



CRIMINAL HISTORY RECORD CHECKS IN FEDERALLY ASSISTED HOUSING APPLICATIONS

2024 REPORT



CRIMINAL HISTORY RECORD CHECKS IN FEDERALLY ASSISTED HOUSING APPLICATIONS: 2024 REPORT

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INTRODUCTION

Under the Housing Authorities Act (310 ILCS 10/8.10a), all Illinois public housing authorities (PHAs) must collect and report the following data annually to the Illinois Criminal Justice Information Authority (ICJIA):

- (1) The number of applications submitted for admission to federally assisted housing.
- (2) The number of applications submitted for admission to federally assisted housing of individuals with a criminal history record, if the authority is conducting criminal history records checks of applicants or other household members.
- (3) The number of applications for admission to federally assisted housing that were denied on the basis of a criminal history record, if the authority is conducting criminal history records checks of applicants or other household members.
- (4) The number of criminal records assessment hearings requested by applicants for housing who were denied federally assisted housing on the basis of a criminal history records check.
- (5) The number of denials for federally assisted housing that were overturned after a criminal records assessment hearing.
- (6) The number of vacant rental units within each housing project operated by the Authority.
- (7) Information on whether each waiting list maintained by the Authority is open or closed.

Also, the above information (elements 1-5) must be disaggregated by the race, ethnicity, and sex of housing applicants (310 ILCS 10/8.10a) (Appendix A).

In fulfillment of this Act, ICJIA produces annual reports that are made available free of charge on its website. This report covers calendar year 2024 and provides information shared with ICJIA by PHAs.

Before presenting the findings from the 2024 reported data, we summarize key challenges encountered during the data collection process.

KEY CHALLENGES

UNSTANDARDIZED SCREENING PROCESS

There is no standardized approach for evaluating applicants and approving eligibility for federally assisted housing in Illinois. We learned that PHAs are guided by federal and state regulations set by the U.S. Department of Housing and Urban Development (HUD) and Illinois law.

Federal law prohibits admission for individuals who:

1. Were convicted of manufacturing methamphetamine in federally assisted housing.
2. Are subject to lifetime sex offender registration.

Beyond these requirements, HUD provides general input on ensuring tenant safety but does not mandate a uniform screening process (HUD, 2025).

Additionally, Illinois legislation (310 ILCS 10/25(e-5)(1)(F)) limits considerations of convictions that occurred more than 180 days before the application was submitted for federally assisted housing. Article 3 of Illinois' Human Rights Act prohibits discrimination in real estate transactions on the basis of some criminal histories. Some rental housing was defined as protected under this Act, and it could also be accessed through federally assisted housing programs like Housing Choice Voucher (HCV).

In general, PHAs retain broad discretion to assess an applicant's criminal history and determine eligibility for housing. As a result, the criteria used to evaluate applicants may differ across PHAs, leading to variability in the interpretation and reporting of data elements collected under the Act.

DATA COLLECTION AND REPORTING CAPACITY

PHAs also differ in their capacity to collect and report the data required under the Act. While PHAs report some applicant data to HUD, those requirements do not necessarily align with the Illinois Housing Authorities Act. As a result, some PHAs may not track certain data elements mandated by the Act, leading to gaps or discrepancies in reporting. In some cases, PHAs only report data that are readily available rather than collecting additional information specifically for this requirement.

ICJIA's role in this process is limited to data collection. The agency does not have the authority to establish standardized data collection procedures, assess data quality beyond what is outlined in this report, or enforce compliance with reporting requirements. Although the Act requires ICJIA to collect these data, it does not include mechanisms for ensuring consistency or completeness in PHA reporting.

IMPLICATIONS FOR THIS REPORT

Due to these challenges, the findings presented in this report have inherent limitations, which are further detailed in the Limitations section. To strengthen data collection and improve alignment with the legislative requirement, policymakers may consider collaborating with PHAs and ICJIA to refine reporting processes and improve data consistency. Addressing these challenges could enhance the completeness and accuracy of future reports and allow for a more comprehensive analysis of housing application trends.

DATA COLLECTION

ADMINISTRATION OF DATA COLLECTION TOOL

CONTACT INFORMATION

In fulfillment of the Act, ICJIA research staff employed multiple methods to contact Illinois public housing authorities (PHAs) and share information. To our knowledge, no comprehensive or current list of all PHAs in Illinois exists. Therefore, we utilized an online U.S. HUD (n.d.) directory for Illinois, which provided contact information. ICJIA staff emailed all 108 Illinois PHAs individually. Four emails were undeliverable due to inactive mailboxes or sending errors. ICJIA staff contacted these PHAs by phone to obtain updated contact information.

RECRUITMENT

We sent two emails during the open data collection period, from January 14, 2025, to March 3, 2025. In addition, two organizations affiliated with PHAs in Illinois, the Illinois Association of Housing Authorities (IAHA) and the National Association of Housing and Redevelopment Officials (NAHRO), sent three emails to their members reminding them and providing access to submit data to ICJIA. ICJIA staff attempted to contact these PHAs by phone and either spoke with staff directly or left messages.

DATA COLLECTION TOOL

The data collection tool was created using Qualtrics online software and could be accessed via a URL link (Appendix B). It was accessible from January 14, 2025, through March 3, 2025. During data collection, ICJIA staff assisted PHAs by phone or email with any questions or issues.

DATA ANALYSIS

We exported data from Qualtrics into Microsoft Excel and reviewed them for errors. To resolve duplicate entries or other unclear responses (e.g., responding ‘yes’ to the status of the waitlist or reporting thousands of vacant units), we contacted several Public Housing Authorities (PHAs). Also, when PHAs provided application ranges (e.g., 2,500–3,000), we used the midpoint value (e.g., 2,750). While this approach provides an estimate, it does not account for variations in data collection practices across PHAs. Future reports may request that PHAs provide exact counts or structured estimates to improve accuracy.

In addition, many PHAs did not report values for at least one data element required under the Act (e.g., total denials, number of Hispanic or Latinx applicants). Of the 81 PHAs that submitted data, at least 18 (22.2%) had a minimum of one missing element. Missing data appeared in various forms—some fields were left blank, while others were reported as ‘N/A’ or ‘unknown.’ Some PHAs explicitly stated that they do not collect the specific information required under the Act but instead reported zeros. As a result, it is impossible to distinguish between actual zero values, missing information, and cases where totals were not applicable.

For example, some PHAs did not process any applications because their waitlist was closed. If they reported ‘N/A,’ this could be interpreted as zero. For consistency in calculations, missing data were substituted with zeros. However, this does not necessarily indicate that no cases occurred—it

may reflect missing or untracked data. As a result, statewide totals likely underestimate the actual number of applications, denials, and appeals.

Furthermore, the lack of demographic information from PHAs limits the extent to which we can analyze their operations using data captured under the Act. Subsequent reports should clearly distinguish between actual zero values and unreported data, and data points may need to be defined more broadly to prevent misinterpretation and strengthen future analyses.

RESULTS

RESPONDENTS

Out of 108 contacted PHAs, 81 Illinois PHAs organized under the Act responded, resulting in a participation rate of 75%. Table 1 provides details on the PHAs that provided data.

Table 1
Public Housing Authorities That Provided Data by Community Detail, 2024

Housing authority	Municipality type	Geographic region	Community type	Population
Adams County*	County	Central	Urban	64,441
Aurora	City	North	Urban	177,563
Bloomington	City	Central	Urban	78,587
Bond County	County	South	Urban	16,450
Brown County	County	Central	Rural	6,294
Bureau County	County	Central	Urban	32,729
Carroll County	County	North	Rural	15,526
Cass County	County	Central	Urban	12,596
Chicago	City	North	Urban	2,664,452
Clark County	County	South	Rural	15,088
Clay County	County	South	Urban	12,999
Cook County*	County	North	Urban	5,087,072
Cumberland County	County	South	Rural	10,261
Danville	City	Central	Urban	28,206
DeKalb County	County	North	Urban	100,288
DeWitt County	County	Central	Urban	15,365
Edgar County	County	Central	Urban	16,334
Edwards County	County	South	Rural	5,968
Effingham County	County	South	Urban	34,331
Elgin	City	North	Urban	113,310
Ford County	County	Central	Urban	13,250
Freeport	City	North	Urban	23,136
Fulton County	County	Central	Urban	32,541
Gallatin County	County	South	Rural	4,670
Granite City	City	South	Urban	26,908

Housing authority	Municipality type	Geographic region	Community type	Population
Greater Metro Area of Rock Island County	County	Central	Urban	141,236
Greene County	County	Central	Rural	11,543
Grundy County	County	North	Urban	53,578
Hamilton County	County	South	Rural	7,911
Hardin County	County	South	Rural	3,569
Henry County	County	Central	Urban	48,448
Jefferson County*	County	South	Urban	36,320
Jersey County	County	South	Urban	21,091
JoDaviess County	County	North	Urban	21,756
Johnson County	County	South	Rural	13,326
Kankakee County	County	Central	Urban	105,940
Knox County	County	Central	Urban	48,411
Lake County*	County	North	Urban	708,760
LaSalle County	County	North	Urban	108,309
Lawrence County	County	South	Urban	14,813
Lee County	County	North	Urban	33,654
Livingston County	County	Central	Urban	35,320
Logan County	County	Central	Urban	27,590
Macoupin County	County	Central	Urban	44,018
Marion County	County	South	Urban	36,673
Marion	City	South	Urban	16,852
McDonough County	County	Central	Urban	26,839
McHenry County	County	North	Urban	312,800
McLean County*	County	Central	Urban	170,441
Menard County	County	Central	Rural	11,954
Mercer County	County	Central	Rural	15,487
Moline	City	Central	Urban	41,965
Morgan County	County	Central	Urban	32,140
Mt. Vernon	City	South	Urban	14,247
Ogle County	County	North	Urban	51,265
Park Forest	Village	North	Urban	20,763
Pekin	City	Central	Urban	31,126
Peoria	City	Central	Urban	110,460
Perry County	County	South	Urban	20,503
Piatt County	County	Central	Urban	16,714
Pike County	County	Central	Rural	14,342
Pope County	County	South	Rural	3,707
Pulaski County	County	South	Rural	4,911
Quincy	City	Central	Urban	38,803

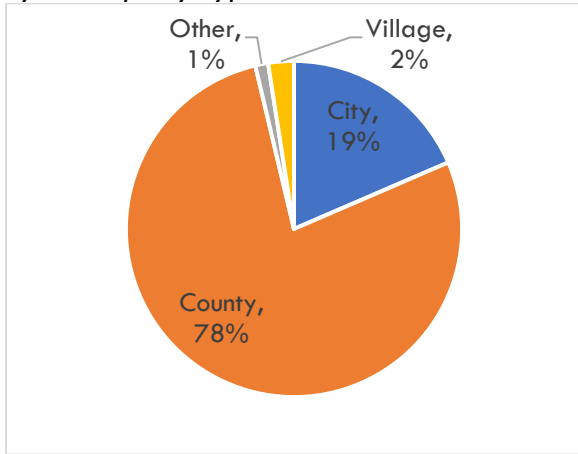
Housing authority	Municipality type	Geographic region	Community type	Population
Randolph County	County	South	Urban	29,815
Richland County	County	South	Urban	15,488
Rockford	City	North	Urban	146,120
Rock Island	City	Central	Urban	36,132
Scott County	County	Central	Rural	4,710
Shelby County	County	Central	Urban	20,568
Springfield	City	Central	Urban	112,544
St. Clair County*	County	South	Urban	251,018
Village of Oak Park	Village	North	Urban	52,055
Union County	County	South	Urban	16,667
Wabash County	County	South	Urban	10,942
Warren County	County	Central	Urban	16,185
Wayne County	County	South	Urban	15,761
Whiteside County	County	North	Urban	54,498
Williamson County*	County	South	Urban	66,706
Winnebago County*	County	North	Urban	280,922
Woodford County	County	Central	Urban	38,285

Note. Population data are from the U.S. Census Bureau's estimate as of July 1, 2023, and are the most current data available ([U.S. Census Bureau QuickFacts: United States](#)). The community type for city housing authorities is based on the county designation in which the city is located and utilizes data from the 2020 decennial census. We designated a county as rural if the population within urban blocks equaled 0% (i.e., [Urban and Rural](#)). *Indicates county-level housing authorities with city-level housing authorities within their jurisdiction. Those county housing authorities include the population of the cities located in the county.

Below, we provide a breakdown of the 81 PHAs who reported data and the 108 Illinois PHAs contacted for data reporting. The data are organized by municipality type, region, rural or urban designation, and population category (Figures 1-8). Of those who provided data (81 PHAs), the majority were county housing authorities (Figure 1), and the largest proportion came from the central region of the state (Figure 3). A majority of responding housing authorities were in urban areas (Figure 5), but more than one-third served areas with fewer than 20,000 residents (Figure 7).

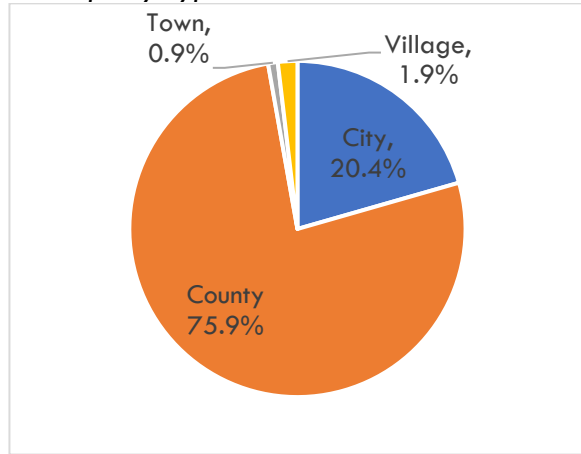
The following figures show that the sample of 81 PHAs, which reported data for the calendar year 2024, mirrors the broader distribution of all 108 PHAs organized under the Act. Generally, more Illinois PHAs are county-level (Figure 2) and centrally located (Figure 4). They are considered urban rather than rural (Figure 6) and are typically found in counties or cities with populations of less than 20,000 (Figure 8).

Figure 1
Illinois Public Housing Authorities by Municipality Type



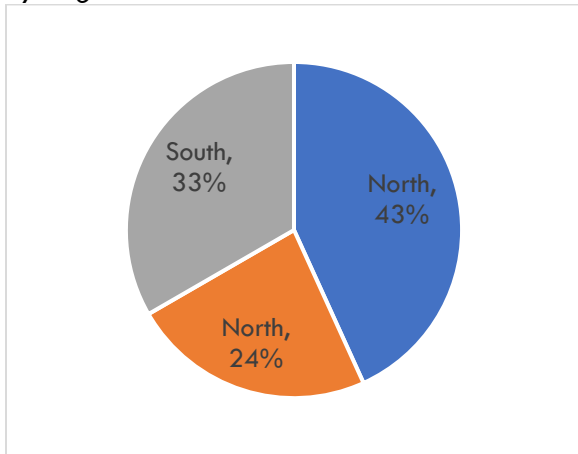
Note. Eighty-one housing authorities reported 2024 data to ICJIA. Danville City Housing Authority includes operations from Vermillion County Housing Authority and is categorized as other.

Figure 2
Illinois Public Housing Authorities by Municipality Type



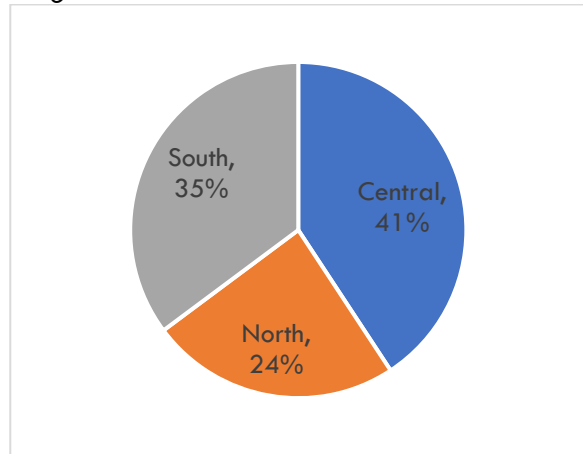
Note. 108 Illinois public housing authorities.

Figure 3
Illinois Public Housing Authorities by Region



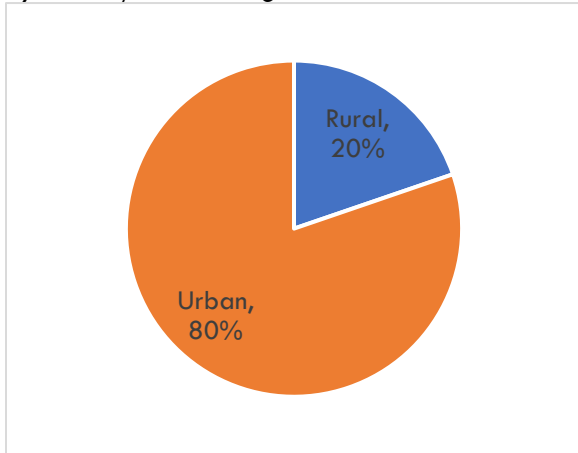
Note. Eighty-one housing authorities reported 2024 data to ICJIA

Figure 4
Illinois Public Housing Authorities by Region



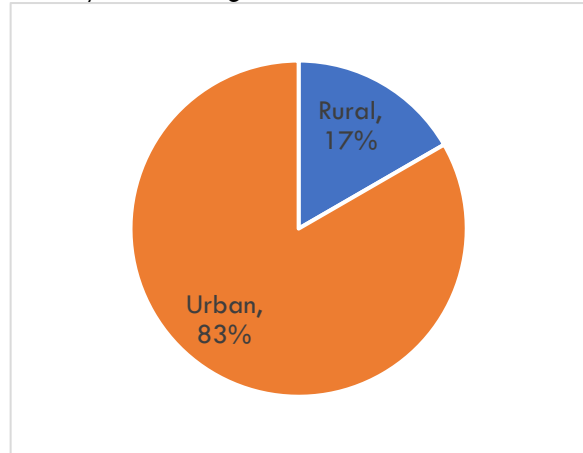
Note. 108 Illinois public housing authorities.

Figure 5
Illinois Public Housing Authorities by Urban/Rural Designation



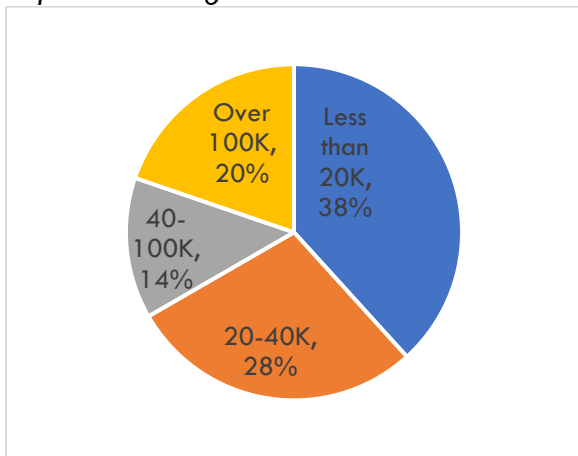
Note. Eighty-one housing authorities reported 2024 data to ICJIA

Figure 6
Illinois Public Housing Authorities by Urban/Rural Designation



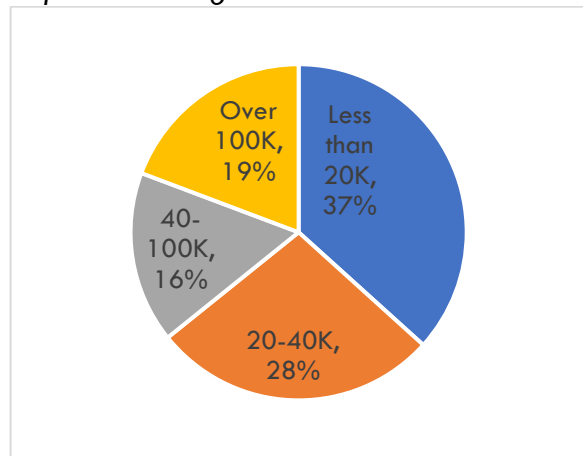
Note. 108 Illinois public housing authorities.

Figure 7
Illinois Public Housing Authorities by Population Categories



Note. Eighty-one housing authorities reported 2024 data to ICJIA

Figure 8
Illinois Public Housing Authorities by Population Categories



Note. 108 Illinois public housing authorities.

Twenty-seven PHAs, or 25% of the 108 Illinois PHAs, *did not* provide data for calendar year 2024 to ICJIA. Table 2 provides details on the housing authorities that *did not* provide data. The 27 PHAs that did not report data are predominantly county-level, located in the central region of Illinois, and urban rather than rural, primarily in cities or counties with populations of less than 20,000.

Table 2
Public Housing Authorities That Did Not Provide Data, 2024

Housing Authority	Municipality type	Geographic region	Community type	Population
Alexander County	County	South	Urban	4,695
Alton	City	South	Urban	25,006
Bond County	County	South	Urban	16,450
Boone County	County	North	Urban	53,202
Calhoun County	County	South	Rural	4,317
Champaign County	County	Central	Urban	205,644
Cicero	Town	North	Urban	81,004
Christian County	County	Central	Urban	33,228
Coles County	County	Central	Urban	46,060
Decatur	City	Central	Urban	68,670
DuPage County	County	North	Urban	921,213
East Peoria	City	Central	Urban	22,012
East St. Louis	City	South	Urban	17,642
Franklin County	County	South	Urban	37,138
Hancock County	County	Central	Urban	17,186
Henderson County	County	Central	Urban	6,088
Jackson County	County	South	Urban	52,141
Joliet	City	North	Urban	150,489
Kendall County	County	North	Urban	139,976
Madison County*	County	South	Urban	262,752
Mason County	County	Central	Rural	12,523
Massac County	County	South	Urban	13,661
Montgomery County	County	Central	Urban	27,663
North Chicago	City	North	Urban	30,416
Saline County	County	South	Urban	22,873
Waukegan	City	North	Urban	87,642
White County	County	South	Urban	13,401

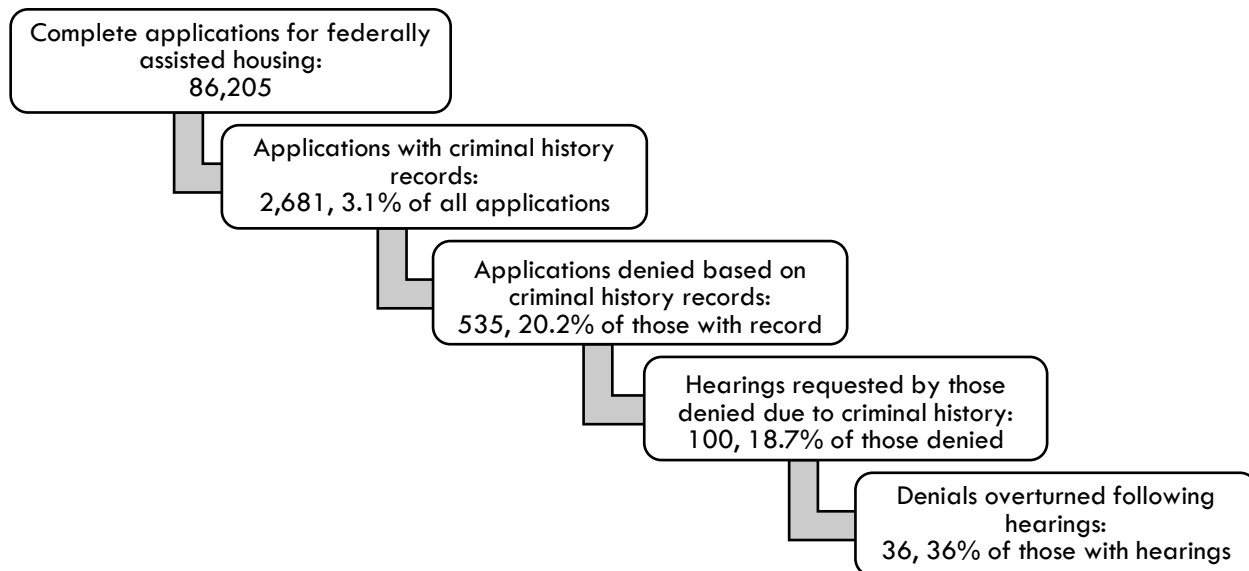
Note. Population data are from the U.S. Census Bureau's estimate as of July 1, 2023, and are the most current data available ([U.S. Census Bureau QuickFacts: United States](#)). The community type for city housing authorities is based on the county designation in which the city is located and utilizes data from the 2020 decennial census. We designated a county as rural if the population within urban blocks equaled 0% (i.e., [Urban and Rural](#)). *Indicates county-level housing authorities with city-level housing authorities within their jurisdiction. Those county housing authorities include the population of the cities located in the county.

RESPONSES

Illinois PHAs reported 86,205 complete applications submitted in calendar year 2024 for admission to federally assisted housing (Figure 9).

Figure 9

Breakdown of Data Reported under the Act



Note. Data are from 81 housing authorities reporting to ICJIA for the calendar year 2024.

Table 3 provides details of the housing authority applications by gender for 2024. Overall, more females submitted applications for admission to federally assisted housing than males or other genders. Females also represented a larger proportion of all applications with a criminal history noted by a PHA. Males represented over half of all applications denied due to criminal history records. Males and females represented nearly equal proportions of all criminal records assessment hearings requested; however, females comprised a large proportion of all denials that were overturned following a hearing.

Table 3

Public Housing Authority Applications by Gender, 2024

Reports on applications	Male		Female		Other gender		Unknown/ Not reported		Total Number
	Number	%	Number	%	Number	%	Number	%	
Applications submitted for admission to housing	22,568	26.2	49,656	57.6	286	0.3	12,561	14.6	86,205
Applications submitted for admission to housing of individuals with a criminal history record	1,127	42	1,269	47.3	0	0	285	10.6	2,681
Applications for admission to housing that were denied based on a criminal history record	282	52.7	208	38.9	0	0	45	8.4	535
Criminal records assessment hearings requested by applicants	44	44	46	46	0	0	8	8	100

	Male		Female		Other gender		Unknown/ Not reported		Total
for housing who were denied housing based on a criminal history records check									
Denials for housing overturned after a criminal records assessment hearing	14	38.9	18	50	0	0	4	11.1	36

Note. Data were from 81 housing authorities reporting to ICJIA for the calendar year 2024. Percentages are of the row totals and may not equal 100 due to rounding.

Table 4 presents a different perspective on the gender data shared by PHAs for 2024 than Table 3. Of the applications submitted by each gender, males had more criminal histories noted by PHAs than females. Also, a greater proportion of male applications were denied based on those records. Females requested criminal assessment hearings proportionally more often than males, and a larger proportion of their denials were overturned following those hearings.

Table 4
Public Housing Authority Applications by Gender, 2024

Gender	Reports on applications									
	Applications submitted for admission to housing			Applications with criminal history records		Applications denied based on criminal history records		Hearings requested by those denied due to criminal history		Denials overturned following hearings
	Number	Number	%	Number	%	Number	%	Number	%	
Male	22,568	1,127	5	282	25	44	15.6	14	31.8	
Female	49,656	1,269	2.6	208	16.4	46	22.1	18	39.1	
Other	286	0	0	0	0	0	0	0	0	

Note. Data were from 81 housing authorities reporting to ICJIA for the calendar year 2024. Percentages are the proportions of the previous element's total.

Table 5 provides details of the housing authority applications by race for 2024. Overall, Black or African American applicants submitted more applications than any other racial group. White applicants represented a larger proportion of all applications with a criminal history noted by PHAs. Additionally, White applicants represented nearly half of all applications denied due to a criminal record. Additionally, by race, this group requested the largest proportion of all criminal assessment hearings following a denial. Black or African American applicants had the highest rate of denials overturned following a hearing.

Table 5
Public Housing Authority Applications by Race, 2024

Reports on applications	White		Black or African American		Asian		Other or mixed-race		Unknown/not reported		Total
	Number	%	Number	%	Number	%	Number	%	Number	%	
Applications submitted for admission to housing	26,062	30.2	41,219	47.8	1,188	1.4	4,215	4.9	13,521	15.7	86,205
Applications submitted for admission to housing of individuals with a criminal history record	1,302	48.6	725	27.4	6	0.2	32	1.2	616	23	2,681
Applications for admission to housing that were denied based on a criminal history record	260	48.6	216	40.4	6	1.1	10	1.9	43	8	535
Criminal records assessment hearings requested by applicants for housing who were denied housing based on a criminal history records check	51	51	35	35	1	1	2	2	11	11	100
Denials for housing that were overturned after a criminal records assessment hearing	14	38.9	16	44.4	1	2.8	1	2.8	4	11.1	36

Note. Data were from 81 housing authorities reporting to ICJIA for the calendar year 2024. Percentages are of the row total.

Table 6 presents a different perspective on the data on race shared by PHAs for 2024 than Table 5. Of the applications submitted by each race, White applicants had a higher proportion of criminal histories noted by PHAs than other races. Also, based on those records, a greater proportion of applications submitted by Black people or African Americans were denied than those submitted by White or multi-racial people (the most prominent groups represented in the sample). White applicants requested criminal assessment hearings at a higher rate than other racial groups, but Black or African American applicants had the largest proportion of denials overturned following those hearings.

Table 6
Public Housing Authority Applications by Race, 2024

Race	Reports on applications											
	Applications submitted for admission to housing			Applications with criminal history records			Applications denied based on criminal history records		Hearings requested by those denied due to criminal history		Denials overturned following hearings	
	Number	Number	%	Number	%	Number	%	Number	%	Number	%	
White	26,062	1,302	5	260	20	51	19.6	14	27.5			
Black or African American	41,219	725	1.8	216	29.8	35	16.2	16	45.7			
Indian or Alaska Native	517	2	0.4	2	100	1	50	0	0			
Asian	1,188	6	0.5	6	100	1	16.7	1	100			
Native Hawaiian or Pacific Islander	199	1	0.5	0	0	0	0	0	0			
Multi-Racial	3,499	29	0.8	8	27.6	1	12.5	1	100			

Note. Data were from 81 housing authorities reporting to ICJIA for the calendar year 2024. Percentages are the proportions of the previous element's total.

Overall, denial rates vary by race and gender; however, the data do not indicate whether this variation results from differences in criminal history rates among applicants, variations in PHA screening practices, or other factors. Further study is needed to understand how discretion is applied in decision-making processes, the various factors that influence those decisions, and how best to measure and comprehend them.

Table 7 provides details of the housing authority applications by ethnicity for 2024. The data collection tool asked PHAs to report Hispanic/Latinx applicants. Therefore, we categorized all other applicants as either not Hispanic/Latinx or unknown. Many PHAs reported they did not collect information on ethnicity. A small number and proportion of applicants were reported as Hispanic/Latinx.

Table 7
Public Housing Authority Applications by Ethnicity, 2024

Reports on applications	Hispanic/Latinx		Not Hispanic/Latinx or Unknown		Total
	Number	%	Number	%	Number
Applications submitted for admission to housing	7,181	8.3	79,024	91.7	86,205
Applications submitted for admission to housing of individuals with a criminal history record	74	2.8	2,607	97.2	2,681
Applications for admission to housing that were denied based on a criminal history record	36	6.7	499	93.3	535
Criminal records assessment hearings requested by applicants for housing who were denied housing based on criminal history records check	14	14	86	86	100

	Hispanic/Latinx		Not Hispanic/Latinx or Unknown		Total
Denials for housing that were overturned after a criminal records assessment hearing	4	11.1	32	88.9	36

Note. Data from 81 housing authorities reporting to ICJIA for calendar year 2024. Percentages are of the row's total.

Table 8 presents a different view of the ethnicity data shared by PHAs for 2024, as presented in Table 7.

Table 8
Public Housing Authority Applications by Ethnicity, 2024

Ethnicity	Applications submitted for admission to housing			Applications with criminal history records		Applications denied based on criminal history records		Hearings requested by those denied due to criminal history		Denials overturned following hearings	
	Number	Number	%	Number	%	Number	%	Number	%	Number	%
Hispanic/Latinx	7,181	74	1	36	48.7	14	38.9	4	28.6		
Not Hispanic/Latinx or Unknown	79,024	2,607	3.4	499	19.1	86	17.2	32	37.2		

Note. Data from 81 housing authorities reporting to ICJIA for calendar year 2024. Percentages are the proportions of the previous element's total.

Table 9 details the people by waitlist status as reported by the 81 PHAs for the calendar year 2024. That year, five PHAs reported that the status of their waitlist was open for parts of their program (e.g., HCV, Public Housing, LIPH) and closed for other portions (Section 8, 'on hold for renovations'). This status is referred to as Mixed in Table 9.

Table 9
Public Housing Authority Waitlist Status, 2024

Waitlist status	Total	%
Open	66	81.5
Closed	9	11.1
Mixed	5	6.2
N/A	1	1.2

Note. Data from 81 housing authorities reporting to ICJIA for calendar year 2024. Waitlist status as of December 31, 2024.

Finally, the Act asks PHAs to report the total number of vacant units at their authority. Seventy-six PHAs reported a total of 1,765 vacant rental units as of December 31, 2024. Five PHAs did not include a count of vacant units or wrote 'N/A'. The highest reported number from a single housing authority was 497 (located in a high-population Illinois city), and zero was the lowest. The PHA reported a waitlist status of 'open.' The highest number of vacant units reported by an Illinois PHA with a closed waitlist status was 89.

However, the number of vacant rental units from a single authority does not necessarily indicate shortages or surpluses of housing units. Without additional information (i.e., the typical number of

vacant units, reasons for the vacancies, and the significance of these vacancies), we cannot determine whether this number, or the total number of vacant units, is typical, low, or high. It is possible that turnover is usual and that vacancies reflect individuals moving into other forms of housing, transferring federally assisted housing to new areas, or experiencing other similar situations. Future reporting could investigate the distribution of vacant units about various aspects of the collected data under the Act or available information, such as Census data. However, more information is needed to understand the significance of vacancies in federally assisted housing in Illinois before proceeding. It is also worth noting that nationwide, the U.S. faces a widely acknowledged shortage of affordable housing, and federally assisted housing can be expected to be subject to limitations in housing stock and follow national trends.

SUMMARY OF FEEDBACK FROM HOUSING AUTHORITIES

The data collection tool requested feedback from housing authorities on their experiences with data reporting and data availability during the data collection process. Below, we provide a summary of the feedback shared. Comments from housing authorities are in Appendix C.

VIEWS ON REQUIREMENT

Some respondents commented that the data collection process was time-consuming and burdensome.

STAFF AND SOFTWARE ISSUES

Some PHAs mentioned that they lacked adequate software capabilities to generate reports for the requirements under the Act easily.

DATA DISCREPANCIES OR CHALLENGES

Most comments shared by PHAs described challenges with data, including the data not being tracked, applicants not providing the required data, or application processes that precluded data collection (e.g., criminal histories not collected until after the application moves forward in the process).

DATA LIMITATIONS

The findings in this report are subject to several data limitations, which should be considered when interpreting the results.

NON-RESPONSES AND MISSING DATA

A total of 27 PHAs (25%) did not submit data. Because their reasons for non-reporting are unknown, it is unclear how their absence affects the representativeness of the dataset. If larger PHAs were more likely to report data while smaller PHAs did not, the report may overrepresent larger agencies. Similarly, if certain regions or demographic groups are underrepresented, the findings may not fully reflect the impact of criminal history checks on housing applications across Illinois. Additionally, PHAs with more advanced data systems may have been more likely to respond, meaning differences in reporting could stem from data tracking capacity rather than actual policy differences.

Future reports should assess the impact of non-responses and explore strategies to improve participation, particularly among PHAs with limited data tracking capacity.

DATA ACCURACY AND VERIFICATION

ICJIA staff cannot independently verify the accuracy of the reported data. Some PHAs provided incomplete or missing responses, meaning that reported totals may not fully capture all PHA operations in Illinois.

Additionally, ICJIA cannot confirm whether all PHAs received notice of their reporting obligations, accessed the data collection tool, or are accounted for in the total number of PHAs operating in Illinois. Due to these factors, this report cannot determine an exact response rate for the dataset.

REPORTING BIAS AND DATA COLLECTION CAPACITY

As in previous reporting under the Act (Maranville & Reichert, 2024; Maranville et al., 2023), PHAs described challenges with data collection, reporting requirements, and availability of relevant records. PHAs vary widely in their capacity to track and report data. Some agencies may maintain comprehensive record-keeping systems, while others do not collect detailed demographic or denial data. As a result, PHAs with better data systems may appear to have higher denial rates simply because they track these cases more consistently.

Future reports should assess how reporting capacity influences data trends and consider methods to account for potential reporting bias.

CONCLUSION

While this report provides important quantitative insights into some information regarding PHAs and their operations, these limitations highlight the need for continued improvements in data collection and reporting processes among PHAs. Addressing non-responses, standardizing data tracking and interpretation, and ensuring broader participation will strengthen the accuracy and usefulness of future analyses.

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APPENDIX A: 310 ILCS 10/8.10(a)

- (a) Every Authority organized under the provisions of this Act shall collect the following criminal history record data:
- (1) The number of applications submitted for admission to federally assisted housing;
 - (2) The number of applications submitted for admission to federally assisted housing by individuals with a criminal history record, if the Authority is conducting criminal history records checks of applicants or other household members;
 - (3) The number of applications for admission to federally assisted housing that were denied on the basis of a criminal history record, if the Authority is conducting criminal history records checks of applicants or other household members;
 - (4) The number of criminal records assessment hearings requested by applicants for housing who were denied federally assisted housing on the basis of a criminal history records check; and
 - (5) The number of denials for federally assisted housing that were overturned after a criminal records assessment hearing.

The information required in this Section shall be disaggregated by the race, ethnicity, and sex of applicants for housing.

- (b) Every Authority organized under the provisions of this Act shall collect the following data:
- a. the number of vacant rental units within each housing project operated by the Authority; and
 - b. information on whether each waiting list maintained by the Authority is open or closed.
- (c) The information collected under subsections (a) and (b) shall be reported to the Illinois Criminal Justice Information Authority and shall be compiled and reported to the General Assembly annually by the Illinois Criminal Justice Information Authority. The Illinois Criminal Justice Information Authority shall also make this report publicly available, including on its website, without fee.

Source: P.A. 103-215, eff. 4-30-24.

APPENDIX B: DATA COLLECTION TOOL

Illinois Federally Assisted Housing Criminal Records Check Calendar Year 2024 Data Collection

Public Act 101-0659/Senate Bill 1980 requires *all housing voucher programs and public housing programs* in Illinois to collect the requested information included in this survey. This consists of both applications for publicly operated housing and privately operated housing using vouchers. As required by statute, this information must be reported to the Illinois Criminal Justice Information Authority.

Per the Act, the following information must be reported:

- (1) The number of applications submitted for admission to federally assisted housing.
- (2) The number of applications submitted for admission to federally assisted housing of individuals with a criminal history record, if the Authority is conducting criminal history records checks of applicants or other household members.
- (3) The number of applications for admission to federally assisted housing that were denied on the basis of a criminal history record, if the Authority is conducting criminal history records checks of applicants or other household members.
- (4) The number of criminal records assessment hearings requested by applicants for housing who were denied federally assisted housing on the basis of a criminal history records check.
- (5) The number of denials for federally assisted housing that were overturned after a criminal records assessment hearing.

Also, the above information (elements 1-5) is required to be disaggregated by the race, ethnicity, and sex of applicants for housing.

- (6) The number of vacant rental units within each housing project operated by the Authority.
- (7) Information on whether each waiting list maintained by the Authority is open or closed.

You can pause and resume this survey. If you have any questions, please contact Ryan Maranville at ryan.maranville@illinois.gov

Person completing this form:

Please provide your email:

What is the name of your Housing Authority? _____

In calendar year 2024, what was the *total number of complete applications* submitted to your Housing Authority for admission to federally assisted housing?

Of those who submitted complete applications in calendar year 2024, what were their gender(s)?
Please select one category per application.

Male : _____

Female : _____
Non-binary / third gender : _____
Total : _____

Of those who submitted complete applications in calendar year 2024, what were their race or races? Please select one category per application.

White : _____
Black or African American : _____
American Indian or Alaska Native : _____
Asian : _____
Native Hawaiian or Pacific Islander : _____
Multi-Racial : _____
Total : _____

Of those who submitted complete applications in calendar year 2024, how many were Hispanic/Latinx?

If your Authority did not collect the total number of applications submitted for federally assisted housing, or have incomplete information like missing demographics, please indicate and describe below. Otherwise, please move to the next section.

Did your Authority conduct criminal records checks on federally assisted housing applicants, or other household members, during calendar year 2024?

- Yes
 No

For the purpose of our data collection, a criminal history record is information reported by Illinois criminal justice agencies summarizing a subject's contacts with the criminal justice system. Criminal history records may include arrests, detentions, indictments, or other formal criminal charges, as well as any disposition, sentencing, correctional supervision, and release. In calendar year 2024 at your Housing Authority, what were the total number of applications submitted for admission to federally assisted housing *with a criminal history record*?

Of those with a criminal history record, what were their gender(s)? Please select one category per application.

Male : _____
Female : _____
Non-binary / third gender : _____
Total : _____

Of those with a criminal history record, what were their race(s)? Please select one category per application.

White : _____

Black or African American : _____

American Indian or Alaska Native : _____

Asian : _____

Native Hawaiian or Pacific Islander : _____

Multi-Racial : _____

Total : _____

Of those with a criminal history record, how many were Hispanic/Latinx?

If your Authority did not collect the total number of applications with a criminal history record, or have incomplete information like missing demographics, please indicate and describe below. Otherwise, please move to the next section.

In calendar year 2024 at your Housing Authority, how many applications for admission to federally assisted housing were *denied on the basis of a criminal history record*?

Of those who submitted applications and were denied on the basis of criminal history records, what were their gender(s)? Please select one category per denied application.

Male : _____

Female : _____

Non-binary / third gender : _____

Total : _____

Of those who submitted applications and were denied on the basis of criminal history records, what were their race(s)? Please select one category per denied application.

White : _____

Black or African American : _____

American Indian or Alaska Native : _____

Asian : _____

Native Hawaiian or Pacific Islander : _____

Multi-Racial : _____

Total : _____

Of those who submitted applications and were denied on the basis of criminal history records, how many were Hispanic/Latinx?

If your Authority did not collect the number of applications denied on the basis of a criminal history records check, or have incomplete information like missing demographics, please indicate and describe below. Otherwise, please move to the next section.

In calendar year 2024 at your Housing Authority, how many criminal records assessment hearings were requested by applicants who were denied federally assisted housing on the basis of a criminal history records check?

Of those who submitted applications, were denied housing, and requested an assessment hearing, what were their gender(s)? Please select one category per denied application which requested an assessment hearing.

Male : _____

Female : _____

Non-binary / third gender : _____

Total : _____

Of those who submitted applications, were denied housing, and requested an assessment hearing, what were their race(s)? Please select one category per denied application which requested an assessment hearing.

White : _____

Black or African American : _____

American Indian or Alaska Native : _____

Asian : _____

Native Hawaiian or Pacific Islander : _____

Multi-Racial : _____

Total : _____

Of those who submitted applications, were denied housing, and requested an assessment hearing, how many were Hispanic/Latinx?

If your Authority did not collect the number of criminal records assessment hearings requested by denied applicants, or have incomplete information like missing demographics, please indicate and describe below. Otherwise, please move to the next section.

In calendar year 2024 at your Housing Authority, how many denials for federally assisted housing were overturned after a criminal records assessment hearing?

Of those applications whose denials for housing were overturned following an assessment hearing, what were their gender(s)? Please select one category per application overturned.

Male : _____

Female : _____

Non-binary / third gender : _____

Total : _____

Of those applications whose denials for housing were overturned following an assessment hearing, what were their race(s)? Please select one category per application overturned.

White : _____

Black or African American : _____

American Indian or Alaska Native : _____

Asian : _____

Native Hawaiian or Pacific Islander : _____

Multi-Racial : _____

Total : _____

Of those applications whose denials for housing were overturned following an assessment hearing, how many were Hispanic/Latinx?

If your Authority did not collect the number of overturned denials following a hearing, or have incomplete information like missing demographics, please indicate and describe below. Otherwise, please move to the next section.

As of December 31, 2024, what were the total number of vacant rental units within each housing project operated by your Authority?

If your Authority did not collect the number of vacant rental units within each housing operated by your authority, or have incomplete information please indicate and describe below. Otherwise, please move to the next section.

As of December 31, 2024, is your waiting list open or closed?

If your Authority does not have information on status of waitlist being open or closed, please indicate and describe below. Otherwise, please move to the next section.

Finally, ICJIA would like feedback on your experience with the Federally Assisted Housing Records Check data collection process, regarding data reporting and data availability. If you have no feedback to share, please move to the next section.

You have reached the end of the Survey on Illinois' Federally Assisted Housing Applications. The information reported will be used to create a final report available May 2025. Also, if you have any questions or further comment, please contact Ryan Maranville at ryan.maranville@illinois.gov. Thank you for your participation.

APPENDIX C: FEEDBACK FROM HOUSING AUTHORITIES

On the data collection tool, ICJIA invited PHAs to provide feedback on their experiences with the data collection process, regarding data reporting and data availability. Some of their comments are provided below.

VIEWS ON REQUIREMENT

- This survey is time-consuming with the information to find, review, calculate and then record into the survey.
- This information is administratively burdensome to collect.
- Easy!

STAFF AND SOFTWARE ISSUES

- Without mandating the software companies provide reports on this, the data collecting is incredibly burdensome on our staff to track.
- Our reporting system does not have parameters that categorize each applicant with a criminal history record, by gender and/or race.
- Our screening software does not provide any race identifying information on reports.

DATA DISCREPANCIES OR CHALLENGES

- We don't have a list of denials based on criminal background.
- Incomplete data to determine how many applicants had criminal history record.
- Our housing authority did not collect this data.
- We do not collect demographics on every application submitted only those with criminal backgrounds and, all applicants that receive housing assistance through Authority.
- Regarding demographic and ethnicity, [we] keep records of Minority and non-minority. We do not keep specific ethnicity records.
- We complete criminal record history as the applicant approaches the top of the wait list.
- Did not collect information regarding criminal history record.
- Some applicants declined to provide information pertaining to race.
- We only collected information for applicants who were denied.
- Thirty-one chose not to respond to race on their application.
- Only have clear date for the first quarter of the year due to a staffing change. Was not briefed on reason why we keep these demographics until survey was due.
- We only collect data pertaining to denials based on criminal history.
- Background checks are not obtained until eligibility is established.
- We do not conduct criminal history records on every household, only those that attend an eligibility appointment.
- We do not track the pre application demographics or how many come in. We use preapplication because our waiting list are over 2 years time.
- We do not track, nor keep records of this data.
- The reports are printed so no record of demographics is kept or known.

- We do not collect race or ethnicity on pre-applications.
- We do not process application backgrounds until they reach the top of the waiting list. We are only able to provide data for this item on those applications that have reached the top of the waiting list and have gone through the background screening process.