

JUST HOUSING AMENDMENT

EVALUATION AND REPORT ISSUED ON NOVEMBER 19, 2024

Cook County Commission on Human Rights (CCCHR) 2024 Evaluation and Report Just Housing Amendment

For the Period of November 1, 2023 to October 31, 2024

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Acknowledgments: Thank you to CCCHR's Investigators and support staff for working tirelessly to amicably resolve housing complaints and encourage fair housing practices in Cook County. Thank you to the many community groups, associations, non-profit organizations, and individuals who continue to support outreach regarding Cook County's laws, distributed the surveys to others, and took the time to complete the survey and provide feedback regarding the Just Housing Amendment. Thank you to Cook County's GIS Division for creating the "Complainant Occurrence by ZIP Code" map.

I. <u>Background:</u>

Based on national statistics, it is estimated that up to 1,407,000 individuals with arrest or conviction records may currently reside in Cook County. One of the significant factors that reduce recidivism, the likelihood that an individual will commit future crimes, is access to safe, stable and affordable housing. Yet, in most cities, people with any justice involvement can be unfairly denied housing.

This is why Cook County has become a national leader in enforcing fair housing protections and institutionalizing supportive services for individuals with arrest or conviction records. Governmental and community support ensures that individuals with arrest or conviction records have the same access to live freely in Cook County as the rest of the public.

The Just Housing Amendment (JHA) to the Cook County Human Rights Ordinance (Ord. No. <u>19-2394</u> § 42-38) was passed to ensure individuals with arrest or conviction records can access safe, stable and affordable housing.

The JHA passed on April 25, 2019, and enforcement began on February 1, 2020. The JHA applies to real estate transactions, including the sale, rental, lease, and sublease renewal of residential properties. The JHA:

- 1. Prohibits housing discrimination based on an individual's covered criminal history; and
- 2. Requires housing providers considering an individual's covered criminal history to perform an **individualized assessment** of an otherwise qualified individual's criminal conviction history prior to denying them any application for housing.

What is an **individualized assessment**?

An "individualized assessment," as referenced in the JHA, means a process by which a person considers all factors relevant to an individual's conviction history from the previous three (3) years. An individualized assessment is not required for convictions that are more than three (3) years old.

Factors that may be considered in performing the Individualized Assessment include, but are not limited to:

- 1) The nature and severity of the criminal offense and how recently it occurred;
- 2) The nature of the sentencing;
- 3) The number of the applicant's criminal convictions;
- 4) The length of time that has passed since the applicant's most recent conviction;
- 5) The age of the individual at the time the criminal offense occurred:
- 6) Evidence of rehabilitation:
- 7) The individual's history as a tenant before and/or after the conviction;
- 8) Whether the criminal conviction(s) was related to or a product of the applicant's disability; and
- 9) If the applicant is a person with a disability, whether any reasonable accommodation could be provided to ameliorate any purported demonstrable risk.

What is **covered criminal history**?

Any information regarding an individual's arrest, charge, or citation for an offense; participation in a diversion or deferral of judgment program; record of an offense that has been sealed, expunged, or pardoned in accordance with applicable law; juvenile record; and conviction.

U.S. Census Bureau QuickFacts: Cook County, Illinois. (n.d.). https://www.census.gov/quickfacts/fact/table/cookcountyillinois/PST045223

² Vallas, R., & Dietrich, S. (2014, December 12). One Strike and You're Out. Center for American Progress. https://www.americanprogress.org/article/one-strike-and-you're-out/

Procedures

Housing providers can not include a question on housing applications that asks whether an applicant has a criminal background.

Disclosures:

Before accepting an application fee, the housing provider must disclose the following:

- Tenant Selection Criteria, which describes how an applicant will be evaluated.
- Notice of the applicant's right to dispute inaccuracies relevant to criminal history and to provide evidence of rehabilitation or other mitigating factors related to their criminal background.
- A copy of Part 700 of CCCHR's Procedural Rules or a link to the CCCHR website, with the address, email address, and phone number of CCCHR.

Two-Step Evaluation Process:

An important element of the JHA is that it separates other aspects of housing applications, such as income, rental history and credit score checks, from a background check and individualized assessment, if necessary. This means that housing providers should process all aspects of a housing application other than a background check *before* conducting a background check.

Step One: Prequalification

- During this step, a housing provider may screen a tenant to determine whether the applicant satisfies all the application criteria such as income, rental history, credit score, pets, etc. **Background checks cannot be performed during Step One.**
- When this first step is completed, the housing provider must either 1) pre-qualify the applicant based on all criteria except those related to criminal history; or 2) deny the application based on failure to satisfy the prequalification criteria.

Step Two: Background Check & Individualized Assessment, if necessary

- Only after the housing provider prequalifies an applicant may a housing provider conduct a background check.
- If the background check reveals a criminal history, the housing provider may only consider criminal conviction(s) within the last three (3) years.
 - A landlord may deny an applicant housing based on criminal history only if:
 - Applicant is a current sex offender required to register under the **Sex Offender Registration Act** (or similar law in another jurisdiction) or a **current child sex offender** under residency restriction; or
 - An individualized assessment affirms that a **criminal conviction within the last three (3)** years causes a **demonstrable risk to the personal safety or property of others**.

Does an applicant who is denied housing have the right to dispute the information contained in the background check?

Yes. The JHA Conviction Dispute Procedures are as follows:

- Within five (5) business days of receiving a background check, the housing provider must deliver a copy to the applicant. A copy of the background check can be delivered in person, by certified mail, or by text or email.
- Once the applicant receives the results of the background check, the applicant has five (5)
 business days to provide evidence that disputes the accuracy or relevance of information
 related to the background check.
- The housing provider then has three (3) business days from receipt of the dispute information to accept or deny the application.

II. Enforcement Data

Since the inception of JHA enforcement, CCCHR has received fifty-eight (58) complaints alleging JHA violations.

In 2024, the categorization options for "Nature of the Complaint" shifted to more accurately capture the point during which potential discrimination took place. The current categories are:

- Discriminatory Advertisement
- Discriminatory Rental Application Policies
- Improper application denial based on arrest or conviction history
- Post-application improper denial following individualized assessment.

Additionally, on September 3, 2024, CCCHR shifted to an online complaint form, which has temporarily shifted case numbering. CCCHR anticipates that case numbering will return to the previous format in 2025.

| | Date | Case Number | Nature of Complaint | Resolution |
|----|-----------|-------------|--|---|
| 1 | 7/20/2020 | 2020H003 | Post-application improper denial following individualized assessment | Alleged Conduct occurred before JHA effective date/ No jurisdiction over racial discrimination claim |
| 2 | 8/28/2020 | 2020JHA001 | Improper application denial based on arrest or conviction history | Settlement |
| 3 | 8/28/2020 | 2020JHA002 | Discriminatory Advertisement | Settlement |
| 4 | 9/8/2020 | 2020JHA003 | Improper application denial based on arrest or conviction history | Withdrawal |
| 5 | 9/30/2020 | 2020JHA004 | Improper application denial based on arrest or conviction history | Settlement |
| 6 | 3/19/2021 | 2021JHA001 | Discriminatory Advertisement | Settlement |
| 7 | 4/29/2021 | 2021JHA002 | Discriminatory Advertisement | Withdrawal |
| 8 | 4/29/2021 | 2021JHA003 | Discriminatory Advertisement | Settlement |
| 9 | 4/29/2021 | 2021JHA004 | Discriminatory Advertisement | Settlement |
| 10 | 4/29/2021 | 2021JHA005 | Discriminatory Advertisement | Settlement |
| 11 | 4/29/2021 | 2021JHA006 | Discriminatory Advertisement | Withdrawal/Duplicate Complaint |
| 12 | 6/2/2021 | 2021JHA007 | Improper application denial based on arrest or conviction history | Settlement |
| 13 | 7/2/2021 | 2021JHA008 | Discriminatory Rental Application Policies | Withdrawal |
| 14 | 7/16/2021 | 2021JHA009 | Improper application denial based on arrest or conviction history | Settlement |
| 15 | 8/26/2021 | 2021JHA010 | Improper application denial based on arrest or conviction history | Settlement |
| 16 | 9/15/2021 | 2021JHA011 | Improper application denial based on arrest or conviction history | Settlement |
| 17 | 9/20/2021 | 2021JHA012 | Discriminatory Rental Application Policies | Settlement |
| 18 | 11/1/2021 | 2021JHA013 | Improper application denial based on arrest or conviction history | Settlement |

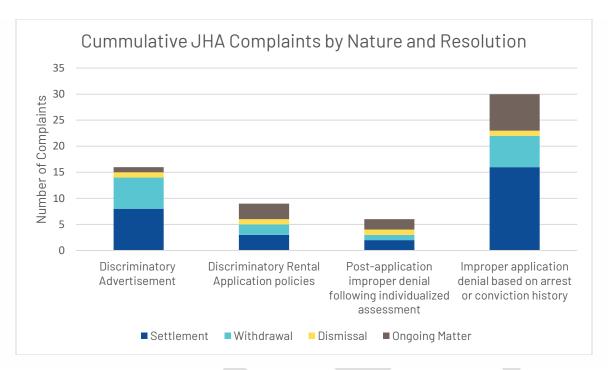
| 19 | 11/9/2021 | 2021JHA014 | Discriminatory Rental Application Policies | Dismissed for Lack of Jurisdiction |
|----|--------------------------|------------|---|---|
| 20 | 11/12/2021 | 2021JHA015 | Improper application denial based on arrest or conviction history | Settlement |
| 21 | 11/19/2021 | 2021JHA016 | Improper application denial based on arrest or conviction history | Settlement |
| 22 | 12/10/2021; 1/13/2022 | 2022JHA001 | Improper application denial based on arrest or conviction history | Withdrawal |
| 23 | 1/12/2022 | 2022JHA002 | Post-application improper denial following individualized assessment | Settlement |
| 24 | 2/16/2022 | 2022JHA003 | Improper application denial based on arrest or conviction history | Settlement |
| 25 | 2/16/2022 | 2022JHA004 | Improper application denial based on arrest or conviction history | Withdrawal |
| 26 | 3/1/2022 | 2022JHA005 | Improper application denial based on arrest or conviction history | Settlement |
| 27 | 4/25/2022 | 2022JHA006 | Improper application denial based on arrest or conviction history | Withdrawal |
| 28 | 5/20/2022 | 2022JHA007 | Post-application improper denial following individualized assessment | Settlement |
| 29 | 6/29/2022 | 2022JHA008 | Improper application denial based on arrest or conviction history | Matter Ongoing |
| 30 | 7/20/2022 | 2022JHA009 | Improper application denial based on arrest or conviction history | Settlement |
| 31 | 8/10/2022 | 2022JHA010 | Improper application denial based on arrest or conviction history | Withdrawal |
| 32 | 7/28/2022 | 2022JHA011 | Discriminatory Advertisement | Dismissed for Lack of Response |
| 33 | 7/28/2022 | 2022JHA012 | Discriminatory Advertisement | Withdrawal |
| 34 | 7/28/2022 | 2022JHA013 | Discriminatory Advertisement | Withdrawal |
| 35 | 7/28/2022 | 2022JHA014 | Discriminatory Advertisement | Settlement |
| 36 | 7/28/2022 | 2022JHA015 | Discriminatory Advertisement | Settlement |
| 37 | 7/28/2022 | 2022JHA016 | Discriminatory Advertisement | Withdrawal |
| 38 | 9/15/2022 | 2022JHA017 | Improper application denial based on arrest or conviction history | Settlement |
| 39 | 11/14/2022 | 2022JHA018 | Improper application denial based on arrest or conviction history | Dismissed for Private Room Exception |
| 40 | 10/25/2023 | 2023H029 | Improper application denial based on arrest or conviction history | Settlement |
| 41 | 12/27/2022 | 2023JHA001 | Improper application denial based on arrest or conviction history | Settlement |
| 42 | 2/1/2023 | 2023JHA002 | Discriminatory Advertisement; Improper application denial based on arrest or conviction history | Settlement |
| 43 | 2/6/2023 | 2023JHA003 | Improper application denial based on arrest or conviction history | Matter Ongoing |
| 44 | 4/5/2023 | 2023JHA004 | Improper application denial based on arrest or conviction history | Matter Ongoing |
| 45 | 1/29/2023 | 2023JHA005 | Discriminatory Rental Application Policies | Settlement |

| 46 | 5/18/2023 | 2023JHA006 | Discriminatory Advertisement; Improper application denial based on arrest or conviction history | Withdrawal |
|----|------------|--------------|---|----------------|
| 47 | 6/23/2023 | 2023JHA007 | Discriminatory Rental Application Policies | Settlement |
| 48 | 8/29/2023 | 2023JHA008A | Improper application denial based on arrest or conviction history | Matter Ongoing |
| 49 | 10/11/2023 | 2023JHA009 | Discriminatory Rental Application Policies | Withdrawal |
| 50 | 10/30/2023 | 2023JHA010 | Discriminatory Rental Application Policies | Matter Ongoing |
| 51 | 11/8/2023 | 2023JHA011 | Post-application improper denial following individualized assessment | Matter Ongoing |
| 52 | 5/9/2024 | 2024H011 | Discriminatory Rental Application Policies; Discriminatory Advertisement | Matter Ongoing |
| 53 | 2/26/2024 | 2024JHA001 | Post-application improper denial following individualized assessment | Matter Ongoing |
| 54 | 3/7/2024 | 2024JHA002 | Discriminatory Rental Application Policies | Matter Ongoing |
| 55 | 2/21/2024 | 2024JHA003 | Post-application improper denial following individualized assessment | Withdrawal |
| 56 | 9/4/2024 | 2024JHA00086 | Improper application denial based on arrest or conviction history | Matter Ongoing |
| 57 | 9/12/2024 | 2024JHA00101 | Improper application denial based on arrest or conviction history | Matter Ongoing |
| 58 | 9/12/2024 | 2024JHA00102 | Improper application denial based on arrest or conviction history | Matter Ongoing |

a. Complaint Summary

i. Cumulative (since the beginning of enforcement in February 2020)

- Thirty (30) complaints were made for improper application denials based upon arrest or conviction history.
- Six (6) complaints were made for post application improper denials following individualized assessment.
- Fifteen (15) complaints were made for discriminatory advertisements.
- Nine (9) complaints were made for discriminatory rental policies.
- Estimated total settlement amount reported for JHA complaints is \$41,031.
- Forty-six (46) of the fifty-eight (58) JHA complaints have been closed.
 - Of the forty-six (46) closed cases, twenty-eight (28) resulted in settlement, which included monetary awards and other compensatory damages; and at least eight (8) housing providers received training from housing community groups on compliance with JHA.
 - o Of the forty-six (46) closed cases, fourteen (14) Complainants voluntarily withdrew their complaints.
 - Three (3) JHA complaints resulted in the Complainant being placed in a housing unit or retaining housing in the property at issue.
- Nineteen (19) complaints were filed in the name of a housing community group.

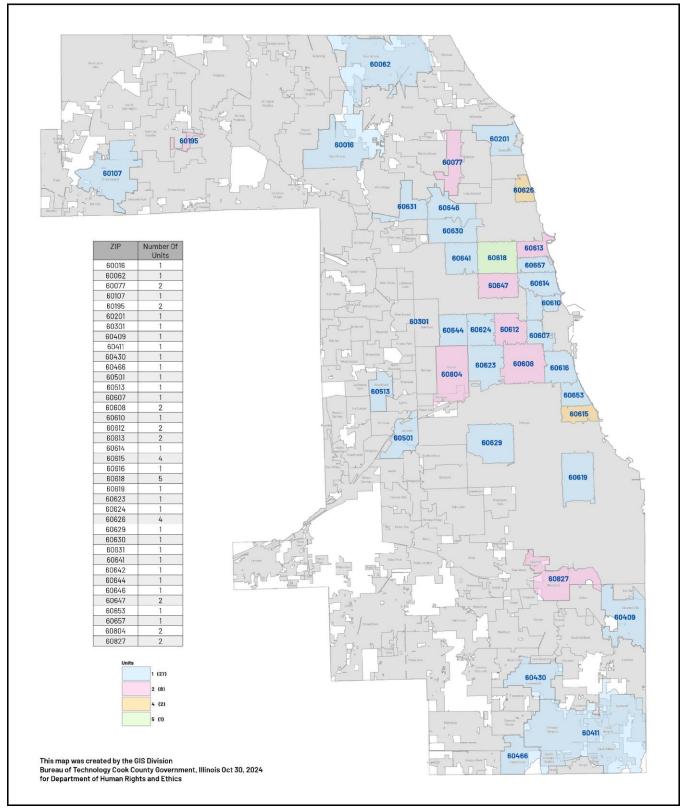


ii. November 1, 2023 to October 31, 2024 Reporting Period

- From November 1, 2023 to October 31, 2024, the Commission handled a total of fifteen (15) JHA complaints.
 - o Of these, seven (7) JHA complaints were filed during the period of November 1, 2023, to October 31, 2024.
 - Of these seven, one (1) complaint has been resolved.
 - o As of October 31, 2024, CCCHR has twelve (12) open JHA cases.
- Estimated settlement amount for cases settled during the reporting period is \$8,500, which is underreported as we have been informed of several cases that settled for undisclosed amounts.
- The complaints resolved in the reporting period included no instances where an individualized assessment was conducted, or demonstrable risk found. There are several matters ongoing, which the Commission cannot make an assessment regarding.

iii. Map: Complaint Occurrence by ZIP Code

This map depicts the cumulative JHA complaints that have been filed with CCCHR based on the ZIP code of the unit(s) associated with the potential discrimination.



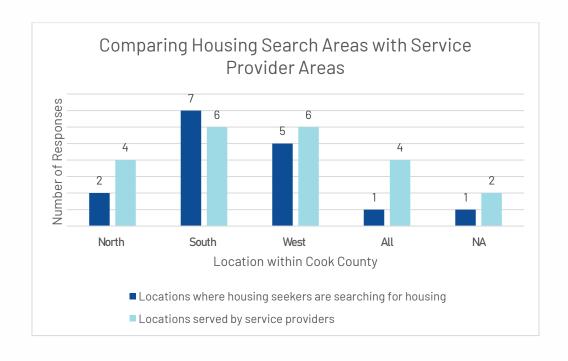
III. <u>Just Housing Amendment Survey</u>

To assess the impact of the JHA outside of the complaints filed with CCCHR, CCCHR issued the 2024 Just Housing Amendment Surveys (see Appendices A and B), which were open from September 16, 2024, to October 31, 2024. The surveys were emailed to community organizations and posted on CCCHR's LinkedIn and Instagram pages.

The 2024 Just Housing Amendment Surveys were separated into versions for [1] Housing Seekers/Applicants and [2] Cook County Service Providers. The intention in dividing the survey was to ask more specific questions that give insight into the amount and types of interventions that occur outside of CCCHR's complaint process.

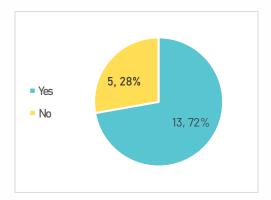
The 2024 Just Housing Amendment Surveys had significant limitations, specifically response bias. The response rate was consistent with 2023, but generally too low to derive real conclusions. There were also limitations in distribution and time, as CCCHR had the staff capacity to share the 2024 Just Housing Amendment Surveys through regular outreach efforts using the same survey hosting platform as in previous years.

The survey yielded thirty-five (35) responses, 18 from Housing Seekers/Applicants and 17 from Cook County Service Providers.

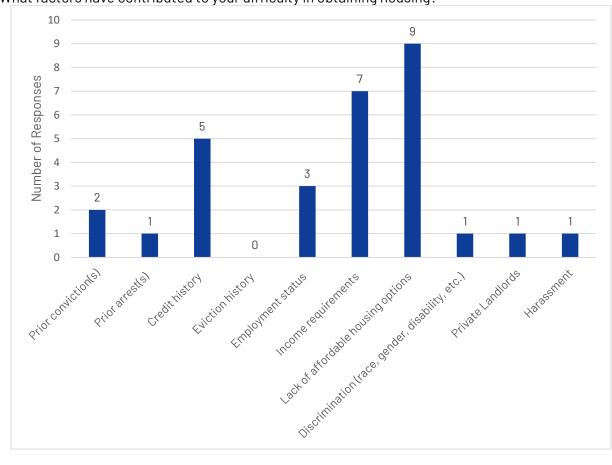


a. <u>Summary of Response Results for Housing Seekers/Applicants</u>

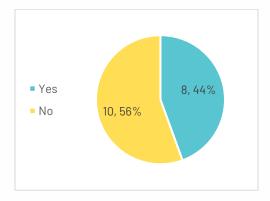
Have you had difficulty obtaining housing in the past 12 months?



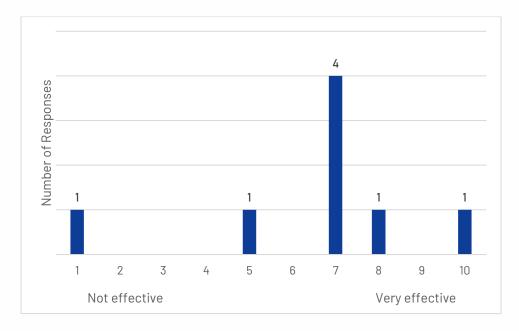
What factors have contributed to your difficulty in obtaining housing?



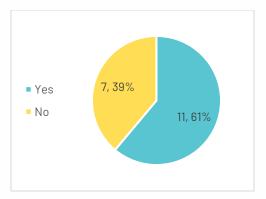
Have you received assistance from any organizations or agencies in finding housing?



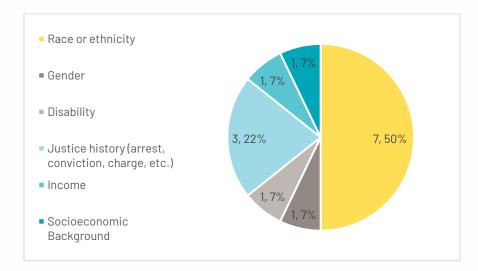
If yes, how effective was the support you received in helping you find housing?



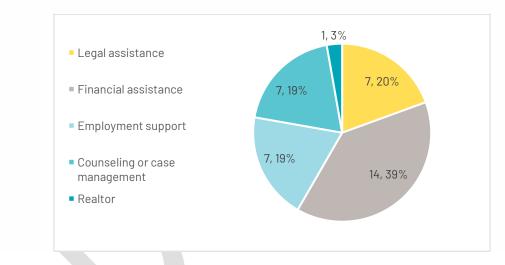
Have you ever felt that you were discriminated against while trying to access housing?



If yes, what type of discrimination did you experience?

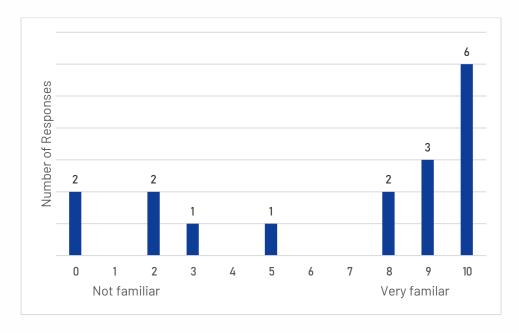


What type of support would help you most in securing stable housing?

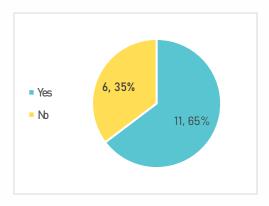


b. Survey for Cook County Service Providers

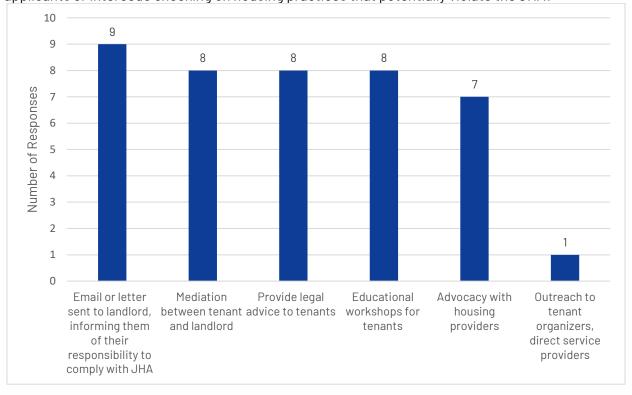
How familiar are you with the Just Housing Amendment (JHA) and provisions?



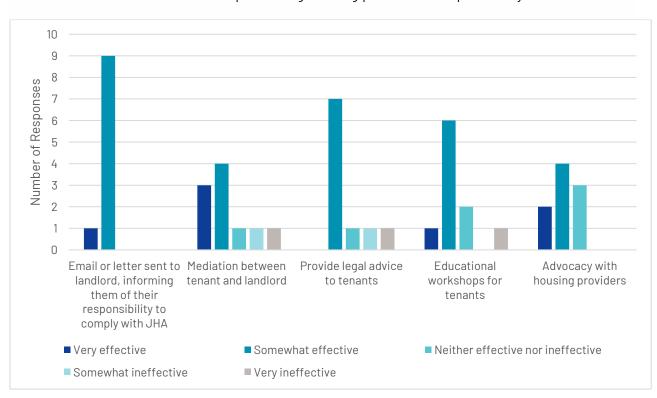
Do you try to resolve potential JHA violations with landlords before filing a formal Complaint?



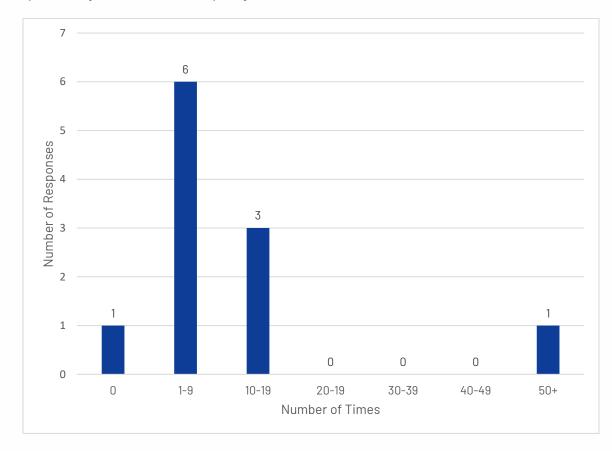
If yes, which type(s) of intervention method(s) does your organization use to support housing applicants or intercede checking on housing practices that potentially violate the JHA?



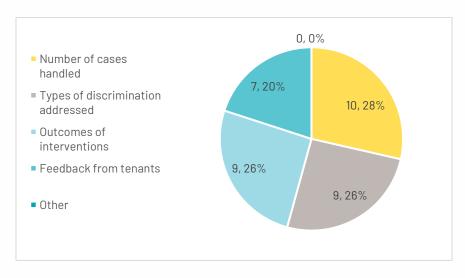
How effective are these actions in preventing housing practices that potentially violate the JHA?



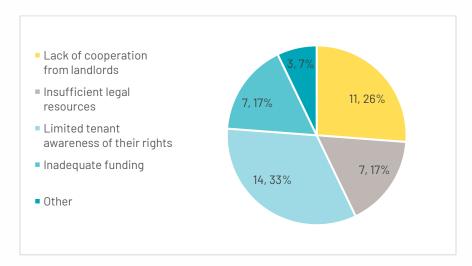
How many times has your organization supported housing applicants during application processes that potentially violate JHA in the past year?



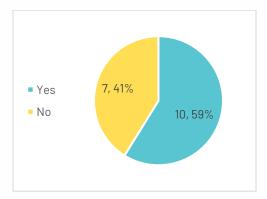
What types of data do you collect when handling potential housing discrimination? (Select all that apply)



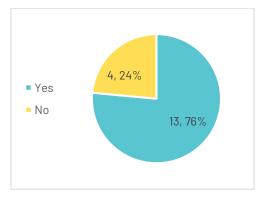
What challenges do you face in intervening in discriminatory housing practices?



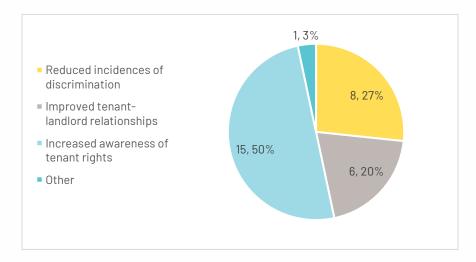
Has your organization participated in any training sessions about the Just Housing Amendment?

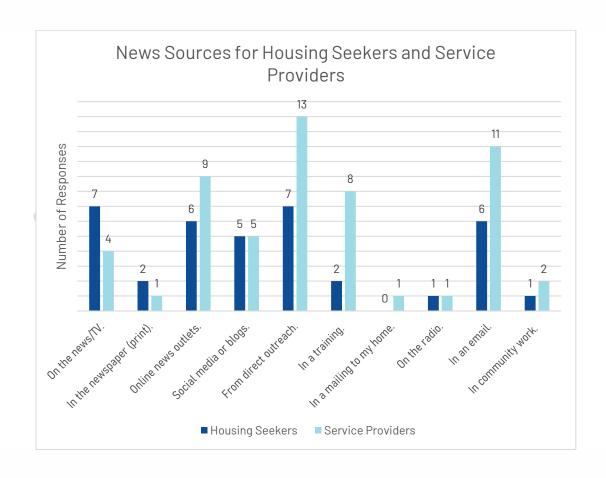


Do you collaborate with other organizations (e.g., community groups, non-profits, universities) to address discriminatory housing practices?



In your experience, what impact has supporting housing applicants had on preventing or addressing discriminatory housing practices?





Survey Conclusions

CCCHR has developed the following conclusions regarding the JHA based on responses to the 2024 Just Housing Amendment Surveys.

Responses from housing seekers reveal a range of challenges in their search for housing, driven by many factors, including financial barriers and discrimination. The types of discrimination reported span multiple aspects of identity, aligning with the types of complaints CCCHR has received, such as those based on race, arrest or conviction records, and gender. 30% of housing seekers who reported discrimination experienced more than one form of discrimination. Additionally, housing seekers identified numerous types of support they believe would help them secure housing.

Service providers are integral to JHA enforcement and often help inform landlords of the law and resolve potential discrimination, using CCCHR as a resort for escalation if a landlord is unwilling to comply. The survey results show that service providers currently offer various effective support services. Housing seekers rate the overall effectiveness of these services at an average of 6.5 out of 10. Service providers report offering advocacy, legal advice, and educational assistance. The effectiveness of assistance in preventing housing practices that potentially violate the JHA varies by the type of assistance and provider. These results indicate that there is no one-size-fits-all solution and the support given by service providers reflects the diverse needs of housing seekers, highlighting the crucial role of service providers in JHA enforcement.

Still, the average familiarity among providers with the JHA is 6.8 out of 10, with only 59% having attended a JHA training. This underscores the continued need to raise awareness and deepen understanding of the JHA.

Additionally, the survey results are not comprehensive, and significant gaps remain in our understanding of the JHA's full impact. To address this, CCCHR, in collaboration with Roosevelt University's Policy Research Collaborative, will conduct a first-of-its-kind JHA Impact Assessment (2024-2025). This assessment aims to provide CCCHR and Cook County service providers with deeper insights into the successes and the continuing challenges associated with the JHA.

In conclusion, the findings from the 2024 Just Housing Amendment Surveys, alongside insights gained from the upcoming JHA Impact Assessment, will inform and guide CCCHR's outreach and enforcement initiatives in 2025 and beyond.

IV. Outreach & Training

During this reporting period (November 1, 2023, to October 31, 2024), CCCHR hosted **twenty-three** (23) trainings regarding the JHA with **fifteen (15) partner community organizations**, to housing applicants and provider groups where approximately **1,000 individuals received live and recorded trainings**. In addition, staff distributed information regarding JHA at **eight (8) community events**, handing out flyers or educating on JHA to approximately 2000 individuals throughout 2024.

Ouarter 1 November 2023-January 2024

- **Training:** Presented on 2023 JHA Report and gave overview of new protections at Chicago Area Fair Housing Alliance (CAFHA) Member Meeting.
- Outreach Materials: Provided 600 JHA print materials to three Cook County Board of Commissioners' offices for distribution at their district offices; JHA overview content was shared with the Cook County Adult Probation Department, for inclusion in the quarterly newsletter.

Ouarter 2 February-April 2024

- **Training:** Gave trainings with Fairview Realty Group, South Suburban Housing Center (SSHC), NHS Chicago, Community Investment Corporation (CIC), and Cook County Adult Probation Department (2).
- **Tabling:** Participated in panel discussion on JHA enforcement progress at Illinois Re-entry Council Housing Workgroup Meeting; Shared JHA handouts at Westside Justice Center Expungement and Sealing Event.
- Outreach Materials: Shared 500 JHA print materials with Cook County Courts for distribution throughout Cook County; An updated JHA digital toolkit and training invitation was sent to 75 non-profit and community organizations.

Ouarter 3 May-July 2024

- **Training:** Gave trainings with CAFHA (5) and CIC (3), AllChicago (1), and Cook County Adult Probation Department (1).
- **Tabling:** Shared JHA handouts and information about CCCHR at Kenwood Oakland Community Organization's (KOCO) Annual Conference, Community Outreach and Training Coordinator, Housing Opportunities and Maintenance for the Elderly's (HOME) Resource Fair, Far South Community Development Corporation's Juneteenth Festival and Housing Workshops, and Northside Community Resources Annual Housing Fair.

Ouarter 4 August-October 2024

- **Training:** Gave trainings with HOME (1), Northside Community Resources (2), Open Communities (2), Alliance to End Homelessness in Suburban Cook County (1), CIC (1), HANA Center (1), CAFHA (2), Access Living (1), St. Leonard's Ministries (1), and Safer Foundation (1).
- **Tabling:** Organized a *Justice and Incarceration* Panel during Cook County's Racial Equity Week to educate Cook County employees on JHA; Discussed JHA during CANTV Channel 21's *Community Unity Now* segment; Shared JHA handouts at Breakthough's Annual Wellness Fair.
- Outreach Materials: Shared 250 JHA print materials in Korean, Spanish an English with HANA Center for distribution throughout Cook County.

Equity Fund Recommendation 2.2

CCCHR has continued our leadership role in <u>Equity Fund Recommendation 2.2</u> to increase enforcement and information-sharing regarding Cook County's housing protections, with an emphasis on JHA.



In September, CCCHR rolled out its *The Right Move!* Fair Housing outreach campaign with messages regarding JHA, source of income protections, and the right to access housing free from discrimination.

Here are highlights from the outreach campaign:

- Internal and external advertisements on Pace buses throughout suburban Cook County from September 23 to October 20, 2024. These advertisements reached **5,665,662 individuals** in suburban Cook County.
- Six trainings hosted by Open Communities, CAFHA and Safer Foundation to more than 150 training participants.
- Two full back page advertisements on Streetwise from October 9-30, 2024. These advertisements reached an estimated **21,000 individuals**.
- Instagram advertisements from October 10-23, 2024 with 13,983,551 post engagements.
- JHA Outreach Toolkit shared with 78 community organizations, realtor associations, and housing authorities on February 21, 2024.





V. Recommendation & Conclusions

The Substantive and Procedural Rules Governing the Cook County Human Rights Ordinance ("Procedural Rules") require that CCCHR annually assess if units should be required to be held off-market until the housing provider finishes conducting the individualized assessment. CCCHR reviews and evaluates other aspects of JHA as part of this assessment to identify areas where outreach and enforcement can be strategically improved.

Pursuant to Subsection 770 of the Procedural Rules, CCCHR must evaluate the rules implementing the JHA to determine whether the Procedural Rules should be amended to JHA's purpose. The evaluation shall include an analysis of whether applicants who receive a positive individualized assessment from housing providers are ultimately admitted into the unit they applied for and data about the complaints made under the Just Housing Amendment.

In 2023, CCCHR revised its Procedural Rules to "streamline the complaint process," as identified in Equity Fund Recommendation 2.2.

2024 Recommendation

No substantive amendments are recommended for Part 700 – Just Housing Amendment Interpretive Rules of CCCHR's Procedural Rules. The Commission continues to provide more strategic outreach and make process improvements to drive access and compliance with the JHA. As such, in September 2024, CCCHR published an online complaint form, significantly increasing public access to complaint filing. Further, at the end of the reporting period, two new Community Outreach and Training Coordinators joined the Commission, which will provide for more expansive knowledge and compliance with JHA.

Conclusions

For Housing Applicants and Landlords

Continued and increasing compliance are essential to JHA's efficacy. Similarly important is understanding JHA's procedures which make it uniquely impactful. An example of this is that housing providers should process all aspects of a housing application other than a background check before conducting a background check.

For questions regarding JHA compliance or to file a complaint, housing applicants and landlords are encouraged to contact CCCHR or a Cook County Service Provider. Continued strategic outreach is necessary to ensure broad knowledge and compliance with JHA.

For Cook County Service Providers

Survey results affirm that Cook County Service Providers support compliance with JHA outside the formal complaint process. Through these efforts, Cook County Service Providers encourage the most repair and continued compliance with the least administrative burden for all parties (Complainant, Respondent, CCCHR). CCCHR commends Service Providers for their efforts.

Recognizing that CCCHR's understanding of the impacts of JHA are limited in scope to filed complaints and anecdotal information from residents, on October 2, 2024, CCCHR announced a research partnership with Roosevelt University's Policy Research Collaborative to conduct a first-of-its-kind JHA Impact Assessment. The 2024-2025 JHA Impact Assessment will give CCCHR and

Cook County Service Providers new insights into successes and ongoing challenges in JHA's implementation and will allow CCCHR to advise other jurisdictions of the true impact of laws like JHA.



APPENDIX

Appendix A: 2024 Just Housing Amendment Survey for Housing Seekers/Applicants

Thank you for participating in this survey. Please answer the following questions based on your experiences. Your responses are confidential and will be used to improve housing services and policies!

The survey will close on 10/31. Please contact the Cook County Commission on Human Rights (human.rights@cookcountyil.gov | 312-603-1100) with questions or concerns.

The survey results are confidential and will only be used in aggregate to publicly share the results of the evaluation. The results of this survey are non-binding -- recorded responses will not necessarily result in policy changes.

Survey Questions 1. Have you had difficulty obtaining housing in the past 12 months? * Yes No No 2. What ZIP Code(s) are you primarily searching for housing in? * Enter your answer

| 3. | Wha | at fac | tors have | e contribu | ıted to yo | our difficul | Ity in obt | aining h | ousing? (| (Select all | that app | oly) |
|----|------------|---------|-------------|-------------|----------------|--------------|------------|-----------|-------------|-------------|----------|--------------|
| | | Prior | conviction | n(s) | | | | | | | | |
| | | Prior | arrest(s) | | | | | | | | | |
| | | Credi | t history | | | | | | | | | |
| | | Evicti | on history | , | | | | | | | | |
| | | Empl | oyment st | atus | | | | | | | | |
| | | Incon | ne require | ments | | | | | | | | |
| | | Lack | of affordal | ble housing | options | | | | | | | |
| | | Discr | mination | (race, gend | er, disability | y, etc.) | | | | | | |
| | | Ot | ner | | | | | | | | | |
| | | | | | | | | | | | | |
| 4. | Hav | e you | receive | d assistan | ice from a | any organi | izations | or agenci | ies in find | ding hou | sing? * | |
| | \bigcirc | Yes | | | | | | | | | | |
| | \bigcirc | No | | | | | | | | | | |
| | | | | | | | | | | | | |
| 5. | If ye | s, ho | w effecti | ve was th | e suppor | t you rece | ived in h | elping yo | ou find h | ousing? | | |
| | | 0 | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
| | Not e | effecti | /e | | | | | ' | | | Ve | ry effective |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |

| 6. Have you ever felt that you were discriminated against while trying to access housing? * |
|--|
| Yes |
| ○ No |
| |
| 7. If yes, what type of discrimination did you experience? (Select all that apply) |
| Race or ethnicity |
| Gender |
| Disability |
| Justice history (arrest, conviction, charge, etc.) |
| Other |
| |
| 8. What type of support would help you most in securing stable housing? (Select all that apply) * |
| Legal assistance |
| Financial assistance |
| Employment support |
| Counseling or case management |
| Other |
| |

Survey Conclusion

| 9. How do you hear about new or changed laws in your area? (Select all that may apply.) |
|---|
| On the news/TV. |
| In the newspaper (print). |
| On the Internet, specifically online news outlets. |
| On the Internet, specifically social media or blogs. |
| From direct outreach by a community group or association. |
| In a training (in-person or virtual). |
| In a mailing to my home. |
| On the radio. |
| In an email. |
| Other |
| |
| 10. If Cook County Commission on Human Rights can contact you further about your responses, please include a contact name and email or phone number where you can be reached. |
| Enter your answer |
| |
| |

| 11. I | f you would like | to be entered | into the raffl | e to win a \$ | 25 Target | gift card, | please s | skip |
|--------------|------------------|---------------|----------------|---------------|-----------|------------|----------|------|
| t | his question and | put your ema | il in the next | question. | | | | |

Enter your answer

12. My email:

Enter your answer



Appendix B: 2024 Just Housing Amendment Survey for Cook County Service Providers

Hello! This survey aims to understand the interventions by Cook County service providers in potentially discriminatory housing practices under JHA. This survey will aid in gathering data outside the formal complaint process and provide insights for the 2024 JHA Annual Report.

The survey will close on 10/31. Your responses will help improve housing policies and support fair housing practices in Cook County! Please contact the Cook County Commission on Human Rights (human.rights@cookcountyil.gov | 312-603-1100) with questions or concerns.

The survey results are confidential and will only be used in aggregate to publicly share the results of the evaluation. The results of this survey are non-binding -- recorded responses will not necessarily result in policy changes.

| Surv | /ey Q | uestior | ıs | | | | | | | | |
|-------|--|-------------|-----------|------------|-----------|--------------|----------------|-------------|------------|-----|--------------|
| | What ZIP Code(s) does your organization serve? * | | | | | | | | | | |
| | | ir answer | · | the lust I | lousing / |) no on duo | ont (IIIA) | and prov | delane? | k | |
| 2. Ho | ow fam | iliar are y | ou with 1 | tne Just F | Housing A | Amendme 5 | ent (JHA) 6 | and prov | /isions? * | 9 | 10 |
| No | t familia | r at all | | | | | | | | V | ery familiar |
| | you tr mplair | | olve pote | ntial JHA | violation | s with lar | ndlords b | efore filir | ng a form | nal | |
| С |) Yes | | | | | | | | | | |
| С |) No | | | | | | | | | | |
| | | | | | | | | | | | |

| If yes, which type(s) of intervention method(s) does your organization use to support housing applicants or intercede checking on housing practices that potentially violate the JHA? * | | | | | |
|---|---------------------|-----------------------|---|----------------------|------------------|
| Email or letter sent to land | lord, informing the | em of their respo | onsibility to compl | y with JHA | |
| Mediation between tenant | and landlord | | | | |
| Provide legal advice to ten | ants | | | | |
| Educational workshops for | tenants | | | | |
| Advocacy with housing pro | oviders | | | | |
| Other | | | | | |
| | | | | | |
| How effective are these ac | tions in prevent | ting housing | practices that p | otentially vio | late the |
| JHA? | | | | | |
| | Very effective | Somewhat effective | Neither effective nor ineffective | Somewhat ineffective | Very ineffective |
| Email or letter sent to landlord, informing them of their responsibility to comply with JHA | 0 | 0 | 0 | \circ | 0 |
| Mediation between tenant and landlord | \circ | \circ | \circ | \circ | \circ |
| Provide legal advice to tenants | \circ | \circ | \circ | \circ | 0 |
| Educational workshops for tenants | 0 | \circ | 0 | \circ | 0 |
| Advocacy with housing providers | \circ | \circ | 0 | \circ | \circ |
| | | | | | |

| | v many times has your organization supported housing applicants during application cesses that potentially violate JHA in the past year? * |
|------------|--|
| \bigcirc | 0 |
| \bigcirc | 1-9 |
| \circ | 10-19 |
| \bigcirc | 20-29 |
| \circ | 30-39 |
| \bigcirc | 40-49 |
| \circ | 50+ |
| | |
| | at types of data do you collect when handling potential housing discrimination? (Select all apply) * |
| | Number of cases handled |
| | Types of discrimination addressed |
| | Outcomes of interventions |
| | Feedback from tenants |
| | |
| | Other |

| | t challenges do you face in intervening in discriminatory housing practices? (Select all apply) * |
|------------|--|
| | Lack of cooperation from landlords |
| | Insufficient legal resources |
| | Limited tenant awareness of their rights |
| | Inadequate funding |
| | Other |
| | |
| | your organization participated in any training sessions about the Just Housing ndment? * |
| \circ | Yes |
| \circ | No |
| | |
| | ou collaborate with other organizations (e.g., community groups, non-profits, ersities) to address discriminatory housing practices? * |
| \bigcirc | Yes |
| \circ | No |
| | |
| 11. If yes | s, please describe the nature of this collaboration. |
| Ente | er your answer |
| | |
| | |

| _ | | pur experience, what impact has supporting housing applicants had on preventing or ressing discriminatory housing practices? (Select all that apply) |
|--|------|--|
| | | Reduced incidences of discrimination |
| | | Improved tenant-landlord relationships |
| | | Increased awareness of tenant rights |
| | | Other |
| | | |
| 13. | | at additional support or resources would help your organization in effectively addressing riminatory housing practices? |
| | Ent | ter your answer |
| St | ırve | y Conclusion |
| 14. How do you hear about new or changed laws in your area? (Select all that may apply.) | | |
| | | On the news/TV. |
| | | In the newspaper (print). |
| | | On the Internet, specifically online news outlets. |
| | | On the Internet, specifically social media or blogs. |
| | | From direct outreach by a community group or association. |
| | | In a training (in-person or virtual). |
| | | In a mailing to my home. |
| | | On the radio. |
| | | In an email. |
| | | Other |

15. If Cook County Commission on Human Rights can contact you further about your responses, please include a contact name and email or phone number where you can be reached.

Enter your answer

16. If you would like to be entered into the raffle to win a \$25 Target gift card, please skip this question and put your email in the next question.

Enter your answer

17. My email:

Enter your answer







Please complete our survey about intervening in potentially discriminatory housing practices in Cook County.

https://bit.ly/ServiceProviders2024



