

Jobs and TIF:

An Analysis of Job Creation
and Tax Increment Financing



Written by:

Colin Briskman
Tax and Budget Researcher

Hailey Witt
Field Director

August, 2012

Executive Summary

Every year, \$500 million worth of property tax revenue collected in Chicago flows into funding pools shielded from public scrutiny and democratic control—the bank accounts of the city’s Tax-Increment Financing (TIF) districts. This money accounts for 10 percent of Chicago’s annual property tax revenue and is intended to promote development and create jobs in struggling areas of the city. Unfortunately, a lack of transparency, democratic oversight and accountability has opened the door to misuse of public money.

Used in Chicago since 1984, the revenue collected by Tax Increment Financing districts is spent outside of ordinary city budgeting processes, allowing for unsupervised spending, political horse-trading and a concentration of spending authority in the mayor’s office.

When Mayor Rahm Emanuel came into office in the spring of 2011, he was widely expected to reform many of the corrupt practices that make Chicago infamous. He went immediately to work on TIF, appointing a TIF Task Force and challenging it to “create accountability systems that will ensure our TIF investments go to projects that have real return for taxpayers—new jobs and new economic development.” The mayor announced the recommendations from the Task Force, including measures to increase accountability, enhance oversight, and establish a cohesive development plan, on August 29, 2011.

A year later, these recommendations have not gone into effect.

This report shines a light on the city’s tracking and follow-up in TIF agreements, exposing the need for more accountability and transparency within the program.

Since TIF projects are typically justified using their purported job-creation benefits, and because the number of jobs created is relatively easy for the city to track, we obtained and examined records on projects with job-creation requirements above 200 in the years 2000 through 2010. These projects ought to be the most scrutinized TIF projects in the city. The results suggest, however, that Chicago’s TIF programs remain largely impervious to scrutiny and unaccountable to the public:

The city could demonstrate consistent tracking of job-creation for only three (14 percent) of these major TIF projects

- Out of 21 projects with some kind of jobs goal, 15 (71 percent) did not provide annual evidence that the jobs goals were being met, but the city asked only two of the projects to give money back.
- Not a single project complies with the 2009 “Sunshine Ordinance” that requires posting of five major documents online; most projects provide less than half.
- A significant number of projects (19 percent) did not even have specific job-creation goals in their official agreements with the city.

To show the relative degree of overall transparency and accountability for each project, we created a scorecard to assign each a letter grade from “A” to “F” based on four criteria: whether enforceable standards were created, whether the developers hit their jobs goals and reported it to the city, whether the city reclaimed the TIF funds in instances where developers failed to hit their jobs goals, and whether all the information required to be available to the public is accessible.

Introduction

Tax-increment financing is a mechanism that allows municipalities to obtain funding for development efforts by setting aside a portion of the tax revenue generated within a district over a period of time. In Chicago, TIF districts are created in under-developed areas of the city. Any additional property tax revenue generated as a result of an increase in property values in the district is diverted into a special fund. Each year, \$500 million worth of property tax revenue (10 percent of Chicago’s annual property tax revenue) is collected in funding pools intended to promote development in struggling areas of the City. Chicago currently has 163 TIF districts.

While Chicago has used TIF for development since 1984, between 1998 and 2002 the city added 86 new TIF districts to its existing 41 districts—more than twice as many in a five year period as it had created over the previous 14 years. Then Mayor Richard M. Daley made them a centerpiece of his development strategy. The money diverted to these district pools is spent outside ordinary city budget processes, allowing for unsupervised spending, political horse-trading and a concentration of spending authority in the mayor’s office.

Because TIF uses such a considerable amount of taxpayer money, taxpayers should be concerned with how the process works and each project’s effectiveness in accomplishing the program’s goals. After all, this is public money spent without extensive openness to the public and, if used improperly, it could allow developers to receive taxpayer dollars without any guarantee of public benefit. The arrangement is akin to hiring a contractor without being able to withhold payment until the job is completed.

Furthermore, with so much taxpayer money being diverted into these funds, it is important that residents have access to clear, accurate information

with which to evaluate TIF proposals and the ability to make their voices heard. Chicago’s TIF budget lacks basic transparency, and is shielded from full review even by the City Council, not to mention members of the public.

In 2009, the city adopted the “TIF Sunshine Ordinance,” which requires that a set of documents related to tax increment financing districts be made available to the public online. The goal of this ordinance was to increase the transparency around TIF, shine a light on its use and abuse, and give the public an opportunity to become informed and engaged.

After taking office in 2011, Mayor Rahm Emanuel made reforming the city’s TIF process one of his early priorities. To begin, he assigned a Task Force to review the city’s use of TIF and propose reforms to the process. The Task Force proposed a series of improvements to the TIF process to establish needed transparency and accountability, including recommending that the city establish strict performance metrics and subject all TIF projects to a thorough justification process. The panel also called for the city to take swift action, including the potential revocation of TIF funds, in cases where private developers do not meet obligations in a TIF project. To ensure oversight of TIF, the Task Force also called for the creation of an internal TIF oversight board.

Given that none of the Task Force’s Recommendations have gone in to effect, we were curious what the current state of transparency and accountability was and how it could be improved.

Methods

Since the adoption of the TIF Sunshine Ordinance in 2009, various documents relating to TIF projects, including each Redevelopment Agreement (hereafter RDA: the official agreement between the City and Developer detailing the responsibilities of each party in the project) have been posted online. However, lack of transparency remains a significant issue in the TIF program. Most documents relevant to TIF are still missing from the city's website, and the public has no way of assessing a project's progress and delivered benefits without a Freedom of Information Act (FOIA) request. Even after receiving all the documents relating to particular projects from the city, information is severely limited.

Illinois PIRG asked the Department of Housing and Economic Development for all information regarding job creation for all of the TIF projects that require the creation of more than 200 jobs between the years 2000 and 2010. The city gave us information for 21 projects. Using information posted online and FOIA requests, we attained all of the information publicly available regarding how many jobs were actually created in these districts.

Using the RDA documents posted online for the projects with the highest job creation or retention numbers, we identified the important details of each project, focusing specifically on jobs covenants. From this information, we determined which projects had jobs requirements and which merely had job targets or goals without any enforcement to ensure the goals were reached.

Additionally, we filed FOIA requests with the city, asking for all documents related to job covenants for each project. The reports, emails and memos received from the city provided an indication of how well the developers were fulfilling their requirements and how well the city was monitoring and enforcing the provisions. We looked to see whether

the city received reports of jobs created, and then we checked to see if these numbers were supported by actual employee rosters. There is no standardized form used by developers taking advantage of TIF funding to report their jobs numbers.

We created a scorecard and graded the projects based on a set of criteria (see Appendix) to determine which projects were best equipped to create jobs and which were lacking the steps necessary to ensure the public's money was not spent poorly. The scorecard demonstrates the need for improvement in the TIF system provides examples of models for future projects, and identifies issues that could be addressed in the future.

Setting Enforceable Standards

Jobs covenants are clauses in the Redevelopment Agreements (RDAs) that relate to job creation. At best, jobs covenants constitute binding agreements in which the developer is required to create or retain a specified number of jobs in the city. These types of covenants help ensure the developer promotes economic growth in Chicago and, ideally, identify the specific TIF district, in return for receiving City funds. At worst, a job covenant is merely a statement of a goal to create a number of jobs without any enforceable language or consequences.

The best jobs covenants will include clawback provisions—a clause in the contract that states that if the developer defaults on their promise to create the amount of jobs guaranteed by the contract, they will be responsible for returning the TIF funds they have received up until that date. Jobs covenants can reduce risk associated with TIF money by holding the developer accountable for meeting employment standards and by allowing for the reimbursement of city funds by the developer if such requirements are not fulfilled. Including clawbacks in the jobs covenant is necessary to ensure the developer will not receive taxpayer money without fulfilling the economic growth expectations of a TIF project. Creating jobs is central to the TIF program. According to the city’s website, it is “to help local companies expand and create employment opportunities for Chicago residents.”

Jobs covenants are important to taxpayers because they add a layer of accountability. If a company is to receive taxpayer money, it is reasonable to assume it will be held responsible for providing the public benefits that were expected of it. Doling out taxpayer money should come with a come with a money-back guarantee if developers can’t or won’t deliver on their goals.

Of the 21 projects examined, 17 had jobs covenants

with tangible requirements while the others just listed job-level goals or expectations. The projects with requirements included language stating that the developer “shall” reach a listed goal, rather than that the developer should “make a reasonable effort to” or “may” reach a job creation goal. The implication of the word “shall” is that the developer’s failure to meet requirements would trigger a set of consequences that often include returning the TIF money. For the projects with jobs covenants, the requirements included in the covenant often offer the best method of monitoring progress on the value of the project. The jobs objectives of projects that do not list clear requirements have little effect on increasing accountability, as the city cannot penalize the developer for failure to reach its targets, giving the developer less incentive to create jobs.

Weak and Barely Enforceable Standards

Example: The developer, Dearborn Center LLC, was given \$10,000,000 to subsidize the building of a 37-story building with parking, retail and office space. The project was supposed to “create or retain” 3,600 jobs.

According the job covenant in the RDA, the developer was required to use “commercially reasonable efforts” to create or retain 3,600 Full-Time Equivalent (FTE), permanent jobs at the facility. However, the phrase “commercially reasonable efforts” is a barely enforceable standard that requires the developer to do what other reasonable businesses would do to create jobs in the situation. The premise of TIF is to get companies to invest in a blighted area that a reasonable developer would not otherwise consider. Essentially, this standard is asking businesses to do what’s in their best interest, meaning that if their bottom line is hurt by the creation of the goal jobs they have no legal ob-

ligation to maintain them. Thus, the inclusion of the jobs covenant in the RDA is largely meaningless.

Language That Doesn't Hold Developers Accountable

Example: Marshfield Plaza. The developer, Primestor 119 LLC, was given \$26,600,000 for the rehabilitation of a 440,000 square foot shopping center that was supposed to result in 750 jobs.

The language of the RDA for Marshfield Plaza says “the developer anticipates that the project will result in” the creation and retention 750 permanent jobs through December 31, 2026. , However, the RDA does not have any jobs requirements and there is no indication that the city monitored job creation.

Example: Scottsdale. The developers were given \$8,100,000 for the demolition and construction of a 235,000 square foot retail and parking facility.

Scottsdale was “anticipated” to retain 80 FTEs and create 200 FTEs and 40 PTEs, but there were no jobs requirements. The city listed an estimate of 300 jobs that had been created or retained through the project, but it is unclear how this number was obtained and there is no evidence supporting its validity.

Example: Merlin, Strong Language and Expectations. The developer was given \$3,225,000 for redeveloping a 300,000 square foot space into a distribution center and offices, with the expectation that 180 jobs would be created.

Compare weak language examples to the language from the jobs covenant for what we found to be the best example of accountability. The Merlin project RDA reads “[t]he Developer shall obligate the Tenant to maintain, and the Tenant shall maintain the Minimum Job Creation at the Project through the Job Creation Period.” This language creates a clear expectation that the developer is responsible for job creation. The RDA goes on to say that “Developer shall deliver to DPD a Job Creation form with every requisition request;” creating a system for monitor-

ing job creation within the jobs covenant.

The analysis of jobs covenants provides insight on how these contractual clauses can be used to most benefit the public. Strong redevelopment agreements include jobs covenants with strict regulations, ensuring the developer will meet the city’s expectations before receiving TIF money. The worst redevelopment agreements use weak language that fails to hold the developer accountable for job creation. Taxpayers should not be helping to fund a project without the guarantee of getting what they paid for.

Monitoring

After examining the developer's requirements in a project, the next step is to determine whether a developer has held up its end of the bargain and reached its required jobs levels. As far as we can see from the records provided by the city, most developers have been meeting their jobs goals. Unfortunately, the projects without clear requirements have not been monitored, and for many others, complete information is unavailable. Furthermore, most projects have ongoing requirements, and developers must continue to maintain job levels years after completion of the project. For six projects, evidence of job levels provided by the city offers confirmation that the developer has so far completely met its requirements (although such evidence is often sporadic). For another six, the city provided incomplete evidence of the fulfillment of job requirements, and for nine projects either no evidence of completion or evidence of failure to meet the requirements was provided.

The city only provided evidence of annual monitoring for three of the 21 projects (Merlin, Miracle and Wrigley), and provided no evidence of any monitoring for six projects (CareerBuilder, Dearborn, Eport, Marshfield, Sears and UIC). Additionally, the city rarely provided documentation received from developers to confirm the validity of the jobs data. In only five projects (Merlin, Midway, NAVTEQ, Rush and United) did the city provide any documentation, and in none were all of the jobs data supported.

Although it is possible the city is receiving more jobs documentation from developers than it released in the FOIA requests, without any evidence of more extensive monitoring it has to be assumed that the city released everything received from the developers. Based on that evidence, it does not appear that the city is adequately monitoring jobs requirements. Not only is the city's monitoring of job levels sporadic, but the numbers the City receives are rarely substantiated.

Example: Bank of America. The developer was given \$27,037,669 to subsidize the construction of a 1.3 million square foot, 31-story technology building. The project was expected to create or maintain 4,900 jobs.

Bank of America was required to maintain 2,700 FTE jobs at the building for 10 years following the issuance of the Certificate of Completion. While no jobs data has been provided, it was reported that the city noticed non-compliance with the jobs requirement and requested the reimbursement of roughly \$5.4 million of TIF funds. The longevity and extent to which Bank of America (or original possessor of the agreement, ABN AMRO) was non-compliant has not been provided.

Example: Rush University Medical Center. Rush University Medical Center was given \$75,000,000 for the destruction and construction of several new buildings as part of a campus redevelopment plan. The project was expected to create 300 jobs.

Rush was required to increase employment from 7,600 FTE jobs to 7,900 FTE jobs and hire 80 new or replacement FTE positions for city residents for 15 years. Rush has provided detailed documentation of its hires to demonstrate compliance with the requirement of hiring 80 FTE positions, but data regarding the total employment is not available. The city, and taxpayers, should have access to information regarding the developer success or failure in meeting all of its obligations.

Example: Merlin, Developer and City living up to expectations. Merlin was required to create or retain 240 FTE permanent jobs and maintain at least 225 FTE permanent jobs for 15 years. It appears the City is monitoring job levels and the developer is providing annual documentation of its employment.

Enforcement

This lack of monitoring in many projects raises uncertainties regarding the developers' employment levels and hinders the city's ability to hold developers accountable for how they use TIF money. Only with proper monitoring of job levels can the city enforce the jobs requirements. Due to the insufficient data received from the city, it is difficult to know how many companies have failed to meet their jobs requirements, and enforcing the clawback provisions without that knowledge is impossible. CNA Financial and Bank of America have both been found non-compliant with their jobs covenants and have had to return TIF money, but whether other developers have failed to reach their targets and continue to receive TIF funds is uncertain.

Example: Wheatland Tube. The Developer was given \$1,869,300 to construct a 35,000 square foot addition to its building and maintain more than 200 jobs.

Wheatland was required to maintain 200 jobs at its facilities for years 1-3 following the issuance of the Certificate; 224 jobs for years 4-5; and 236 jobs for years 6-10. In Wheatland's requests for payment, the company claimed to employ 199 employees on January 31, 2010 and 155 employees on January 31, 2011. No estimates of employment at the company's other Chicago facilities (if any) was provided, nor is there any evidence the city is enforcing the penalties for non-compliance with the jobs requirements.

Example: CNA. Successful Enforcement of a Clawback Provision. The Developer was given \$13,680,000 to maintain its corporate headquarters in the city and create 2,700 jobs.

CNA Financial Corporation was authorized to receive TIF funds to maintain its corporate headquarters in the city. The city authorized TIF compensa-

tion for interior building improvements that would allow CNA to rent space within the building to a third party. The RDA claimed that CNA, which at the time was the sole occupant of the building, required only 861,000 square feet of the approximate 1,144,000 square feet of rentable office space for its operations.

CNA was required to create or relocate at least 200 FTE jobs from outside the city to its new headquarters, maintain or create at least 3,000 FTE permanent jobs at the headquarters until December 31, 2006, and maintain or create at least 2,700 FTE permanent jobs at the headquarters through the entirety of the Compliance Period. Although the city provided no job level data, it monitored CNA's compliance with its requirements and requested complete reimbursement of city funds once it was discovered CNA had failed to maintain 2,700 FTE permanent jobs.

As indicated by a letter sent from the city to CNA in October 2009 requesting employment documentation, periodic affidavits confirming the maintenance of 2,700 FTE positions, as well as the return of TIF funds to the city, it appears that in this case the city ensured the fulfillment of the jobs requirement in providing TIF money and requested reimbursement upon discovering the company's failure to do so. The city had the right, but not the obligation, to request the reimbursement of the entirety of the TIF funds contributed to the project once the developer defaulted on the jobs requirement. The announcement of the return of TIF funds coincided with similar reimbursement required by Bank of America and CME for failing to meet their own jobs covenants, headlining Mayor Rahm Emanuel's promise of TIF reform.

Transparency

Allowing the public to access all of the information received by the city regarding jobs covenants is central to the public's ability to determine the worth of a TIF project. Currently, information on whether a developer is creating or retaining jobs from projects partially funded by the TIF program is unattainable without a FOIA request. Even after receiving information from the City, determining whether a developer has fulfilled its requirements is often difficult or impossible due to inconsistent and incomplete monitoring by the City.

Public access to information on how tax dollars are spent is extremely important in maintaining an honest and responsible government. The public has a right to know how their money is spent and whether or not it's being used for its intended purpose

At a minimum, jurisdictions with TIF programs should create websites that provide key information about TIF that meets the standards of Transparency 2.0. Ideally, information on TIF revenue and spend-

ing should be included in a transparency website that includes all aspects of municipal spending.

With regard to TIF districts, governments should:

- Provide budget information about all TIF districts in a city, school district, or state and about each individual TIF district, accessible online.
- Provide information on each TIF district, including:
 1. The overall goals of the TIF district;
 2. The specific benefits (in terms of jobs or other measures) it is expected to produce;
 3. The most current information on what benefits have been produced to date;
 4. The identities of all recipients of TIF districts treated with the same transpar-

Transparency 2.0

In recent years, governments around the United States and around the world have embraced “Transparency 2.0”—a new standard of comprehensive, one-stop, one-click budget accessibility and accountability. Cities and states that have adopted Transparency 2.0 principles have developed transparency websites that enable citizens to find information. The primary characteristics are:

- **Comprehensive**—including all the various ways governments spend money,

including the provision of subsidies to private actors.

- **One-stop**—aggregating all information on government spending into a single website.
- **One-click**—providing searchable, downloadable information that can be accessed by citizens without requiring a pre-existing knowledge of budgetary nomenclature or bureaucratic structure.

ency requirements that apply to ordinary municipal spending.

- Ensure that funds raised through TIF districts are covered by at least the same transparency requirements that apply to ordinary municipal spending.
- Track all city spending in TIF districts, including not only direct outlays, but also subsidies provided in the form of selling land at below market value, allowing delayed repayment on loans, or issuing loans at favorable rates.

Despite Mayor Emmanuel's assurances of increased transparency in the TIF program and the availability of many documents online, overall there is still much progress to be made. Of the five major non-RDA documents (the Designation Ordinance, Economic Disclosure Statement, Certificate of Completion, Employee Certification, and CDC Staff Report), each project included no greater than three online, with an average of below two. Two projects posted no information other than the RDA. Of the projects we examined, the city posted Economic Disclosure Statements for 10 projects, and Certificates of Completion and CDC Staff Reports for 11 projects. None of the projects had Designation Ordinances or Employee Certifications available online.

Policy Recommendations

Chicago is moving in the right direction on management of its Tax-Increment Financing program, but it still has work to do to bring its program in line with best practices. In particular, the city needs to expand and improve its existing transparency measures, and go beyond the reform panel's recommendations to ensure that TIF is used only where it is appropriate. Chicago should:

- **Implement the TIF reform panel's recommendations.** The improvements recommended by the TIF reform panel would take Chicago a long way toward solving the problems with its TIF program. In particular, putting TIF spending back “on the books” by including it in budgets reviewed and passed by the City Council would reduce the problematic concentration of TIF-related spending authority in the mayor's office.
- **Include clear jobs requirements in the RDA with precise language ensuring that the developer must return TIF funds if it fails to hit its requirements.** The best scoring TIFs we found had clear expectations that gave the developer a goal to strive for and strong language ensuring that there would be consequences if the goal wasn't met. In order to ensure that these requirements are included, all TIF RDAs should include a standard set of language that sets these standards. Section 8.06 of the RDA should list specific jobs requirements that “shall obligate” the developer to maintain a specific number of jobs, and the RDA should have remedies that give the city the ability to demand repayment if the developer is in default by not hitting these requirements.
- **Make follow-through a priority.** Our research makes it clear that the city has failed to take all the steps necessary to protect the public interest when issuing TIF subsidies. City leaders should make implementation of TIF reforms, and scrupulous adherence to transparency and monitoring requirements, a top priority.
- **Collect and publish performance data scrupulously.** The TIF reform panel's proposal to require reviews of every TIF district's performance every five years would be a step in the right direction, ensuring that every district would receive scrutiny on a regular basis. Over the shorter term, the public should have access to the schedule for publishing information about each TIF district, so that failure to publish such information on time would be immediately obvious. For shorter-term accountability, information about TIF districts should be made available according to a schedule, which would allow members of the public to track whether information was being collected appropriately. Subsidy recipients should be subject to penalties if they fail to report information to the city on time.
- **Adopt “Transparency 2.0” best practices for TIF spending, and track information about the outcomes.** Citizens should be able to track TIF spending through a website that is comprehensive, one-stop, and once-click searchable. (See page 8.) Details about each TIF district and project should be easily accessible—from initial proposals, to redevelopment plans for each district, to the specific contracts the city signs with subsidy recipients or service providers, to detailed data about the TIF district's performance. The city should report each year on its compliance with these practices.

Appendix: The Scorecard

The scorecard is based the following criteria:

Jobs Covenant:

10 points if a clear jobs requirement was included in the RDA

0 points if a jobs goal was included but the Developer was not required to meet that goal

Strength of Clawback Language-

5 points if RDA included clear consequences and required that money be returned if noncompliant

0 points if no consequences are included

Requirements Fulfilled:

10 points if completely fulfilled (multiple reports show developer consistently above jobs target)

5 points if partially fulfilled (one report shows developer above jobs target)

0 points if not fulfilled or no information is available

City's Monitoring:

10 points if evidence of monitoring every year

5 points if evidence of monitoring is sporadic

0 points if no evidence of monitoring

Verifiable Documentation Provided-

10 points if documentation is provided to support each job figure

5 points if documentation is provided at all

0 points if no documentation is provided

City's Enforcement:

10 points if all TIF funds were returned upon Developer's failure to complete requirements

5 points if funds were partially returned upon Developer's failure to complete requirements

0 points if no funds were returned upon Developer's failure to complete requirements

Transparency:

Based on information available online.

1 point for each of the Designation Ordinance, Economic Disclosure Statement, Certificate of Completion, Employee Certification, and CDC Staff Report that is available online (up to 5 total points)

Grading is based on the following scale:

A: 40+

B+: 37-39

B: 33-36

B-: 30-32

C+: 27-29

C: 23-26

C-: 20-22

D+: 17-19

D: 13-16

D-: 10-12

F: 0-9

Project (District)	Jobs Req. Score	Strength of Clawback Language	Requirements Fulfilled	Periodic Monitoring	Documentation Provided	Failure to Fulfill Requirements	Information Available Online	Total	RDA Amount Authorized	Jobs Req'd.	Grade
Merlin (Northwest Industrial Corridor)	10	5	10	10	5	n/a	1	41	3,225,000	180	A-
NAVTEQ (LaSalle/Central)	10	5	10	5	5	n/a	3	38	5,000,000	900	B+
Wrigley (Goose Island)	10	5	10	10	0	n/a	2	37	15,000,000	288	B+
Miracle (35th/Halsted)	10	5	10	10	0	n/a	1	36	1,650,000	250	B
USG (Canal/Congress)	10	5	10	5	0	n/a	3	33	6,500,000	500	B
United (LaSalle/Central)	10	5	5	5	5	n/a	3	33	24,389,768	2,500	B
CNA (Central Loop)	10	5	0	5	0	10	2	32	13,680,000	2,700	B-
S&C (Pratt/Ridge)	10	5	10	5	0	n/a	2	32	39,735,000	1,550	B-
Midway Games (Addison Corridor North)	10	5	5	5	5	n/a	1	31	1,850,621	225	B-
Rush (Central/West)	10	5	5	5	5	n/a	0	30	75,000,000	8,475	B-
Quaker (Canal/Congress)	10	5	5	5	0	n/a	2	27	11,000,000	800	C+
Bank of America (River West)	10	5	0	5	0	5	2	27	27,037,669	4,900	C+
Chicago Manufacturing Capus (126th/Torrence)	10	0	5	5	0	n/a	2	22	17,183,334	1,000	C-
Wheatland (45th/Western)	10	5	0	5	0	0	1	21	1,869,300	200	C-
Eport (Chicago/Kingsbury)	10	5	0	0	0	0	2	17	33,243,085	750	D+
CareerBuilder (Central Loop)	10	0	0	0	0	0	2	12	2,900,000	1,400	D-
Scottsdale (79th/Cicero)	0	0	5	5	0	n/a	2	12	8,100,000	280	D-
UIC (Roosevelt/Union)	10	0	0	0	0	0	0	10	50,000,000	348	D-
Dearborn (Central Loop)	0	0	0	0	0	0	2	2	10,000,000	3,600	F
Sears (Central Loop)	0	0	0	0	0	0	2	2	10,500,000	800	F
Marshfield (119th/I-57)	0	0	0	0	0	0	1	1	23,200,000	750	F