

# City of Chicago RACIAL EQUITY ACTION PLAN

## Department of Law (DOL)

Under the City of Chicago's Municipal Code (Ch. 2-4-100), all City of Chicago departments must create and maintain Racial Equity Action Plans (REAPs) "to articulate and guide strategy aimed at advancing equity and making it a permanent pillar in all departmental workstreams."

Progress on all REAPs are accounted for annually as a part of the City of Chicago's budget process. This document outlines the components of the REAP and ensures that all strategies are aligned to Chicago's citywide vision: ***All people and all communities have power, are free from oppression, and are strengthened by equitable access to resources, environments, and opportunities that promote optimal health and well-being. (HC2025)***

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### THE CITY OF CHICAGO'S DEFINITION OF EQUITY

Equity is both an outcome and a process:

As an **outcome** equity results in fair and just access to opportunity and resources that provide everyone the ability to thrive. Acknowledging the present and historical inequality that persist in our society, equity is a future state we strive to create where identity and social status no longer predestine life outcomes.

As a **process**, equity requires a new way of doing business: one that

- (1) Prioritizes access and opportunities for groups who have the greatest need.
- (2) Methodically evaluates benefits and burdens produced by seemingly neutral systems and practices.
- (3) Engages those most impacted by the problems we seek to address as experts in their own experiences, strategists in co-creating solutions, and evaluators of success.

Further, our focus is on evaluating our own strategies, interventions and resources in a way that prioritizes those who are most negatively impacted by current policies, procedures & practices.


**Racial equity** focuses on the social construction of race and how it has been used (historically and presently) to unjustly distribute opportunity and resources based on a person's skin color, heritage, ethnicity, and/or national origin. Advancing racial equity requires an analysis of systemic racism inclusive of the ways harm is created at the individual, interpersonal, institutional, and structural levels. It also requires a commitment to dismantling systems that perpetuate racialized outcomes and rebuild systems that produce systemic inclusion.🔗

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The coordination of the development and implementation of City of Chicago REAPs is led by the Office of Equity and Racial Justice. For more information about REAPs and/or the work of the office visit [www.chicago.gov/equity](http://www.chicago.gov/equity).

## RACIAL EQUITY ACTION PLAN: Priority #1

**The City of Chicago's Vision:** All people and all communities have power, are free from oppression, and are strengthened by equitable access to resources, environments, and opportunities that promote optimal health and well-being. (HC2025) 

### Citywide Priority Area & Desired Result:

**WORKFORCE:** The City of Chicago's workforce reflects the demographics of the City, and all employees are connected to training and advancement opportunities.

### Indicators Examined:

#### *Community Data*

Chicago's demographics, City of Chicago's workforce demographics

#### *Program/Department Data*

Department of Law (DOL) workforce demographics; DOL's leadership and salaries; DOL applicant demographics (January 2017 – August 2022; demographics of DOL internship applicants - Summer 2021, Summer 2022; demographics of internship participants - Summer 2021, Summer 2022; demographics of internship participants applying to roles in DOL - Summer 2021, Summer 2022; workforce networks DOL engages with (Distribution list, bar associations, schools, etc.)

### Community Feedback and Narratives

### Define the Problem

The City of Chicago's workforce should reflect the demographics of the City. However, the City of Chicago's workforce has lower representation of people of color. This is also shown in the Department of Law's workforce, particularly for the Hispanic demographic. Over 29% of the City's population is Hispanic. Hispanics represent 8.1 % of the Department of Law's ("DOL") workforce.

**Identify Root Causes to the Problem**

Historically, communities of color have had limited access to legal educational opportunities, scholarships, and professional networks that would support starting a career in law. Inequities in K-12 and post-secondary education have impacted the pipeline of attorneys in communities of color.

**Define Your Department's Opportunity**

DOL seeks to create workforce equity by attracting and retaining diverse attorneys and staff, particularly addressing the disparity in Hispanic attorneys, by improving recruitment practices and offering Department-wide training.

## RACIAL EQUITY ACTION PLAN: Priority #1

### Our department will advance the following strategies:

**1. Department Strategy: Address unconscious biases that exist in recruitment practices to attract more diverse candidates.**

**Measures of Impact: Increased diversity of DOL workforce; higher level of consciousness in hiring process around issues of bias.**

Actions	Implementation Plan	Timeline	Status
1.1 Update minimum requirements	Review attorney job descriptions and minimum requirements for all existing and future positions for opportunities to improve equity. [Resources: DOL Director of Attorney Recruitment, First Assistant Corporation Counsel, Director of Personnel Policies]	Q1-2024	
1.2 Implement DEI training for hiring managers	Provide training on diversity, equity, and inclusion for hiring managers. [Resources: 0169 funds and the training will be identified by DOL Administration; DOL Deputies and Hiring Managers]	Q3-2024	
1.3 Update interview questions to include value-based questions	Review interview questions and identify opportunities to include value-based questions. [Resources: Director of Attorney Recruitment will work with the Committee on Inclusion and Diversity to propose questions to Corporation Counsel for approval]	Q1-2024	

## RACIAL EQUITY ACTION PLAN: Priority #1

**Our department will advance the following strategies:**

**2. Department Strategy: Market DOL as DEI-focused employer at job fairs and external recruitment events to attract and increase the number of applicants that reflect Chicago's demographics.**

**Measures of Impact: Increase in applications received from job fairs and external recruitment (including increase in diverse applicants); increase in number of hires (including increase in number of diverse hires) from job fairs and external recruitment events.**

Actions	Implementation Plan	Timeline	Status
2.1 Revamp DOL marketing for job fairs and recruitment events	Create a communications plan for use at job fairs and other recruiting events that includes strategies and tactics which showcase DOL as a DEI-focused employer. [Resources: Director of Attorney Recruitment, First Assistant Corporation Counsel, Deputy Corporation Counsel – Administrative Services]	Q1-2024	
2.2 Track hiring process of external candidates recruited from career fairs and other hiring events.	Retain information from applicants to track progress through the hiring process and determine the number of applicants hired from events; use tracking data to identify challenges/dropoffs in the hiring process. [Resources: Director of Attorney Recruitment, DHR ]	Q4-2023	
2.3 Host career and informational sessions	Organize biannual career/hiring informational session (inclusive of law students), including an event in the spring for graduating 3Ls. [Resources: DOL Corporation Counsel, First Assistant, DOL Professional Development, DOL CID]	Plan in Q4-2023 for Q2-2024 event; plan in Q3-2024 for Q4-2024 event	

## RACIAL EQUITY ACTION PLAN: Priority #1

**Our department will advance the following strategies:**

**3. Department Strategy: Reduce barriers in application process to increase the applicant pool.**

**Measures of Impact: Increased rate of complete applications submitted. Reduced drop-off rate for applicants with incomplete applications. Increase in applications from most negatively impacted community.**

Actions	Implementation Plan	Timeline	Status
3.1 Streamline job postings	Create standard application per position with minimum qualifications. [Resources: Director of Attorney Recruitment, DOL Deputies and Hiring Managers, DHR]	Q1-2024	
3.2 Reduce dropoff rate in applicant pool	Review and update the current policy on informing candidates about background check requirements including fingerprinting. [Resources: DOL Corporation Counsel, DOL Administrative Services, DHR]	Q1-2024	
3.3 Simplify access to application and hiring process	Create information for DOL's website to explain its hiring process. [Resources: DOL Corporation Counsel, First Assistant, DOL Administrative Services, DHR, AIS (technology)]	Q3-2024	

## RACIAL EQUITY ACTION PLAN: Priority #1

**Our department will advance the following strategies:**

**4. Department Strategy: Increase community engagement with Hispanic community organization and networks for attorney pipeline.**

**Measures of Impact: Decrease in disparity of workforce representation of Hispanics in attorney positions in DOL.**

Actions	Implementation Plan	Timeline	Status
<p>4.1 Collect feedback from Hispanic legal organizations regarding DOL awareness, barriers, challenges to hiring process</p>	<p>Collect feedback from bar and legal aid organizations serving Hispanic communities. [Resources: First Assistant, Director of Attorney Recruitment, Cohort 2 members and/or designees from CID]</p>	<p>Q3-2024</p>	
<p>4.2 Determine how feedback gathered can inform recruiting practices and processes</p>	<p>Review feedback and incorporate feasible strategies to decrease the disparity of workforce representation of Hispanic attorney and support staff positions in DOL. [Resources: First Assistant, Director of Attorney Recruitment, Cohort 2 members and/or designees from CID]</p>	<p>Q4-2024</p>	

## RACIAL EQUITY ACTION PLAN: Priority #1

**Our department will advance the following strategies:**

**5. Department Strategy: Provide training and education re DEI and implicit bias.**

**Measures of Impact: Continuing Legal Education classes (provider: DOL) and mandatory training for equity implemented in DOL.**

Actions	Implementation Plan	Timeline	Status
5.1 Implement mandatory department implicit bias training	Budget and schedule mandatory department implicit bias training to increase awareness of equity and implicit bias among DOL staff; full compliance in attending trainings. [Resources: Director of Attorney Recruitment, First Assistant Corporation Counsel, Deputy Corporation Counsel – Administrative Services]	Q2-2024	
5.2 Provide CLE trainings twice a year for Diversity credits	Implement semiannual CLE training with a DEI focus, with input from DOL’s Committee on Inclusion and Diversity. [Resources: Director of Attorney Recruitment, CID]	Q2-2023	Ongoing



## RACIAL EQUITY ACTION PLAN: Priority #1


**Our department will advance the following strategies:**

**5. Department Strategy: Increase mentoring of DOL law clerks to increase their professional networks and sense of belonging, needs which are particularly critical to address for law students of color, women, and first-generation law students.**

**Measures of Impact: Mentor and law clerk feedback.**

Actions	Implementation Plan	Timeline	Status
6.1 Implement a mentoring program for summer law clerks.	All law clerks will be assigned a mentor from outside of their assigned division. Mentors will have weekly check-ins with mentees.	Q2-2023	Completed.
6.2 Implement a year-round mentoring program for law clerks.	Implement a law clerk mentoring program for law clerks clerking during the academic school year.	Q3-2024	Ongoing

## RACIAL EQUITY ACTION PLAN: Priority #2

**The City of Chicago's Vision:** All people and all communities have power, are free from oppression, and are strengthened by equitable access to resources, environments, and opportunities that promote optimal health and well-being. (HC2025) 



### Citywide Priority Area & Desired Result:

**CONTRACTING: All Chicagoans benefit from and can participate in economic business with the City of Chicago.**

### Indicators Examined:

#### *Community Data*

Demographics of City of Chicago

#### *Program/Department Data*

Data regarding DOL's outside counsel utilization relative to law firm ownership and attorney demographic information.

### Community Feedback and Narratives

### Define the Problem

DOL would like to engage minority- and women-owned law firms in a greater proportion of cases. Historically, this has been challenging in part due to the small proportion of law firms that are majority-owned by minorities and women.

### Identify Root Causes to the Problem

Historically, communities of color have had limited access to legal educational opportunities, scholarships, and professional networks that would support starting a career in law (as an attorneys or support staff). Further, attorneys of color represent a disproportionate number of associates at large law firms, and an even smaller proportion of equity partners, suggesting there are various barriers on the pathway to partnership.

**Define Your Department's Opportunity**

DOL can forge stronger connections with law firms owned by minorities and women in order to ensure a more equitable distribution of dollars spent on outside counsel. DOL can also place a stronger emphasis on law firm diversity so that diverse attorneys at firms handling matters for the DOL receive high-quality assignments on those matters that develop their professional experience.

## RACIAL EQUITY ACTION PLAN: Priority #2

### Our department will advance the following strategies:


**1. Department Strategy: Proactively engage with minority-owned law firms and work with all outside counsel law firms to create equity in work distribution.**

**Measures of Impact: Increased utilization of minority-owned law firms and diverse attorneys and paraprofessionals at law firms (tracked by expense data).**

Actions	Implementation Plan	Timeline	Status
1.1 Analyze outside counsel distribution	Review list of existing outside counsel law firms; review current data on percentage of DOL's outside counsel caseload handled by minority law firms. [Resources: Corporation Counsel, First Assistant Corporation Counsel, Managing Deputy of Litigation, Deputy Corporation Counsel – Administrative Services]	By Q4-2024	
1.2 Revise outside counsel guidelines to require firms to report timekeeper EEO demographics	Require firms to report timekeeper EEO demographics; require full compliance from outside counsel firms; revise outside counsel guidelines and publish to law firms; require law firms'/timekeepers' demographic data in CounselLink (DOL's legal expense management tool). [Resources: Corporation Counsel, First Assistant Corporation Counsel, Managing Deputy of Litigation, Deputy Corporation Counsel – Administrative Services]	By Q4-2024	
1.3 Review engagement letter	Revise engagement letter template to state City's/DOL's inclusivity values and requirements. [Resources: Corporation Counsel, First Assistant Corporation Counsel, Managing Deputy of Litigation, Deputy Corporation Counsel – Administrative Services]	By Q4-2024	

<p>1.4 Update outside counsel contact list</p>	<p>Continue to monitor outside counsel and identify diverse leaders in areas of law DOL practices. [Resources: Counsel, First Assistant Corporation Counsel, Managing Deputy of Litigation, Deputy Corporation Counsel – Administrative Services]</p>	<p>Q2-2024</p>	
<p>1.5 Reinstate open-houses</p>	<p>Cultivate and maintain relationships with minority-owned law firms in Chicago by conducting an open-house for firms, with a focus on outreach to small and MBE/WBE law firms. [Resources: Event planning will involve multiple DOL senior leaders]</p>	<p>Q2-2024; Q4-2024</p>	

## RACIAL EQUITY ACTION PLAN: Priority #3

**The City of Chicago's Vision:** All people and all communities have power, are free from oppression, and are strengthened by equitable access to resources, environments, and opportunities that promote optimal health and well-being. (HC2025) 



### Citywide Priority Area & Desired Result:

**ENVIRONMENT, CLIMATE & ENERGY: All Chicagoans breathe air free from pollutants and have resilient and sustainable communities.**

### Indicators Examined:

#### *Community Data*

Air quality data; news reports.

#### *Program/Department Data*

City of Chicago Air Quality and Health Report, 2020

### Community Feedback and Narratives

Many neighborhoods that are situated closer to highways and high concentrations of industry have a high proportion of low-income residents and residents of color. These residents have spoken out about the disproportionate pollution burden in their areas.

### Define the Problem

Chicago residents face various deceptive and abusive business practices, including some that impact our environment and air quality.

### Identify Root Causes to the Problem

In addition to historical red-lining practices and other racial causes of the development of Chicago's segregated neighborhoods alongside the development of highways and industry, some corporations have misrepresented the environmental impact of their manufacturing process and/or the use of their products.

**Define Your Department's Opportunity**

DOL's Affirmative Litigation Division (ALD) can address violations of Chicago's consumer protection ordinance and other laws by demanding action and/or damages from polluters, or bringing lawsuits to address these violations.

## RACIAL EQUITY ACTION PLAN: Priority #3

**Our department will advance the following strategies:**


**1. Department Strategy: Develop strategy to hold sellers of polluting products accountable.**

**Measures of Impact: Action taken by polluters to inform consumers about the true impact of their products; dollars collected in actions against polluters**

Actions	Implementation Plan	Timeline	Status
1.1 Analyze potential targets for legal action.	The ALD will investigate potential violations of the City's consumer protection ordinance and other laws.	Q3-Q4 2023	
1.2 Bring litigation against selected violators.	Utilize contacts with community organizations to identify bad actors or problems that could be remedied via affirmative litigation.	Q4 2023	



## RACIAL EQUITY ACTION PLAN: Priority #4

**The City of Chicago's Vision:** All people and all communities have power, are free from oppression, and are strengthened by equitable access to resources, environments, and opportunities that promote optimal health and well-being. (HC2025) 



### Citywide Priority Area & Desired Result:

**ECONOMIC DEVELOPMENT: All Chicagoans are economically self-sufficient, can build wealth, and thrive.**

### Indicators Examined:

#### *Community Data*

Reports from legal aid and community organizations.

#### *Program/Department Data*

Investigation data.

### Community Feedback and Narratives

When businesses engage in acts of consumer fraud, unfair competition, or other deceptive practices, these acts reduce residents' economic resiliency. Chicagoans have complained about businesses that engage in unfair lending practices and deceptively market programs purporting to help residents resolve their debts and improve their credit.

### Define the Problem

The Department of Law's (DOL) Affirmative Litigation Division (ALD) pursues violations of the City of Chicago's consumer protection ordinance. However, ALD can only pursue those violations of which it is aware. Thus, ALD relies on contacts with legal aid and other organizations with greater grassroots reach, in order to stay informed about potential consumer abuses or other acts which could be remedied through legal action. Specifically in the realm of lending, lower-income residents frequently seek reasonably priced loans or help resolving outstanding debts and repairing damaged credit. Some businesses prey upon residents facing difficult financial circumstances, extracting money from those who can least afford to pay.

### Identify Root Causes to the Problem

Businesses typically seek to make a profit, but some businesses are willing to cut corners and even violate the law in order to increase profits. Unfair lending and deceptive debt-negotiation and credit-repair programs are two areas of bad business practices that DOL seeks to address.

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### **Define Your Department's Opportunity**

Often, the consumers or residents who are most affected have few resources to pursue legal action on their own. The ALD works to use its resources most efficiently and effectively to obtain redress from businesses that violate the law. DOL can forge stronger bonds with legal aid organizations serving vulnerable populations in order to stay informed about misconduct and bad business practices committed by companies operating or selling products within the City of Chicago. In addition, ALD has filed lawsuits under the City's consumer protection ordinances against businesses that (a) used unfair lending terms in "selling" distressed properties to low-income residents on a rent-to-own basis, and (b) deceptively market a debt-negotiation program while charging exorbitant fees. ALD is investigating other businesses for similar misconduct.

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## RACIAL EQUITY ACTION PLAN: Priority #4

**Our department will advance the following strategies:**

**1. Department Strategy: Increase Affirmative Litigation Division outreach to local organizations that are attuned to community needs.**

**Measures of Impact: Increase in information flow/tips about potential legal violations.**

Actions	Implementation Plan	Timeline	Status
1.1 Review/update directory of local organizations	Affirmative Litigation Division will review their directory of community organizations and make updates accordingly if it identifies additional organizations.	Q1 2024	
1.2 Target community organizations for regular contact.	Each Affirmative Litigation Division attorney will identify 4-5 organizations within which to maintain biannual contact.	Q1 2024	
1.3 Leverage relationships with community organizations to identify opportunities to pursue justice on behalf of underserved communities.	Utilize contacts with community organizations to identify bad actors or problems that could be remedied via affirmative litigation.	Q4 2024	

## RACIAL EQUITY ACTION PLAN: Priority #4

### Our department will advance the following strategies:

**2. Department Strategy: Address unlawful lending practices with affirmative litigation.**

**Measures of Impact: Dollars recovered in litigation; injunctions entered against unlawful business practices.**

Actions	Implementation Plan	Timeline	Status
2.1 Resolve ongoing litigation described above.	ALD will continue to litigate its pending lawsuits, seeking restitution for injured residents and injunctive relief requiring changed business practices.	2023-2025	
2.2 Investigate other businesses for similar misconduct	ALD will use its pre-suit subpoena authority and other methods to investigate businesses that engage in unfair lending and administer deceptive debt-resolution or credit-repair programs.	Q4 2023, 2024	
2.3 Sue businesses that engage in misconduct	ALD will follow through on its investigations by suing businesses identified as having violated the City's laws, seeking restitution for injured residents and injunctive relief requiring changed business practices.	2024	