

# Chicago Proactive Rental Inspection Pilot Proposal

## Introduction

PASH (Proactively Addressing Substandard Housing), an interdisciplinary coalition of advocates, proposes a three-year pilot program in which the City will establish a citywide rental registry and implement a proactive healthy homes inspection system in two community areas.

Poor housing conditions and hazards cause serious health issues, disabilities, poor educational outcomes, and job instability, all of which cost the City of Chicago hundreds of millions, if not billions, of dollars each year. To address substandard rental housing, the City relies upon an antiquated and ineffective complaint-driven building code enforcement process, in which citizens make complaints *after* they or their children have been harmed.

The solution to that fundamentally flawed process is a budget-neutral proactive inspection and rental registration program that has yielded significant health and financial benefits to municipalities in Illinois and across the country.<sup>1</sup> This long-awaited pilot is the first step to repairing the damage caused by substandard housing, and ensuring Chicagoans can live in safe, healthy housing for generations to come.

## Statement of Need

### *Chicago Has a Big Problem: Substandard Rental Housing.*

Over 55% of Chicago dwellings are renter-occupied households, amounting to 603,352 homes.<sup>2</sup> Only a small fraction of these rental homes have ever been inspected.<sup>3</sup> According to the National Center for Healthy Housing, when compared to other cities Chicago has higher-than-average rates of water leaks, heating and plumbing equipment breakdown, problems with broken plaster and peeling paint, and sewage disposal issues.<sup>4</sup> Over 41,000 units have open cracks or holes, 23,000 have peeling paint, and 57,000 have water leaks. According to Chicago 311 data, in 2019 renters made more than 30,000 complaints for occupied blight and other habitability issues, with most complaints coming from the South Side and West Side.<sup>5</sup>

### *Chicago's Reactive Inspection System Fails Its Residents.*

Without a mechanism that allows for proactive inspection of rental units, city officials must rely on a complaint-driven process to identify rental properties with these dangerous conditions. Waiting for citizen complaints means that initially unknown, minor, and easily-fixable housing problems will go unaddressed until after they balloon into a disaster, and that unreported hazards will necessarily continue to persist. Indeed, studies have shown that complaint-driven code enforcement results in the under-identification of problem properties in cities across the country.<sup>6</sup> This is particularly true for communities with large low-income and immigrant populations who are much less likely to report code violations for fear of retaliation by landlords.<sup>7</sup>

Under Chicago's complaint-based system, inspectors often limit the scope of their investigation only to the issue complained about, without regard to other problem conditions, which then require further complaints. Chicago's current process additionally depends in part on reporting from medical providers, while more than 1 in 3 people under the age of 18 do not visit the doctor.<sup>8</sup> This complaint system and lack of property registration wastes City employees' time, as well: inspectors regularly have trouble accessing properties without landlord cooperation, which causes many complaints to go uninvestigated. The lack of a rental property registration system exacerbates this problem, as many owners do not have discoverable contact information, particularly when the property is owned by a limited liability company (LLC). Indeed, in 2019, Chicago's Office of Inspector General concluded that our current complaint-based system permitted potential safety and health hazards to go unaddressed for longer than the Municipal Code allowed.<sup>9</sup> In response, the City simply eliminated the requirement for building inspectors to respond to 311 complaints

within three weeks, without putting into place any governing rules on how the City should respond to complaints about home-based hazards.

Data makes clear that the current system is not working. Chicago renters continue to suffer from elevated prevalence of lead poisoning, asthma, and other health issues—especially on the West Side and South Side.

***Substandard housing conditions impose serious health inequities and societal hazards to Chicagoans, and significant financial costs to our city.***

**Lead Poisoning.** Because over 81% of Chicago’s housing stock was built before the federal government banned lead-based paint in 1978,<sup>10</sup> most of these buildings, many of which have not been appropriately maintained, repaired, or renovated, likely contain lead-based paint. Exposure to lead is harmful at all ages, and it is particularly dangerous for very young children.

Lead is a major neurotoxin that causes lifelong learning disabilities, hearing loss, speech delays, intellectual disability, ADHD, and aggressive/violent behaviors, even at relatively low levels.<sup>11</sup> In 2017, of Chicago children younger than seven years of age screened for lead, 1,376 children—a rate of 1.7 out of 100—had blood lead levels (BLL) over 5 µg/dL. In many community areas, the childhood lead poisoning rates are more than double or quadruple the city-wide rate: from 4.4 and 5.7 per 100 children in Austin and West Garfield Park, and as high as 7.2 and 7.3 per 100 children in Englewood and West Englewood.<sup>12</sup>

There is a significant racial inequity here: the West Side, South Side, and Far South Side, which are associated with lower median household incomes, older housing stock, and higher percentages of Black and Latino citizens, have the highest risks of lead poisoning. The risk is greatest for Black children.<sup>13</sup> The City of Chicago, through its Department of Health, has made eliminating health inequities a goal for the City, with a focus on health in all policies, healthy housing, and interventions that help reduce racial inequities.<sup>14</sup>

**Asthma.** Researchers have found excess moisture allows for the breeding of mold, mildew, mites, and cockroaches, and that cracks allow pests like rodents and bugs to enter the home, all of which have been linked to greater asthma morbidity and mortality, especially for low-income racial and ethnic minority children in urban areas.<sup>15</sup> This racial inequity is particularly pronounced for Black children, who have seen the greatest rise in asthma prevalence rates nationally.<sup>16</sup> And in Chicago, Black children have twice the prevalence of asthma when compared to White and Hispanic children.<sup>17</sup>

**Societal, Economic, and Educational Harms.** Other poor housing conditions, such as presence of rats and cockroaches, missing or malfunctioning necessities (e.g., toilet, stove, windows), and other structural, electrical, and plumbing issues, also cause problems for renters. These issues have been connected to higher school absenteeism, reduced performance on standardized tests, and cognitive deficiencies in students.<sup>18</sup> Housing instability caused by poor and unsafe conditions leads to financial instability, job loss, and can make it more difficult for individuals to find jobs and to be present and punctual at work. Poor housing is also far less energy efficient, which imposes additional financial burdens on low-income renters.<sup>19</sup> And, when housing conditions go unaddressed, they can become so dangerous that the City of Chicago will vacate the tenants, which increases homelessness.<sup>20</sup>

**Fires and Fatalities.**<sup>21</sup> Between 2014 and 2019, 140 fires killed 92 Chicagoans. Nearly half of those fires involved buildings without a working smoke detector. A Chicago Tribune / Better Government Association investigation into fires in the same timeframe found more than two dozen cases in which safety conditions played a role in the fires, but records showed the buildings had not been inspected for five or more years. The same investigation showed that even when serious safety complaints were made before fires broke out, weeks or months could pass before an inspector attempted to visit the building. The majority of these fatal fires were in low-income Black and Latino neighborhoods. In Chicago’s reactive complaint system, fire safety intervention is too little, too late, with fatal consequences.

**Public Fiscal Costs.** Chicago’s inability to proactively address dangerous housing conditions is expensive to the public writ large. The special education costs associated with lead poisoning illustrates that financial burden. Lead poisoning has long been linked to child disability and the need for special education.<sup>22</sup> Experts have found that the cost of instructing one special education student is double or triple the cost of other students.<sup>23</sup> Very conservatively estimating that just one-half of Chicago’s 1,376 lead-poisoned children in 2017<sup>24</sup> required special education, Chicago therefore spent roughly \$7.5 million to \$15 million per year in additional instructional costs for those students alone.<sup>25</sup> From kindergarten through 12th grade—and not even including operational costs, early childhood services, or transition services (for ages 18-22)—the total cost will be \$97.5 million to \$195 million, for just 688 students, and is likely higher.

These special education costs are just one consequence, of just one type of hazardous home condition, for one particular group of children harmed in 2017. Other studies corroborate that every dollar spent to prevent lead poisoning saves hundreds of dollars in the form of greater earnings and reduced taxpayer-funded health care, special education, and law enforcement costs.<sup>26</sup> Indeed, completely eliminating lead nationally could indirectly save our country \$200 billion per year.<sup>27</sup> And apart from lead poisoning, preventing or limiting other harms caused by substandard housing—relating to health, economic stability, and crime, for example—will impart exponentially greater savings, as well.

***A proactive rental inspection system will improve—and save—Chicagoans’ lives while reducing health inequities.***

Until Chicago adopts a prophylactic system to identify problem rental properties, the serious health, economic, and societal harms caused by substandard housing—and inequitable racial impact of those harms—will persist. Unlike the ineffective complaint-driven model, proactive housing inspection systems have been shown to significantly improve health outcomes in other cities, with little harmful impact on the housing market.<sup>28</sup> For example, one study of North Carolina cities found that registration ordinances resulted in properties being brought into code compliance more quickly, a decrease in residential fires, and a reduction in code complaints.<sup>29</sup> And importantly, these programs often pay for themselves, even without considering the financial benefits of diminishing the public harm caused by poor housing conditions.<sup>30</sup>

Fortunately, Chicago will not be breaking new ground in enacting a proactive housing inspection system, and it can take guidance from the many state and local jurisdictions, both within Illinois and nationally, that have been enforcing similar legislation for decades.<sup>31</sup>

## **Pilot Program Description**

### ***Overview***

PASH is proposing a three-year pilot to begin the transition from Chicago’s ineffective and dangerous complaint-driven inspection system to a proven proactive rental inspection and rental registry program.

The pilot includes three major components: (1) healthy homes inspection of all residential rental properties in two select community areas; (2) a citywide residential rental registry; and (3) community outreach to educate and engage tenants, landlords, and other stakeholders.

The program is designed to be budget neutral, as it will be funded by registration fees paid by landlords. It will be implemented by a project manager hired by the city, in collaboration with the Departments of Housing, Buildings, and Health. At the conclusion of the pilot, we expect to see better-maintained housing and improved health, societal, economic, and educational outcomes.

### ***Program Components***

**Healthy Homes Inspections.** The City will develop a healthy homes inspection program to be used citywide and pilot the program in two community areas—one high-need and one mixed-need—during a three-year period, beginning in January 2022. The high-need community area will be determined based on selected criteria, such as number of 311 complaints about poor housing conditions, percentage of renter

households, number of building code violations, elevated blood lead levels rates, asthma morbidity rates, and eviction filing rates. Aldermanic support and availability of community resources will also be considered in selection of the pilot communities.

The City will hire and train inspectors, ideally from pilot communities, to field test the proposed inspection protocol, and conduct healthy homes inspections of all residential rental units in the pilot communities. To ensure the inspections are conducted efficiently and the inspection data is useful and readily available to relevant City departments, the City will design a mobile inspection application and other software, and maintain the information collected on a cloud-based database.

The pilot's healthy homes inspections will incorporate nationally-recognized principles of healthy homes, including that they be dry, clean, safe, contaminant-free, well-ventilated, thermally controlled, well-maintained, and accessible. By proactively inspecting all rental housing in the pilot communities and focusing the inspection on conditions that are known to be detrimental to health, the program will ensure the target communities' rental housing is maintained and the hazards are remediated before harming their occupants. The proactive inspection model will not only reduce the strain caused by substandard rental housing on public health systems, but it is also likely to reduce the demand on the City's own services, such as 311. Greensboro, NC, for instance, saw tenant complaints fall by 61% in the first two years of their proactive rental inspection program.<sup>32</sup>

**Rental Registry.** As part of the pilot, the City of Chicago will establish a citywide residential rental registry, to be managed by the Department of Housing. All landlords will be required to register their rental properties with the City annually, paying a registration fee and providing some basic information about the property.

A rental registration fee, like those required by hundreds of municipalities across the country,<sup>33</sup> will allow the program to be budget neutral. Not-for-profit landlords and owners of buildings with fewer than 30 units will pay \$30/unit, and owners of buildings with 30 or more units will pay \$80/unit. The fees collected through the registry will be used to cover the expenses of the pilot—e.g., wages of inspectors and other necessary municipal personnel, grants to community-based organizations (see below), the independent evaluation (below). The remaining registration fees will be utilized to expand the healthy homes inspection program to all Chicago community areas at the conclusion of the pilot, and to fund other critical components of the citywide program—like tenant relocation assistance funds, and rental property repair loans and grants, for low-income landlords.

In addition to funding the pilot, the rental registry will help the City collect important information that currently is not collected, such as the number of rental units, current rent rates, ownership information, and a verifiable point of contact for the property. The data gathered through the registry will help the City enforce property standards and code violations, and collect and increase its revenue (e.g., water bills, permit fees, property/income taxes). A rental registry is necessary to implement the proactive rental inspection program.

**Community Outreach.** Because community buy-in and support is critical to the success of the pilot, the City will involve key stakeholders in the community at all stages of pilot development and implementation by creating a community advisory board to assist with oversight, and to contribute to the evaluation at the conclusion of the pilot. The City will also seek to hire inspectors and other City personnel from pilot communities, which will help to ensure that the pilot is implemented equitably and with the needs of the community in mind.

The City will also offer competitive grants to community-based organizations to conduct outreach and community education. Grantee organizations will hire individuals from pilot communities to serve as healthy homes ambassadors, training them on elements of healthy housing and how to facilitate the inspection process. Healthy homes ambassadors will work with both landlords and tenants to ensure they

understand their rights and the inspection process and connect them to City services and community resources.

## Goals and Objectives

**Goal 1:** At the conclusion of the three-year pilot program, which will begin January 2022, the City will have developed an effective, scalable healthy housing inspection program for the City of Chicago.

- Identify two Chicago community areas to participate in the pilot program, one-high need and one-mixed need, based on select criteria.
- Hire and train City inspectors to field test the proposed inspection protocol.
- Design mobile application software to collect inspection information and a cloud-based database to store inspection information (or implement existing software).
- Develop an evaluation methodology using a community engagement approach and selected quantitative measures.

**Goal 2:** Through the establishment of the residential rental registration program, the pilot will register all of Chicago's residential rental units and collect the requisite fee.

- Design an online registration and fee collection process, to be managed by the Department of Housing.
- Inform landlords about the rental registration requirement through print/social media, real estate/landlord groups, and community-based organization outreach.
- Monitor and assess compliance with registration requirements.

**Goal 3:** Through the creation of a community advisory board and registration awareness campaign, and by activating community-based organizations, the pilot will facilitate a high rate of registration compliance and successful healthy homes inspections.

## Evaluation

To evaluate the pilot project, the City will hire an independent professional who is a healthy housing expert. This individual will design and implement a robust evaluation, collecting and analyzing both qualitative and quantitative measures. Quantitative outcome measures will include identified hazards, hazards remediated, cost to the City, cost to landlords, training needs, number of inspections/inspectors, frequency of inspector success in property entry, estimated fiscal benefits for the public, and both financial and health benefits for impacted households. Qualitative measures will include open-ended interviews with inspectors, community stakeholders, advocates, landlords, and tenants about their experiences during the pilot.

The evaluation will also use the inspection data to identify common housing hazards that are not considered violations under Chicago's Building Code and make recommendations for possible amendments. The evaluator will additionally ascertain compliance with the rental registry requirements, to inform potential incentives and penalties to ensure compliance.

## Appendix 1

### Jurisdictions with Rental Registry and/or Proactive Rental Inspection (Non-Exhaustive)

#### Arizona

[Statewide](#) – registration

#### California

Los Angeles

[San Diego](#) – registration; [annual fee](#)

San Francisco

San Jose

#### Colorado

[Boulder](#)

Denver

#### Florida

[Broward County \(Unincorporated\)](#) – registration; inspection

[Coral Springs](#) – registration; certification of conditions

[Daytona Beach](#) – registration; annual inspection

Miami

[Palm Coast](#)

#### Illinois

[Aurora](#)

[Bloomington](#) - registration; initial inspection

[Chicago Heights](#)

[Cook County \(Unincorporated\)](#) – license; annual inspection

[Edwardsville](#)

[Elgin](#)

[Hoffman Estates](#)

[Niles](#) – license; inspection

[Oak Park](#)

[Palatine](#) – license; initial inspection

[Rock Island](#) – license; initial inspection

[Rockford](#)

[Rolling Meadows](#)

[Schaumburg](#)

[West Chicago](#) – license; annual inspection

[Wheeling](#)

#### Indiana

[East Chicago](#)

[Indianapolis](#) – registration; inspection

#### Kansas

Leavenworth

Westwood – license; annual inspection

**Kentucky**

[Louisville](#) – registration

**Maryland**

Baltimore

**Massachusetts**

Boston

**Michigan**

[Detroit](#) – registration; annual inspection

[Rochester](#) – registration; inspection

**Minnesota**

Minneapolis

**Missouri**

Fairway

Gladstone – registration

Kansas City – registration; inspection

[Overland Park](#) – registration; inspection

[Prairie Village](#) – registration

[Raytown](#) – registration; inspection

[St. Joseph](#) – registration; inspection

Springfield – registration

**New Jersey**

Statewide

**New York**

[Binghamton](#) – registration; triennial inspection

[Buffalo](#) – registration

[Canandaigua](#) – registration

[Clarkstown](#) – registration; biennial inspection

[East Hampton Town](#) – registration

[Henrietta](#) – registration

[New York](#) – registration

[Plattsburgh](#) – registration; inspection

Rochester

[Syracuse](#) – registration; annual inspection; limitations on rent collection and eviction if unregistered

[Troy](#) – registration

[White Plains](#) – registration; inspection

**Ohio**

[All Counties Pop. >200,000](#) – registration with assessor

[Columbus](#)

**Oregon**

[Corvallis](#)

[Portland](#)

**Pennsylvania**

Philadelphia

**Rhode Island**

Narragansett

**Tennessee**

[Statewide](#) – registration

**Texas**

Anna

Arlington

[Austin](#)

Duncansville

Dallas

[Ennis](#) - registration

Fate

[Forney](#)

[Fort Worth](#)

Houston

Lancaster

Leon Valley

Little Elm

Milford

Missouri City

Richardson

Rosenberg

Rowlett

Saginaw

San Antonio – registration (absentee landlords only)

[Sugarland](#) – license; exterior inspection

**Washington**

Seattle

**Wisconsin**

[Milwaukee](#) – registration



## Appendix 2

### Example Healthy Homes Inspection Form

#### VISUAL ASSESSMENT FORM - The STOVE IAQ Project

##### General comments:

Form drawn from: Healthy Housing Inspection Manual. U.S. Centers for Disease Control and Prevention and U.S. Department of Housing and Urban Development. Atlanta: US Department of Health and Human Services; 2008 and Home Environmental Checklist and others.

##### *Instructions for Visual Assessment Observations*

- Select only one answer per question unless specified otherwise. If more than one answer is possible, record the most severe hazard and note the others in the comments section at the end of each section.
- It is not necessary to measure the size of cracks, holes and other similar items; a visual estimate is adequate.
- Document deviations from inspection protocol in the comments section space
- Specific locations of specific hazards can be recorded in the comments section if desired.

This inspection protocol does not establish legal and/or complete compliance with local, state, federal or other applicable housing, building, health, safety or other applicable policies, codes, regulations, statutes and laws.

## WINDOWS

1. How many windows are in the housing unit \_\_\_\_

2. **Windows** (Check all that apply)

- One or more windows missing
- One or more windows cracked or broken
- One or more windows cannot be opened
- All windows intact and can be opened (Skip to 3)

2a. Can at least one window be opened?

- Yes
- No

3. **Window Sills**

- Missing or damaged
- Not missing or damaged

4. **Window Caulking/Seals**

- Missing/deteriorated (air or water leaks present)
- Missing/deteriorated (no leaks)
- Not missing/deteriorated

## GENERAL CONDITION OF DWELLING (ALL ROOMS)

5. **Door Surface Damage**

- Large,  $\geq 1$  inch
- Small,  $\frac{1}{4}$  inch to 1 inch diameter
- None

If door surface(s) are damaged, record door location \_\_\_\_\_

6. **Holes in Ceilings, Floors and Walls**

- Large holes  $\geq 8\frac{1}{2}$  inches x 11 inches
- Medium-sized holes present ( $< 8\frac{1}{2}$  inches x 11 inches but bigger than  $8\frac{1}{2}$  inches x  $\frac{1}{2}$  inch)
- Small holes present ( $< 8\frac{1}{2}$  inches x  $\frac{1}{2}$  inch but bigger than pinhole)
- No holes observed

7. **Ceilings, Floors, or Walls have Peeling/Non-Intact Paint/Need Paint**

- Large,  $\geq 2$  square feet damage
- Small,  $< 2$  square feet damage
- None: No damage/peeling paint

## GENERAL CONDITIONS - MOISTURE ISSUES

### 8. Water Stains/Water Damage on Ceilings, Floors, or Walls

- Large,  $\geq 4$  square feet water stains/water damage
- Small,  $< 4$  square feet water stains/water damage
- None

Note: This does not include visible suspect mold, which is addressed in 14.

### 9. Condensation on Windows, Doors or Walls

- Yes
- No

### 10. Do any bedrooms have carpets?

- Yes
- No (SKIP to 11)

### 10a. Are any of the carpet damp to touch?

- Yes
- No

### 11. Dehumidifier Present

- No
- Yes

### 12. Humidifier Present

- No
- Yes

### 13. Moldy or Musty Odor Present

- Yes
- No

13a. If yes, record location: \_\_\_\_\_

### 14. Suspect Mold

- Large,  $\geq 4$  square feet visible mold present
- Small,  $< 4$  square feet visible mold present
- None (SKIP to 15)

Note: This does not include water stains or damage, which are addressed in 8.

### 14a. Suspect Mold Source (Check all that apply)

- Leaking roof

- Leaking appliance
- Leaking water pipe in wall or ceiling
- Condensation on windows or other surfaces
- Poor ventilation
- Do not know

**HEATING, COOLING, WATER HEATER (IF PRESENT IN DWELLING SPACE)**

**15. Water Heater for Housing Unit**

- No gas water heater observed in unit (skip to 16)
- Gas water heater in unit

**15a. Water Heater Exhaust (Gas Fuel)**

- Misaligned
- Not misaligned

**16. Main heating source for Housing Unit:**

- Radiators (steam or hot water)
- Gas-heated forced air (vents)
- Electric-heated forced air (vents)
- Gas stove/fireplace/wall furnace
- Electric space heater
- Kerosene space heater
- Wood-burning stove/fireplace
- Some other source Specify: \_\_\_\_\_
- No source of heat
- Could not identify

**16a. Heating Equipment in Housing Unit**

- Heating equipment outside of housing unit
- Heating equipment in housing unit (gas fuel)
- Heating equipment in housing unit (other fuel)

**17. Air-conditioning system for Housing Unit:**

- Central air conditioning
- Window units (number: \_\_\_\_\_)
- No air conditioning
- Could not identify

**18. Room air filtration device in Housing Unit**

- Yes
- No

- Don't know

### 19. Space Heaters

- Space heaters used in unit and are less than 3 feet from anything that can burn
- Space heaters used in unit and are at least 3 feet from anything that can burn
- No space heaters observed in unit

### 20. Unvented Combustion Appliances Present

- Yes: Unvented combustion appliances (e.g., fuel-fired space heaters, gas clothes dryers, gas logs, charcoal, stoves, portable generator, etc.) present
- No

20a. If yes, record type and quantity: \_\_\_\_\_

## KITCHEN

### 21. Garbage and Debris Indoors

- Garbage and debris not properly stored
- Garbage and debris properly stored

### 22. Kitchen Exhaust Fan

- Kitchen exhaust fan not operable
- Kitchen exhaust fan missing or not observed (SKIP to 24)
- Kitchen exhaust fan works properly

### 23. Is kitchen fan exhausted to the outside?

- Yes
- No
- Don't Know

### 24. Kitchen Plumbing Leak

- Leak, not contained by sink
- Leak, contained by kitchen sink
- None: No leak observed

### 25. Does kitchen floor have carpet?

- Yes
- No

## BATHROOM(S)

### 26. Plumbing Faucets/Fixtures

- Large water leak
- Small water leak

- No leaks observed

## 27. Bathroom Exhaust Fans

- At least one exhaust fan not working
- All bathroom exhaust fans working
- No bathroom exhaust fans are present (SKIP to 28)

### 27a. Are bath fans exhausted to the exterior?

- Yes
- No
- Could not determine

## 28. Permanent Carpet on Bathroom Floor

- Permanent carpet
- No permanent carpet

## LAUNDRY AREA (IF PRESENT IN DWELLING SPACE)

### 29. Clothes Dryer Vent

- Dryer vent is missing
- Dryer vent damaged
- Dryer vent is functioning properly
- No dryer or dryer vent could be observed (skip to 30)

### 29a. Dryer Venting

- Dryer vents to basement
- Dryer vents to attic
- Dryer vents to crawl space
- Other: \_\_\_\_\_
- Dryer vents to outside
- Cannot observe location to which dryer vents

## GENERAL CONDITIONS – PESTS/ODORS/CLUTTER

### 30. Infestation: Roaches

- Frass or shells observed
- One or more live roaches observed
- No roaches or roach evidence location

30a. If roach evidence present, record location(s): \_\_\_\_\_

### 31. Infestation: Rats or Mice

- Droppings or chewed holes observed
- One or more rats/mice observed
- No rats/mice/droppings/holes

31a. If rat or mouse evidence present, record location(s): \_\_\_\_\_

### 32. Other Insects or Vermin Observed

- Yes
- No

32a. If yes, record and location(s) type: \_\_\_\_\_

### 33. Are “air deodorants” or “air fresheners” observed?

- Yes
- No

### 34. Tobacco Butts, Smoke or Odor Present

- Yes
- No

### 35. Level of dust on surfaces in rooms (flat surfaces – do not include floors):

- None
- Slight
- Moderate
- Heavy

### 36. Level of Clutter Present

- None
- Slight
- Moderate
- Heavy

### Overall Comments on This

**Inspection:** \_\_\_\_\_

\_\_\_\_\_



## Endnotes

- <sup>1</sup> In 2012, CDPH committed to a broader and more comprehensive home inspection program, stating that, despite significant budget cuts, its inspectors would evaluate homes for other home-based hazards, in addition to lead, and offer interventions to remediate those hazards for families in need. Chic. Dep't Pub. Health, *Sweet Home Chicago: Challenges to Creating Healthy Homes*, Jan. 2012, <https://www.chicago.gov/dam/city/depts/cdph/CDPH/HealthyChgoPolicyBriefHealthyHomesJan2012.pdf>. (Sweet Home Chicago). In 2016, as part of Chicago's 5-year "health equity" plan, the City stated its intent to develop a comprehensive, proactive home inspection program. Chic. Dep't Pub. Health, *Healthy Chicago 2.0: Partnering to Improve Healthy Equity: 2016-2020*, at 23, [https://www.chicago.gov/content/dam/city/depts/cdph/CDPH/HC2.0Plan\\_3252016.pdf](https://www.chicago.gov/content/dam/city/depts/cdph/CDPH/HC2.0Plan_3252016.pdf).
- <sup>2</sup> American Community Survey: Selecting Housing Characteristics, 2019 ACS 1-year estimates, data profile.
- <sup>3</sup> American Community Survey 2016 and DePaul University's Institute for Housing Studies.
- <sup>4</sup> Nat'l Ctr. for Healthy Housing, *State of Health Housing Rankings, Chicago*, <https://nchh.org/tools-and-data/data/state-of-healthy-housing/rankings/location/chicago-il/?data-year=2018>
- <sup>5</sup> This is an estimate based on the complaints made between 1/1/2019 and 12/31/2019 under the following relevant service type categories: 21,863 (building violations); 383 (lead inspection request); 4,897 (no water complaint); 4,995 (water in the basement complaint); 4,989 (no building permit and construction). Chicago Data Portal, 311 Service Requests, <https://data.cityofchicago.org/Service-Requests/311-Service-Requests/v6vf-nfxy/data>.
- <sup>6</sup> See Heather K. Way et al., *An Analysis of Rental Property Registration in Austin*, July 2013, at 22-23 (summarizing studies of complaint-based systems in Memphis, Seattle, San Francisco, and Asheville) ("Way") (describing studies performed in Seattle, San Francisco, Memphis, and Asheville).
- <sup>7</sup> See, e.g., Guadalupe, Luna, *Immigrants, Cops and Shumlords in the Midwest*, 29 SOUTHERN ILLINOIS UNIV. L.J. 61, 89 (2004) ("Tenants' fears of retaliation from landlords, coupled with the lack of alternative housing effectively stifles complaints of tenants who are weary of possible eviction.").
- <sup>8</sup> Brett O'Hara and Kyle Caswell, *Health Status, Health Insurance, and Medical Services Utilization: 2010*, United States Census Bureau <https://www.census.gov/prod/2012pubs/p70-133.pdf>.
- <sup>9</sup> City of Chic. Office of Inspector General, *Department of Buildings Complaint-Based Inspections Follow-Up Inquiry* (Nov. 19, 2019), <https://igchicago.org/2019/11/19/department-of-buildings-complaint-based-inspections-follow-up-inquiry/>.
- <sup>10</sup> Illinois Lead Program, 2017 Annual Surveillance Report, Feb. 2019, at 36, <http://dph.illinois.gov/sites/default/files/publications/lead-surveillance-report-2017-20.pdf>
- <sup>11</sup> Anne Evens et al., The Impact of Low-Level Lead Toxicity on School Performance Among Children in the Chicago Public Schools: A Population-Based Retrospective Cohort Study, ENVIRON. HEALTH 14, 21 (2015) <https://doi.org/10.1186/s12940-015-0008-9> (Evens).
- <sup>12</sup> Chic. Dep't of Pub. Health, Surveillance Data for 2017, <https://www.chicagohealthatlas.org/indicators/lead-poisoning> (archived) (link no longer functions as information appears to have been removed from the City's website). Notably, less than 40% of Chicago children under the age of six are screened for lead each year. See also Hawthorne 2015. And while most Chicago children are screened at least once before the age of six, the prevalence of lead in Chicago homes and that the average tenancy lasts only two years suggests the number of children with lead poisoning may be much higher.
- <sup>13</sup> Robert J. Sampson & Alix Winter, *The Racial Ecology of Lead Poisoning: The Toxic Inequality in Chicago Neighborhoods, 1995-2013*, Dubois Rev., 2, 4, 19 (2016), [https://scholar.harvard.edu/files/alixwinter/files/sampson\\_winter\\_2016.pdf](https://scholar.harvard.edu/files/alixwinter/files/sampson_winter_2016.pdf)
- <sup>14</sup> Chicago of Chicago, *Health Homes 2025: Closing Our Life Expectancy Gap 2020-2025* (2020), [https://www.chicago.gov/content/dam/city/depts/cdph/statistics\\_and\\_reports/HC2025\\_917\\_FINAL.pdf](https://www.chicago.gov/content/dam/city/depts/cdph/statistics_and_reports/HC2025_917_FINAL.pdf).
- <sup>15</sup> Christina Pacheco et al., *Homes of Low-income Minority Families with Asthmatic Children Have Increased Condition Issues*, Allergy and Asthma Proceedings, National Center for Biotechnology Information, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4210655/#:~:text=Substandard%20housing%20and%20indoor%20environmental,children%20living%20in%20urban%20areas.&text=Poor%20quality%20housing%20can%20harbor%20indoor%20allergens%20and%20triggers> (Pacheco).
- <sup>16</sup> Sweet Home Chicago, at 2; Pacheco.
- <sup>17</sup> Pacheco; see Ruchi S. Gupta et al., *Geographic Variability in Childhood Asthma Prevalence in Chicago*, <https://chicagoasthma.org/resources/Documents/Data%20and%20Reports/Geographic-variability-in-Chicago.pdf>.

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- <sup>18</sup> Maya Brennan et al., *The Impacts of Affordable Housing on Education: A Research Summary*, Ctr. for Housing Policy, at 7 (Nov. 2014), <https://nhc.org/wp-content/uploads/2017/03/The-Impacts-of-Affordable-Housing-on-Education-1.pdf>.
- <sup>19</sup> Kriti Ramakrishnan et al., *Why Housing Matters for Upward Mobility: Evidence and Indicators for Practitioners and Policymakers*, Urban Institute, p. 7 (January 12, 2021).
- <sup>20</sup> *Vacated Buildings Can Leave Tenants on Brink of Homelessness*, Beyond Chicago, Spring 2015, <https://news.medill.northwestern.edu/chicago/vacated-buildings-can-leave-tenants-on-brink-of-homelessness>.
- <sup>21</sup> Madison Hopkins & Cecilia Reyes, *Deadly Fires, Broken Promises: Chicago's Political Leaders Fail to Enact Safety Rules That Stick*, CHIC. TRIB. (Apr. 23, 2021), <https://www.bettergov.org/news/deadly-fires-broken-promises/>
- <sup>22</sup> Rauch & Lanphear, at 197; *see also* Evens, *supra*.
- <sup>23</sup> Special Education Expenditure Project, Ctr. for Spec. Educ. Finance, *What Are We Spending on Special Education Services in the United States, 1999-2000*, <https://www.air.org/sites/default/files/SEEP1-What-Are-We-Spending-On.pdf> (cost of special education students is generally double that of general education students); Legislative Analyst's Office, *Overview of Special Education in California* (2019), <https://lao.ca.gov/Publications/Report/4110> (average annual cost of educating a student with disabilities was almost triple that of a student without disabilities).
- <sup>24</sup> Chic. Dep't of Pub. Health Surveillance Data for 2017, <https://www.chicagohealthatlas.org/indicators/lead-poisoning> (archived) (link no longer functions as information appears to have been removed from the City's website).
- <sup>25</sup> Illinois Report Card, Chicago Public Schools, Operating Expenses Per Pupil, <https://www.illinoisreportcard.com/district.aspx?source=environment&source2=perstudentspending&Districtid=15016299025> (Instructional spending per student is \$10,851).
- <sup>26</sup> Rauch & Lanphear, at 197; Michael Hawthorne, *Lead Paint Poisons Poor Chicago Kids as City Spends Millions Less on Cleanup*, CHIC. TRIB. (May 1, 2015), <https://www.chicagotribune.com/investigations/ct-lead-poisoning-chicago-met-20150501-story.html>.
- <sup>27</sup> Rauch & Lanphear, at 197; Eric Potash et al., *Predictive Modeling for Public Health: Preventing Childhood Lead Poisoning*, <http://www.dssgfellowship.org/wp-content/uploads/2016/01/p2039-potash.pdf>, citing S. Zahran, H. W. Mielke, S. Weiler, and C. R. Gonzales. Nonlinear associations between blood lead in children, age of child, and quantity of soil lead in metropolitan new orleans. *Sci. Total Environ.*, 409(7):1211–1218, mar 2011.
- <sup>28</sup> Angus Corbett, *A Review of Three Models for Enforcing Housing Codes*, Ctr. Pub. Health L. Res., Apr. 4, 2017, at 3, <https://www.law.upenn.edu/cf/faculty/corbetta/workingpapers/Angus%20Corbett,%20A%20Review%20of%20three%20models.pdf> (Rochester's proactive inspection law resulted in "a significant reduction in the number of children with elevated blood [lead] levels" in the first two years) (Corbett); Way, at 22 (describing improved
- <sup>29</sup> Carol Hickey, *Ensuring Housing Quality: Proactive Minimum Housing Code Inspections of Rental Properties in North Carolina Cities*, Paper submitted for Masters of Public Admin. at UNC Chapel Hill (Apr. 4, 2008), <https://keepaustinwonky.files.wordpress.com/2013/09/enhancinghousingquality.pdf>.
- <sup>30</sup> Corbett, at 2 (Los Angeles's property registration fees help fund its proactive inspection program); Way, at 2 ("rental registration programs are typically self-funding"); Brandon Richardson, *Understanding the Proactive Rental Housing Inspection Program—City Responds to Claims, Concerns of Landlords and Tenants*, LONG BEACH BUS. J. (Aug. 29, 2016) (Long Beach's proactive inspection program is funded by "revenue generated by the program itself").
- <sup>31</sup> *See* Appendix 1.
- <sup>32</sup> *See* ChangeLab Solutions, *A Guide to Proactive Rental Inspection Programs*, at 5 (2014), [https://www.changelabsolutions.org/sites/default/files/Proactive-Rental-Inspection-Programs\\_Guide\\_FINAL\\_20140204.pdf](https://www.changelabsolutions.org/sites/default/files/Proactive-Rental-Inspection-Programs_Guide_FINAL_20140204.pdf).
- <sup>33</sup> *See* Appendix 1.