

**DRAFT FOR PUBLIC COMMENT**

# **Chicago Blueprint for Fair Housing**

**Completed as part of the Cook County Regional Assessment of Fair Housing**

Find more information online at [www.Chicago.gov/fairhousing](http://www.Chicago.gov/fairhousing).

Public comments accepted through May 12, 2021 through the above website.

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## Chicago Blueprint for Fair Housing – Executive Summary

The Cook County Regional *Assessment of Fair Housing* is a first-of-its-kind planning effort, convening 13 jurisdictions and six public housing authorities to understand the underlying causes behind the region's residential segregation and related fair housing issues. The assessment will specifically focus on the communities most harmed by these issues. As part of the regional effort, the City of Chicago and the Chicago Housing Authority (CHA) partnered to craft goals and strategies to affirmatively further fair housing and make Chicago a more equitable, prosperous place, with the most impacted residents at the center of the conversation. Produced in collaboration with Enterprise Community Partners, Chicago Area Fair Housing Alliance and the Metropolitan Planning Council, this Blueprint for Fair Housing identifies actions the City and CHA will take over the next 5 years to advance fair housing.

### Context and Background

Today's fair housing challenges are rooted in Chicago's history of segregation and structural racism. When compared against the 100 largest metropolitan areas in the country, Chicago has the fifth highest combined racial and economic segregation.<sup>3</sup> Of the 1.8 million people of color living in Chicago, 74% live in economically disconnected areas -- parts of the City not well connected to regional economic progress, as defined by the Chicago Metropolitan Agency for Planning.<sup>1</sup> The majority of these areas are located on the City's South and West Sides, where rates of unemployment and poverty far exceed those in the City's North Side neighborhoods.

This segregation both drives and exacerbates income inequality, as the factors that influence a community's access to opportunity -- proximity to quality schools, viable employment, and affordable transportation -- vary greatly by neighborhood. Data and community conversations show us that disparities persist between South and West Side neighborhoods and their North Side counterparts in all areas, from education and employment to transit and environmental health. Whether it's an aging housing stock with limited access for people with physical disabilities, or an affordable community that lacks safe sidewalks or adequate lighting, symptoms of segregation and inequality around Chicago are evident.

Nationally, the typical Black family has just 1/10th the wealth of the typical white one. In 1863, black Americans owned one-half of 1 percent of the national wealth.<sup>12</sup> Today it's just over 1.5 percent for roughly the same percentage of the overall population.<sup>13</sup> Since emancipation, the causes that have maintained and perpetuated racial wealth disparities range from laws, policies, programs, and practices, implemented at the various levels of government, to systematic practices adopted by neighborhoods, individuals, and the private sector across urban, suburban and rural communities. For every gain marginalized communities have made, new mechanisms have been created to suppress the economic promise of emancipation.

### The Assessment of Fair Housing

The Assessment of Fair Housing (AFH) sets out to surface such instances of segregation and inequity, identify associated fair housing issues and contributing factors, and commit to specific plans to mitigate and eliminate them. The AFH provides a comprehensive framework for improving access to housing and opportunity for all Chicago residents and promoting equity and justice for historically marginalized groups. The process has its roots in the Fair Housing Act of 1968. The Fair Housing Act not only

prohibited discrimination in housing on the basis of protected characteristics but also created a duty to affirmatively further fair housing through actions designed to overcome the legacy of segregation, unequal treatment, and historic lack of access to opportunity in housing.

To accurately identify and tackle fair housing problems, the Assessment of Fair Housing engaged community partners through a six-step process:

1. **Assess** past goals, strategies, and actions
2. **Analyze** fair housing issues and identify significant contributing factors
3. **Prioritize** contributing factors and justify the prioritization
4. **Set** fair housing priorities and goals
5. **Link** fair housing priorities and goals to subsequent planning processes
6. **Take** meaningful actions

The project awarded grants to local organizations to seek feedback from directly impacted communities with an emphasis on the South and West sides. Grantees included:

- Chicago Housing Initiative
- Connections for the Homeless
- Housing Choice Partners
- Lawyers' Committee for Better Housing
- Legal Aid Chicago
- Metropolitan Tenants Organizations
- Northwest Compass
- Respond Now

Additionally, the project established an Advisory Committee, convened by the Chicago Area Fair Housing Alliance, which was comprised of grant recipients in addition to the following organizations:

- Access Living
- Housing Choice Partners
- Northwest Compass
- Oak Park Regional Housing Center
- Northside Community Resources
- Respond Now
- Open Communities
- Supportive Housing Providers Association
- Center for Neighborhood Technology
- Housing Opportunity and Maintenance for the Elderly
- Northwest Side Housing Center
- Metropolitan Tenants Organization
- South Suburban Housing Center
- Chicago Housing Initiative
- Working Family Solidarity
- Connections for the Homeless
- Black Chicago Tomorrow
- Lawyers' Committee for Better Housing
- Neighbors for Affordable Housing
- Legal Aid Chicago
- The Chicago Urban League

Feedback sessions focused on housing discrimination and segregation; expanding affordable housing options; creating equitable opportunities to live, work, and flourish in any community; and remedying policies and practices that lock segregation in place and create unjust disparities in quality of life.

### Chicago's Fair Housing Goals

Chicago's residential segregation and fair housing challenges are driven by the root causes of systemic racism and poverty. Community conversations and extensive data analysis confirm that barriers to

housing today perpetuate Chicago's residential segregation, creating a cycle of instability with long-lasting consequences that not only impact individuals, but the entire city.

Building on these findings of fair housing challenges, City and community partners collectively identified historic policies and decisions, as well as root causes, that can inform future action. Together, the City of Chicago, led by the Department of Housing, Commission on Human Relations, Office of the Mayor with additional agencies involved in implementation, and the CHA will focus their affirmative fair housing work on 8 goals with complementary strategies and actions. These goals are:

Goal 1: Increase and preserve affordable, accessible housing options

- *Example: Change zoning policies to encourage the construction of housing for all income levels and that is accessible for residents with disabilities*

Goal 2: Prevent involuntary displacement and stabilize neighborhoods

- *Example: Strengthen guidelines around evictions and renewal regulations*

Goal 3: Increase opportunities and community integration for people with disabilities

- *Example: Provide an accessible website and call center that can assist people with disabilities in locating units with accessible features*

Goal 4: Address the segregation of opportunity and related inequitable distribution of resources

- *Example: Develop a process to equitably distribute public resources based on need.*

Goal 5: Enhance housing authority policies and programs to increase fair housing choice

- *Example: Continue to support the Mobility Program*

Goal 6: Expand fair housing outreach, education, and enforcement

- *Example: Ensure materials are available to non-English speakers and people who are visually or hearing-impaired*

Goal 7: Preserve existing and expand affordable homeownership

- *Example: Support home repairs and rehabilitation for qualifying owners through grants, low-cost loans, or other cost assistance*

Goal 8: Ensure that internal policies and practices advance equity and address history of structural racism

- *Example: Develop standardized tools to assess racial and social equity impacts in capital planning and budget processes*

A complete list of Chicago's fair housing goals and strategies can be found in the larger report, beginning on page 47.

## Fair Housing Issues

Across the above goals, the City and CHA seek to address the fair housing issues identified by community partners and data analysis throughout the Assessment of Fair Housing process. The

challenges highlighted below each fall under one of the issue categories HUD established as part of the former Affirmatively Furthering Fair Housing rule.

Chicago's fair housing challenges are outlined in more detail below. For more in-depth data, please review the Existing Conditions Analysis in Appendix A.

#### **HUD Issue Category: Segregation and Integration**

##### ***Chicago has a self-reinforcing cycle of income inequality and segregation***

The inequitable housing market paired with deep income and wealth inequality work together to perpetuate segregation: Affluent households are more able to comfortably afford high-cost housing in certain communities, while lower-income households spend higher shares of their income for lower-cost options in different communities. The result is a self-reinforcing cycle in which income inequality creates segregation and segregation furthers income inequality and limits opportunities for wealth building. Economic outcomes in Chicago frequently reflect racial lines of demarcation. Of the approximately 1.8 million people of color living in Chicago, about 74% live in Economically Disconnected Areas.<sup>1</sup> Of the 227,000 people in Chicago that live in Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), the vast majority (78%) are Black. The second largest population is Hispanic, with 35,000 residents (15%).<sup>2</sup> Residents of color, particularly Black residents, often experience lower incomes and higher unemployment. Some communities become caught in a cycle of disinvestment, unable to promote economic development, invest in infrastructure, and otherwise serve their residents.

#### **HUD Issue Category: Segregation and Integration**

##### ***Segregation costs Chicago.***

Racial and economic inclusion supports regional economic strength. In Chicago, reducing levels of economic and racial segregation to the national median could lead to a nearly \$3,000 increase in African American income, an \$8 million rise in gross domestic product, a 30% drop in homicide rate, and an increase in individuals with bachelor's degrees by 83,000.<sup>3</sup>

#### **HUD Issue Category: Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)**

##### ***Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) are prevalent across Chicago's South and West side neighborhoods.***

R/ECAPs are clustered on the South and West sides of the City, with many of the areas sharing neighborhood boundary edges. 78% of people living in R/ECAPs are Black residents, compared to only 4.1% white Non-Hispanic residents. The second largest racial/ethnic group residing in R/ECAPs is the Hispanic population, at 15%.<sup>2</sup> Community engagement findings indicate that people living in poverty, especially racial minorities, are being pushed out of centrally located neighborhoods into areas on the far South and West sides of the City.

#### **HUD Issue Category: Disparities in Access to Opportunity – Educational Opportunities**

##### ***Black and Hispanic populations have less access to high performing neighborhood schools based on where they live.***

The average white non-Hispanic person and Asian person has access to more high-performing neighborhood elementary schools than any other racial or ethnic group (56.9 and 53.6%, respectively). School performance in this analysis is determined by students' state test scores in reading and math. In comparison, Black residents have the lowest access, followed by Hispanic residents (22.5 and 30.9%, respectively). Chicago's least proficient schools are in South and West side neighborhoods, where the majority of residents are Black and Hispanic, while high proficiency schools are clustered in neighborhoods north of Chicago's downtown and the Northwest side of the City, where the predominant racial/ethnic group is white, non-Hispanic.<sup>4</sup>

#### **HUD Issue Category: Disparities in Access to Opportunity – Employment Opportunities**

##### ***Disparities in access to employment exist across Chicago neighborhoods.***

The lowest labor force participation in the City is concentrated in South and West side neighborhoods. In comparison, the highest labor force participation rates are concentrated in downtown Chicago and neighborhoods north of downtown. Areas with high access to jobs are also found in and around downtown Chicago. Consistent with the neighborhoods where Black and Hispanic Chicagoans tend to reside, the average Black Chicago resident has the least access to jobs and the labor market, followed by the average Hispanic person.<sup>4</sup>

#### **HUD Issue Category: Disparities in Access to Opportunity – Transportation**

##### ***Commute times and travel costs are higher in South and West side neighborhoods.***

While Chicago as a whole is a highly walkable city (with a walkability score of 91.66), neighborhoods on the North side of the City are more walkable than the rest of the City. The far South corner of Chicago has particularly low walkability.<sup>5</sup> While the majority of the Black and Hispanic population in Chicago has moderately high access to transit, this population has longer average commutes by CTA rail and bus service or by Pace bus service than any other racial or ethnic group. Transportation costs are higher in the far South and Southwest corners of the City where there are fewer public transportation options.<sup>6</sup>

#### **HUD Issue Category: Disparities in Access to Opportunity – Low Poverty Exposure Opportunities**

##### ***The average Black person in Cook County is more likely to live in an area with high poverty rates, when compared to other racial/ethnic groups.***

Areas with the lowest poverty rates in Chicago are concentrated in neighborhoods north of downtown and in the northwest portion of the City. Consistent with this geographic trend, Chicagoans residing in South and West side neighborhoods of the City are surrounded by greater rates of poverty, compared to the rest of the City. The average white non-Hispanic person in Chicago has the least exposure to poverty (58%), while the average Black person in Chicago has the most exposure to poverty (20%).<sup>4</sup>

#### **HUD Issue Category: Disparities in Access to Opportunity – Environmentally Healthy Neighborhoods Opportunities**

##### ***Disparities in health outcomes exist by neighborhood.***

Patterns of health outcomes, including blood lead levels, asthma rates, and life expectancy, exist by race and neighborhood. The top five Chicago community areas with the largest number of children with elevated blood lead levels are all located on the Southwest and West sides of the City. When analyzing

rates of child asthma-related emergency department visits by race and ethnicity, Chicago's population of Black children has by far the highest rate of child asthma-related emergency room visits. The Hispanic population has the second highest rate.<sup>7</sup> Disparities in average life expectancy also exist by race, with white non-Hispanic Chicagoans living an average of 8.8 years longer than Black residents. Between certain communities, this gap widens to 17 years.<sup>8</sup> These trends reflect the conditions in which people live, influencing the ease by which residents can access healthcare, healthy food, and social services.

#### **HUD Issue Category: Disproportionate Housing Needs**

##### ***Housing issues are most prevalent in Black, Hispanic, and undocumented households.***

When evaluating housing problems such as overcrowding and substandard housing, Chicago's Hispanic households experience such issues at a higher rate (57%) than other racial/ethnic groups. Black households face housing issues at the second highest rate, at 54%. Areas of the City that experience at least one housing problem are concentrated in the West and Southwest sides of the City, which overlap with the location of R/ECAPs, and are heavily populated by Black and Hispanic populations.<sup>4</sup> Such populations also experience the most urgent housing problems, with a large portion of calls to the city's Metropolitan Tenants Organization hotline regarding home repairs originating in South side neighborhoods. Additionally, immigrant families and undocumented residents struggle to gain access to affordable housing assistance and often find themselves in incredibly unsafe and over-crowded housing situations as a result.

#### **HUD Issue Category: Disproportionate Housing Needs**

##### ***Black Chicagoans experience barriers to homeownership.***

Homeownership rates are highest among white non-Hispanic households (54.4%), and lowest among Black households (35.2%).<sup>4</sup> Such a trend can be attributed to the many barriers to home ownership that Black Chicagoans face. For example, Black individuals are most likely to have their home purchase loan denied and, when approved, the loan is more likely to be non-conventional.

#### **HUD Issue Category: Publicly Supported Housing Analysis**

##### ***Affordable housing residents are mostly Black.***

In Chicago, 75% of public housing residents are Black. This means that individuals and families living in any type of publicly supported housing are more likely to be Black than any other racial/ethnic group. The rate of Black households living in publicly supported housing exceeds the share of all households that are Black in Chicago.<sup>4</sup>

#### **HUD Issue Category: Publicly Supported Housing Analysis**

##### ***Residents returning from incarceration have limited housing options.***

The majority of unsheltered people in Chicago were previously incarcerated — 60% of unsheltered men and 58% of women report being previously incarcerated in jail or prison.<sup>9</sup> Community engagement findings have reported several barriers to finding housing for previously incarcerated residents. This leaves already vulnerable residents without a place to live, exacerbating an already difficult transition. Until 2015, returning residents were limited in accessing Chicago Housing Authority (CHA) properties. In



2015, CHA created a special pilot program that permitted up to 50 formerly incarcerated individuals to live in CHA properties.<sup>9</sup>

#### **HUD Issue Category: Publicly Supported Housing Analysis**

##### ***Housing Choice Voucher holders face barriers to moving to mobility areas.***

CHA's Mobility Program aims to provide opportunities for voucher holders to move into Mobility Areas, which are Chicago Community Areas that have lower levels of poverty and crime and access to positive economic indicators. However, community engagement efforts indicate that despite these efforts, many of Chicago's voucher recipients continue to reside in high-poverty, primarily Black census tracts that have little access to opportunity, including reliable transit, well-performing schools, job centers, and healthy physical and social environments.<sup>10</sup> CHA has commissioned a Fair Housing study that is entering its second year which seeks to identify barriers HCV participants face when searching for housing in mobility areas.

#### **HUD Issue Category: Disability and Access Analysis**

##### ***People with disabilities face tradeoffs between living where there is accessible infrastructure and affordable rent.***

Chicagoans with disabilities often need to choose between accessible infrastructure and affordable rent. Stakeholders have indicated that accessible infrastructure, such as maintained streets and sidewalks tends to be located in the least affordable neighborhoods of Chicago. As a result, people with disabilities are more prevalent on the South and West sides of Chicago, areas with the least proficient schools and the lowest rates of market engagement compared to other parts of the City.<sup>11</sup> Accessible housing for residents with physical disabilities continues to be scarce and expensive.

#### End Notes:

1 – ON TO 2050 Layer: EDAs and Disinvested Areas, Chicago Metropolitan Agency for Planning 2017

2 – 2013-2017 5-Year American Community Survey

3 – The Cost of Segregation [Report](#), Metropolitan Planning Council

4 – Affirmatively Furthering Fair Housing (AFFH) v4a

5 – ON TO 2050 Layer: Walkability, Chicago Metropolitan Agency for Planning 2018

6 – Transit Availability Index, Chicago Metropolitan Agency for Planning 2017

7 – Discharge Data, Division of Patient Safety and Quality, Illinois Department of Public Health (2017)

8 – Healthy Chicago 2025

9 – [Re-Entry Housing Issues in Illinois](#) Report, Metropolitan Planning Council

10 – HUD Custom Tabulations of Inventory Management System/PIH Information Center data

11 – HUD, Census 2010

12 – Federal Reserve Bank. ["Recent Trends in Wealth-Holding by Race and Ethnicity: Evidence from the Survey of Consumer Finances."](#) September 2017.

13 – Schermerhorn, Calvin. ["Why the racial wealth gap persists, more than 150 years after emancipation."](#) Washington Post, 19 June 2019.

## Cook County Regional Executive Summary

### Cook County Regional Assessment of Fair Housing

Patterns of segregation did not occur organically, nor are they the result of a compilation of individual choices. Segregation is rooted in historical public policy decisions directly intended to keep populations separated by race.<sup>1</sup> It has become baked into the American experience and has resulted in vast inequities in life outcomes based on race and ethnicity. The Fair Housing Act was enacted in 1968 to alter the trajectory of inequities fueled by discriminatory acts and the structural perpetuation of racism operating within the housing market and upheld by public policy decisions. The Fair Housing Act was intended both to address actions, policies, and programs that have discriminatory effects and to encourage the proactive dismantling of segregation and mitigation of disparities in housing need.

Because modes of discrimination change over time and disparities in housing need are highly localized, it is important to assess impacts based on the full range of protected classes at the Federal, State, County, and local level. The Cook County Regional Assessment of Fair Housing (AFH) is a rigorous planning approach, bringing together 13 participating jurisdictions (local governments) and five public housing authorities to understand the underlying causes of the region's residential segregation, identify the populations and geographic areas most harmed by the impacts of segregation and limited housing choice, and lay out a blueprint of strategies to make Cook County a more equitable, prosperous, and inclusive place.<sup>2</sup> This report builds on the Fair Housing Act of 1968 by reflecting the desire to end discrimination and segregation to the point where the supply of housing is truly accessible and residents have more housing choice.

The Cook County Regional AFH champions the right for all people to live where they choose, have equal access to housing (which includes finding, purchasing, renting, and selling housing) and enjoy the full use of their homes without unlawful discrimination, interference, coercion, threats, or intimidation by owners, landlords, real estate agents, banks or any other persons.<sup>3</sup> Along with barring discrimination and ensuring that basic housing needs are met, the tenets of furthering fair housing can also include decisions and policies that impact entire communities. Participants of the Cook County assessment process recognize that the choices cities and counties make about zoning, land-use, and infrastructure projects can all further—or create barriers to—fair housing and have demonstrated their commitment to collaborating on concrete plans for change.

### Background and Historical Context

Cook County is markedly segregated; oftentimes one need only name a neighborhood or municipality, and an intuitive breakdown by race and ethnicity is triggered in one's mind. When mapped out, Cook County has clear "color lines" prevalent across the region.<sup>4</sup> This is significant because these "color lines"

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<sup>1</sup> Richard Rothstein. *The Color of Law: A Forgotten History of How Our Government Segregated America*. 2017.

<sup>2</sup> Adapted from Cook County Fair Housing Guidebook.

<sup>3</sup> Adapted from Chicago Area Fair Housing Alliance (CAFHA) Public Participation Guide.

<sup>4</sup> As of the 2013-2017 American Community Survey, the White, non-Hispanic population is predominantly concentrated and is the predominant racial/ethnic group in neighborhoods on the north side of Chicago and in most of suburban Cook County with the exception of South Suburban Cook County and portions of West Suburban Cook County. The Black/African American, non-Hispanic population is primarily concentrated in neighborhoods on the south side of Chicago and in South Suburban Cook County and to a lesser extent in neighborhoods on the West side of Chicago and Western Cook County near Maywood. The Hispanic population predominates in the majority of neighborhoods on the west and southwest sides of Chicago, but also in some north side neighborhoods, in neighborhoods around O'Hare airport, and in smaller clusters throughout northern and

overlap with where place-based opportunities like employment, transportation options, and healthy and safe housing exist; meaning the segregation of resources follows the segregation of people. Therefore, Black and Latinx households do not enjoy the same level of neighborhood amenities and access to opportunity as White households, and also face heightened threats of unsafe housing and unhealthy housing conditions and communitywide disinvestment.

Because Cook County's historic segregation denied families of color wealth building opportunities and denied entire communities of investments needed to thrive, impoverished households in Cook County are disproportionately Black, Latinx, and areas with concentrated poverty are disproportionately made up of people of color. Data demonstrates that the overlap between race and poverty is only becoming more severe. The number of Racially Concentrated Areas of Poverty (R/ECAPs) in Cook County have steadily increased from a total of 75 in 1990 to 105 in 2017, indicating increased concentration of poverty following historic patterns of segregation born out of the era of redlining. Because historic patterns of segregation have been perpetuated over time by public policy, and exacerbated by economic distress, such as the 2008 Recession, R/ECAP neighborhoods in Cook County are not experiencing the relief and investment needed to thrive. Compounded with race-based disparities, are disparities by disability and family status, with households with children and people with disabilities more likely to face poverty and financial hardship. Community engagement strategies throughout the assessment process worked to understand the underlying issues and factors perpetuating Cook County's residential segregation and the consequent barriers to equitable opportunities. Below is a list of the key themes gleaned through this engagement along with supporting data.

## Findings

### **1) Cook County municipalities exhibit vastly different capacity, resources, and political will to advance fair housing, challenging comprehensive, countywide fair and affordable housing efforts.**

Within Cook County there are varying degrees of compliance with fair housing and civil rights requirements. Additionally, the use of Home Rule status to thwart fair and affordable housing efforts is a pervasive issue. This creates a patchwork of compliance and harms comprehensive efforts to affirmatively further fair housing, meet the affordable housing needs of residents, and create greater connectivity to job centers.

A noted mismatch has developed between where jobs are created and where housing is affordable for the people who work those jobs. Additionally, much of the growth in job centers has occurred in suburban areas with limited transit accessibility. Census tracts with more than 50 percent of owner-occupied units affordable to a household at 80 percent Area Median Income (AMI) are concentrated in south and west Cook County.” These areas are generally a significant distance from major regional job centers, especially in the case of south Cook County... Moreover, very few census tracts outside of Chicago have a significant number of rental units priced affordable to very low-income households earning below 50 percent AMI.”<sup>5</sup>

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southern Cook County. There are a small number of predominantly Asian/Pacific Islander neighborhoods in the county. These are primarily located in Central Chicago in and around Chinatown and to a lesser extent in northern Cook County communities.

<sup>5</sup> Fair Housing and Equity Assessment: Metropolitan Chicago, 2013.

Because of the great need for affordable housing, especially near job opportunities, in 2003 Illinois enacted the Affordable Housing Planning and Appeal Act (AHPAA) to encourage local governments to incorporate affordable housing in their communities. According to the Illinois Housing Development Authority's 2018 community designation under the AHPAA, at least 16 municipalities within Cook County have under 10 percent affordable housing. And many municipalities utilize Home Rule status to "opt-out" of the AHPAA entirely. Land-use designations, building codes, and local ordinances may further limit the availability of affordable housing and concentrate multifamily housing in certain neighborhoods.<sup>6</sup>

Regarding fair housing education and enforcement, at the most basic level, many municipalities lack procedures, policies, or staffing for directing complaints of discrimination,<sup>7</sup> and sufficient internal education and external community outreach and education to train residents, housing industry professionals, and other stakeholders on fair housing rights.<sup>8</sup> At the county level, greater resources are needed to enforce the protections that exist and provide the oversight of municipal compliance with fair and affordable housing requirements.

## **2) Barriers to fair and affordable housing perpetuate Cook County's patterns of historical residential segregation**

It is well documented that Cook County faces a shortfall of affordable housing units. AFH data suggests that in 2017, 29 percent of renter households earned less than 30 percent AMI, a share that has been relatively stable in Cook County since 2007 but has increased since 2015. And the Institute for Housing Studies at Depaul University has documented a consistent mismatch between the number of households in Cook County that need affordable rental housing and the number of units that are affordable. Wages and incomes have not kept pace with increasing market rent rates. At the same time, noted NIMBY opposition to affordable developments restricts the supply of needed affordable housing. AFH engagement activities highlighted this extreme shortfall with community feedback from every subregion of Cook County. Community members noted the lack of affordable housing as a primary and urgent concern, indicating that this is not merely a Chicago problem, or a south suburban problem, but a regional problem, and one that requires a comprehensive response.

The lack of affordable housing is not solely an economic issue but a fair housing issue. Because racism is baked into our history and determines who has access to what opportunities, people in need of affordable housing today are disproportionately Black and Latinx in Cook County. Findings from AFH research indicate that income levels for Black households has decreased by nearly 10% since 2010, significantly more than for white (1.5%) and Hispanic (4%) households. Although the mechanisms that perpetuate it have evolved, residential segregation remains a palpable force within Cook County communities and the lack of affordable housing options only serves to lock segregation in place. The current health crisis has only laid bare these inequities and is perhaps the most urgent call for swift and significant change the county has faced in recent history. As of August 2020, 43 percent of COVID-19 deaths were among Blacks, followed by 32.7 percent Latinx.<sup>9</sup> In an April 2020 article by ProPublica a

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<sup>6</sup> Schaumburg Analysis Impediments to Fair Housing Choice 2015; A City Fragmented, CAFHA 2018

<sup>7</sup> Cook County Tiered Compliance Model Report CAFHA 2018.

<sup>8</sup> Cook County Tiered Compliance Model report CAFHA 2018; Hoffman Estates Analysis of Impediments to Fair Housing Choice, 2012

<sup>9</sup> Chicago Department of Public Health: Chicago COVID-19 Update, August 6, 2020

former CDC official shared in an interview, “COVID is just unmasking the deep disinvestment in our communities, the historical injustices and the impact of residential segregation.”

Common barriers to housing include the lack of affordable and accessible housing options, especially affordable options for larger households, people with disabilities, and those in need of deeply affordable units. Additionally, prevalent and pervasive private market discrimination, particularly by race, source of income, familial status, sexual orientation, and disability impede fair housing choice, and in turn, access to neighborhood level opportunity. According to the 2013 Fair Housing and Equity Assessment: Metropolitan Chicago, although outright discrimination has waned since the days of bank and real estate practitioner redlining and blockbusting, segregation today is reinforced by real estate practices that serve to limit housing choice such as “soft steering,” lending and appraisal disparities, and continued and pervasive rental market discrimination. Rental housing application hurdles such as credit score requirements, background checks (eviction and arrest/conviction records), and income requirements, and high security deposits and fees place further constraints on where Cook County residents may live and disproportionately curtail housing opportunity for people of color and people with disabilities. These barriers, taken together, ensure the perpetuation of Cook County’s historic patterns of residential segregation.

### **3) Segregation creates a cycle of instability with long-lasting penalties**

This segregation and the limitations it places on the trajectory of life outcomes and opportunities creates long-lasting consequences for county residents. Overall, the average Black person in Cook County has the least access to proficient schools, the labor market, and areas with low poverty exposure, compared to other racial/ethnic groups. Comparatively, the average White/Non-Hispanic person in Cook County has the greatest access to these opportunities. And while some neighborhoods within the region are awash with investment and opportunity, others struggle with limited job access, medical and mental health providers, grocery stores, green space, transit access and other basic amenities and support systems. Areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors include the south and west neighborhoods of Chicago, as well as south suburban Cook County, the location of most of the R/ECAPs in Cook County. Decades of public policy decisions have resulted in communities cut off from the investments needed to thrive and shut out from the opportunities available in resource-rich communities. Cook County residents struggling to access transportation, job and educational opportunities, face housing instability and even homelessness. Evident in eviction data, Black women, and in particular Black women with children, bear the brunt of this instability.

Most urgently, Cook County residents express a concern over the connection between severe housing problems<sup>10</sup> and vulnerable populations, the increased likelihood of residing within unsafe and unhealthy housing, and the decreased likelihood or power to report such issues. Areas of the County with households that experience at least one housing problem are concentrated in the southwest and west sides of Chicago and the southern and western portions of the County, which overlap with the location of R/ECAPs, and are heavily populated by Black and Hispanic populations. Community engagement findings indicate that a large portion of calls to the MTO hotline, regarding home repairs, originate in the

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<sup>10</sup> HUD tracks four housing problems in Comprehensive Housing Affordability Strategy (CHAS) data: “1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened. A household is said to have a housing problem if they have any 1 or more of these 4 problems.” [https://www.huduser.gov/portal/datasets/cp/CHAS/bg\\_chas.html](https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html)

south neighborhoods of Chicago. This suggests that residents of this area experience higher rates of substandard housing. The lack of adherence to basic housing standards leads to disparities in health and safety issues,, especially for families with children.. Without access to healthy homes, healthy environments, and healthcare services, residents recognize growing disparities in life expectancy, magnified even more so by the current COVID-19 pandemic.

#### **4) Populations most harmed by segregation have historically not been a part of the planning process and faced continued disproportionate housing barriers**

Exacerbating these fair housing issues, is the reality that those populations most harmed by segregation have historically not been a part of the planning process that impacts their lives and communities.

The City of Chicago noted in its 2016 AI a theme that is shared by advocacy groups across the County—that local jurisdictions develop assessment and planning efforts that address housing in a way that is not fully inclusive of all stakeholders’ perspectives, especially those most impacted.<sup>11</sup> Additionally, people of color remain underrepresented on the City’s housing-related boards and commissions.<sup>12</sup>

#### **4) Those most impacted populations have not been part of the planning or decision-making process**

- *I’m a disabled vet with PTSD and brain injury and people would say, ‘you’re not fit for this building.’<sup>13</sup>*
- *They treat us differently than a heterosexual couple.<sup>14</sup>*
- *As a Latino, I don’t feel welcome in white neighborhoods—it feels like I’m being watched.*
- *“It’s pointless for us to keep paying application fees, we know we will be denied. It’s depressing, stressful, constant denial.”<sup>15</sup>*
- *“people are not choosing their neighborhoods; they are going where they can find: 1) something they can afford; 2) a landlord that will accept their application.”*
- *We have more liquor stores than grocery stores*
- *I feel like this is a dead zone. No stores no jobs, and they are needed very badly.”<sup>16</sup>*
- *It takes one paycheck away from being homeless and it’s scary.*
- *I want to own my own home before I die. I am tired of moving. My health is not what it used to be; I am getting older.*

### **The People and the Process**

The regional AFH is a collaborative effort involving several local partners committed to a meaningful engagement and analysis process to tell the stories of Cook County residents.<sup>17</sup> Seventeen jurisdictions

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<sup>11</sup> City of Chicago Analysis of Impediments to Fair Housing Choice, 2016.

<sup>12</sup> Oak Park Analysis of Impediments to Fair Housing; Evanston Analysis of Impediments to Fair Housing Choice 2014.

<sup>13</sup> Legal Aid Chicago one-on-one interview with former client

<sup>14</sup> Northwest Compass, Northwest Suburban Cook County

<sup>15</sup> Northwest Compass Community Engagement Session

<sup>16</sup> Legal Aid Chicago one-on-one interview with former client

<sup>17</sup> The regional AFH is supported by the following partners, Enterprise Community Partners, the lead planning entity convening jurisdictions, public housing authorities, and local partners, including Chicago Area Fair Housing Alliance (CAFHA) on community engagement, the Chicago Metropolitan Agency for Planning (CMAP) on data collection and analysis, and the Metropolitan Planning Council (MPC) on strategy development.

and public housing authorities (PHAs) across Cook County collaborated on the regional AFH to collectively respond to community needs and meet HUD’s obligation to affirmatively further fair housing. These jurisdictions and PHAs, which comprised the Steering Committee, include:

- Cook County
- Chicago
- Arlington Heights
- Berwyn
- Des Plaines
- Evanston
- Mount Prospect
- Oak Lawn
- Oak Park
- Palatine
- Schaumburg
- Skokie
- Housing Authority of Cook County
- Chicago Housing Authority
- Cicero Housing Authority
- Oak Park Housing Authority
- Park Forest Housing Authority

Through the engagement process, the AFH planning team sought to partner with frontline service providers and community organizers to conduct outreach to impacted populations. The report threads data on segregation, housing needs, and access to opportunity with resident narratives and self-defined needs, reflecting the community’s history and infusing an awareness that can transform the AFH from a planning document to a tangible and sustainable action plan.

#### Demographic Overview

Total Population	5,274,129
Median Age of Residents	37
Median Household Income	\$59,718.00
Percent of Housing Insecure Households*	19%

\*Low-income and paying more than 50% of income.

#### Three Most Prominent Racial/Ethnic Group(s)

African American	24%
Latino	26%
White	42%

#### Housing Tenure and Vacancy Overview

Renter-Occupied	40%
Owner-Occupied	50%
Doubled-up Households*	11%
Percent of All Households that are Low-Income	44%

\* Households with one or more nonrelatives (ACS table ID B11015)<sup>1</sup>.

#### Homelessness by Continuum of Care

Number of Homeless	780
Percent Unsheltered	12%
Percent Chronically Homeless	14%
Percent Homeless Veterans	7%

Source: HUD Point-in-Time Homeless Persons Count (PIT), 2017.

Counts based on the Continuum of Care service area best matched to the selected.

### Data Collection and Resident Engagement

A substantial portion of the data used in this analysis comes from nationally available data published by HUD in the form of their AFFH-T data or from the US Census Bureau. Relevant local data was also collected to supplement key information not covered by nationally available sources. The approach intended to ensure comparisons and consistency over time and to aggregate data by jurisdiction.

To ensure the planning process was targeted and effective, it was necessary that those most impacted by community planning and policy change have meaningful opportunities to influence, shape, and share in decision-making. The engagement approach adopted for the Cook County AFH incorporates a range of activities that allows for active participation based on community interest. Partnership grants (also known as Community Convener Grants) have been provided to community groups to support targeted engagement efforts and grantees were selected through a Request for Proposals process based on their engagement with or representation of the following stakeholder groups:

- Housing Choice Voucher holders and/or public housing residents
- People with disabilities
- Populations facing housing instability or homelessness
- Individuals living in disinvested areas and racially and ethnically concentrated areas of poverty (R/ECAPs)
- Populations with limited English proficiency
- People with arrest and conviction backgrounds

Eight frontline service providers and community organizers served as Community Convener Grantees to conduct engagement and foster collaboration with key stakeholders most vulnerable to housing insecurity and most impacted by housing policies and practices. Community Conveners worked with the Chicago Area Fair Housing Alliance to facilitate 59 engagement events across Cook County including open community forums and more focused roundtable sessions. In addition, community input was collected through surveys, reaching 446 county residents, and more in-depth one-on-one interviews with 21 individuals who have faced housing instability and/or housing discrimination.

An Advisory Committee<sup>18</sup> was also established to provide advice, technical information, and recommendations to the AFH project team. Members included Community Conveners and other experts such as: data analysts, staff of fair housing and civil rights organizations, affordable housing providers, and social service providers. The Advisory Committee reviewed data and analyses from the project team, and qualitative and quantitative local knowledge and data from the Community Convener grant process.

### Actions to Address Disparities

Despite the emergence of fair housing protections, residential segregation remains a palpable force within communities today, reinforced by economic pressures and thinly veiled racism disproportionately

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<sup>18</sup> Community Engagement Attachments A-F



affecting Black and Latinx residents of Cook County. Declines in housing affordability and accessibility as well as proximity to healthy environments, quality schools, and transportation options have compounded the challenges faced by residents. In response, jurisdictions and PHAs participating in this AFH study have elevated the realities of resident experiences and developed a series of goals that eliminate barriers to fair housing choice for all community members.

### **Goals and Strategies**

- Goal 1: Increase and preserve affordable, accessible housing options
- Goal 2: Prevent involuntary displacement and stabilize neighborhoods.
- Goal 3: Increase opportunities and community integration for people with disabilities.
- Goal 4: Address the segregation of opportunity/inequitable resource distribution.
- Goal 5: Enhance housing authority policies and programs to increase fair housing choice.
- Goal 6: Expand fair housing outreach, education, and enforcement.
- Goal 7: Preserve existing and expand affordable homeownership.
- Goal 8: Ensure that internal policies and practices advance equity and address history of structural racism.

All institutions, including and especially units of government, need to dismantle institutional barriers that create and perpetuate disparities and inequities by race, income, sex, sexual orientation, disability status, and other protected classes. A proactive commitment to anti-racism and anti-oppression is critical to undoing historic inequities and cultivating a sense of belonging that improves local quality of life. As the assessment process identifies barriers to fair housing choice, the goals and strategies developed by this study are intended to further efforts that address community disparities and implement new actions to affirmatively further fair housing in the region and sub-regions.

Today, regardless of intention, segregation continues to be upheld by public policy—and because segregation was planned, only through deliberate planning can it be remedied. Local jurisdictions, public housing authorities, and local community groups collaborating to create a meaningful AFH, are taking steps toward a more open and inclusive housing market and more equitable investment in all communities in Cook County,

## Chapter 1: Historical Background

### 1.1 Fair housing in the United States

Title	Year	Summary
Title VI of the Civil Rights Act	1964	prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.
Architectural Barriers Act	1968	requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by people with disabilities.
Title IX of the Education Amendments Act	1972	prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.
Sec. 504 of the Rehabilitation Act	1973	prohibits discrimination based on disability in any program or activity receiving federal financial assistance. HUD has an obligation to ensure individuals do not face discrimination on the basis of disability in any program or activity receiving HUD funds.
Sec. 109 Title I of the Housing & Community Development Act	1974	prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant Program.
Age Discrimination Act	1975	prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.
Community Reinvestment Act	1977	requires that banks and other deposit-taking financial institutions offer equal access to lending, investment, and other services within the geographic area surrounding each branch. The CRA was passed to address redlining, the practice of denying communities of color and low-income neighborhoods access to loans, investments, and other financial services.
Title II of the Americans with Disabilities Act	1990	prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities, including government services, public accommodations, transportation, and housing. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

\*Source: Fair Housing Resource Guide Cook County Department of Planning and Development  
HOPE Fair Housing Center: <http://hopefair.org/pages/104/laws/>

### 1.2 Fair housing in Cook County

Local governments must address inequalities in housing and access to opportunity as a requirement for receiving federal housing dollars. In order to comply with federal policies, Cook County and all other entitlement jurisdictions part of this regional planning effort, are reviewing practices and policies to ensure they do not disproportionately impact people with protected characteristics (also known as protected classes) in a negative way. The AFH report builds on the Fair Housing Act requirement that HUD administer programs and activities in a manner that affirmatively furthers the policies of the Act – reflecting the desire to have HUD use its grant programs to end discrimination and segregation to the point where the supply of housing is truly accessible, and residents have more housing choice.

Within Cook County, the Illinois Human Rights Act, and the Cook County Human Rights Ordinance have provided additional fair housing protections as a means to address historic segregation.

Protected Class	Federal Fair Housing Act	Illinois Human Rights Act	Cook County Human Rights Ordinance
Race	X	X	X
Color	X	X	X
Religion	X	X	X
National Origin	X	X	X
Sex (including sexual harassment)	X	X	X
Familial Status (children)	X	X	X
Disability	X	X	X
Ancestry		X	X
Age		X	X
Marital Status		X	X
Military/Veteran Status		X	X
Sexual Orientation		X	X
Unfavorable Military Discharge		X	X
Order of Protection Status (domestic violence)		X	
Source of Income*			X
Gender Identity			X
Housing Status			X
Covered Criminal History**			X

\*Source of Income protections under the Cook County Human Rights Ordinance include Housing Choice Vouchers.

\*\*Cook County passed the Just Housing Amendment on April 25, 2019, to go into effect in November 2019. Also, Illinois passed more limited protections for individuals with arrest records and juvenile records in 2019.

In reviewing participating jurisdictions prior Analysis of Impediments to Fair Housing Choice (AI); public housing authorities' plans; and, research and reporting from local planning entities and advocacy groups, the following common themes emerged:

**Theme 1: Cook County municipalities exhibit vastly different capacity, resources, and political will to advance fair housing, challenging comprehensive, countywide fair housing efforts.**<sup>19</sup> Within Cook County there are varying degrees of compliance with fair housing and civil rights requirements and the use of Home Rule status to thwart fair and affordable housing efforts.<sup>20</sup> This creates a patchwork of compliance and harms comprehensive efforts to affirmatively further fair housing. For instance, through the Cook County AI process, municipal representatives were convened for roundtable sessions, and it was found: "Indicative of this general ambivalence is the conclusion drawn from the AI's roundtable sessions with municipal leaders: Fair housing efforts seem to be seen by many municipal administrators as a requirement for federal funds with little real impact or relevance to their communities."<sup>21</sup>

<sup>19</sup> Cook County Analysis of Impediments to Fair Housing Choice, 2012; City of Chicago Analysis of Impediments to Fair Housing Choice, 2016; Schaumburg Analysis Impediments to Fair Housing Choice 2015.

<sup>20</sup> Cook County Analysis of Impediments to Fair Housing Choice, 2012; Cook County Tiered Compliance Model Report, CAFHA 2018

<sup>21</sup> Cook County Analysis of Impediments to Fair Housing Choice 2012.

**Affordable Housing** - The 2013 *Fair Housing and Equity Assessment: Metropolitan Chicago* noted the growing job-housing-transit mismatch evident in the Chicago 7 County Region: “The most recent housing and employment crisis, which hit the Chicago region particularly hard, has served to more deeply entrench the geographical divergence between housing opportunity and access to the job market. Since the economic downturn, areas with once thriving industrial sectors have witnessed overwhelming job loss, impacting the livelihoods of large segments of the population... the three largest job centers in the region are the Chicago Loop, Schaumburg-Elk Grove Village, and Oak Brook-Downers Grove centers. Together, these areas account for 30 percent of the Chicago region’s primary jobs.”<sup>22</sup>

A noted mismatch has developed between where jobs are created and where housing is affordable for the people who work those jobs. Additionally, much of the growth in job centers has occurred in suburban areas with limited transit accessibility. In Cook County, the southern part of Chicago and the surrounding suburbs lack jobs while the north and northwest have experienced job growth. “Contributing to the cycle of poverty, affordable housing is readily available in the areas deficient in job opportunities, and virtually non-existent near thriving job centers. Census tracts with more than 50 percent of owner-occupied units affordable to a household at 80 percent Area Median Income (AMI) are concentrated in south and west Cook County... These areas are generally a significant distance from major regional job centers, especially in the case of south Cook County... Moreover, very few census tracts outside of Chicago have a significant number of rental units priced affordable to very low-income households earning below 50 percent AMI.”<sup>23</sup>

Because of the great need for affordable housing, especially near job opportunities, in 2003 Illinois enacted the Affordable Housing Planning and Appeal Act (AHPAA) to encourage local governments to incorporate affordable housing in their communities. The AHPAA responds to a shortage of affordable housing in the State and the acknowledgement that action is necessary to ensure that such housing exists. The AHPAA encourages local governments within Illinois that do not have sufficient affordable housing to provide affordable housing in order to “assure the health, safety, and welfare of all citizens of the State.” The law names the Illinois Housing Development Authority (IHDA) the State-administering agency, and provides tools and updates to aid non-exempt communities (those subject to AHPAA) in compliance. Non-exempt status means that these communities have a population of at least 1,000 and less than 10% of their housing stock is considered affordable. Communities in Illinois that are found to be non-exempt from the law are required to adopt an Affordable Housing Plan. According to the Illinois Housing Development Authority’s 2018 community designation under the Affordable Housing Planning and Appeals Act, at least 16 municipalities within Cook County have under 10% affordable housing. And as noted earlier, many municipalities utilize Home-Rule authority to “opt-out” of the AHPAA entirely.

This mismatch has resounding negative consequences on Cook County residents’ ability to access place-based opportunities such as education, retail, and parks and open space. The 2013 *Fair Housing and Equity Assessment: Metropolitan Chicago* contained an assessment of opportunity by census tract and found, “The correlation between opportunity and race is startling and is evidence of extreme inequality in the region. All but six census tracts with majority African American population are low-opportunity tracts and only three of those tracts are high-opportunity. Similarly, for Hispanics, there is also an inverse relationship between population shares and opportunity. All but ten census tracts with a majority Hispanic population are low-opportunity tracts. Meanwhile, communities with white population shares over 75

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<sup>22</sup> Fair Housing and Equity Assessment: Metropolitan Chicago, 2013.

<sup>23</sup> Fair Housing and Equity Assessment: Metropolitan Chicago, 2013.

percent are closely correlated with high-opportunity tracts. Geographically, the pattern is also stark and marks a severe divide in opportunity.”<sup>24</sup>

It is important to note that the communities that faced discriminatory disinvestment historically; for example, through redlining practices, are the same communities that today continue to struggle with providing place-based opportunities to local residents. The overlap between disinvestment and race in this context cannot be ignored and creates unjust disparities in housing access and housing need by race and national origin.

**Land-use, zoning laws, and local ordinances** - Many jurisdictions prevent the development affordable and multifamily housing.<sup>25</sup> Land use designations and building codes may limit the availability of affordable housing choices and concentrate multifamily housing in certain neighborhoods.<sup>26</sup> Additionally, local elected officials, when faced with NIMBY pressure from constituents, fail to uphold their duty to affirmatively further fair housing.<sup>27</sup> Because land-use policies and zoning codes differ across Cook County’s 128 municipalities, drastically varying levels of exclusion and inclusion exist. With some communities incentivizing affordable and accessible housing and housing stock diversity, others erect barriers through exclusionary policies and land-use decisions. For example, many north and northwest suburban Cook County areas with ample job access limit multifamily, rental, and subsidized units through their zoning codes, “The widespread failure to permit construction of subsidized multifamily housing in suburban Cook County can be found in eight years of data from the Illinois Housing Development Authority, which shows that between 2001-08, only a handful of affordable workforce housing developments were constructed in suburban job corridors along I-90.”<sup>28</sup>

Additionally, certain local ordinances may serve to exclude Cook County residents from municipalities. For example, The Sargent Shriver National Center on Poverty Law notes that crime-free and nuisance-free property ordinances penalize landlords and tenants for suspected criminal activity and/or calls for police service associated with rental properties. As of the release of their report, *The Cost of Being Crime Free* in 2013, more than 100 municipalities in the state of Illinois alone had adopted some type of crime- or nuisance-free ordinance.<sup>29</sup> According to the Shriver Center, “Adoption of these ordinances can be inconsistent with a municipality’s obligation to affirmatively further fair housing, because of the disparate harmful impact that ordinance enforcement can have on protected groups and the minimal contribution such an ordinance may make to the security of the community beyond other available tools that would generate less problems for protected groups.”<sup>30</sup> These types of ordinances have noted disparate impacts based on race, national origin, gender, and disability. Such ordinances may violate fair housing laws because they would disproportionately impact members of the protected classes.”<sup>31</sup>

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<sup>24</sup> Fair Housing and Equity Assessment: Metropolitan Chicago 2013

<sup>25</sup> Cook County Analysis of Impediments to Fair Housing Choice, 2012; Cook County Tiered Compliance Model Report, CAFHA 2018

<sup>26</sup> Schaumburg Analysis Impediments to Fair Housing Choice 2015; A City Fragmented, CAFHA 2018

<sup>27</sup> Cook County Analysis of Impediments to Fair Housing Choice, 2012; City of Chicago Analysis of Impediments to Fair Housing Choice, 2016; Cook County Tiered Compliance Model Report, CAFHA 2018; A City Fragmented, CAFHA, 2018

<sup>28</sup> Fair Housing and Equity Assessment: Metropolitan Chicago, 2013.

<sup>29</sup> Sargent Shriver National Center on Poverty Law. *The Cost of Being “Crime Free”: Legal and Practical Consequences of Crime Free Rental Housing and Nuisance Property Ordinances*. 2013.

<sup>30</sup> Sargent Shriver National Center on Poverty Law. *The Cost of Being “Crime Free”: Legal and Practical Consequences of Crime Free Rental Housing and Nuisance Property Ordinances*. 2013.

<sup>31</sup> Evanston Analysis of Impediments to Fair Housing Choice 2014.

Also, occupancy limits in the form of overcrowding ordinances restrict the number of residents that may live in a dwelling, generally imposing a two-persons-per-bedroom limit. However, these restrictions can implicitly produce discriminatory effects, specifically on the basis of national origin or ethnicity. Several participating jurisdictions note in previous analysis of impediments that occupancy codes limit the number of unrelated persons who may live together as a single family and that these may have fair housing implications.<sup>32</sup>

**Fair Housing Enforcement** - Many suburban municipalities have enacted their own fair housing ordinances that do not include all protected classes offered in the Cook County Human Rights Ordinances and that additionally lack enforcement capacity. Among municipalities surveyed by CAFHA in 2015-2017, there exists a noted lack of capacity to properly identify, refer, or handle complaints of discrimination.<sup>33</sup> As Cook County's 2012 AI notes, "[w]hile most of the municipalities have complied with this requirement [by DPD to adopt an ordinance], in many instances the resulting ordinances have been superficial acts without procedures or policies in place to ensure enforcement. As a municipal employee stated: 'the only people who have read their fair housing ordinance are the lawyer who crafted it and perhaps the council members on the night it was passed.'"<sup>34</sup>

At the most basic level, many municipalities lack procedures, policies, or staffing for directing complaints of discrimination.<sup>35</sup> A municipal respondent to CAFHA's fair housing survey noted that their discrimination complaint forms were available on the Village website, however, a department was not designated to review complaints. Although a majority of respondents note that they have a fair housing ordinance, far fewer actually have the ability to enforce the policy or educate residents about their rights and the process for filing a complaint. Most communities throughout Cook County therefore lack any meaningful local resources or support when instances of discrimination arise.<sup>36</sup>

Historically, Cook County used federal housing and CDBG funds in a manner that perpetuated segregation; failed to address and combat entrenched residential segregation, and lacked needed oversight and monitoring of municipal sub-recipients.<sup>37</sup> Since 2013, Cook County has been working to address these deficits by: developing an intentional, more strategic and countywide approach to affirmatively furthering fair housing; assessing the fair housing landscape, including identifying needs, trends, and a unified vision for fair housing in the County; and implementing a framework to assist County sub-recipients of federal housing dollars in continuing or expanding existing activities related to affirmatively furthering fair housing.<sup>38</sup>

Moreover, Cook County and several municipalities within Cook County have noted that available funding and resources to address fair housing issues are limited. This results in insufficient funding to affirmatively further fair housing, as limited HUD funding is needed address pressing social service concerns.<sup>39</sup> Additionally, the Cook County Commission on Human Rights and Chicago Commission on Human Relations

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<sup>32</sup> Evanston Analysis of Impediments to Fair Housing Choice 2014.

<sup>33</sup> Tiered Compliance Model Report CAFHA 2018.

<sup>34</sup> Cook County Analysis of Impediments to Fair Housing Choice 2012; Cook County Tiered Compliance Model Report CAFHA 2018.

<sup>35</sup> Cook County Tiered Compliance Model Report CAFHA 2018.

<sup>36</sup> Tiered Compliance Model Report CAFHA 2018.

<sup>37</sup> Cook County Tiered Compliance Model Report CAFHA 2018

<sup>38</sup> Cook County Tiered Compliance Model Report CAFHA 2018; Cook County AI 2012; Cook County Con Plan 2015-2019

<sup>39</sup> Hoffman Estates Analysis of Impediments to Fair Housing Choice 2012

are not adequately staffed and resourced to address discrimination complaints in Cook County and City of Chicago<sup>40</sup>

**Fair Housing Education** - Municipalities lack sufficient internal education and external community outreach and education to train residents, housing industry professionals, and other stakeholders on fair housing rights.<sup>41</sup> A common barrier to fair housing in Cook County is the lack of internal municipal staff education on fair housing and limited and/or inconsistent communication and coordination between and among city departments within municipalities.<sup>42</sup> Past fair housing assessments have demonstrated that city staff often feel ill-equipped to understand fair housing laws and rights/responsibilities due to a lack of internal fair housing training and a lack of staff designated to address fair housing issues.<sup>43 44</sup>

Those who have been most affected by discrimination, especially vulnerable populations lack an understanding of fair housing laws, rights, and where to turn for help.<sup>45</sup> Local jurisdictions have noted that certain populations are particularly difficult to reach with education efforts, including populations with limited English proficiency<sup>46</sup>and seniors<sup>47</sup>

## **Theme 2: Real estate industry and lending patterns demonstrate continued discrimination**

Real estate professionals are the front line of housing access yet have inefficient training on fair housing<sup>48</sup> and at times actively work against fair housing efforts in Cook County. According to the *2013 Fair Housing and Equity Assessment: Metropolitan Chicago*, “Outright discrimination in housing has waned since the days of bank and real estate practitioner redlining and blockbusting. However, segregation today is reinforced by real estate practices that serve to limit housing choice, such as the emergence of less obvious implicitly biased ‘soft steering.’ In Cook County’s recent AI, interviews with real estate agents uncovered a serious gap in the knowledge of fair housing laws and the history of segregation in the county. Real estate agents, whether they acknowledge it or not, play a pivotal role in either promoting or inhibiting the affirmative furthering of fair housing, and should therefore strive to cultivate an understanding of fair housing... Studies indicate that from 1980 to 2000, the steering of African Americans has actually increased.”<sup>49</sup>

Additionally, several municipalities noted through their AI process, that people of color have greater difficulty accessing loans and becoming homeowners.<sup>50</sup> The housing crisis and recession have disproportionately impacted people of color.<sup>51</sup> For instance, the South Suburban Housing Center has

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<sup>40</sup> Cook County Analysis of Impediments to Fair Housing Choice, 2012; City of Chicago Analysis of Impediments to Fair Housing Choice 2016.

<sup>41</sup> Cook County Tiered Compliance Model report CAFHA 2018; Hoffman Estates Analysis of Impediments to Fair Housing Choice, 2012

<sup>42</sup> City of Chicago Analysis of Impediments to Fair Housing Choice, 2016; Hoffman Estates Analysis of Impediments 2012

<sup>43</sup> Town of Cicero 2018 Action Plan

<sup>44</sup> Schaumburg Analysis Impediments to Fair Housing Choice 2015.

<sup>45</sup> City of Chicago Analysis of Impediments to Fair Housing Choice, 2016; Mount Prospect Analysis of Impediments to Fair Housing Choice 2012. Hoffman Estates Analysis of Impediments to Fair Housing Choice 2012.

<sup>46</sup> Town of Cicero 2018 Action Plan. Hoffman Estates Analysis of Impediments to Fair Housing Choice 2012.

<sup>47</sup> Schaumburg Analysis Impediments to Fair Housing Choice 2015.

<sup>48</sup> Cook County Analysis of Impediments to Fair Housing Choice, 2012; City of Chicago Analysis of Impediments to Fair Housing Choice 2016.

<sup>49</sup> Fair Housing and Equity Assessment: Metropolitan Chicago. 2013

<sup>50</sup> Cook County Analysis of Impediments to Fair Housing Choice, 2012; City of Chicago Analysis of Impediments to Fair Housing Choice 2016; Schaumburg Analysis Impediments to Fair Housing Choice 2015.

<sup>51</sup> City of Chicago Analysis of Impediments to Fair Housing Choice, 2016. Berwyn CAPER 2013.

documented the increase in fair housing complaints due to predatory lending, and they note that by the late 1990s, complaints received by South Suburban Housing Center's fair housing compliance program and studies conducted by the Chicago-based National Training and Information Center established a sharp increase in predatory lending practice: "The clear correlation between areas of substantial minority homeownership, the clustering of high cost subprime lending, and high rates of default/foreclosures in the South Suburbs is extremely dramatic."<sup>52</sup>

This has resulted in an increasing hardship particularly in the south suburbs and for families facing housing instability, doubled up and/or homeless.<sup>53</sup> In the Chicago metropolitan area, communities of color and distressed communities' foreclosure and vacancy rates are higher, home sales are less frequent, and property sales are lower than in surrounding communities.<sup>54</sup> <sup>55</sup> Nationally, lower-income Americans and households of color are less likely to be homeowners. Households with the highest 20 percent of incomes are 2.2 times more likely to own their homes than the lowest earning 20 percent of households. There is also a deep disparity in the rates of homeownership for white households and households of color. While more than 7 in 10 white households own homes, less than 45 percent of households of color do.<sup>56</sup> Additionally, as noted in the City of Chicago's 2016 AI, inequitable appraisals based on the racial makeup of communities further impacts the wealth building capacity of Black and Latinx communities.<sup>57</sup>

As noted through AFH community engagement and also in reviewing fair housing complaint trends, discrimination in the rental market is the most severe in Cook County and yet very difficult to assess. Over the years, the forms of housing discrimination have moved from more overt to more insidious and difficult to detect. The National Fair Housing Alliance reports on national discrimination complaint trends annually, but notes that the vast majority of housing discrimination acts are unreported.<sup>58</sup> According to their reporting, over the past several years the most common discrimination complaint was based on disability, with race and family status following.<sup>59</sup> In the Chicago region, race complaints are the most prevalent, with disability complaints the second most prevalent. Historically and today, anti-Black racism drives much of the locally-based discrimination.<sup>60</sup>

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<sup>52</sup> Fair Housing and Equity Assessment: Metropolitan Chicago 2013; Further note from this report: The fair housing implications of mortgage lending practices have not been overlooked by Illinois Attorney General, Lisa Madigan. In 2009, the Attorney General filed a lawsuit against Wells Fargo for "illegally targeting African American and Hispanic borrowers for sales of the lender's poorest quality and most expensive mortgages." She also filed a lawsuit against Countrywide (purchased by Bank of America). A \$20 million settlement was reached in December of 2011 over allegations that Countrywide discriminated against thousands of "borrowers of color" through subprime lending practices

<sup>53</sup> Town of Cicero 2018 Action Plan

<sup>54</sup> DePaul Institute for Housing Studies: 2015 Chicago Area Housing Market Conditions Report (7/12/16). Source: <https://www.housingstudies.org/research-publications/research-report/chicago-area-housing-market-conditions-report/> (last accessed 11/4/2016)

<sup>55</sup> <http://www.chicagotribune.com/business/ct-suburban-housing-slump-0327-biz-20160324-story.html>

<sup>56</sup> <http://cfed.org/assets/pdfs/Fact File-Homeownership Still Out of Reach.pdf>

<sup>57</sup> City of Chicago Analysis of Impediments to Fair Housing Choice, 2016.

<sup>58</sup> National Fair Housing Alliance, 2018 Fair Housing Trends Report.

<sup>59</sup> NFHA annual trends reports 2016-2019

<sup>60</sup> A City Fragmented. CAFHA 2018.



**CAFHA 2015 Discrimination Trends Chicago Region<sup>61</sup>**

PROTECTED CLASS	TRANSACTION						TOTAL
	Rental	Sales	Lending	Insurance	Harassment	Other:_____	
Race	172	35	387	5	18	5	622
Disability	248	4	3	0	11	21	287
Source of income	95	1	1	0	7	1	105
National Origin	19	1	17	0	10	5	52
Familial Status	25	5	0	0	4	2	36
Sex	10	0	0	0	6	1	17
Sexual Orientation	6	0	0	0	4	0	10
Other: Order of Protection Status	7	0	0	0	0	0	7
Age	4	0	0	0	0	1	5
Religion	3	0	0	0	2	0	5
Color	1	1	0	0	0	0	2
Marital Status	2	0	0	0	0	0	2
Gender Identity/ Expression	1	0	0	0	0	0	1
Military/ Servicemember Status	0	0	0	0	0	0	0
<b>TOTAL</b>	<b>593</b>	<b>47</b>	<b>408</b>	<b>5</b>	<b>62</b>	<b>36</b>	<b>1151</b>

**CAFHA 2016 Discrimination Trends Chicago Region**

PROTECTED CLASS	TRANSACTION						TOTAL
	Rental	Sales	Lending	Insurance	Harassment	Other:_____	
<b>Race</b>	242	39	136	7	20	18	478
<b>Disability</b>	334	1	3	0	18	28	384
<b>Familial Status</b>	58	4	0	0	4	5	71
<b>Sex</b>	26	0	0	1	10		37
<b>National Origin</b>	47	6	10	0	11	5	79
<b>Color</b>	3	0	0	0	0		3
<b>Religion</b>	8	1	0	0	3	1	13
<b>Sexual Orientation</b>	13	0	0	0	6		19
<b>Gender Identity/ Expression</b>	2	0	0	0	0		2
<b>Marital Status</b>	9	0	0	0	1		10
<b>Source of income</b>	141	1	0	0	3	5	150
<b>Military/ Servicemember Status</b>	1	0	0	0	0		1
<b>Other: ____Age____</b>				1		3	4
<b>Other: __Criminal Background__</b>	2						2
<b>Other: _____</b>							
<b>TOTAL</b>	<b>886</b>	<b>52</b>	<b>149</b>	<b>9</b>	<b>76</b>	<b>65</b>	<b>1253</b>

<sup>61</sup> CAFHA 2015 Discrimination Trends Chicago Region

### **Theme 3: Housing market conditions have been affected by historic, entrenched residential segregation resulting in housing instability and inequitable community investment<sup>62</sup>**

The region is highly segregated. Barriers to accessing housing in certain neighborhoods across the county based on income and race restrictions continue to exist, and the housing market mirrors and perpetuates long-standing institutional racism.<sup>63</sup>

There is clear evidence that segregation negatively affects lower-income populations and communities of color but metropolitan areas as a whole suffer as well. Regions with higher levels of inclusion generate more long-term economic growth, while areas with higher levels of segregation have slower economic growth and shorter periods of economic growth. Segregation imposes significant costs on all—including taxpayers living in more affluent parts of metro areas, who must pay for public services to address the effects of segregation.<sup>64</sup>

### **Theme 4: Populations most harmed by segregation have historically not been a part of the planning process and faced continued disproportionate housing barriers**

The City of Chicago noted in its 2016 AI a theme that is shared by advocacy groups across the County—that local jurisdictions develop assessment and planning efforts that address housing in a way that is not fully inclusive of all stakeholders’ perspectives, especially those most impacted.<sup>65</sup> Additionally, people of color remain underrepresented on the City’s housing-related boards and commissions.<sup>66</sup>

The Cook County Regional AFH serves to champion the right for all people to live where they choose, have equal access to housing (which includes finding, purchasing, renting, and selling housing) and enjoy the full use of their homes without unlawful discrimination, interference, coercion, threats, or intimidation by owners, landlords, real estate agents, banks or any other persons.<sup>67</sup> Along with barring discrimination and ensuring that basic housing needs are met, the tenets of furthering fair housing can also include decisions and policies that impact entire communities. Participants of the Cook County assessment process recognize that the choices cities and counties make about zoning, land-use, and infrastructure projects can all further—or create barriers to—fair housing and have demonstrated their commitment to collaborating on concrete plans for change.

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<sup>62</sup> Cook County Analysis of Impediments to Fair Housing Choice, 2012; Cook County Tiered Compliance Model Report, CAFHA 2018; A City Fragmented, CAFHA, 2018

<sup>63</sup> City of Chicago Analysis of Impediments to Fair Housing Choice, 2016; Fair Housing and Equity Assessment Metro Chicago. 2013.

<sup>64</sup> MPC Cost of Segregation 2017.

<sup>65</sup> City of Chicago Analysis of Impediments to Fair Housing Choice, 2016.

<sup>66</sup> Oak Park Analysis of Impediments to Fair Housing; Evanston Analysis of Impediments to Fair Housing Choice 2014.

## Chapter 2: Creating the Plan

Fair housing issues, such as segregation, can often only be understood when viewed through a regional lens. The policies of one jurisdiction can exacerbate or mitigate fair housing issues not only within its own borders, but also throughout a region. Additionally, limited resources and competing priorities make regional collaboration all the more important to make headway on fair housing. In recognition of this interconnection and interdependence, nineteen jurisdictions and public housing authorities (PHAs) across Cook County collaborated on the regional AFH to collectively respond to community needs and meet HUD's obligation to affirmatively further fair housing. These jurisdictions and PHAs include:

- Cook County
- Chicago
- Arlington Heights
- Berwyn
- Des Plaines
- Evanston
- Mount Prospect
- Oak Lawn
- Oak Park
- Palatine
- Schaumburg
- Skokie
- Housing Authority of Cook County
- Chicago Housing Authority
- Cicero Housing Authority
- Oak Park Housing Authority
- Park Forest Housing Authority

The regional AFH aims to guide actions for the 2020-2024 planning cycle to create equitable access to opportunity at the individual level and equitable investment at the community level. The regional AFH included three key phases and deliverables:

Phase 1: Assess and identify local and regional fair housing issues

Phase 2: Identify and prioritize significant contributing factors

Phase 3: Set fair housing priorities and goals; Link fair housing priorities and goals to subsequent planning

The regional AFH focused on assessing four key fair housing issues:

1. Integration and segregation
2. Racial or ethnically concentrated areas of poverty
3. Disparities in access to opportunity
4. Disproportionate housing needs

### 1.1 Stakeholder Engagement

To ensure the planning process is targeted and effective, it is necessary that those who will be most impacted by community planning and policy change are valued and can influence, shape, and share in the decision-making. Through meaningful partnership opportunities, local governments and housing authorities collaborated on the regional AFH to ensure that they are adequately responding to community needs.

As part of the regional AFH process, stakeholders were provided opportunities for meaningful engagement to inform decision makers. The community engagement in the AFH process was iterative and used as a platform for the broader community to voice their concerns, opinions, and recommendations on implementation of proposed policies and programs. Best practices call for jurisdictions conducting an AFH to support participation by groups least likely to participate in the community planning processes. Limited participation by community members stem from barriers to access, as historically, their voices have not been heard and valued in the planning process. These groups include low to moderate-income persons, particularly those living R/ECAP areas or areas with higher rates of blight and lack of safe and affordable housing and, non-English speaking persons, as well as persons with disabilities.

To ensure maximum participation by community members and build in decision-making opportunities, the community engagement strategy incorporated a two-pronged approach. The engagement approach incorporated a range of activities that allowed for meaningful participation from a variety of stakeholders.

To inform the community engagement plan, an environmental scan was completed early on in the process to review existing policies, programs, and practices to understand the landscape of fair housing across the region and current efforts underway to increase access and supply of affordable housing. The stakeholder analysis helped identify key stakeholders for community engagement efforts, along with an understanding of their interests, influence and past experience with community engagement and fair housing. This analysis also provided an assessment of relationships, power, and disparities between and among stakeholders. Key stakeholder groups and activities are described below.

#### 1.1.1 Project Team

The Project Team will meet regularly to discuss progress on the project, upcoming steps, and share completed work products between the parties.

The day-to-day operation and oversight of the regional AFH was led by Cook County, the “lead entity” and managed by a project team composed of Enterprise Community Partners, Chicago Metropolitan Agency for Planning (CMAP), Chicago Area Fair Housing Alliance (CAFHA), Metropolitan Planning Council (MPC) the participating civic organizations, one Cook County representative, one City of Chicago representative, one Chicago Housing Authority representative, one Housing Authority of Cook County representative, one municipal PHA, and one municipal entitlement. The Project Team met regularly to discuss progress on the project, upcoming steps, and share completed work products between the parties.

#### 1.1.2 Steering Committee

The Steering Committee consisted of one representative from each of the participating jurisdictions and PHAs. The Steering Committee provided feedback to the Project Team throughout the planning process, including reviewing all draft deliverables in advance of public release and/or legislative review/approval.

#### 1.1.3 Advisory Committee

An Advisory Committee was established to provide advice, technical information, and recommendations to the AFH Project Team. The Advisory Committee met bi-monthly for the duration of the regional AFH planning process and reviewed data and analyses from the Project Team and provided qualitative and quantitative local knowledge. The Advisory Committee provided an expert lens and assisted in analyzing information, identifying common themes and contributing factors, and providing targeted recommendations to address the issues identified. Additionally, the Advisory Committee provided

support during the goals and strategies vetting process by addressing questions from jurisdictions and PHAs and providing data, research, and anecdotal information to support the goals and strategies outlined. AFH Advisory Committee Members included:

- Access Living
- Housing Choice Partners
- Northwest Compass
- Oak Park Regional Housing Center
- Northside Community Resources
- Respond Now
- Open Communities
- Supportive Housing Providers Association
- Center for Neighborhood Technology
- Housing Opportunity and Maintenance for the Elderly
- Northwest Side Housing Center
- Metropolitan Tenants Organization
- South Suburban Housing Center
- Chicago Housing Initiative
- Working Family Solidarity
- Connections for the Homeless
- Black Chicago Tomorrow
- Lawyers' Committee for Better Housing
- Neighbors for Affordable Housing
- Legal Aid Chicago
- The Chicago Urban League

Draft documents and deliverables were shared with the Advisory Committee for input and recommendations. For more information on the members of the Advisory Committee see Attachment B: Advisory Committee Member List.

#### 1.1.4 Community Conveners

Participating jurisdictions and public housing authorities pooled funding to support sustained engagement throughout the regional AFH project timeline. As part of the community engagement strategy, "Community Convener" grants totaling \$56,000 were awarded to frontline service providers and community organizers to conduct engagement and foster collaboration with key stakeholders most vulnerable to housing insecurity and most impacted by housing policies and practices. Six of the eight Convener grantee organizations were selected to collect feedback from stakeholder groups through in-person group engagement sessions, and in some instances, combined with self-reported questionnaires and/or surveys. Two Community Convener grantees, both legal service providers, were selected to collect feedback from their former clients in addition to networks of attorney and housing advocate partners through interviews and roundtable sessions.

- The grants provided resources necessary to:
  - Inform key stakeholders about the AFH plan, purpose, process, and use of the plan.
  - Share initial data and analytical findings with the key stakeholders and gain informed feedback.
  - Provide a space for consultation with key stakeholders on the existing conditions analysis, the assessment of contributing factors, the strategy development under goals and strategies, along with AFH Plan draft reports.
  - Provide a space for consistent sharing of information throughout key phases of the planning process to ensure that key stakeholders understand how their feedback has been used.
- To ensure balanced geographic representation, at least one grant was awarded in each of the following "sub-regions" of Cook County:

- City of Chicago - North, West, South
- Suburban Cook County - North, West, South
- To ensure balanced focus-area representation, grants have been awarded to groups that engage with or represent the following stakeholder groups:
  - Housing Choice Voucher holders and/or public housing residents.
  - People with disabilities.
  - Populations facing housing instability or homelessness.
  - Individuals living in disinvested areas and racially and ethnically concentrated areas of poverty (R/ECAPs).
  - Populations with limited English proficiency.
  - People with arrest and conviction backgrounds.

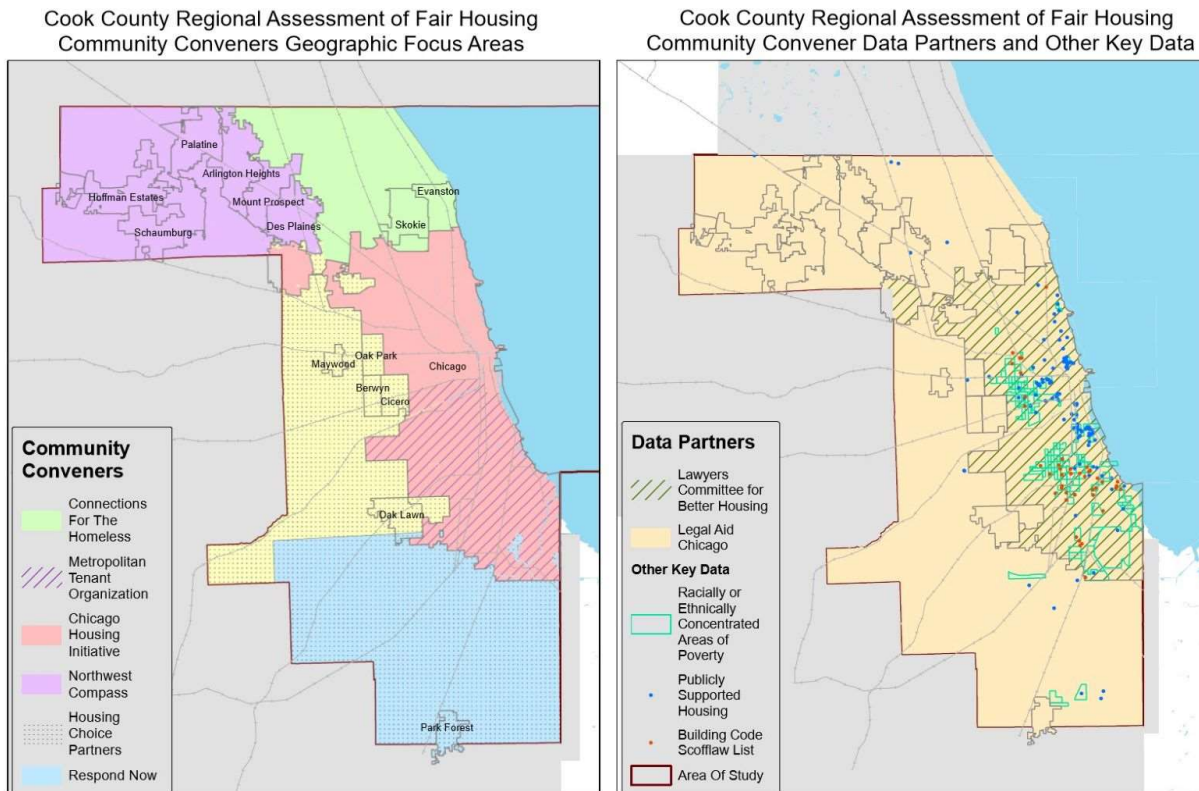
In June 2019, the Community Convener RFP was released, and nine awardees were selected based on their established relationships with the above listed stakeholder groups around community-led dialogue on the AFH over the project timeline. Applicants proposed a plan to convene key stakeholders, with a focus on vulnerable populations, throughout the AFH process from reviewing and informing the data analyses, identification and prioritization of contributing factors to the development of goals and strategies. Depending on funding restrictions, this included items such as providing travel and/or childcare for stakeholder participants, and/or food and refreshments for community meetings. Meetings were held in convenient locations in order to reduce any undue travel burdens. Grant awardees were required to demonstrate an ability to:

- Assign one key staff person to carry out the goals of the grant, serve on the Advisory Committee, and communicate with AFH project staff.
- Convene a key stakeholder group (out of the 6 listed above) over the course of 10 to 12-months.
- Organize and carry out monthly stakeholder meetings to review AFH data and analyses to identify fair housing issues, make suggestions for additional data points, make recommendations for prioritizing contributing factors and recommendations on the goals and strategies, and review AFH drafts.
- Identify key community wants/needs that can be vocalized in the AFH process and gather local data and local knowledge for inclusion in the AFH.
- Provide notes or reports from stakeholder meetings to guide AFH process.
- Assist in planning and carrying out public hearings with other awardees, CAFHA, and project staff.

Below is a list of Community Convener awardee organizations:

- Chicago Housing Initiative
- Connections for the Homeless
- Housing Choice Partners
- Lawyers' Committee for Better Housing
- Legal Aid Chicago
- Metropolitan Tenants Organization
- Northwest Compass
- Respond Now

Assigned staff of awardee organizations received training and materials to lead AFH discussions, and fair housing technical assistance and support from AFH project partner, CAFHA. During monthly meetings with stakeholders, AFH issues were discussed, including housing discrimination, preventing displacement, and overcoming barriers to stable housing. The ongoing dialogue was intended to lead to action, where participants could come together to share ideas that would be incorporated into the AFH strategy framework.



To learn more about the Community Conveners see Attachment A: Community Convener Awardee Profiles and Engagement Reports in the Appendix.

### 1.1.5 Housing Industry Focus Group

Housing industry experts were invited to participate in a focus group to engage and inform the Cook County Regional Assessment of Fair Housing. Participation included two convenings over the project period for direct input on the draft goals and strategies.

- Meeting 1 (early December 2019): At the conclusion of the first phase of AFH process, focus group participants were asked to provide feedback on the quantitative findings of the Existing Conditions Analysis and the qualitative findings of the Community Engagement process.
- Meeting 2 (late April 2020): Participants reviewed and provided feedback on the draft recommendations memo to be distributed to Participating Jurisdictions and PHAs.

## 1.2 Public Participation

Best practices call for jurisdictions conducting an AFH to support participation by groups least likely to In addition to focused engagement with key stakeholder groups described above, additional engagement activities and tools included:

- Interviews, roundtables, or meetings meant to gain information or educate key stakeholder groups.
- Community meetings and listening sessions to inform the public on the planning progress and to hear directly from community members.
- Project website that captures regular updates throughout the process. Updates shared on the project website will also be shared across jurisdictions and housing authority websites.

Informational Interviews/Roundtable Sessions: Individual and group interviews with key informants, such as City staff, Advisory Committee members, service providers and hard to reach groups. These interviews provide an opportunity to gather in-depth information on issues identified through the existing conditions and other AFH analyses.

Public Comment Period: In collaboration with jurisdiction and housing authority staff, a draft AFH was published and publicized for a 30-day (PJ) and 45-day (PHA) comment period. The project team coordinated with jurisdictions and housing authority staff to publish legal notice per local requirements before public hearing, which would include a brief summary of the proposed AFH with beginning and ending dates of public comment period, procedures for submitting oral or written comments and questions.

Public Hearing: Jurisdictions and housing authority staff are to conduct at least one public meeting during the comment period at an agreed upon time to maximize public participation.

Finalizing the AFH: Upon completion of the comment period, final revisions will be made to the AFH based on comments received. The team will also present a short, visually appealing presentation on the final AFH at Council meetings, Council Committee and Commission meetings.

## 1.3 Data Collection and Analysis

A key condition to data collection and analysis for the regional AFH is that it be consistent across the jurisdictions involved. This is important both to ensure findings and representations are comparable across jurisdictions and for practical reasons— given the scale of the analysis, it would not be reasonable to define a different analysis process for each jurisdiction individually.

A second condition is that, to the greatest extent possible, the Project Team made “apples-to-apples” comparisons when considering trends over time. Because change over time is a critical component of fair housing assessment, this condition is necessary for accurate interpretation and findings across many sections of the analysis. Although methods exist for accounting for changes in census geographies (census tracts, block groups, etc.), jurisdictional boundary changes caused by annexation and other activities are more difficult to identify and account for, particularly when dealing with several jurisdictions over multiple decades as in this analysis. Thus, it is critical that when making comparisons over time, the analysis reveals actual demographic shifts rather than merely changes in a jurisdiction’s boundary.



A substantial portion of the data used in this analysis comes from nationally available data published by HUD in the form of their AFFH-T data or from the US Census Bureau. Although both the Census and HUD produce jurisdiction-level estimates in their data, these were not sufficient. In the case of HUD's data, although data is available at the census tract and block group level nationwide, HUD publishes jurisdiction-level estimates only for entitlement communities. Because some of the jurisdictions participating in this assessment are not entitlement communities, HUD's jurisdiction-level estimates did not provide an adequate starting point for the analysis. In addition, one of the subregions covered (suburban Cook County) is not technically a jurisdiction at all and so would not be covered in most jurisdiction-level datasets at all.

In the case of the Census's jurisdiction-level data, although data is published for non-entitlements, Census data is reported for jurisdictions as defined in the year the data was collected. So this makes comparisons over time at the jurisdiction-level impossible without a way to ensure consistent geographic definitions.

The approach used to ensure both "apples-to-apples" comparisons over time and consistency across time is to start from census tract and block group level data and aggregate up to the jurisdiction level using a CMAP-created geographic crosswalk. These crosswalks are the same method used by CMAP to create the Community Data Snapshots. This method accounts for partial tract/block groups contained within a jurisdiction and is consistent with HUD's methods for creating jurisdiction-level estimates in the AFFH-T data.

The crosswalk created by CMAP relies on apportioning census block data across each jurisdiction such that local difference in population distributions are accounted for.<sup>68</sup> Using this method, CMAP created three weights based on the distribution of 1) people, 2) households and 3) housing units. These then served as weights for tract and block-group level variables in the AFFH-T dataset to create the jurisdiction-level estimates.

Variables were weighted according to their base unit of measurement. For example, variables capturing the race/ethnicity of the population use the population weights, while the variables relevant for calculating homeownership rate were weighted by household weights.

A key consideration for this method of creating jurisdiction-level estimates is that although it results in consistency across jurisdictions and across time, it does produce estimates which may vary slightly from published census estimates. In testing performed by the Enterprise Team, differences between census-published estimates and those produced by the census tract/block group aggregation method just described were typically less than one percent.

As part of the data collection process, relevant local data was also collected to supplement key information not covered by nationally available data. Jurisdictions participating in the AFH had a chance to provide relevant datasets, and information found in studies or reports to add local knowledge to each of the sections covered in the AFH report. Any local data in this document was from research identified by a member of the project team, was local data provided by one of the jurisdictions participating in this project, or local data provided by a member of the Advisory Committee. CMAP staff reviewed the local

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<sup>68</sup> Note that even using block-level data, the highest resolution population data that is widely available, there is no way to account absolutely for local variations in distributions. So, while this is the most accurate method, this is still an inherent source of error in the estimates.

data provided and processed that data in a manner that allows for a comparison to other data in the document. More data will be added from all of these local sources in the course of the project.

## Chapter 3: Fair Housing in Cook County Today

### 1.1 Regional Snapshot

#### 1.2.2 Chicago

##### 1.2.2.1 Summary

Chicago has a long and notorious history of enacting policies and allowing for decision making with the direct aim of intentionally segregating Chicago residents. Specifically, it is well documented that past mayors, aldermen, and department heads put in place mechanisms to control where Black Chicagoans could reside in an effort to maintain strict boundaries of racial segregation. One such tool to maintain segregation was through the control of affordable and public housing development. In 1946, then alderman of the 19<sup>th</sup> ward criticized the Chicago Housing Authority's plan for public housing development noting: "By putting up a project in every section of Chicago they could infiltrate Negroes."<sup>69</sup> And in 1947, then 9<sup>th</sup> ward alderman Reginald DuBois went so far as to join leaders of a violent backlash against attempts of racial integration by Black residents in his ward.<sup>70</sup> These acts and statements were not outliers, aldermen, who had (and still have today), near total control of decision-making within their wards, worked in lockstep with racist neighborhood groups and residents to maintain rigid patterns of segregation, finding more and more creative ways to maintain segregation as the legal landscape changed and new fair housing rights emerged.

Evident of this history was the landmark 1969 civil rights case, *Gautreaux v. Chicago Housing Authority*, which illuminated the fact that the City of Chicago had an intentional and deliberate policy to control where public housing was sited in the city, resulting in concentrations of public housing in predominately Black, low-income neighborhoods.<sup>71</sup>

Despite the restrictions imposed by the *Gautreaux* settlement, over the past several decades, affordable housing development has remained constrained, developed that has occurred has been segregated to a large degree, the City has lost developable land for multi-family housing to downzoning efforts, and rents have risen beyond what many low- and moderate-income households can afford.<sup>72</sup>

On the other hand, in predominantly Black and Latinx neighborhoods that were intentionally segregated, needed investments are woefully lacking. The result is that Black and Latinx residents today experience persistent disparities with respect to employment and educational opportunities, transit options, and healthy and safe housing and in turn, income and wealth-generating opportunities.

Overall, the average Black/African American person in Chicago has the least access to proficient schools, the labor market, and areas with low poverty exposure. Comparatively, the average White/Non-Hispanic person in Chicago has the greatest access to these opportunities. This pattern also exists in the County as a whole.

##### 1.2.2.2 Who lives in Chicago

Of the 2.7 million people who lived in Chicago as of 2010, the population is divided roughly evenly between White, non-Hispanic (32% of the total population), Black/African American (33%), non-

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<sup>69</sup> A City Fragmented

<sup>70</sup> A City Fragmented

<sup>71</sup> A City Fragmented: How Race, Power, and Aldermanic Prerogative Shape Chicago's Neighborhoods

<sup>72</sup> A City Fragmented

Hispanic, and Hispanic/Latino (29%) residents with Asian or Pacific Islanders making up the remaining 6%. Since 1990, the White, non-Hispanic and Black/African American, non-Hispanic populations have become both numerically and proportionally smaller, while the population of both Hispanic/Latino and Asian/Pacific Islanders has grown over the same period.

Compared to Cook County as a whole, Chicago has proportionally fewer White, non-Hispanic residents, and more Black/African American residents and Hispanic residents (tables 1 and 2). Between 1990 and 2010, the City's White non-Hispanic and Black/African American populations have decreased, while the Hispanic and Asian population of the City increased (tables 3 – 7).

The number of foreign-born residents has remained the same since 2017 and similar to Cook County as a whole, the top country of origin for Chicago's foreign-born residents is Mexico (Table 11). Poland, China (excluding Hong Kong and Taiwan) and the Philippines also represent a substantial portion of foreign-born populations in the city. This largely mirror trends in the County as a whole with the exception that Indian immigrants are somewhat less represented in Chicago compared to suburban Cook County.

Foreign-born populations in Chicago are largely concentrated on the west, central and north sides of the City. China and India-born residents tend to live in the central and north sides of the City. Mexico-born residents are more heavily concentrated on the west and northwest areas of the City. Residents from the Philippines tend to live in north side neighborhoods. Poland-born residents live in two discrete areas on the northwest and southwest areas of the City.

Of residents with Limited English Proficiency (LEP), the most common language spoken is Spanish, followed by Polish and Chinese (Table 14). The largest percentages of limited English proficiency residents include Albany Park, Archer Heights, Armour Square, Avondale, Belmont Cragin, Gage Park, Hermosa, Lower West Side, South Lawndale, and West Edison. Similar to the population of Cook County, slightly more than half of Chicago's population is female (Table 17). About a quarter of Chicago's total residents are children under the age of 18, the majority are adults aged 18 to 64, and 10 percent are seniors aged 65 or older (Table 18). This is similar to the overall proportions in the County as a whole, with the suburban county having slightly fewer adults and more seniors proportionally. Since 1990, Chicago has proportionally slightly fewer children and seniors, and slightly more adults. Slightly less than half of families in Chicago are families with children; this number has decreased since 1990.

Approximately 11 percent of the City's population are people with disabilities, which is in line with the proportion for the County as a whole (Table 16). Geographically, people with disabilities are more prevalent in neighborhoods on the south and west sides of Chicago, and there are particularly low rates of people with disabilities in neighborhoods directly to the north of downtown Chicago (Figure 22). Among people with a disability, the most common types of disability are Ambulatory (6% of the total population), Independent Living (4%), and Cognitive (4%). Hearing, Vision and Self-Care disabilities are less common at 2% of the total population each.

Homeowners in Chicago are primarily located in portions of the northwest and far southwest sides of the City. Portions of the City's west and south sides have particularly high rates of renters (Figure 47).

Chicago is home to 75,378 veterans, 3.5% of the adult population, slightly lower than the share in all of Cook County.

There are approximately 11,000 individuals returning each year to Chicago from Illinois prisons.<sup>73</sup>

According to the 2014-2016 Healthy Chicago Survey approximately 146,000 adults in Chicago (7.5% of adult population) identify as LGBT. About 61% of the LGBT population in Chicago is 18-44 years old, while 38% is 45 years old or older. In terms of race and ethnicity, the largest share of Chicago's LGBT population is White non-Hispanic (44.5%), followed by the Black/African American population (30.1%), the Hispanic population (19.2%), the Asian population (4.8%) and other race/ethnicities (1.4%). The majority (66%) of Chicago's LGBT population is single, never married, and about 16% of the population is married.

#### *1.2.2.3 Fair Housing Disparities*

##### **Key Takeaways**

The fair housing issues prevalent across the County are particularly evident within the City of Chicago. Community engagement undertaken through the AFH demonstrate that pervasive patterns of residential segregation are perpetuated by the lack of affordable and accessible housing, continued discrimination, particularly within the private rental market, and housing application hurdles, notably, credit score, background checks including arrest/ conviction and eviction, income requirements, and high security deposits and fees. This segregation creates a cycle of instability with long lasting penalties, including the lack of equitable community investment and access to place-based opportunity.

Community engagement within the City of Chicago highlights the following, particularly urgent fair housing issues:

Legal fair housing and tenant protections are routinely violated.

Legal and regulatory obligations required under the federal Fair Housing Act and under the City of Chicago fair housing law are routinely violated. These violations often go without recourse due to the power disparities between those in need of affordable and accessible housing options, and owners and providers of housing and housing services.

Compounding these power disparities is the fact that, particularly for accessible housing for those disabilities, suitable housing options are severely limited. When faced with such violations of rights, those in need of affordable, and in particular affordable, accessible housing, face diminished opportunities for restitution. Community Convener grantees note that residents with disabilities and in need of affordable housing are routinely denied basic reasonable accommodations required by the ADA, including being denied wheelchair ramps, and grab bars, or relocations to first floor units. With limited alternatives, individuals in these situations often endure unsuitable and untenable housing situations because they lack the resources and access to alternative options to fully enforce their rights. Simply put, the City's fair housing laws, and affordable housing laws and regulations for that matter, are not self-implementing or self-enforcing. For example, despite the new Illinois Immigrant Tenant Protection Act and Cook County Just Housing Amendment, many tenants and housing seekers fear that their immigration status, or background status will still make them vulnerable to housing barriers and retaliation. And this fear is not unwarranted. Community Convener engagement with landlord attorneys

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<sup>73</sup> <https://www.bpichicago.org/wp-content/uploads/2018/09/No-Place-To-Call-Home.pdf>

in Chicago uncovered that landlord attorneys expressed skepticism about their clients' ability to comply with the new Immigrant Tenant Protection Act and the Just Housing Amendment. They Report that they have advised their clients to sell their properties as new laws are too onerous and/or time consuming to abide by.

Although legal protections provide the absolutely critical foundation for fair housing rights, necessary to accompany these legal protections are resources for education, outreach, and enforcement of these rights.

Also, of critical importance is the consistent monitoring of legal requirements and the adherence to legal protections by not only individual actors in the housing market but the City overall. For example, the City of Chicago is currently facing three legal complaints due to its own failure to comply with fair housing laws and its duties to further fair housing.

In 2018, Access Living of Metropolitan Chicago filed suit in the U.S. District Court for the Northern District of Illinois, "alleging the City of Chicago has funded and developed tens of thousands of affordable rental housing units with ensuring that sufficient number are accessible to people with disabilities, as required by federal law." The lawsuit outlines the city's failure to comply with accessibility requirements of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, and the Fair Housing Act (FHA). This has resulted in, according to the complaint, "low-income people with disabilities struggle to find suitable housing and are often forced to live on the street, in their cars, nursing homes, in homeless shelters, or in other inadequate and dangerous housing."<sup>74</sup>

In 2019, 10 community based organizations across Chicago filed a HUD Housing Discrimination complaint against the City of Chicago: "Pursuant to the Fair Housing Act, Title VI of the Civil Rights Act of 1964, and Section 109 of the Housing and Community Development Act of 1974, this complaint challenges the City of Chicago's longstanding policy and practice of honoring 'aldermanic prerogative' for all affordable housing finance, land use, and zoning decisions, in a manner that permits local aldermen and their constituents to veto the placement of affordable housing in their predominately white neighborhoods and wards. The effect of those policies and practices has been to discriminate against black and Latinx households, families with children, and persons with disabilities."<sup>75</sup>

In 2020, environmental justice organizations filed a HUD Housing Discrimination complaint against the City of Chicago noting the discriminatory impacts of years of zoning and land-use policy, especially that related to the placement of polluting industrial sites, that place disproportionate negative consequences on the health and well-being of Black and Latinx communities while benefitting predominantly White communities.

### Eviction and Displacement

Between 2010 and 2017, Chicago saw an average of more than 23,000 eviction filings per year, or just over 3.9 eviction filings per 100 rental units. Put in human terms: About 1 in 25 Chicago renters and their families faced eviction each year. On average 60 percent of cases ended in eviction orders. Eviction

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<sup>74</sup> <https://www.accessliving.org/newsroom/press-releases-and-statements/access-living-sues-the-city-of-chicago-for-three-decades-of-discrimination-against-people-with-disabilities-in-affordable-rental-housing-program/>

<sup>75</sup> <https://www.povertylaw.org/files/advocacy/CAFHA%20et.%20al%20v.%20City%20of%20Chicago%20HUD%20Administrative%20Complaint.pdf>

disproportionately impacts African American women with children, and is a main driver of displacement. Eviction filings also disproportionately silo African American women into substandard housing based on the cycle of penalties an eviction record can trigger. Housing choice is significantly curtailed with the appearance of an eviction filing and/or order affiliated with the tenant's name in tenant screening databases and publicly available databases. African American women relegated to substandard housing as a result of an eviction record, are in turn less likely to assert their rights to obtain necessary maintenance work at the unit due to fear of retaliation by the landlord and given that limited housing options are available to them.

### Health and Safety Issues

Health and safety issues- both at the household and community level are particularly pronounced in the City of Chicago. Through community engagement, especially that conducted with subsidized renters, it is clear that many residents feel that even basic health and safety conditions are lacking from their current housing situations. Substandard housing "is persistent and demonstrates deeply rooted systemic racism. The struggles that tenants have in getting property owners and management companies to provide them with equitable treatment in addressing their housing needs is endemic to localized fair housing discrimination. Tenants voice their anger and indignation about a 'system that doesn't care.' The takeaway is that tenants fully want to exercise their power and are resilient in the face of bureaucratic inertia and local managerial incompetence. As one tenant stated at a recent meeting 'we are boiling on the inside but stay cold on the outside.'" HUD buildings are substandard, particularly those located on Chicago's south and west sides. With the vast majority of attendees at engagement events noting the following issues: lack of property upkeep and maintenance and sometimes leading to health issues especially for children and seniors; lead poisoning; insect and rodent infestation; plumbing and heat issues; elevators broken/unsafe; tenants also routinely complain about rude and disrespectful management; and a lack of responsiveness to conditions issues.

Community members noted that Black/ African American families in Chicago seem to have some of the most urgent worst-case housing scenarios, as well as immigrant families /individuals living without documentation regarding citizenship or legal residency, who struggle to gain access to any affordable housing supports and can find themselves in incredibly unsafe and over-crowded housing situations as a result.

In 2016, more than half of the city's homicides occurred in 11 communities that were predominantly people of color and home to some of the city's highest rates of poverty. Chicago ranked last in population growth in 2015 among the nation's 10 largest cities. One study firmly links homicides to population loss for cities, positing that every additional homicide over the previous year results in the loss of 70 residents.

#### *1.2.2.3.1 Segregation and Integration*

According to dissimilarity index values from the most recent American Community Survey (2013-2017), Chicago has high levels of segregation across three of the four racial/ethnic pairings tested – Non-White/White, Black/White, and Hispanic/White (tables 23 – 26). The fourth pairing, Asian or Pacific Islander/White qualifies as a moderate level of segregation. The highest segregation level is between the Black/White pairing. Dissimilarity index values across all four pairings has decreased slightly since 1990, indicating slight decreases in the levels of segregation across all four groups. However, these decreases have been modest. This mirrors trends in the County as a whole.

Beyond these city-wide trends, geographically, there are high levels of spatial clustering of people by race/ethnicity across specific neighborhoods within the City. Neighborhoods in the central and north sides of the City are predominantly White/Non-Hispanic population, Black/African American households predominate the south side of the City, and west side neighborhoods to a lesser extent. (figures 2 – 5) Neighborhoods on the west side of the City are predominantly Hispanic/Latino. Community engagement efforts indicate that gentrification, displacement, and a lack of affordable housing exacerbate the segregation of Chicago's neighborhoods by race and income. For example, in previously diverse neighborhoods such as Pilsen and Logan Square, the influx of White higher income residents has led to the displacement of Hispanic residents, many of whom are moving out of the City altogether. When analyzing the location of owner and renter occupied housing, data shows that more owner-occupied housing is located in portions of the northwest and far southwest sides of the City, where the predominant racial/ethnic group is the White/Non-Hispanic population (Figure 47). Portions of the City's west and south sides have particularly low rates of homeownership, where the predominant racial/ethnic group is the Black/African American population.

Some observe that Chicago's segregation is actually worsening and becoming more extreme, with much of the naturally existing affordable housing that was once affordable under the market disappearing in many of Chicago's previously diverse and previously most integrated neighborhoods such as Edgewater, Albany Park, Logan Square, Pilsen, and Rogers Park.

Taking apartment buildings out of the free market--- through use restrictions (which function as a building-based form of rent control) and/or related subsidy streams, and/or real inclusionary zoning tools, is the only method by which sustainably integrated living patterns by race and by income has been produced in Chicago. The City of Chicago's current market development patterns are both retrenching and increasing the segregation of Chicago's neighborhoods.

The City only sees reliably neighborhood economic and racial integration in any sustainable sense in areas with dedicated, hard units of physical affordable housing in higher-income or whiter neighborhoods---- housing protected by long-term affordability guarantees such as restrictive covenants and use restrictions which regulate rental prices and income-eligibility over several decades (if not in perpetuity).

#### [1.2.2.1.2 R/ECAPs](#)

Chicago contains a total of 97 Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), which constitutes the majority of R/ECAPs in Cook County (Table 28). There is a concentration of R/ECAPs on the south and west sides of the City that are highly geographically clustered, with a many of the areas sharing neighborhood boundary edges (see Figure 32).

Of the 227,000 people in Chicago that live in RECAPs, the vast majority (177,000 or 78%) are Black/African American, non-Hispanic (Table 30). The second largest population is Hispanic/Latino with 35,000 residents living in RECAPs. Over half of these Hispanic residents are concentrated in RECAPs in the New City and South Lawndale CCAs.

About 51% of families living in RECAPs have children, which is slightly higher than the overall rate of families with Children across the City.



Since 1990 the number of R/ECAPs in Chicago has increased, and their location has been consistent and persistent over time (see Figure 37).

#### *1.2.2.1.3 Access to Opportunity*

##### **Education**

Access to proficient schools, as measured by HUD, varies significantly based on race and ethnicity. Based on HUD's School Proficiency Index scores, the average White non-Hispanic person and Asian person has access to more proficient neighborhood elementary schools than any other racial or ethnic group (56.9 and 53.6 respectively) (Table 40). Comparatively, Black or African American residents have the lowest access followed by Hispanics (22.5 and 30.9 respectively). The least proficient schools in Chicago are in south and west side neighborhoods of the City (Figure 34). The predominant racial/ethnic groups in these areas of the County are the Black/African American and Hispanic populations. Comparatively, high proficiency schools are clustered in neighborhoods north of Chicago's downtown and the northwest side of the City, where the predominant racial/ethnic group is the White, non-Hispanic population. Charter schools are a common school option in the City of Chicago and not in suburban Cook County (Table 37). When looking at charter schools alone, the vast majority (90%) of the student body are low income students (Table 39). Community engagement efforts indicate that the loss of thousands of children due to demolition of public housing in neighborhoods on the south and west sides of the City, has contributed to closures of dozens of schools in this part of Chicago

Overall, there are more Hispanic and Black/African American students enrolled in Chicago's public and charter schools compared to White non-Hispanic and Asian students. Of the 368,584 enrolled students 46.8% are Hispanic or Latino, 36.8% are Black/African American, 10.1% are White non-Hispanic, and only 4% are Asian. This trend is consistent across various school types (charter, elementary, middle, and high school). The one exception to this trend is PreK, where the number of White non-Hispanic and Hispanic enrolled students is the same (43%), while Black/African American students represent only 9% of the enrolled students. According to the 2017-2018 Illinois Report Card, the majority (82.4%) of students enrolled in Chicago's public and charter schools are low income students.

##### **Employment**

Similar to Cook County as a whole, access to jobs and the labor market in Chicago varies by race/ethnicity. the average Black/African American person in Chicago has the least access to jobs and the labor market followed by the average Hispanic person (tables 41 and 42). White non-Hispanic persons and Asian persons in Chicago have far greater access to jobs and the labor market. Persons living in the south and west neighborhoods of Chicago have the lowest labor force participation rates (Figure 36). The highest labor force participation rates, on the other hand, are concentrated in downtown Chicago, the north side of Chicago. Similarly, areas with high access to jobs are found in and around downtown Chicago (Figure 35).

##### **Transportation**

The majority of Chicago's population (96.89%) is served by transit and about 97% of jobs are accessible by transit. More than half of the City's population has moderately high access to transit, and slightly less than half of the population has high access to transit. Access to transit is better in neighborhoods on the north side of the City compared to neighborhoods on the south and southwest sides. To increase transit accessibility, 100% of Chicago Transit Authority vehicles (buses and trains) are accessible, 103 of 145 rail stations are accessible. In terms of transportation costs, persons residing on the north side of the City, as well as neighborhoods immediately south of downtown have lower transportation costs compared to the rest of the City (Figure 43). Transportation costs are particularly high for those living in the far south and far southwest corners of the City (Figure 48). Chicago as a whole is highly walkable (Table 50). Neighborhoods on the north side of the City are more walkable than the rest of the City (Figure 41). The far south corner of Chicago has particularly low walkability.

The majority of the Black/African American and Hispanic population in Chicago has moderately high access to transit per the CMAP Access to Transit Index, but have longer average commutes by CTA rail and bus service or by Pace bus service than any other racial or ethnic group (Table 48). Similarly, the majority of the Black/African American population in Chicago lives in high walkability areas; however, Blacks or African Americans have the longest average commute time by biking and walking or any racial or ethnic group (Table 51).<sup>8</sup> This difference highlights longstanding concerns about a mismatch in the location of jobs relative to the location of the public transportation system.

Of the total highway lane miles in Chicago, more than a quarter are in need of pavement condition repairs, about 38 % are in need of congestion improvements, and approximately 41 % are in need of safety and reliability improvements.

The City of Chicago has released data on transportation network company (TNC) trips, which will help illustrate the effects of ride hailing services such as Uber, Lyft, and Via on the transportation system, and improve policy and investment decision making. Of the 12 million TNC trips taken during non-holiday periods in November and December 2018, approximately 17% either originated or ended in an EDA. These trips tended to follow the same time of day trends as the rest of the city, but some unique patterns emerged in other areas. Of trips that connected an EDA to a non-EDA location, 38% were to the Loop, Near North, and Near West sides. Weekday trips starting or ending in EDAs had a higher proportion of shared rides than trips taken outside of EDAs.

### **Poverty Exposure**

According to HUD's Low Poverty Index, areas of the City with the highest levels of poverty are concentrated in south and west side neighborhoods. The predominant racial/ethnic group on the south side of Chicago and southern parts of the County is the Black/African American population, while the Hispanic population predominates the west side neighborhoods of Chicago. Persons residing in south and west side neighborhoods of the City have more exposure to poverty, compared to the rest of the City (Figure 44). Areas with the lowest poverty rates in the City are concentrated in neighborhoods north of downtown, and the northwest portion of the City. A small portion of the south side of the City, near the border of Oak Lawn, also has particularly low levels of poverty (see Figure 49). Compared to the County, the average Chicago resident, regardless of race or ethnicity, has a higher exposure to poverty (see Table 53).

### **Environmentally Healthy Neighborhoods**

Adult obesity rates in Chicago are highest among the Black/African American population, followed by the Hispanic/Latino population (Table 55). Comparatively, the Asian population in Chicago has the lowest rates of adult obesity. When analyzing rates of adult obesity by gender, sexual orientation, and age, females, heterosexuals, and the 45-64 age group have higher rates of adult obesity (Table 56). Chicago's Black/African American population has the highest rate of child asthma related ED visits, compared to other racial/ethnic groups (Table 59). Child asthma related ED visits are much lower among Chicago's White non-Hispanic and Asian populations. The top five Chicago community areas with the largest number of children with elevated blood lead levels are all located on the southwest and west sides of the City (Table 62).

Overall, people living in Chicago are more exposed to environmental health toxins compared to people living in suburban Cook County. According to the Environmental Health Index, people living on the north and southwest sides of Chicago have higher rates of exposure to environmental health toxins compared to the rest of the City (see Figure 45). HUD's Environmental Health Index varies by race and ethnicity.

#### *1.2.2.1.4 Housing Needs*

In Chicago, housing cost burden is highest among Black/African American households, when compared to other racial/ethnic groups and family types (see Table 71). Chicago's Hispanic households experience higher rates of severe housing problems and severe housing problems, compared to other racial/ethnic groups (see Table 69). Areas of the City that experience at least one housing problem are concentrated in the west and southwest sides of the City, which overlap with the location of R/ECAPs, and are heavily populated by Black/African American and Hispanic populations (Figure 49). Overall, households in Chicago experience a higher rate of housing problems than households in suburban Cook County (tables 64 – 69).

Community engagement findings indicate that a large portion of calls to the MTO hotline, regarding home repairs, originate in the south neighborhoods of Chicago. This suggests that residents of this area experience higher rates of substandard housing. Differences in rates of owner-occupied housing varies by race/ethnicity in Chicago. Homeownership rates in Chicago are highest among White non-Hispanic householders (54.4%). Comparatively, 35.2 % of Black householders, 37.8 % of Native American householders, 44.1 % of Asian householders, 43.5 % of Hispanic householders, and 34.6 % of other householders own their home. Geographically, homeownership rates are higher in portions of the northwest and far southwest sides of the City compared to other neighborhoods in Chicago. HMDA lending data from 2018 indicate that more White/ Non-Hispanic individuals complete home loan applications and are least likely to have their applications denied (tables 97 and 98). Conversely Black/African American individuals are most likely to have their home purchase loan denied and, when approved, to have the loan be non-conventional.

Similar to the County as a whole, family households with more than 5 people experience higher rates of housing problems, compared to other family types (Table 67). Community engagement efforts indicate that Black/African American families in Chicago seem to have some of the most urgent housing problems. In Chicago, families with children make up over a quarter of households in public housing and project based section 8 housing; however, the majority of units in this type of publicly supported housing are units with one or less than one bedroom (tables 80 – 82 and 88 – 90). Out of all types of

publicly supported housing, families with children are more likely to live in units supported by housing choice vouchers, with many voucher holders seeking out 2 or 3 bedroom units (tables 83 and 91).

Housing units affordable at 50% AMI are concentrated in the southwest and far south side of Chicago. Downtown Chicago, and much of the neighborhoods north of downtown have the least amount of housing units affordable at 50% AMI. As of 2017, the highest rate of residential eviction filings occurred in the South Shore community area. Other community areas with high rates of residential eviction filings include Washington Park, Pullman, West Garfield Park, and Oakland, all of which are located on the south and west sides of the City. As of 2018, some of the highest foreclosure rates in Chicago were filed primarily in community areas on the south side of the City. The three community areas with the highest foreclosure filing rates were Greater Grand Crossing, Avalon Park and Pullman, all of which are located on the City's south side.

The majority of unsheltered people in Chicago were previously incarcerated — 60% of unsheltered men and 58% of women report being previously incarcerated in jail or prison. Community engagement findings have reported several barriers to finding housing for previously incarcerated persons. The Chicago Housing Authority acknowledges the challenges formerly incarcerated individuals face when it comes to background checks and screening for housing, and CHA is in the process of changing its own criteria.

Community members noted that Black/ African American families in Chicago seem to have some of the most urgent worst case housing scenarios, as well as immigrant families /individuals living without documentation regarding citizenship or legal residency, who struggle to gain access to any affordable housing supports and can find themselves in incredibly unsafe and over-crowded housing situations as a result.

#### *1.2.2.1.5 Publicly Supported Housing*

In Chicago, the largest source of publicly supported housing is through Housing Choice Vouchers (52,661), followed by other multifamily developments (43,182), project-based Section 8 (26,378), and public housing (21,004). Households are led by people 65 and older make up at least half of households in public housing and other HUD supported multi-family housing, and almost half of households in project based Section 8 housing. Seniors make up 88% of the occupants of other HUD supported multifamily housing. The vast majority of these units have 0 and 1 bedrooms. This is likely due to the prominence of the Section 202 program within this category of publicly supported housing.

In Chicago, households living in any type of publicly supported housing are more likely to be Black/African American than any other racial/ethnic group (tables 80 – 83). The rate of Black/African American households living in publicly supported housing exceeds the share of all households that are Black/African American in Chicago, and the share of Black/African American households that earn less than 80 percent of AMI (Table 87). While 26% of Chicago households earning less than 80% of AMI are Hispanic, Hispanic households occupy far lower shares of public housing, project-based Section 8, or other HUD supported multifamily housing. When analyzing the demographic composition of publicly supported housing located in R/ECAP and non-R/ECAP areas, public housing, project-based Section 8, and other HUD supported multifamily housing units are more likely to be occupied by families with children when that unit is located in a R/ECAP.

Similar to the County as a whole, Black/African American households in Chicago's publicly supported housing are more likely to occupy units that are located in R/ECAPs, while White, Asian, and Hispanic households are more likely to occupy units in non-R/ECAPs.

Seniors are more likely to reside in Other HUD publicly supported housing, while families with children are more likely to live in HCV units (tables 80 – 83). Comparatively, more persons with disabilities live in Chicago's public housing units, compared to other types of publicly supported housing. Hispanic households and White non-Hispanic households are far less likely to occupy all forms of publicly supported housing than would be expected given their share of households earning less than 80 percent of AMI.

Community engagement findings indicate that despite mobility counseling programs, many HCV participants are living in primarily Black/African American census tracts and areas that have little access to opportunity, including reliable transit, well-performing schools, job centers, and healthy physical and social environments.

Community members note that the voucher program has not been set up to enable voucher holders to "compete" with market renters in high-market neighborhoods. Doubly concerning, voucher holders consistently face source of income discrimination.

Lease-up incentive payments offered by the Chicago Housing Authority have had little change in the creating mobility for residents.

The Plan for Transformation, and the loss of households in some parts of the City, is closely connected with the subsequent closure of dozens of schools on Chicago's south and west sides.

The City's Affordable Requirements Ordinance requires residential developments that receive City financial assistance or involve City-owned land to provide a percentage of units at affordable prices, 60% of AMI. However, the ordinance does not create the needed number or type of affordable units and, therefore, does little to reduce segregation or create integrated living opportunities. As part of a strategy to expand housing choices for HCV participants, and meet the needs of low-income renters who are interested and choose to live in Mobility Areas, CHA implemented an Exception Payment Standard (ESP) policy (with approval from HUD) that increases the amount of subsidy up to 150% of FMR.

In addition, CHA subsidy can go up to 250% FMR for a Reasonable Accommodation to provide required accessibility features.

In FY2018, CHA received approval to change the areas eligible for EPS from Opportunity Areas based on census tracts to Mobility Areas based on Community Areas. The change significantly increased the number of areas where a voucher holder can receive an EPS and gives access to communities previously unavailable.

#### *1.2.2.1.6 Disability and Access*

Persons with disabilities are more prevalent on the south and west sides of Chicago, and less prevalent in neighborhoods north of downtown Chicago (Figure 22). These areas of the City have the least proficient schools, and the lowest rates of market engagement, compared to other parts of the City and the County as a whole. Parts of the south side of Chicago, particularly areas in the far south have lower

access to affordable transportation, compared to the rest of the City. Areas with higher concentrations of persons with disabilities overlap with Chicago's R/ECAPs. Similar to the County as a whole, the geographic distribution of persons with disabilities is somewhat consistent across the different disability types. The only exception to the overall pattern is the geographic location of persons with hearing disabilities, which are dispersed throughout all parts of Chicago (Figure 27). Through the community engagement efforts, stakeholders have indicated that accessible infrastructure, such as maintained streets and sidewalks tends to be located in the least affordable neighborhoods of Chicago, therefore, persons with disabilities often need to choose between accessible infrastructure and affordable rent.

Chicago's Mayor's Office for People with Disabilities administers a number of programs that aim to make Chicago an accessible city. An example of a program administered through this office is the Job Training and Placement referrals program, which provides persons with disabilities access to a network of employment partners. Other services offered to persons with disabilities include the Pace bus paratransit service, which lets persons with disabilities schedule affordable rides in an accessible transit vehicle.

## Chapter 4: Fair Housing Goals & Strategies

The following tables document Chicago’s eight fair housing goals with related strategies. For each strategy, we identify the related fair housing issue and contributing factors as well as commit to specific metrics, milestones, and timeframes for their achievement. After completion of the public comment period, each goal will be followed by a discussion section with more detail on the strategies.

- Goal 1: Increase and preserve affordable, accessible housing options
- Goal 2: Prevent involuntary displacement and stabilize neighborhoods
- Goal 3: Increase opportunities and community integration for people with disabilities
- Goal 4: Address the segregation of opportunity and related inequitable distribution of resources
- Goal 5: Enhance housing authority policies and programs to increase fair housing choice
- Goal 6: Expand fair housing outreach, education, and enforcement
- Goal 7: Preserve existing and expand affordable homeownership
- Goal 8: Ensure that internal policies and practices advance equity and address history of structural racism

### GOAL 1: Increase and preserve affordable, accessible housing options

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
1.A	Very High	Increase the stock of affordable, accessible rental housing throughout the region, especially in areas of opportunity.	Disparities in Access to Opportunity; Disproportionate Housing Needs; Disability and Access Analysis; Segregation/Integration; R/ECAP	Lack of Public and Political Will to Address Effects of Structural Racism; Community Opposition; Land Use and Zoning; Displacement of Residents due to Economic Pressure; Lack of Affordable, Accessible Housing in a Range of Sizes; Lack of Community Revitalization Strategies and/or Appropriate Funding; Lack of Access to Opportunity Due to High	Every “inclusionary” Community Area, as defined by the ARO recommendation, sees an increase in its affordable housing stock with evaluation every 3-5 years, with a long-term goal of at least 10% of rental stock legally restricted affordable in each community area.  <i>Milestone:</i> 1. Introduce and pass amendments to the ARO by Fall 2021.  2. Within 1 year, Mayor’s Office will develop comprehensive city-wide vacant lot strategy that	DOH, MO, CHA

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
				Housing Costs; Displacement of Residents Due to Economic Pressure; Availability, Type, Frequency, and Reliability of Public Transportation	includes identifying priorities and goals for dedicating city-owned land to be used as affordable housing.  3. Within 1 year, identify interventions needed to encourage multifamily and affordable housing development near transit as part of City's equitable Transit-Oriented Development (ETOD) policy plan implementation.  CHA:  Prioritize the redevelopment of CHA-owned properties as an approach to reduce or eliminate acquisition costs, to incentivize, and to encourage affordable housing development throughout the city, especially in areas of opportunity.	
1.B	Very High	Generate dedicated revenues for affordable housing programs.	Fair Housing Enforcement, Outreach Capacity, and Resource Analysis; R/ECAP	Lack of Resources for Fair Housing Agencies and Organizations; Lack of Public Investment in Specific Neighborhoods; Lack of Private Investment in Specific Neighborhoods	An increase of 25% in sustainable local funding within 5 years.	Law, OBM, DPD, DOH
1.C	High	Preserve the existing stock of affordable, accessible housing (zero net loss).	R/ECAP; Segregation/Integration; Disproportionate Housing Needs;	Deteriorated and Abandoned Properties; Lack of Community Revitalization Strategies and/or appropriate funding; Lending Discrimination; Community	Within 2 years, maintain a database of affordable and accessible housing to monitor accessible, legally restricted and naturally occurring affordable housing in gentrifying neighborhoods, done in partnership with the Assessor's Office.	DOH



Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
				Opposition; Land Use and Zoning Laws; Lack of Affordable, Accessible Housing in a Range of Sizes; Availability of Affordable Units in a Range of Sizes; Loss of Affordable Housing; Location and Type of Affordable Housing	Milestone: Ordinances passed in Q1 2021 that limit demolitions and deconversions in areas with rapidly increasing home prices and impose a teardown surcharge. (Original goal was to be completed within 12 months.)	
1.D	High	Increase access to affordable housing.	Segregation/Integration; R/ECAP; Publicly Supportive Housing Analysis;	Lack of Public and Political Will to Address Effects of Structural Racism; Lack of Affordable, Accessible Housing in a Range of Sizes; Location and Type of Affordable Housing; Source of Income Discrimination; Availability of Affordable Units in a Range of Sizes; Lending Discrimination	Recommend alternative tenant screening models that minimize barriers to affordable housing. Match production of AMI levels and family-sized affordable units as a proportion of all new affordable units to need as determined by Census data and community and property management feedback.	DOH, MO
1.E	Very High	Increase health and safety of affordable housing.	Disability and Access Analysis; Fair Housing Enforcement, Outreach Capacity, and Resource Analysis; R/ECAP	Deteriorated and Abandoned Properties; Unresolved Violations of Fair Housing or Civil Rights Law; Lack of Disparate Impact Analysis;	Reform the health and safety requirements for home repairs grants to better serve low-to-moderate homeowners (mold & lead remediation). This will require higher grant amounts and less units served – however, we’ll address safety and healthy homes without additional funding. We will align goals and strategies based on the Healthy Chicago 2025 plan.	CDPH, DOB, DOH, DFSS

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
					DOB will be setting benchmarks for this programming after it migrates to the City's new IT system no earlier than Q2 2021.	
1.F	High	Increase deeply affordable housing options.	R/ECAP; Segregation/Integration; Disproportionate Housing Needs;	Lack of Public and Political Will to Address Effects of Structural Racism; Displacement of Residents Due to Economic Pressure; Lack of Access to Opportunity Due to High Housing Costs; Community Opposition; Lack of Public Investment in Specific Neighborhoods; Lack of Private Investment in Specific Neighborhoods; Location and Type of Affordable Housing; Availability of Affordable Units in a Range of Sizes	Within 5 years, expand City-supported stock of affordable housing for households at 30% AMI or below by 33%. Identify revenue sources in partnership with Cook County and State of Illinois.	DOH, DFSS
1.G	High	Implement regional partnerships to expand affordable housing opportunity.	Fair Housing Enforcement, Outreach Capacity, and Resource Analysis; Segregation/Integration; Disproportionate Housing Needs; Disparities in Access to Opportunity	Lack of Public and Political Will to Address Effects of Structural Racism; Lack of Local and Regional Cooperation; Availability of Affordable Units in a Range of Sizes; Displacement of Residents due to Economic Pressure	City of Chicago:  In Q2 2021, build upon the work that the AFH Working Group started and have quarterly meetings with the 60+ community organizations that establishes a forum to report on metrics and milestones for continuous accountability until the next version on fair housing goals is published.  CHA:	MO, DOH, CHA

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
					Participate in coordination meetings with other Public Housing Authorities through the Regional Housing Initiative and utilize to also discuss best practices, challenges and provide portability information.	
1.H	High	Improve access to water, recognizing water is a human right.	R/ECAP; Segregation/Integration	Lack of Public and Political Will to Address Effects of Systemic Racism; Quality of Affordable Housing Information Programs	<p>Remove barriers to clean and safe water access for households impacted by water shutoffs pre-moratorium and address water-related debt for families who are low-moderate income. Create a public education campaign within the first year that informs tenants their rights from water shutoffs as a form to evict.</p> <p>Within 1 year, assess options to expand the Chicago Utility Billing Relief program to include renters by overcoming operational challenges given structure of current water billing system.</p>	MO, DWM, Finance

*Background and Discussion sections to be added following public comment period.*

## GOAL 2: Prevent Involuntary Displacement and Stabilize Neighborhoods

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
2.A	Very High	Strengthen guidelines around evictions and renewal regulations.	Disparities in Access to Opportunity; Disproportionate Housing Needs; Fair Housing Enforcement, Outreach Capacity, and Resource Analysis; Segregation/Integration	Displacement of Residents Due to Economic Pressure; Unresolved Violations of Fair Housing or Civil Rights Law; Lack of Public and Political Will to Address Effects of Structural Racism; Displacement of Residents Due to Economic Pressure	Establish an eviction working group led by DOH and MO to monitor eviction trends and responses by the second quarter of 2021 and by Fall 2021 institute a policy that addresses the loopholes or trends of the working group.	DOH, MO
2.B	High	Support state legislation on eviction sealing and screening protections.	Fair Housing Enforcement, Outreach Capacity, and Resource Analysis	Lack of State or Local Fair Housing Laws	Meet with sponsors and relevant stakeholders, including advocates and industry groups during the 2021 legislative session for the Illinois General Assembly.	DOH
2.C	Very High	Establish a pilot “right to counsel” in eviction court program	Fair Housing Enforcement, Outreach Capacity, and Resource Analysis	Lack of State or Local Fair Housing Laws	Extend and expand upon the CARES Act-funded eviction and lockout defense counsel program in 2021. Build in new anti-eviction opportunities through American Rescue Plan dollars.	DOH
2.D	Very High	Extend the right to cure a rent default, even after tenants have been brought into eviction proceedings	Fair Housing Enforcement, Outreach Capacity, and Resource Analysis	Lack of State or Local Fair Housing Laws	Build long-term resources/funding for emergency rent or partner with DFSS. DOH will identify a delegate agency administrator that will be available to make grants available to them.  Extend right to cure period under Fair Notice ordinance.	DOH
2.E	High	If the State of Illinois removes the prohibition on municipal rent regulation policies, study the potential impact of local legislation as an option to address housing instability.	Fair Housing Enforcement, Outreach Capacity, and Resource Analysis; Segregation/Integration, R/ECAP	Lack of State or Local Fair Housing Laws; Displacement of Residents Due to Economic Pressure; Lack of Access to Opportunity Due to High Housing Costs	If the Illinois State Legislature lifts restrictions on municipal rent regulation, within 12 months DOH will coordinate, with the Mayor's Office, a study that will examine the impact of a rent stabilization ordinance on the Chicago housing market.	DOH, MO

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
2.F	Moderate	Consider implications of requiring subsidized affordable housing providers to provide tenants a 14-day notice of nonpayment and offer the opportunity to participate in mediation, including exploring repayment plans or accepting homeless prevention funds. Note: this requirement already exists in CHA.	Fair Housing Enforcement, Outreach Capacity, and Resource Analysis	Lack of Local Public Fair Housing Enforcement; Private Discrimination	Issue evaluation by Q3 2021.	DOH
2.G	High	Study the feasibility of a preference policy program to prioritize households displaced by past government action or investment, such as, but not limited to, urban renewal efforts or the 606, to have priority in accessing subsidized housing (excluding CHA units).	R/ECAP; Segregation/Integration	Lack of Public and Political Will to Address Effects of Structural Racism; Location and Type of Affordable Housing;	Issue an evaluation of neighborhood preference policy in city-funded affordable housing within 6 months following the resolution of the New York City lawsuit over local preferences.	DOH
2.H	Moderate	With leadership guidance from the Mayor's Office, establish a proactive rental inspection program at a scale that is enforceable so that renters are not evicted for demanding code compliance.	Fair Housing Enforcement, Outreach Capacity, and Resource Analysis	Lack of Local Public Fair Housing Enforcement; Lack of Disparate Impact Analysis	<p>Within 2 years, institute a process of home inspections with the Mayor's Office that protects tenants from environmental health hazards, paves the way for a robust proactive framework and transfers power to community members to sustain the program over time (i.e., apprenticeships).</p> <p>DOB will be setting benchmarks or programming no earlier than Q2 2021.</p>	MO, DOH, CDPH, DOB

*Background and Discussion sections to be added following public comment period.*

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GOAL 3: Increase Opportunities and Community Integration for People with Disabilities

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
3.A	Very High	Create an equitable infrastructure improvement program that invests in areas of greatest need (e.g. like inaccessible public facilities, sidewalks and public transit) with the most impacted populations.	Disability and Access Analysis; Publicly Supportive Housing Analysis	Access to Transportation for Persons with Disabilities; Inaccessible Public or Private Infrastructure	<p>Convene interdepartmental work group to develop equitable process and metrics to guide capital bill infrastructure investments. Within 1 year, use preliminary process to prioritize near-term investments. Within 2 years, build on preliminary process to guide longer-term investments.</p> <p>Metrics for accessibility infrastructure improvements: ADA ramps: There are approximately 240,000 locations where ADA ramps are warranted citywide. By the end of 2020, approximately 120,000 ramps have been made compliant. Approximately 8,000 ramps will be improved per year for a total of 152,000 by the end of 2024; 160,000 by the end of 2025.</p>	MO, CDOT, DPD, CTA, MOPD
3.B		Advocate for funding to make all publicly funded shelters accessible. Currently, there are accessible shelters within all our program models and populations served except for Overnight (Men and Women) Interim Housing DV and Safe Haven (Men).	Disability and Access Analysis; Publicly Supportive Housing Analysis	Inaccessible Public or Private Infrastructure; Lack of Enforcement and Oversight	<p>(1) Milestones: Within 1-2 years, convene interagency work group to: Identify options (or external partners) for assessment of accessibility needs</p> <p>(2) Develop estimate of budget needed for full accessibility</p> <p>(3) Provide more education and guidance materials on reasonable accommodations for existing shelters in the interim while pursuing longer term strategy</p>	DFSS, MO
3.C	Very High	Continue to grow the inclusionary zoning policy that links affordability for people with disabilities. This is important because	Disability and Access Analysis; Publicly Supportive Housing Analysis; Disparities in Access to	Lack of Affordable, Integrated Housing for Individuals Who Need Supportive Services;	Successfully pass improved ARO policy in 2021.	DOH, MOPD, MO

		new construction is the primary source of accessible housing.	Opportunity; R/ECAP; Segregation/Integration	Location of Accessible Housing; Access to Publicly Supported Housing for Persons with Disabilities		
3.D	High	Ensure developers who receive federal funding include 10% units accessible using UFAS standards (or stricter) to people with physical disabilities and 4% accessible to people with sensory disabilities. Create a model where MOPD is leading this work to ensure compliance per federal funding.	Disability and Access Analysis; Fair Housing Enforcement, Outreach Capacity, and Resource Analysis; Publicly Supportive Housing Analysis	Location of Accessible Housing; Siting Selection Policies, Practices and Decisions for Publicly Supported Housing, Including Discretionary Aspects of Qualified Allocation Plans and other Programs; Lack of local oversight and enforcement of land use, code, and HQS regulations	<p>Within 1 year, codify standards for ongoing implementation and compliance.</p> <p>For the 2021 QAP Application and any future applications, Department of Housing will request for a breakdown of units that comply with UFAS standards or stricter.</p> <p>Limit the waivers that developers receive for reducing square footage that comprise ADA accessible units.</p>	DOH, MOPD, DOB
3.E	High	Create robust region-wide modification fund for home modifications for people with disabilities.	Fair Housing Enforcement, Outreach Capacity, and Resource Analysis; Disability and Access Analysis	Lack of Assistance for Housing Accessibility Modifications	<p>Evaluate the existing efforts by MOPD and revise policy accordingly within DOH.</p> <p>Meet with advocates and residents from the disability community regularly to get their feedback and make changes accordingly.</p>	DOH, MOPD
3.F	High	Build more accessible housing near fixed transit.	Disability and Access Analysis; Disparities in Access to Opportunity; Segregation/Integration	Access to Transportation for Persons with Disabilities; Inaccessible Public or Private Infrastructure; Location of Accessible Housing; Lack of Access to Opportunity Due to High Housing Costs	Promote multi-family program incentives for Equitable Transit-Oriented Development starting with the 2021 QAP to be issued in Spring 2021.	DPD, DOH, MO
3.G		Identify options to improve incorporation of pedestrian friendly design into new developments.	Disability and Access Analysis	Inaccessible Public or Private Infrastructure	Within 1 year, review existing processes and standards for including pedestrian friendly design in new development. Within 2 years, identify and implement improvements.	DPD



3.H		Continue to install Accessible Pedestrian Signals (APS) at signalized intersections to help people with disabilities safely cross the street.	Disability and Access Analysis	Inaccessible Public or Private Infrastructure	Metrics/milestones: Target goal of 50 new APS installations over the next 5 years.	CDOT
3.I		Provide an accessible website that can assist persons with disabilities in locating units with accessibility features.	Disability and Access Analysis	Lack of Assistance for Housing Accessibility Modifications; Lack of Assistance for Transitioning from Institutional Settings to Integrated Housing	<p>Benchmark: Launch centralized ARO Homefinder website in 2021.</p> <p>Timeframe: MOPD hopes to start working with DOH to develop a database of accessible housing: Second quarter 2021. Target completion by Q3 2021.</p> <p>CHA: Perform an assessment of the City's compliance to Title II of the ADA. Create implementation plan following assessment to ensure compliance.</p>	MOPD, AIS, CHA
3.J		Support the ongoing work of the Mayor's Employment Task Force who responsibility is to increase access to integrated employment for persons with disabilities by partnering with the regional centers to connect individuals to job opportunities with public entities.	Disability and Access Analysis; Disparities in Access to Opportunity	Lack of Affordable In-Home or Community-based Supportive Services; Access to transportation for Persons with Disabilities; Lack of Employment Opportunities; Lack of Local and Regional Cooperation		MOPD, BACP, CDPH

*Background and Discussion sections to be added following public comment period.*

GOAL 4: Address the Segregation of Opportunity/Inequitable Resource Distribution.

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
4.A		Prioritize public investments in communities that have experienced underinvestment.	R/ECAP; Disparities in Access to Opportunity; Disproportionate Housing Needs;	Availability, Type, Frequency, and Reliability of Public Transportation; Lack of Public and Political Will to Address Effects of Structural Racism; Lack of public investment in specific neighborhoods	\$750MM investment in 10 target neighborhoods	MO, DPD
4.B		Provide reliable, frequent, and affordable access to multiple transportation options to populations disproportionately reliant on public transportation.	Disparities in Access to Opportunity; Disabilities and Access Analysis; Segregation/Integration	Availability, Type, Frequency, and Reliability of Public Transportation; Impediments to Mobility; Lack of Public Investment in Specific Neighborhoods; Inaccessible Public or Private Infrastructure; Access to Transportation for Persons with Disabilities	<p>Milestone: In partnership with CTA, produce better bus policy plan with related guidance and tools.</p> <p>Timeframe:</p> <ul style="list-style-type: none"> <li>• Within 1-3 years, depending on budget: City advocacy with CTA and State to establish reduced fare for eligible residents (affordable housing residents, etc.)</li> <li>• Within 1 year: identify opportunities for matching transit fares and lower priced Divvy memberships for affordable units</li> </ul>	CDOT
4.C		Enhance community input in community development decision-making	Segregation/Integration; R/ECAP	Lack of Public and Political Will to Address Effects of Structural Racism; Community Opposition; Lack of Community Revitalization	<p>Within 1 year, finalize new community review guidelines for Planned Developments (PDs).</p> <p>Within 2 years, leverage We Will Chicago, the City's citywide planning effort, to identify further opportunities to enhance community</p>	MO, DPD

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
				Strategies and/or Appropriate Funding	input in community development decision making.	
4.D		Address the jobs/housing mismatch by investing in meaningful job opportunities and small business development in areas with high unemployment rates and in racially or ethnically concentrated areas of poverty (R/ECAPs).	Disproportionate Housing Needs; Segregation/Integration; R/ECAP; Disparities in Access to Opportunity	Displacement of Residents Due to Economic Pressure; Lack of Private Investment in Specific Neighborhoods; Lack of Access to Opportunity Due to High Housing Costs; Lending Discrimination	<p>Within 1 year, identify areas where residents have disproportionately longer, more challenging commutes. Within 2 years, align existing small business/economic development funding with target areas of need.</p> <p>Promote economic development along 12 commercial corridors in Invest South/West neighborhoods. Metrics for success include: unemployment rates, growth in small businesses, .</p>	MO, DPD
4.E		Develop a process to equitably distribute public resources based on need.	Segregation/Integration; R/ECAP; Disparities in Access to Opportunity;	Lack of Public and Political Will to Address Effects of Structural Racism; Lack of Public Investment in Specific Neighborhoods; Community Opposition; Displacement of Residents Due to Economic Pressure	Convene interdepartmental work group to develop equitable process and metrics to guide infrastructure investments. Within 1 year, use preliminary process to prioritize near-term investments. Within 2 years, build on preliminary process to guide longer-term investments.	CDOT, MO

*Background and Discussion sections to be added following public comment period.*

GOAL 5: Enhance Housing Authority Policies and Programs to Increase Fair Housing Choice.

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
5.A		Continue to support mobility programs and housing locator assistance.	Disability and Access Analysis; R/ECAP	Access to Transportation for Persons with Disabilities; Inaccessible Public or Private Infrastructure; Impediments to Mobility	<p>Mobility Counseling:</p> <ol style="list-style-type: none"><li>1. Continue to assist families in identifying housing and community needs and desires, as well as locating a unit in a Mobility Area.</li><li>2. Participating families work with the Mobility Counselor throughout the move process to assist with transition into new communities (e.g. locating community resources, enrolling children in schools).</li><li>3. Participants can also take advantage of the following benefits:<ul style="list-style-type: none"><li>• Workshops on home maintenance, financial management and tenant rights</li><li>• Community tours and unit search assistance</li><li>• A grant of up to \$500 to be used toward a security deposit or move-in fee.</li></ul></li></ol> <p>Housing Locator</p> <ol style="list-style-type: none"><li>1. Develop a database of accessible units throughout the Chicago and categorize the units based on the accessible features.</li><li>2. Attend HCV participant briefings/meetings and explain the housing locator services for people with disabilities.</li><li>3. Outreach to landlords, property managers and realtors to develop relationships and build units within the housing locator database.</li><li>4. Provide webinars (both live an recorded) to potential and existing HCV landlords on accessibility opportunities.</li><li>5. Advocate on behalf of HCV participants who need reasonable accommodations and accessible units.</li></ol>	CHA
5.B		Increase education and outreach for voucher holders to ensure participants are better equipped for housing searches	Disparities in Access to Opportunity; Segregation/Integration; Disproportionate Housing Needs;	Private Discrimination; Source of Income Discrimination; Lending Discrimination; Lack of meaning language access for	<p>CHA:</p> <p>CHA will continue to provide Voucher Participants and Applicants information on program processes. The CHA will also continue to provide referrals to NHS for credit counseling for families seeking to learn about home ownership.</p>	CHA

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
				individuals with limited English proficiency		
5.C		Continue to assess LEP policies to ensure compliance.	Disproportionate Housing Needs	Displacement of Residents due to Economic Pressure; Impediments to Mobility; Admissions and Continued Occupancy Policies and Procedures, Including Preferences in Publicly Supported Housing	CHA adheres to HUD's LEP Guidance	CHA
5.D	Priority: 2, this term (Impact: High; Effort: Moderate)	Measure current transportation services for persons with disabilities provided by delegate agencies during their housing search and increase services as capacity allows.	Fair Housing Enforcement, Outreach Capacity, and Resource Analysis	Lack of Local Private Fair Housing Outreach and Enforcement;	With guidance from MOPD, CTA and Pace, develop a tracker for people with disabilities to be able to submit automatic reports of their housing search and transportation options.	MOPD, DOH, DFSS, CTA/Pace
5.E		Utilize HUD-designated Qualified Fair Housing Organizations to provide training and education.	Fair Housing Enforcement, Outreach Capacity, and Resources Analysis; Disability and Access Analysis	Lack of Resources for Fair Housing Agencies and Organizations; Lack of Meaningful Language Access for Individuals with Limited English Proficiency	The CHA currently partners with outside FHIP agencies to provide training and education. In addition, the CHA provides referrals to HUD and FHAP agencies for investigations of alleged fair housing violations.	CHA

*Background and Discussion sections to be added following public comment period.*

GOAL 6: Expand Fair Housing Outreach, Education, and Enforcement.

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
6.A		Greater funding for non-profits conducting fair housing enforcement and education	Fair Housing Enforcement, Outreach Capacity, and resources Analysis;	Lack of Resources for Fair Housing Agencies and Organizations	CCHR will advocate for increased funding for non-profits	CCHR
6.B		Increase investigative and enforcement staff of Chicago Human Relations Commission.	Fair Housing Enforcement, Outreach Capacity, and resources Analysis; Disproportionate Housing Needs;	Unresolved Violations of Fair Housing or Civil Rights Law; Lack of Local Private Fair Housing Outreach and Enforcement; Lack of Local Public Fair Housing Outreach and Enforcement; Lack of Public and Political Will to Address Effects of Structural Racism; Private Discrimination	<p>Funding will likely not be in place for increasing CCHR staff; however, within the first six months of 2021, we will institute innovative ways to conduct outreach and education. CCHR is committed to continuing to collaborate with community organizations and fair housing advocates.</p> <p>Within one year CCHR will develop a City-wide online education and training program.</p> <p>CCHR's materials are currently available in several languages. Within one year, CCHR will work with organizations to develop materials for the visually impaired.</p>	City, CCHR

*Background and Discussion sections to be added following public comment period.*

GOAL 7: Preserve existing and expand affordable homeownership.

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
7.A	High	Home repairs and rehabilitation for qualifying owners	Disproportionate Housing Needs; Disparities in Access to Opportunity; R/ECAP	Access to Financial Services; Lack of Community Revitalization Strategies; Deteriorated and Abandoned Properties	In 1 year, review existing city-wide home improvement programs to ensure 100% delivery of funds.	DOH
7.B	Very High	Study property tax freeze programs for low-income owners facing rapid property tax increases to prevent displacement	Segregation/Integration; R/ECAP	Displacement of Residents Due to Economic Pressure; Lending Discrimination	In 2021, work with the Cook County Assessor's Office on property tax freeze as they will be assessing the Chicago Triad. Provide relief through a special district or other enforceable measure in conjunction with the City Council.	DOH, Cook County Assessor's Office
7.C	Moderate	Subsidize affordable homeownership opportunities	R/ECAP; Disparities in Access to Opportunity	Quality of Affordable Housing Information Programs; Displacement of Residents due to Economic Pressure; Lending Discrimination; Lack of Private Investment in Specific Neighborhoods; Access to Financial Services	In the next 1-2years, increase public education of public and private down payment assistance programs and home counseling centers Require mandatory informational meetings for Counselors by a lead agency. This will ensure the standardization of information to homebuyers – 2 years  Produce guide on ITIN lending with immigrant rights groups  Identify new funding sources to sustain community partners	DOH, Law
7.D	High	Support cooperative homeownership models for marginalized communities	Disparities in Access to Opportunity; Segregation/Integration	Lack of Access to Opportunity due to High Housing Costs; Displacement of Residents due to Economic Pressure; Lack of Community Revitalization Strategies; Lack of Regional or Local Cooperation	In 2021, partner with the Mayor's Office to further our commitment to community wealth building in housing plans and form partnerships with financial institutions and philanthropy to expand cooperative models	DOH

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
7.E	High	Support Community Land Trusts	R/ECAP	Lack of Community Revitalization Strategies and/or Appropriate Funding	Draw down at least 1/3 of the \$1.5M allocation for acquisition and rehab in partnership with neighborhood-based CLTs by 2022  Codify the existing agreement with the Cook County Assessor's Office so that the process is clear and efficient within three years.	DOH
7.F	Very High	Continue foreclosure prevention counseling and outreach activities.	R/ECAP; Segregation/Integration	Deteriorated and Abandoned Properties; Displacement of Residents Due to economic Pressure; Lack of Private Investment in Specific Neighborhoods; Loss of Affordable Housing	In 1-2 years, develop a strong Federal policy agenda with the Mayor's DC Office to increase CDBG funding (State funding had been diminishing over the years). Include advocacy for federal appropriations funding when possible.	DOH, MO

*Background and Discussion sections to be added following public comment period.*



GOAL 8: Ensure that internal policies and practices advance equity and address history of structural racism.

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
8.A	Very High	Commit to ongoing training of agency leadership and staff on concepts of racial and social equity, such as structural racism, diversity and inclusion, etc.		Lack of public and political will to address effects of structural racism	<p>DOH: In 2022, establish change teams across bureaus to institutionalize knowledge on racial equity change and operationalize the work.</p> <p>City-wide: Initiate cohort of department leaders to receive ongoing training on equity with the Government Alliance on Race and Equity (GARE) and the Mayor's Office of Equity and Racial Justice.</p> <p>City-wide: Within 6 months, launch and conduct Community Wealth Building trainings across departments and agencies.</p> <p>CHA: Administer annual agency-wide trainings.</p>	All
8.B	Moderate	Pilot or expand the usage of equity assessments in city policy and program development.	Segregation/Integration	Lack of public and political will to address effects of structural racism; Private Discrimination; Lack of Local Public Fair Housing Enforcement	<p>By Q1 2021, release the country's first REIA of a QAP.</p> <p>Continue to promote and conduct racial equity impact assessments and use the QAP process, as a standard to operationalizing racial equity.</p> <p>Milestone: Create a clear tool to track demographics of people served, developers engaged, etc.</p> <p>Within 1 year, Mayor's Office of Equity and Racial Justice will identify at least 1 additional department to launch a racial equity impact assessment.</p>	DOH, CHA, Mayor's Office

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
					<p>Within 3 years, Mayor's Office of Equity and Racial Justice will launch a pilot of department cohorts to practice and learn about using equity assessments.</p> <p>Within 5 years, DOH will have well-established racial equity goals, metrics and public accountability mechanisms across programs and policies.</p> <p>CHA: Create an inventory of policies governing CHA to identify equity metrics.</p>	
8.C	High	Develop intentional equity action plans across departments.		Lack of public and political will to address effects of structural racism	<p>City-wide: All city departments will have yearly equity goals and plans published by 2021.</p> <p>CHA: Create an inventory of policies governing CHA to identify equity metrics</p>	CHA, Mayor's Office
8.D	Very High	Develop standardized tools to assess racial and social equity impacts in capital planning and budget processes		Lack of public and political will to address effects of structural racism	<p>With the help of the DePaul, DOH will commit to developing transparent and clear assessments and data on racial equity and equation to taxpayer dollars saved or spent.</p> <p>In year 5, DOH will have tools to analyze financial processes and plans using racial equity lens.</p>	DOH, Mayor's Office
8.E	High	Address NIMBYism and lack of political will to create affordable, accessible housing at the scale needed	Segregation/Integration; Disparate Access to Opportunity; Fair Housing Enforcement, Outreach Capacity, and Resource Analysis	Lack of public and political will to address effects of structural racism; Community Opposition; Private Discrimination;	Within 1-2 years, conduct a broad-based educational campaign to counter misperceptions around affordable, accessible housing.	DOH, CCHR, Mayor's Office

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
				Lack of Local Public Fair Housing Enforcement; Lack of Local Private Fair Housing Enforcement		
8.F	Very High	Establish a human-centered approach to affordable housing.	Fair Housing Enforcement, Outreach Capacity, and Resource Analysis; R/ECAP; Segregation/Integration	Lack of Disparate Impact Analysis; Lack of Public and Political Will to Address Effects of Structural Racism; Community Opposition	Incorporate the new mission, vision and values that centers the people the Department of Housing is serving in programs, policies and services. The outreach efforts will always have the best interest of the public and center their voices and needs.	DOH

*Background and Discussion sections to be added following public comment period*