a map of housing counseling locations. The map is used to prioritize grants under the Multi-family Housing Incentives Program. Grants are awarded to buildings that could benefit from improvements to increase the marketability of the building and in buildings that need increased affirmative marketing to prevent segregation. The map is also given to the Oak Park Regional Housing Center to use for affirmative marketing purposes for buildings that do not participate in the Multi-family Housing Incentives Program.

Condominium Inspection fees: The Village of Oak Park also conducts a biennial inspection of all condominium buildings and inspects all rental units within a building. The Division is responsible for collecting the inspection fee from each condominium association and for obtaining contact information for each association for the Board members and owner/renters of each rental unit in the building. The Division then provides that information to the Division of Building and Property Standards (BPS) to use when scheduling the inspection.

Monitors Foreclosures and Real Estate sales: The Division subscribes to Public Records Information Services. Public Records maintains an online database of many Cook County files including foreclosures, mortgages and bankruptcies. The Division reviews all foreclosures filed in the Village and forwards that information to the Division of Building and Property Services (BPS) for possible inclusion on the Vacant Property Database. The Division follows each foreclosure and reports back to BPS on the disposition of each property. After a judgment for foreclosure has been filed the Division tracks the property to determine when it has returned back to the market.

Building Improvement Committee: In FY13, the Division took over the leadership of the BIC committee. BIC is comprised of individuals from various departments/divisions including BPS, Community Relations, Fire, Police, Business Services, Law and the Village Managers Office. BIC meets monthly to discuss problem properties in the Village. BIC members then decide how to coordinate efforts to address problem properties and strategies to deal with the properties going forward. Strategies have included sending property owners a letter that their property is being

reviewed by BIC and offering to meet with the property owner to discuss problems identified by the Village as well as administrative adjudication and legal options.

Community Development Block Grant (CDBG): The CDGB Grant Fund is staffed by the Grants Administration staff which manages and coordinates with other Village departments and divisions the Village's federal grant programs funded by the United States Department of Housing and Urban Development (HUD) to meet community development and housing needs. On an annual basis, the Village receives various federal funds which may be allocated via an established review process in the form of a grant to eligible local non-profits and Village projects to achieve targeted goals and strategies that are directed toward strengthening the community and improving conditions for our lower and moderate income residents. The range of projects include housing, economic development and jobs, infrastructure, community facilities, public service programs and more.

CDBG is responsible for conducting the operations of the following HUD grants:

- Community Development Block Grant (CDBG)
- Emergency Solutions Grant (ESG)

2013 Accomplishments

Among the most significant developments of FY13 for the Housing Programs Division was the addition of the CDBG program staff resources. Expanding the division to include programs that support efforts to provide decent housing, a suitable living environment and expand economic opportunities for persons of low and moderate income fit well within the Village's well-established housing initiatives.

Key accomplishments of the now Housing & CDBG Programs Division in Fiscal Year 2013 include the following:

- Serviced seven Single-Family Housing Rehabilitation Loan Program projects received in 2012 and selected 24 applicants from 60 new inquiries for future participation.
- Continued four Small Rental Properties Rehabilitation Loan Program projects from 2012, with 10 applicants from 20 new inquiries expected to qualify for future participation.
- Paired the Chicago Metropolitan Agency for Planning's Multi-Unit Retrofit Ramp-up program with the Village's Small Rental Properties Rehabilitation Program to help two buildings containing 10 units reduce their energy consumption.
- Awarded Multi-family Housing Incentives Program grants to 20 recipients, while continuing to work with grant recipients from the prior four years. The program now encompasses 63 buildings containing 1,109 units.
- Distributed 300 water conservation kits, while helping 100 households receive rebates half for installing low water usage toilets and half for having energy audits performed under the Oak Park River Forest Foundation's Residential Energy and Water Conservation Program
- Processed 23 Sewer Backup Protection Grant Program applications from the 2012 waiting list and 32 new applications. Of the applications received in 2013, 48 were eligible for the grants.

• Worked with U.S. Department of Housing and Urban Development and Cook County to change the Village's program year to align with Cook County to allow access to funding under the federal HOME Program.

2014 Work Plan

The Housing Programs staff is committed to completing seven rehabilitations in FY14 through the Single-Family Housing Rehabilitation Program. As the availability of new CDBG funds varies, other funding sources are becoming necessary to support the program and meet goals. The division has applied for funding from the Illinois Housing Development Authority under the Trust Fund Emergency Loan Assistance Program to supplement the CDBG Revolving Loan Fund.

Working toward improving water conservation in our community, Housing staff will collaborate with the Village's Sustainability Manager to secure funding to continue the current Residential Water Conservation Program. The Oak Park and River Forest Community Foundation, which funds the program, has limited resources available, so additional funding is requested from the Village's Water & Sewer Fund managed by the Public Works Department.

With fewer than 20 percent of the Village's rental buildings participating in the Multi-Family Housing Incentives Program, Housing staff recommends continued funding to grow participation and retain current participants.

CDBG staff will continue to work to coordinate activities with Cook County to reduce administrative redundancies and increase funding opportunities for Oak Park-based non-profits. Staff also is committed to aligning the CDGB and ESG program goals with those identified by the Village Board of Trustees to the extent possible under federal regulatory guidelines.

MAP Program

The following is a summary of the Governance Priorities and performance visions for the Division of Housing and CDBG Programs:

Housing and CDBG Programs Governance Priorities							
Governance Priority #1 – Multi-family and single family grant and loan programs	Governance Priority #2 – Sub- regional coordinated housing strategies	Governance Priority #3 – Community Development Block Grant Funding					
 Vision#1- Expand the portfolio of housing programs to positively impact the quality, affordability and accessibility of the Village's housing stock Vision #2- Continue to refine housing programs to ensure that they remain relevant and aligned with Village values and goals. 	Vision #1 – Strengthen existing intergovernmental partnerships to improve sub-regional housing stock	 Vision #1- To align the Village's strategic goals with the CDBG funding allocation Vision #2- To maximize the Village's use of CDBG funds Vision #3- To prepare for joint consolidated planning process with Cook County 					

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Fund	2010 Actual	2011 Actual	2012 Actual	2013 Budget	<u>2013 Est.</u>	2014 Budget
General Fund	\$467,973	\$700,520	\$989,217	\$1,267,636	\$993,370	\$1,056,087
CDBG	\$1,771,555	\$1,514,934	\$1,280,317	\$1,660,690	\$1,530,800	\$1,500,000
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ESG Grant	\$85,396	\$130,527	\$149,456	\$149,456	\$108,633	\$108,633
Total Housing Expenditure:	\$2,324,924	\$2,345,981	\$2,418,991	\$3,077,782	\$2,632,803	\$2,664,720
		-				
Expenditure Type	2010 Actual	2011 Actual	2012 Actual	2013 Budget	<u>2013 Est.</u>	2014 Budget
Personal Services	-\$43,196	\$144,515	\$184,986	\$232,364	\$212,150	\$240,324
Fringe Benefits	-\$15,132	\$73,223	\$62,503	\$83,497	\$77,143	\$88,463
Materials & Supplies	\$4,346	\$4,229	\$4,805	\$4,300	\$4,652	\$6,000
Contractual Services	\$521,955	\$478,553	\$736,923	\$947,475	\$699,425	\$721,300
Department Total	\$467,973	\$700,520	\$989,217	\$1,267,636	\$993,370	\$1,056,087
			•			•
FTE Summary	2010 Actual	2011 Actual	2012 Actual	2013 Budget	2013 Est.	2014 Budget
General Fund	4.0	6.0	6.0	6.0	6.0	6.0
			•			•
Revenue Summary	2010 Actual	2011 Actual	2012 Actual	2013 Budget	2013 Est.	2014 Budget
Multi Family Dwelling License	\$0	\$151,270	\$139,080	\$127,520	\$140,500	\$140,520
Condo Inspection Fees	\$45,890	\$46,179	\$45,828	\$46,820	\$42,600	\$42,600
Loan Interest	\$4,930	\$4,304	\$13,161	\$2,500	\$6,598	\$5,519
Revolving Loan Fund	\$2,463	\$3,446	\$39,243	\$2,750	\$3,000	\$2,750
Revenue Total:	\$53,283	\$205,199	\$237,312	\$179,590	\$192,698	\$191,389

Table 3-11: Housing & CDBG Programs Financial Summary

2014 Significant Budget Changes

The Housing and CDBG Programs Division has not requested any significant budget changes at this time.

Partner Agency Summary

The Housing and CDBG Programs Division serves as the liaison to the following Partner Agencies:

- Oak Park Regional Housing Center The Oak Park Regional Housing Center is a communitybased non-profit organization that works to achieve meaningful and lasting racial diversity throughout Oak Park and surrounding communities. The Housing Center assists the Village with its core value of diversity and integration in the rental housing market by affirmatively marketing housing in the Village. In FY14, it is proposed the Village enter into a one-year service agreement with the Housing Center to provide marketing and rental assistance for the Multi-family Housing Incentives Program and to promote fair housing.
- Oak Park Residence Corporation- The Oak Park Residence Corporation is a community-based non-profit organization that preserves Oak Park's housing diversity and economic balance by offering quality apartments at affordable prices. In FY14, it is proposed the Village enter into a one-year service agreement with the Oak Park Residence Corporation that will enable it to offer its expertise in real estate management to small condominium associations. The purpose of the program is to provide "hands-on" training to the participating condominium associations in property management, with particular emphasis upon self-management.

• Oak Park Housing Authority- The Oak Park Housing Authority (OPHA) is an Illinois municipal corporation that provides affordable housing for <u>elderly and disabled</u> individuals and families. It also administers various <u>Federal housing programs</u> that assist low-income families in finding decent and affordable housing. In 2005, the Housing Authority experienced a decrease in funding from the U.S. Department of Housing and Urban Development (HUD) for the administration and operation of the Housing Choice Voucher program. Many Housing Authorities across the country and in Illinois also experienced similar cuts in funding. For FY14, it is proposed that the Village enter into a one-year contract to fund a portion of administrative costs of the Housing Choice Voucher program.

The following is a summary of partner agency funding for these agencies:

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Partner Agency		2008		2009		2010	2011	Ţ	•••	2012		2013	201	2014 Budget
Oak Park Regional Housing Center General Fund - Housing Programs Contractual Services CDBG Funding		389,111 203,177	φ φ	350,000 \$ 210,000 \$		315,000 \$ 210,000 \$	ю й	365,000 \$ 210,000 \$	ഗ ഗ	385,000 187,311	6 6	425,000 200,000	ഗ ഗ	425,000 200,000
Total Oak Park Regional Housing Center - 53% of Agency Funding	\$	592,288	↔	560,000 \$	\$	525,000 \$		575,000 \$		572,311	÷	625,000	\$	625,000
Oak Park Residence Corporation General Fund - Housing Programs Contractual Services	\$	225,000 \$	\$	150,000 \$	\$	\$			(۵		\$			
General Fund - Housing Programs Contractual Services (Small Condo Program)	÷	25,000 \$	θ	25,000 \$	θ	25,000 \$		25,000 \$	(A	25,000	÷	25,000 \$	\$	35,000
Total Res Corp - less than 10% of Agency Funding	⇔	250,000	∽	175,000	⇔	25,000 \$		25,000	φ	25,000	⇔	25,000	\$	35,000
Oak Park Housing Authority General Fund - Housing Programs Contractual Services	\$	100,000 \$	ŝ	25,000 \$	\$	ග '			↔	ı			\$	35,000
WhiteCo Affordable Housing Funds	\$	T	\$		\$	\$			÷		\$	25,000		
Total Housing Auithority - less than 10% of Agency Funding	⇔	100,000 \$	⇔	25,000 \$	⇔	\$			\$		\$	25,000	\$	35,000
Sumr	mar	y of Hous	ing	and CDBG	Pro	Summary of Housing and CDBG Programs Partner Agency Funding	ìer Aξ	gency Fi	pun	ing				

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December 9, 2013

3.2.4 Community Relations



Executive Summary

Established in 1971, the Oak Park Community Relations Department is responsible for monitoring and enforcing the Village's Fair Housing and Public Accommodations Ordinances. The Department is established specifically by Municipal Code and also provides a wide range of intervention and outreach services to the community designed to enhance the overall quality of life and promote the Village's goal of fostering diversity and respect for human differences. The Community Relations Department works amongst and through each department within the Village for the provision of its multiple services to residents. The department accomplishes its mission via three areas of service delivery, including:

Tenant/Landlord Relations

- Investigates complaints of discrimination, unlawful management practices and code compliance for mitigation
- Provides diversity counseling and training to the public, residents, landlords and realtors to increase awareness of diversity and inclusion issues
- Mediation of landlord tenant disputes to promote long term tenancies in rental sector
- Conducts fair housing and educational sessions to realtors, landlords, tenants and public

Community Outreach Services

- Serves as Village information clearinghouse
- Develops programs that promote neighbor connectivity
- Provides new resident information and orientation services
- Facilitates neighborhood and community conflict resolution
- Provides referrals to community resources
- Trains residents for community organizing projects
- Coordinates Village's graffiti hotline and removal program

Special Events and Services

- Coordination of Day in Our Village Festival
- Coordination of July 4th Diversity Parade
- Middle School Human Relations Awards
- Youth Life/Employment Skills Program
- Coordinates Diversity Dialogue Dinner Program

2013 Accomplishments

FY13 was highlighted by the successful coordination of the 40th annual A Day in Our Village festival, which attracted one of the largest crowds in recent memory. The year also included the ninth annual July 4th Parade. These two events, more than any others, showcase and celebrate Oak Park's continued warm embrace of diversity, a pursuit that led to the very creation of the department.

Other accomplishments for FY13 included the following:

- Coordinated and recruited participants and mentors and helped lead the ninth annual Youth Life/Employment Skills workshop series. The program taps local resources to help area youth learn the critical skills necessary to secure gainful employment and make positive life decisions.
- Laid initial groundwork for cross-community discussions about teen violence and mentoring issues to be developed further in 2014. Also began identifying and coordinating youth ambassador task force members to lead efforts to address issues that cross community boundaries.
- Established collaborative working relationship with District 97 Multicultural Education Resource Center for cross referrals for diversity counseling and consultation to new, prospective residents and service providers.
- Joined the Metropolitan Mayors Caucus Diversity Task Force.
- Assisted the Oak Park Housing Authority in enhancing diversity counseling sessions related to Housing Choice Voucher recipients hoping to find homes in the Village. Also conducted three Fair Housing training classes for new Oak Park Board of Realtors members.
- Restructured the Middle School Human Relations Awards Program to more actively engage school administration and staff in efforts to promote a diversity philosophy at the middle school level

2014 Work Plan

Cooperative cohabitation will be the catchphrase of FY14, as the Community Relations Department strives to support Oak Park's commitment to acceptance and inclusion rather than simple tolerance of the differences in race, ethnicity, religion, sexual orientation and income that have made us a community of many viewpoints and lifestyle choices. So many different people coexisting in such close proximity also create stresses and conflicts among neighbors and within neighborhoods, and between landlords and tenants. In fact, the one-person Community Relations Department typically responds to about 3,000 inquiries from residents seeking assistance in a wide range of interactions.

In the year ahead, the department also will continue to focus on attaining many of the goals and objectives set 40 years ago when the community relations role was codified, including combating housing discrimination, helping resolve tenant/landlord disputes and fostering community diversity.

Targeted, proactive outreach to combat youth violence along our borders and more aggressive collaboration with local and Chicago service providers to develop responses and solutions to shared

Adopted Budget

social issues also will be on the 2014 agenda. In addition, efforts will focus on strengthening relationships with neighboring communities such as Austin, Berwyn, Galewood and Cicero.

MAP Program

The Department of Community Relations will be incorporated into the MAP Program during the second wave of program deployment (2013-2014).

Expenditure Type	<u>2010 Actual</u>	2011 Actual	2012 Actual	2013 Budget	<u>2013 Est.</u>	2014 Budget
Personal Services	\$97,410	\$97,846	\$99,358	\$101,003	\$98,815	\$103,817
Fringe Benefits	\$23,587	\$24,825	\$26,824	\$28,973	\$28,973	\$32,047
Materials & Supplies	\$1,410	\$609	\$465	\$2,200	\$2,200	\$2,300
Contractual Services	\$16,796	\$19,852	\$19,528	\$21,000	\$21,000	\$24,500
Department Total:	\$139,203	\$143,132	\$146,175	\$153,176	\$150,988	\$162,664
				·		

<u>FTE Summary</u>	<u>2010 Actual</u>	2011 Actual	2012 Actual	2013 Budget	2013 Est.	2014 Budget	
General Fund	1.0	1.0	1.0	1.0	1.0	1.0	
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Table 3-12: Community Relations Financial Summary

2014 Significant Budget Changes

There are no significant budget changes for 2014. It should be noted that the Department requested an additional employee to for additional staff support. While the VMO believes this would be an appropriate investment, resource limitations caused the VMO to not include this requested position).