

City of Chicago RACIAL EQUITY ACTION PLAN

Department of Housing (DOH)

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.



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:

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

Indicators Examined:

Community Data

Findings from the Racial Equity Impact Assessment (REIA) the Department of Housing (DOH) completed in 2020 confirm that systemically racist and structural conditions have contributed to reduced opportunities for Minority and Women-Owned (M/WBE) developers. Data from the City

Program/Department Data

Bureaus of Construction and Compliance, Housing Development, along with the Neighborhood Development and Housing Preservation program will continue collaborate regarding the development of technical assistance pipeline for BIPOC developers. Progress to goal will be measured by the percentage increase of contracts of city projects awarded to BIPOC developers, as well as the reduction of M/WBE violations occurring on DOH-led projects.

Community Feedback and Narratives

In 2022, DOH implemented "racial equity change teams" within its Policy and Construction and Compliance Bureaus to deeply examine equity-centered programmatic goals. Each "change team" conducted stakeholder interviews for the data and contracting goals. The contracting goal to increase the number of BIPOC developers was also heavily influenced by the 2021 Racial Equity Impact Assessment (REIA) on the department's Qualified Allocation Plan (QAP). The REIA report found that most of DOH's construction contracts go to majority white developers and only a small number of BIPOC developers. The REIA process was informed feedback provided by minority developers and small nonprofits and specifically named the barriers which limited their ability to apply for financing from the City and/or prevented them from winning City contracts - inequitable contracting results in Black and Brown-led firms not being able to access city contracts and access the higher wage paying jobs, and also results in Black and Brown-led firms having less access to capital.

Define the Problem

The REIA found that the majority of our Low-Income Housing Tax Credits go to white developers, meaning that non-community-based developers are benefiting from public investments in historically marginalized communities. Due to this historic inequity in lending, minority developers have not been able to access capital to grow their experience in progressively more complex projects. Furthermore, BIPOC-led firms often do not have access to capital needed to complete deals with the city, despite having the technical capability.

Identify Root Causes to the Problem

The REIA found that the majority of our Low-Income Housing Tax Credits go to white developers, meaning that noncommunity-based developers are benefiting from public investments in historically marginalized communities. Due to this historic inequity in lending, minority developers have not been able to access capital to grow their experience in progressively more complex projects. Furthermore, BIPOC-led firms often do not have access to capital needed to complete deals with the city, despite having the technical capability.

Define Your Department's Opportunity

DOH's opportunity to address this issue is to develop an inclusive process which helps connect Black and Brown-led firms to business management support organizations, networking opportunities, and can help minority-led firms leverage public investments to gain private investments. While DOH cannot solve the deep systemic racism in our systems, DOH can help correct past wrongs caused by government contracting and serve as an example to other local governments and private housing investors. To this end, DOH is exploring how to develop the Neighborhood Development and Housing Preservation program to scale its impact and increase the pool of M/WBE developers - this successful workforce development program is focused on returning residents (i.e., individuals returning from prisons and jails) and building their capacity to support development community.

RACIAL EQUITY ACTION PLAN: Priority #1

Our department will advance the following strategies:

1. Department Strategy: Reduce barriers and create a pipeline of BIPOC developers by providing technical assistance to better prepare BIPOC developers seeking to take on city contracts by building capacity in key areas. The Bureaus of Construction and Compliance, Housing Development, along with the Neighborhood Development and Housing Preservation program target outreach and will host trainings focused on minority and women owned businesses.

Measures of Impact: Back office needs being addressed based in the needs assessment

Actions	Implementation Plan	Timeline	Status
1.1 Conduct a needs assessment over developer needs	<p>The Compliance Team will create and analyze survey results from minority developer needs assessment</p> <p>The Compliance Team will work with a pool of priority minority developers identified from the needs assessment to host focus groups to understand the needs in more detail</p> <p>The Compliance team establish regular communication and planning with community-based organizations that already provide technical assistance to the development community.</p>	Q1 2023	
1.2 Develop equitable speaker schedule	<p>The Compliance Team will connect with representatives from expert organizations and confirm presenters for 6 topics identified from the needs assessment and focus groups</p> <p>The Compliance Team will align its budgeted funding to compensate presenters for their time</p> <p>The Compliance team will partner with BACP for professional recording services</p>	Q2 2023	
1.3 Create a professional certificate process	<p>The Compliance Team will design certificates for completing the webinar series as an additional professional credential for minority and small developers.</p> <p>The Compliance Team will use a learning management system to track course completion for certificate awarding</p>	Q2 2023	

RACIAL EQUITY ACTION PLAN: Priority #1

Our department will advance the following strategies:

2. Department Strategy: Develop Minority Developer Technical Assistance Pilot Program focused on increasing the number of M/WBE

Measures of Impact: A percentage of minority developers part of the program are awarded multi-family development contracts by completion of program

Actions	Implementation Plan	Timeline	Status
2.1 Connect with organizations that provide assistance	The Compliance Team will conduct outreach to current technical assistance organizations to understand how they conduct their programming and where there are gaps in service.	Q1 2023	
2.2 Develop RFP for assistance providers	The Compliance Team will develop an internal team to develop RFP language for the minority developer technical assistance program, and release the RFP by the end of the year.	Q4 2023	
2.3 Host a vendor fair	Host a vendor fair to share information about assist programs	Q4 2023	

RACIAL EQUITY ACTION PLAN: Priority #1


Our department will advance the following strategies:

3. Department Strategy: Develop long-term funding plan to support minority developers capacity building

Measures of Impact: Decrease in the number of violations of compliance issues

Actions	Implementation Plan	Timeline	Status
3.1 Analyze current budget allocations which can help fund a pilot program	The Compliance Team will meet with internal program managers to determine if any current budget line items can be used to create a pilot program to support minority developers with back office support	Q3 2023	
3.2 Create a budget plan to evaluate for the 2024 budget	The Compliance Team will create a 2024 budget planning for the pilot program, which will be analyzed of the impact as more long-term funding is examined.	Q3 2023	
3.3 Create a long-term funding strategy for the minority developer program	The Compliance Team will review 2024 pilot program to create a long-term funding strategy that is related to departmental goals	Q2 2024	

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:

DATA: All Chicagoans can obtain, view, or use public facing data from the City of Chicago.

Indicators Examined:

Program/Department Data

Reduction of external data requests because information is easily accessible. Increase trust in departmental data reliability.

Community Feedback and Narratives

The REIA also exposed a lack of internal housing data on race and ethnicity. As a result, DOH launched the Data Equity Project last year to conduct stakeholder interviews on how to improve our departmental data systems.

Define the Problem

The Department of Housing lacks a unified system to collect, track, and evaluate programs using data. This also includes how the department tracks data that can illuminate how we can improve our programmatic outcomes for historically underrepresented groups.

Identify Root Causes to the Problem

Since the 1980s, there was been a push to shrink the size of the government and reduce its workforce. While the department once had staff persons who could devote their full-time job to helping enter data, track data, and report on outcomes, the current workforce has been reduced to one person who provides reporting on departmental data. The desire to reduce the size and workforce of the government coincided with the time where Black and Brown people and low-income people were receiving greater assistance from the government, entering government workforce, and improving their economic standing. The reduction of funding to government for technology and workforce has resulted in City departments doing more with less funding and making difficult decisions on what work can continue. Investment in technology systems and data maintenance is one of the areas that DOH decided to not invest its limited resources in.

Define Your Department's Opportunity

The opportunity is that technology enables workplaces to handle large amounts of data and make reporting easier. Technology enables us to do more with fewer people. The department has leadership which values evidence-based decision-making. Using evidence to inform decision-making will enable the department to make strategic decisions with public funds to ensure that we are maximizing public good with taxpayer dollars. This project will help the public find our data more accessible and easier to understand, so the public may use the same data we are using to hold us accountable with public funds.

RACIAL EQUITY ACTION PLAN: Priority #2

Our department will advance the following strategies:

1. Department Strategy: Develop Delegate Agency Data Support Program

Measures of Impact: Clear data expectations in Technical Assistance Program

Actions	Implementation Plan	Timeline	Status
1.1 Survey Delegate Agencies on their understanding	The Policy Team will present data evaluation plan to current DOH Delegate Agencies to understand their current use of data, and where they need support.	Q2 2023	
1.2 Embed data guidelines in 2024 delegate agency RFP	The Policy Team will work with CERESI to create clear expectations on data and the support delegate agencies can play in the technical assistance RFP	Q3 2023	
1.3 Share data evaluation plan with staff	The Policy Team will gather staff feedback on data plan during quarter 1 staff meeting, and provide updates to staff on pilot program for larger team feedback	Q1 2024	

RACIAL EQUITY ACTION PLAN: Priority #2

Our department will advance the following strategies:

2. Department Strategy: Develop and Implement Data Evaluation Pilot Program

Actions	Implementation Plan	Timeline	Status
2.1 Develop selection criteria for pilot program	The policy team will review programs of the department to determine which programs might be best to target for the evaluation pilot program	Q1 2023	
2.2 Select pilot program	The Policy Team, after reviewing the selection criteria, will select and launch the pilot program as part of the 2023 DOH Equity Change Team program. This will allow the Policy Team to test out data tools to help make equity-centered programmatic changes.	Q1 2023	
2.3 Run pilot program through the DOH racial equity change team process	The Policy Team will act as consultants to CERESI to run the pilot program through the Change Teams program. This will allow the pilot team to have a space to work through large programmatic changes and to use data to improve outcomes for vulnerable residents.	Q4 2023	

RACIAL EQUITY ACTION PLAN: Priority #2


Our department will advance the following strategies:

3. Department Strategy: Long-term data support and planning

Measures of Impact: Dedicated funding for data evaluation support for department and delegate agencies

Actions	Implementation Plan	Timeline	Status
3.1 Onboard new staff	The Policy Team will onboard the Senior Database Analyst to help manage the internal data governance and champion the data equity evaluation work internally and externally.	Q2 2023	
3.2 Hire external data partner	The Policy Team will develop scope of work for public RFP process to onboard additional external partners to help support data and evaluation work.	Q4 2023	
3.3 Plan and evaluate 2024 budget year	Submit funding requests during 2024 budget year and develop evaluation framework to understand the needed funding request.	Q1 2025	

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:

HOUSING: All Chicagoans have healthy, accessible, and affordable homes

Indicators Examined:

Community Data

Reduction in housing and transportation cost burden

Program/Department Data

Affordable housing units produced in ETOD zones.

Community Feedback and Narratives

Equitable Transit-Oriented Development work has been informed by the participation of City of Chicago staff along with Elevated Chicago and the ETOD Policy Plan. As a result, DOH is a vital partner in the Connected Communities Ordinance efforts and increased the number of developments in an ETOD zone. In DOH's last funding round, 75% of developments funded were in ETOD zones.

Define the Problem

The two largest household expenses are housing and transportation. Chicago's transportation system is a contributor to environmental and health hazards. The City's previous transit-oriented development ordinance also benefited higher-income households, and lower-income households were not able to take advantage of living close to transit.

Identify Root Causes to the Problem

Starting in the 1950s, the United States government put more public investments in car infrastructure. This resulted in communities being displaced due to highway construction, decreased air quality, and increased carbon in the atmosphere.

Define Your Department's Opportunity

The Department of Housing is able to leverage affordable housing next to transit stops to help low-income residents access affordable public transit

to decrease their housing and transportation costs, and have positive impacts on environmental health.

RACIAL EQUITY ACTION PLAN: Priority #3

Our department will advance the following strategies:

1. Department Strategy: Increasing the City's internal capacity

Actions	Implementation Plan	Timeline	Status
1.1 Create a cross-functional team to improve coordination and implementation	The Policy Team will hire a staff person to coordinate cross-departmental work to improve implementation of the Connected Communities Ordinance.	ongoing	
1.2 Create an evaluation scorecard for government and community	The Policy Team will develop scope of work and create an RFP to hire an external partner to help create a community-informed ETOD scorecard to help community groups and developers know how to comply with the Connected Communities Ordinance.	Q4 2024	
1.3 Develop public education to communicate the vision and case for ETOD	The Policy Team and CERESI Team will develop public education campaign to educate community members on the vision and case for ETOD.	ongoing	

RACIAL EQUITY ACTION PLAN: Priority #3

Our department will advance the following strategies:

2. Department Strategy: Increase accessibility to ETOD programming

Measures of Impact: baseline # of 2-4 flat buildings (as documented by DePaul IHS); # of permits to deconvert/demo 2-4 flats near transit; # of multifamily proposals received in funding round near qualifying transit; # of multifamily affordable developments funded near transit

Actions	Implementation Plan	Timeline	Status
2.1 Preserve existing unsubsidized affordable housing within ETOD zones	Disincentivizing the demolition and deconversion of 2-4 flat buildings	ongoing	
2.2 Streamline and incentivize the production of multi-family affordable housing near transit	<p><u>Pilot Projects</u> Create pilot project program that incentivizes affordable TOD with pre-development/planning grants and technical assistance Select affordable housing developments Award funds and provide Multifamily Finance in-take assessment Prepare participants for QAP Funding Round</p> <p><u>Modify QAP</u> Refine language in the 2023 QAP that defines proximity parameters and other stipulations for ETOD qualifications (eg, parking exclusions) Select proposals that align with preferences</p> <p><u>Identify Additional Sources for Capital Stack</u> Continue conversations with USDOT to explore financing opportunities via TIFIA program Explore conversations with CTA, DIVVY regarding partnerships for transit subsidies for multifamily housing tenants</p>	<p>TBD</p> <p>Q1 2023 Q4 2023</p> <p>Ongoing</p> <p>Ongoing</p>	