

Empty Promises:
**Fair Housing Ordinances in Metropolitan
Chicago Suburbs**

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I. Introduction

The Illinois Municipal Code grants to any municipality the power to enact ordinances prescribing fair housing practices. Of the 271 suburban municipalities in the six-county metropolitan area of Chicago, 101 (37%) have adopted codes concerning fair housing practices. Most of these codes take the form of independent fair housing ordinances. (See Appendix A for a list of communities with an ordinance.)

Enacting a fair housing ordinance is an important part of promoting and sustaining a diverse community. Codifying fair housing as part of municipal law provides community members an opportunity to appeal to their local government regarding the geographically sensitive issue of choosing a place to live. It also provides municipalities the opportunity to promote their communities as open and inclusive. Ordinances commit personnel and, in some cases, boards or commissions to investigate claims of housing discrimination, provide community education and outreach, and maintain a level of accountability for members of the housing industry. However, adopting a fair housing ordinance is not enough to guarantee all persons the right to live where they choose or to guarantee an inclusive and stable community. Stable, open, and inclusive communities depend upon a commitment from municipalities to enforce fair housing practices and promote their community in an affirmative manner.

The Leadership Council has conducted a study concerned with implementation and enforcement of municipal fair housing ordinances. The findings of this report contain information gathered through a survey of village clerks, town managers, board and commission members, staff liaisons, mayors, and other municipal representatives responsible for administering fair housing ordinances. Our survey investigated the efficacy of fair housing ordinances in the Chicago region. Measured activities include

the number and frequency of complaints, the activities of the personnel or entities charged with administering and adjudicating an ordinance, the affirmative marketing of the ordinance to the community in general and to traditionally underserved populations, and the amount of knowledge and training demonstrated in our phone interviews with staff.

This research builds on an earlier study that quantified the number of municipalities with fair housing ordinances. To date, we have identified 101 municipalities that have passed fair housing ordinances. We requested a copy of these ordinances from each municipality. Eighty-eight communities provided copies of their ordinances. In one phase, fifty-eight municipalities completed at least a portion of a survey either by telephone or in writing. In a second phase, the remaining municipalities were contacted by phone and asked similar questions. Eight municipalities did not respond to the survey in any way after both phases.

II. General Survey Findings

A. Implementation and Enforcement

A Fair Housing Ordinance (FHO) establishes governmental entities or personnel with the power to implement and enforce the provisions of the ordinance. Methods of implementation and enforcement vary -- often according to the resources available to the municipality and the specific provisions of the ordinance. An analysis of the ordinances collected in the first phase of the study revealed that most municipalities have the same body handling the administrative and adjudicative responsibilities. However, there were cases where different bodies handled these two tasks. This study reveals that for a number of municipalities where more than one body for implementation and enforcement was originally established, the two bodies have since combined into one functioning body. Merrionette Park, for example, has combined the

Human Relations Commission, the Fair Housing Review Board and the Planning and Zoning Commission into one body.

Interviewers asked each municipality to provide information on the status and activities of the instituting body(ies). While a number of municipal ordinances require meetings and submission of information on a regular basis, over half of the municipalities studied do not comply with their ordinances. Only 37.2% of the municipal entities responsible for fair housing meet at least quarterly.

- 19 municipalities have bodies that meet at least once a month. (32%)
- 3 municipalities have bodies that meet quarterly. (5.2%)
- 2 municipalities have bodies that meet twice a year. (3.4%)
- 16 municipalities have bodies that meet on an “as needed” basis. (27.6%)
- 13 municipalities have inactive instituting bodies (22.4%)
- 8 municipalities did not provide information.

It was common to discover that in some communities, the entity responsible for fair housing has not met for a period of several years. For example, the Fair Housing Review Board for St. Charles has not met in over 18 years. Several municipalities reported having Fair Housing Review Boards that have not met in several years or that have never met.

This was not limited to entities that deal specifically with fair housing issues. For most municipalities a human or community relations commission bears the responsibility of implementing its ordinance. These sorts of commissions are set up to work not only on fair housing issues but also on myriad issues that relate to human relations, such as employment or public accommodations. The study found that some generalized human relations commissions also failed to meet regularly. The City of Batavia, for example, has a Human Relations Commission that has not met since 1988. The City of Barrington

has a Human Relations Commission that has never met even though it enacted an ordinance in 1968. Furthermore, the City of Barrington's web site does not include the Human Relations Commission on its listing of boards and commissions. Few municipalities utilize this simple addition to publicize fair housing in their communities.

The lack of action by fair housing review boards or similarly empowered human relations commissions is the surest indication that a municipality does not place a priority on fair housing. In many of our interviews, a respondent would suggest that the body had not met because in so many words, "Our community has no minorities, so [the fair housing body] has not really needed to meet."

Such comments generally illustrate a very narrow understanding of fair housing and/or the role of a fair housing commission. Perhaps what is more striking is the casual inference that only communities that have a certain level of racial diversity need to engage in fair housing practices. The corollary is that in racially homogeneous communities, i.e. those that are entirely or mostly segregated, fair housing is really not an issue. Lost is the reality that the more racially segregated a community, the more likely that fair housing is needed, if for no other reason than to assure potential minority residents that they are welcome, even if they are not present.

On a more practical level, an active commission is necessary for residents and potential residents to make complaints. If a commission is inactive and does not make an effort to promote public knowledge of the ordinance, prospective and newly arriving residents are not likely to know that they can make a complaint to the municipality. Secondly, inactive commissions promote perceptions that the municipality does not consider fair housing to be important. Thus, home-seekers and housing providers do not take the issue seriously either.

Another function of the efficacy of local ordinances is the identification of protected classes that constitute discrimination. The Illinois Human Rights Act makes it illegal to discriminate against eleven protected classes. The federal Fair Housing Act includes seven of these twelve protected classes. Ideally, each municipality would include all the state protected classes in its ordinance. At a minimum, all of the federally protected classes would be included in an ordinance. However, the results from the survey were disappointing as can be seen in this chart.

Protected Class	Number Citing as Discriminatory	Percentage of Total (88)
Race*	87	99%
Color*	86	98%
Religion*	87	99%
National Origin*	85	97%
Ancestry	51	58%
Age	49	56%
Sex/Gender*	75	85%
Marital Status	47	53%
Familial/Parental Status*	39	44%
Disability*	66	75%
Military/Discharge Status	21	24%

* also protected federally

These numbers pale even further when compared to the City of Chicago’s protected classes that also protect against discrimination based on sexual orientation and source of income (including Housing Choice Vouchers). Similarly, Cook County provides protection for sexual orientation, source of income (except for Housing Choice Vouchers), and housing status.

On a positive note, it is encouraging to find that high percentages of municipalities include race and national origin as protected classes since they are traditionally the most divisive factors in the Chicago regional housing market. However, this is coupled with the disappointing findings that only 75% reported the inclusion of disability and only 44% reported the inclusion of familial status as protected classes. The National Fair Housing Alliance (NFHA) found that, in 2003, disability complaints amounted to 24% of all discrimination complaints. Familial status complaints made up 14% of all complaints nationally². These percentages ranked disability and familial status as the second and third most reported forms of discrimination respectively (after race).

Given NFHA's findings, local governments that are not protecting disabled persons and families with children should consider adding these classes to their ordinances. Furthermore, except for sex (85%), the remaining statewide-protected classes have lower than 60% inclusion rates in the region's fair housing ordinances. These omissions deny local protection to the elderly, women, single parents, and veterans.

B. Education and Outreach

Education and outreach to members of the housing industry, community organizations, local leaders, and the general public is an important part of active, effective implementation and enforcement of fair housing ordinances. Some municipalities require education and outreach within their fair housing ordinances. For example, the ordinance for the City of Blue Island requires distribution of fair housing information to real estate brokers annually. Unfortunately, Blue Island officials reported that this does not happen. More commonly, ordinances call for general education and outreach

² see National Fair Housing Alliance 2004 *Fair Housing Trends Report* at <http://www.nationalfairhousing.org/html/trends/trends%202004/NFHA%202004%20Trends%20Report.pdf>

activities such as requiring a fair housing body to undertake “such activities as will promote a better understanding of fair housing and the advancement of fair housing” throughout the municipality.

Twenty-six municipalities have a requirement in their ordinance to provide some sort of education and outreach on fair housing. Only twenty-one municipalities identified some form of education and outreach regarding fair housing in their communities. Often, these municipalities have only made their ordinance available on-line or brochures available in municipal facilities. A few provided fair housing information in a newsletter sent to residents. Regardless of whether this is a requirement within the municipal ordinance, municipalities -- in addition to adopting a fair housing ordinance and having managing institutions in place -- **should** work to promote awareness of the ordinance and become involved in programs and activities that promote fair housing. Absent regular outreach, residents and prospective residents are unlikely to even know that local fair housing laws exist or what is covered.

Each municipality was asked if there is any work being done to educate members of the housing industry, community organizations, local leaders, or the general public about the government’s fair housing ordinance or fair housing issues in general. Several municipalities indicated that they distributed materials about their ordinances when they initially adopted them - including written guidelines that in some cases were distributed at informational meetings or forums. However, since then, most municipalities only provide information upon request. Since thirty-seven communities adopted or last amended their ordinances prior to 1990, this suggests at least a fourteen-year gap since any organized training or educational outreach would have taken place in those communities. Specifically, the survey found that:

- More than 60% of the municipalities indicated that they are **not** involved in any form of educational outreach to members of the housing industry, community organizations, local leaders, or the general public.
- For the twenty-one municipalities identified as involved in some form of educational outreach, the efforts in many cases were minimal or limited to certain segments of the community. For most of these twenty-one municipalities, education and outreach has extended only as far as making the ordinance available on-line or at a local library. Some also provide information through newsletters sent to residents.

In 2002, HUD conducted a survey on awareness of fair housing issues³. Twenty-three percent of those with a low awareness of fair housing law did not know what to do if they encountered discrimination. Only five percent of those with a high awareness of fair housing laws were unsure of what action to take. Similarly, only three percent of those with low awareness of fair housing law would have complained to a governmental entity compared to seventeen percent of those with a high awareness. The point cannot be overstated – rights are of little value if people do not know they enjoy them.

The City of Evanston – which has an active human relations commission in place – is one community that devotes a great deal of energy to educational outreach. Evanston reports that the Human Relations Commission holds monthly meetings that include discussions of fair housing issues. The Commission also schedules regular seminars and distributes fair housing materials to real estate agents/brokers, community organizations, faith-based leaders, and other groups. For the general public, the City holds forums, distributes brochures, and maintains information on the City web site and at local libraries. This effort results in approximately thirty complaints of

discrimination per year – most of which it successfully mediates due to the high profile of the Human Relations Commission in the community.

Other communities that presently engage in some level of education and outreach include⁴:

Calumet City: Provides information on its ordinance and fair housing generally in the city newsletter.

Country Club Hills: Publishes welcome books with information on fair housing for the general public.

Elgin: Distributes pamphlets on its ordinance to real estate agents and that an annual Fair Housing Fair is open to anyone interested. HUD organizes outreach to community groups and leaders. The municipality also distributes pamphlets on fair housing to the general public.

Glencoe: Distributes information on its ordinance to real estate agents.

Justice: Distributes fair housing guidelines to real estate brokers and title companies.

Matteson: Provides information about its ordinance and about fair housing issues to real estate brokers, sales representatives, and lenders through workshops and seminars. The Village also provides information for community members, leaders, and groups through the Neighborhood Conference that covers a number of issues in addition to housing.

³ see HUD's *How Much Do We Know?* available at <http://www.huduser.org/publications/fairhsg/hmwk.html>

⁴ To be included in this list, a community had to do something beyond providing a copy of the ordinance at the local library or online. While making information accessible is important, the emphasis is on actively implementing and enforcing the ordinance.

Naperville: Holds two educational workshops annually for property management companies.

Oak Lawn: Annually, Oak Lawn hosts a seminar on fair housing. Initially designed for real estate agents, it is now open to anyone interested. The Commission also prepared an anti-discrimination/fair housing advertisement that ran in the local papers.

Oak Park: Checks to determine if any landlord-tenant complaints might also have fair housing implications. Oak Park also trains its police officers on diversity awareness, surveys satisfaction of village services (comparing them by race), and partners with local fair housing organizations.

Park Forest: Provides information through its community newsletter and through the cable access network.

Richton Park: Provides fair housing information in its newsletter. The village also holds bimonthly meetings with property owners and managers.

Rolling Meadows: Distributes pamphlets and flyers on fair housing issues to real estate agents, churches, park districts, schools, and libraries.

Skokie: From time to time, includes articles in the town newsletter on fair housing with information on its ordinance.

South Holland: Holds diversity dinners to foster conversations between residents and the mayor conducts quarterly coffees where residents can discuss fair housing and other issues.

Streamwood: Holds diversity events and co-sponsors seminars through its community relations commission. Streamwood also uses public access television to educate residents on fair housing rights.

University Park: Distributes brochures to new homeowners.

C. Leadership Training

In addition to educating the general public and specific stakeholder groups such as real estate professionals and other housing service providers, it is also important for individuals who are responsible for implementing and enforcing a fair housing ordinance to be aware of the provisions of the ordinance and versed in the many complexities surrounding fair housing issues. The survey asked if each municipality required participation in fair housing training or if it held programs and seminars around fair housing issues for staff or others responsible for the administration and enforcement of an ordinance. Of the fifty municipalities that responded to this question, only four required training. Just nine others encouraged leaders to receive training. The rest - over 60% of those responding - were not involved in any training of those responsible for implementing fair housing on behalf of the municipality.

A few representatives commented that municipal leaders in charge of implementation and enforcement of the fair housing ordinance are not involved in on-going training or seminars because there have not been any complaints filed or because these leaders have been around for years. Anecdotally, municipalities not receiving complaints correspond with those that provide no education or outreach about their ordinance. It is likely that municipalities that do not provide or require fair housing training will receive fewer complaints because the staff will not recognize and process complaints.

When collecting information for this report, operators and receptionists often transferred interviewers to the wrong person or department. This usually followed with a number of transfers to find a person who knew about the ordinance. On other occasions, municipal employees would hang up on the interviewers. Too often, the interviewer had to explain fair housing to the person answering the phone. In the end, it was often up to the interviewer to suggest the appropriate party – something the average community resident may not be able to do.

That scarce resources certainly limit the ability of some municipality's responses to community concerns is undeniable. While some communities have used this as an excuse to do nothing, others have taken advantage of external resources. For example, East Hazel Crest indicated that they are a small community and therefore cannot maintain commissions for all their ordinances. Nonetheless, East Hazel Crest has coordinated efforts at a larger level through Diversity Inc. and the South Suburban Mayors' and Managers Association. In other cases, communities for whom resources are problematic may form cooperative agreements with other communities or rely on non-profit fair housing organizations for training and technical assistance. At a minimum, a cost effective procedure for referring housing complaints can be established so that the first responders have an understanding of how and where to refer complaints if their community does not have an active commission or entity addressing fair housing.

D. Language Availability

Given the increasing diversity of the Chicago metropolitan region, the issue of language accessibility has increased in importance. Despite this, few communities have taken steps to provide information about fair housing ordinances in languages specific to their residents' abilities.

- In the 2002 survey, of the fifty-eight municipalities contacted only three – Elgin, Rolling Meadows, and St. Charles – had a translation of their ordinance available in a language other than English. For all of these communities the translation has been to Spanish. St. Charles reports that all municipal information is available in Spanish at their web site.
- None of the communities indicated that they produce announcements, pamphlets, or any other related information in another language. Elgin does provide a copy of announcements for meetings to Spanish publications.

In the course of our interviews, we commonly came across an operating assumption that all individuals living in the United States should speak English. This insensitivity was demonstrated most pointedly by the representative of Chicago Ridge who, when asked if the ordinance was available in more than one language responded, “Why would it be? We are in America.”

Municipalities should not make access to information and the fulfillment of rights unattainable because of a language barrier. It is important that communities provide information in languages that reflect the language composition of their communities. The U.S. Department of Housing and Urban Development (HUD) is currently considering rules to require any community receiving HUD funds – including CDBG funds – to undertake a formal assessment of their limited English proficient (LEP) population needs. If required, HUD grant recipients must take steps to provide residents with documents and information in their native languages. This requirement is likely to absorb a certain percentage of CDBG allocations for any given community, so municipalities are also encouraged to work with fair housing or other non-profit organizations to produce translations of materials where possible.

E. Complaint Procedures

Having a municipal fair housing ordinance offers an alternative to filing a complaint at the county, state, or federal level. There are many reasons why a complainant might make the choice to file locally including a need for a quick resolution, a belief that local governments are more accountable than larger governments, a desire for a more informal solution, and a preference to work within the community. Local governments with a structure to process complaints in place can often provide all of these options that are attractive to both complainants and respondents.

However, as the survey responses show, many municipalities reported handling complaints through avenues other than those specified in their ordinances. Fair housing review boards or human relations commissions did not investigate and hear testimony on complaints. Often, this derived from the inactivity or nonexistence of these bodies. Instead, municipalities assign this task to employees as a low-priority addition to their primary tasks. This situation adds to the confusion of directing complainants to the proper employee. It also reduces the efficacy of fair housing enforcement since the employee responsible is not likely to receive the training and support necessary.

Inactivity of the bodies assigned by an ordinance to enforce fair housing diminishes awareness in the community that one can file a complaint locally. Holding regular meetings of these bodies and publicizing their function would increase community awareness and would likely result in more local complaints. The increased visibility of these meetings would also pose as a deterrent to less scrupulous housing providers.

In some cases, communities indicated that complaints go directly to private attorneys or to fair housing organizations. This is an effective way to ensure lower costs and proper handling of complaints. However, municipalities should couple this policy with

programs that affirmatively further fair housing in their communities either on their own or through fair housing organizations.

Some municipalities did not write complaint procedures into their ordinances. In these cases, interviewers asked municipalities to explain the process. None of the municipalities contacted had put a formal process in place. In some cases, such as Arlington Heights and Park Ridge, municipalities stated that they had not defined these procedures because they have never received a complaint.

F. Penalties

Twenty-two of the eighty-eight municipalities that provided an ordinance did not provide penalties for fair housing violations in their ordinances. Not defining penalties for violations undermines the perceived gravity of an offense. Awareness on the part of housing providers that a local government has not set penalties for fair housing violations diminishes the incentive to comply with the law. Similarly, it reduces the likelihood that home seekers will file a complaint.

Moreover, most municipal ordinances do not provide for monetary damages to complainants. Because complainants often suffer financial hardship from discrimination, the omission of a financial penalty to the complainant lowers the incentive to file with a local government. Providing language for compensatory damages would remedy this oversight.

There are provisions requiring violators to pay fines to the municipalities. Usually, these fines are nominal. They rarely exceed \$100 for a first offense and \$750 for more than two offenses. Municipalities could raise these fines as high as \$10,000 for a first offense and \$50,000 for three or more offenses.

III. Summary and Recommendations

Our earlier study indicated that 101 out of 271 suburban municipalities have enacted fair housing ordinances. The enactment of a fair housing ordinance is only one part of an open housing market. This follow-up study indicates that adoption of an ordinance represents little more than a symbolic effort to support fair housing in all but a handful of communities. Most of the communities that have fair housing language in their ordinances report to have done little to implement and enforce the provisions of that language. They have made little or no effort to educate leaders, key staff members, community stakeholders, or the general public about the protections provided by the ordinance or about how to identify and handle complaints. Thus, while 101 communities have taken a first step toward open and inclusive housing markets, most have not progressed beyond that point.

A number of municipalities indicated that their intentions in adopting an ordinance were to respond to specific situations that were applicable at certain times. For many, this situation was the period of civil unrest in the late 1960s; eighteen municipalities passed an ordinance between 1965 and 1970. The perception that housing discrimination is a problem of the past ignores the fact that metropolitan Chicago is still a highly segregated region⁵. For many, housing choices are still constrained by discriminatory practices as well as by historic notions of where minorities are welcome and where they are not. The following recommendations provide some guidance for effectively implementing a fair housing ordinance in suburban municipalities.

Recommendation 1: Update Ordinances

⁵ see the Lewis Mumford Center for Comparative Urban and Regional Research's "Dissimilarity Index" at <http://mumford1.dyndns.org/cen2000/WholePop/WPSegdata/1600msa.htm>

Municipalities should update their ordinances to reflect current protected classes provided by the State of Illinois. Uniform protection of fair housing would foster a common understanding of fair housing law. It would also guarantee the residents of each community protections for disabled persons, women, single parents, and veterans.

An ordinance should also include language that describes how the municipality will process a complaint. This should include what position is responsible for intakes, what department or body will investigate a claim, and what the powers the investigative body has to enforce the ordinance. It should also include what penalties and remedies are available for the victims of discrimination.

Municipalities should also update the penalties for fair housing violations. Many ordinances have fines that were determined over 25 years ago. Because of inflation, these fines no longer function as a deterrent to unscrupulous housing providers. In addition, ordinances should also specify that victims of discrimination may receive compensatory damages from violators. These revisions will make for ordinances that are more effective.

Finally, ordinances should include language requiring that the staff, department, or body charged with administering the ordinance communicate with housing providers, community groups, and the general public. This will ensure that all of the residents in the community are aware of the protections offered to them. Similarly, it will ensure better understanding of the law in the housing industry.

A good guide when beginning to update a fair housing ordinance is the Northeastern Illinois Planning Commission's *Fair Housing: Issues, Approaches, and a Model Ordinance*. It provides language incorporating most of the revisions in this recommendation.

Recommendation 2: Activate Boards/Commissions

Too many municipalities have inactive boards or commissions. While, in other cases, these bodies are active but ineffective. Each municipality should review the performance of the body in their community. All the seats on a body should be filled with qualified community members. The members should also reflect the population of the community to ensure fairness.

After filling these seats, local governments should set education and outreach goals for the body. These goals should include the number of contacts with the community, priority populations, and number of meetings held per year.

Municipalities should also ensure that there are strong links between the body and the employees that enforce the ordinance. Most complaints begin with a call to municipal staff. There should be a staff person designated to take complaints. This person should maintain regular communication with the body responsible for investigating complaints.

Recommendation 3: Provide Training for Staff

Without properly trained staff, municipalities cannot enforce fair housing. Municipal personnel are the most likely to receive complaints. The first responders such as operators and receptionists should know who receives fair housing complaints. This simple step will ensure the proper registration of all complaints.

In most cases, the ordinance for a local government assigns this task to a position or department. In smaller municipalities, it might be most effective to designate a certain position to receive intakes. Larger municipalities probably should designate a department that will handle complaints. In either case, without knowledge of fair

housing law the staff person is not likely to provide helpful information to complainants. Therefore, staff members responsible for complaint intakes, investigations, and reports should receive continual education.

Recommendation 4: Affirmatively Further Fair Housing

Language requiring education, outreach, and other affirmative measures should be included in a municipal ordinance. Municipalities that are more active in affirmative measures tend to be more effective as seen in the Evanston model. By playing a visible role in the community, Evanston's Human Relations Commission receives approximately thirty complaints annually. Compare this to Batavia. Batavia has never had an active body and correspondingly has never received a complaint. Moreover, Evanston's Human Relations Commission has been able to successfully mediate most of the complaints it received partly because of its visibility in the community.

Municipalities need to take a more honest look at the nature of their populations and the reasons behind their particular demographic mix. A community's legal protections against discrimination are only part of the picture. Municipalities need to examine how local governmental policies affect who can or chooses to live in their communities. In addition to housing considerations, municipalities should discern how practices in other areas of government impact the availability or desirability of a community to new residents, including those in protected classes. Analysis of the role that education, law enforcement, zoning, employment, transportation, and local culture play in attracting new residents can help identify areas where improvement is necessary to create and sustain diverse communities.

HUD requires an analysis of this type for all Community Development Block Grant (CDBG) recipients. To receive CDBG funds, grantees must submit a fair housing action plan that describes the state of fair housing in the grantee's jurisdiction and the steps

that the grantee will take to further fair housing. Municipalities over 50,000 residents apply for CDBG funds directly from HUD, while those less than 50,000 operate as sub-grantees of the county in which they are located. Despite the requirement to submit these plans, there is limited review of these plans by HUD or county staff and very little follow-up evaluating the efficacy of the plans. Indeed, this survey found that eleven CDBG entitlement jurisdictions or sub-grantees did not have a fair housing ordinance in place.

Another way to affirmatively further fair housing in a municipality is to make fair housing materials available in languages other than English. Most of the region's communities have Spanish-speaking residents. Many localities have populations that speak other languages including Arabic, Chinese, Hindi, and Russian. Providing materials in multiple languages ensures that all members in the community are aware of their fair housing rights.

Recommendation 5: Partner with Fair Housing Organizations

The Chicago region's fair housing organizations are an excellent resource for municipalities. The Leadership Council, in particular, has a wealth of experience assisting communities seeking to improve their fair housing performance. In partnership, municipalities and fair housing organizations can promote open and inclusive communities throughout the Chicago region. Municipalities could partner with fair housing organizations in many ways. In the past, Cook County partnered with the Leadership Council and other fair housing organizations to evaluate the fair housing action plans it received from sub-grantees. According to the County, this relationship provided an objective perspective from well-qualified organizations that specialize in fair housing. Fair housing organizations can offer this service to CDBG grantees and sub-grantees that need to create their own action plans and analyses of impediments. Municipalities could also contract with fair housing organizations to

conduct testing in the community, provide workshops for underserved populations, train local housing providers, or advise boards or commissions in their investigations.

Adopting an ordinance that addresses fair housing can ameliorate housing discrimination and perceptions of community intolerance. However, an ordinance is not in and of itself a deterrent to housing discrimination. Local governments must implement the ordinance effectively. Municipalities should review their ordinances and ideally add protections for all of the protected classes in Illinois or, at the minimum, all of the classes in the Fair Housing Act. They should fill their commissions, boards, or other bodies with qualified community residents that reflect the population and review their performance annually. They should establish regular training schedules for employees to ensure efficient processing of complaints. They should engage in affirmative measures to promote the community to underserved populations. Finally, they should work in concert with fair housing centers to gain insight from their experiences and expertise. Following these measures will allow for more effective implementation of suburban municipal fair housing ordinances.

Appendix A:
Municipalities with Ordinances Addressing Fair Housing

Cook County

Arlington Heights	Hometown	Orland Park
Bellwood	Homewood	Palos Heights
Blue Island	Justice	Park Forest
Bridgeview	LaGrange	Park Ridge
Burnham	Lansing	Prospect Heights
Calumet City	Lincolnwood	Richton Park
Calumet Park	Lynwood	Riverdale
Chicago Heights	Lyons	River Grove
Chicago Ridge	Markham	Robbins
Cicero	Matteson	Rolling Meadows
Country Club Hills	Maywood	Sauk Village
Dixmoor	Merrionette Park	Schaumburg
Dolton	McCook	Skokie
East Hazel Crest	Morton Grove	South Chicago Heights
Evanston	Mount Prospect	South Holland
Flossmoor	Niles	Streamwood
Ford Heights	Norridge	Thornton
Glencoe	Northbrook	Tinley Park
Glenwood	Northfield	Wheeling
Harvey	Northlake	Willow Springs
Hazel Crest	Oak Lawn	Wilmette
Hickory Hills	Oak Park	Worth
Hodgkins	Orland Hills	

DuPage County

Addison

Aurora

Batavia

Bensenville

Clarendon Hills

Downers Grove

Glen Ellyn

Hinsdale

Itasca

Lemont

Lisle

Lombard

Naperville

St. Charles

Warrenville

West Chicago

Winfield

Kane County

Elgin

Geneva

Huntley

Maple Park

Lake County

Barrington

Deerfield

Highland Park

Mundelein

North Chicago

Waukegan

McHenry County

Richmond

Will County

Bolingbrook

Joliet

New Lenox

Steger

University Park