



STATE LEVEL PARTNERSHIPS TO SUPPORT UNSHELTERED RESIDENTS

NATIONAL ALLIANCE TO END HOMELESSNESS CONFERENCE
JULY 1, 2025



Today's Discussion



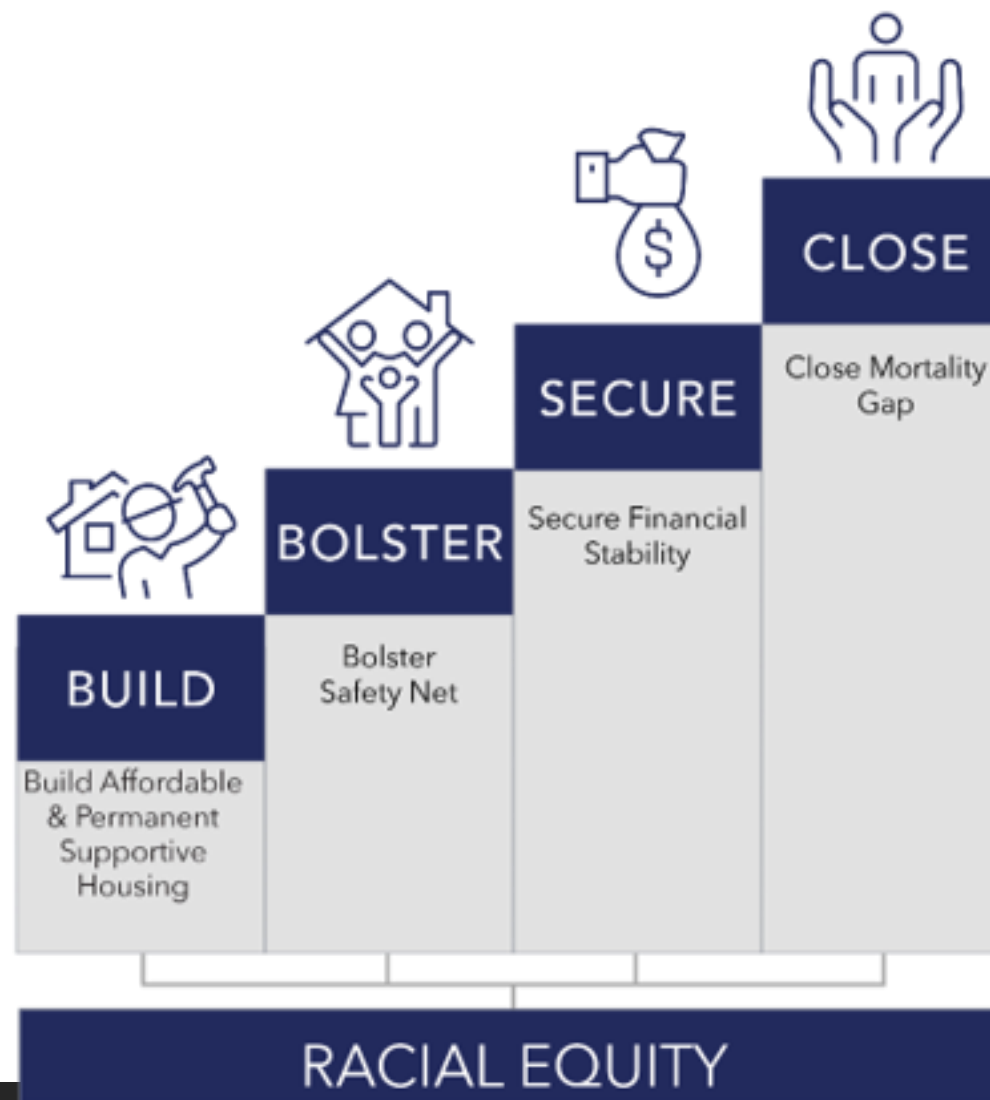
- Home Illinois Framework
 - Christine Haley, Illinois Office to Prevent & End Homelessness
- Strategies to End Homelessness from the Division of Substance Use Prevention and Recovery
 - James Kowalsky, Illinois Department of Human Services
- State of Illinois Response to Grants Pass Decision
 - Betsy Madden, Illinois Department of Human Rights
- Capacity Building and Pilot Development Across the State
 - Christine Haley, Illinois Office to Prevent & End Homelessness

HOME ILLINOIS FOUNDATION

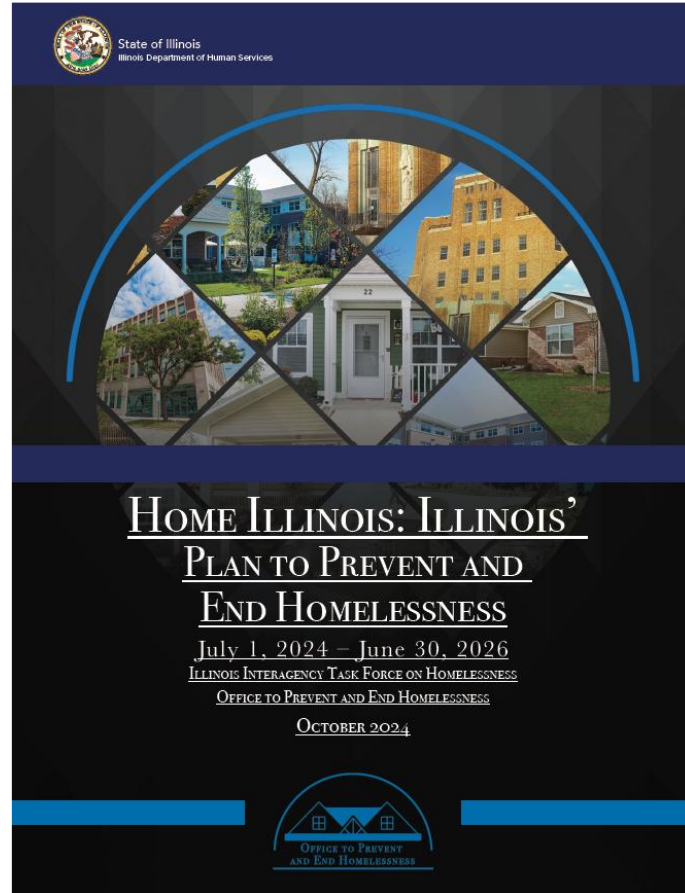
- 2021: Illinois Governor JB Pritzker signed Executive to Fight Homelessness
 - Creating Illinois Interagency Task Force on Homelessness
 - Community Advisory Council on Homelessness
 - Chief Homelessness Officer & IL Office to Prevent & End Homelessness
- 2022: First state plan to prevent and end homelessness, Home Illinois, released
- July 2023
 - HB2831: Home Illinois Bill codifies the executive order that created the Interagency Task Force, Advisory Council and Office
 - Home Illinois Program created with \$200M general revenue investment



HOME ILLINOIS FRAMEWORK



HOME ILLINOIS FY25-26 PLAN



- Download the plan at endhomelessness.illinois.gov

James Kowalsky

Integrated Recovery Support Services Administrator

Illinois Department of Human Services,
Division of Behavioral Health & Recovery

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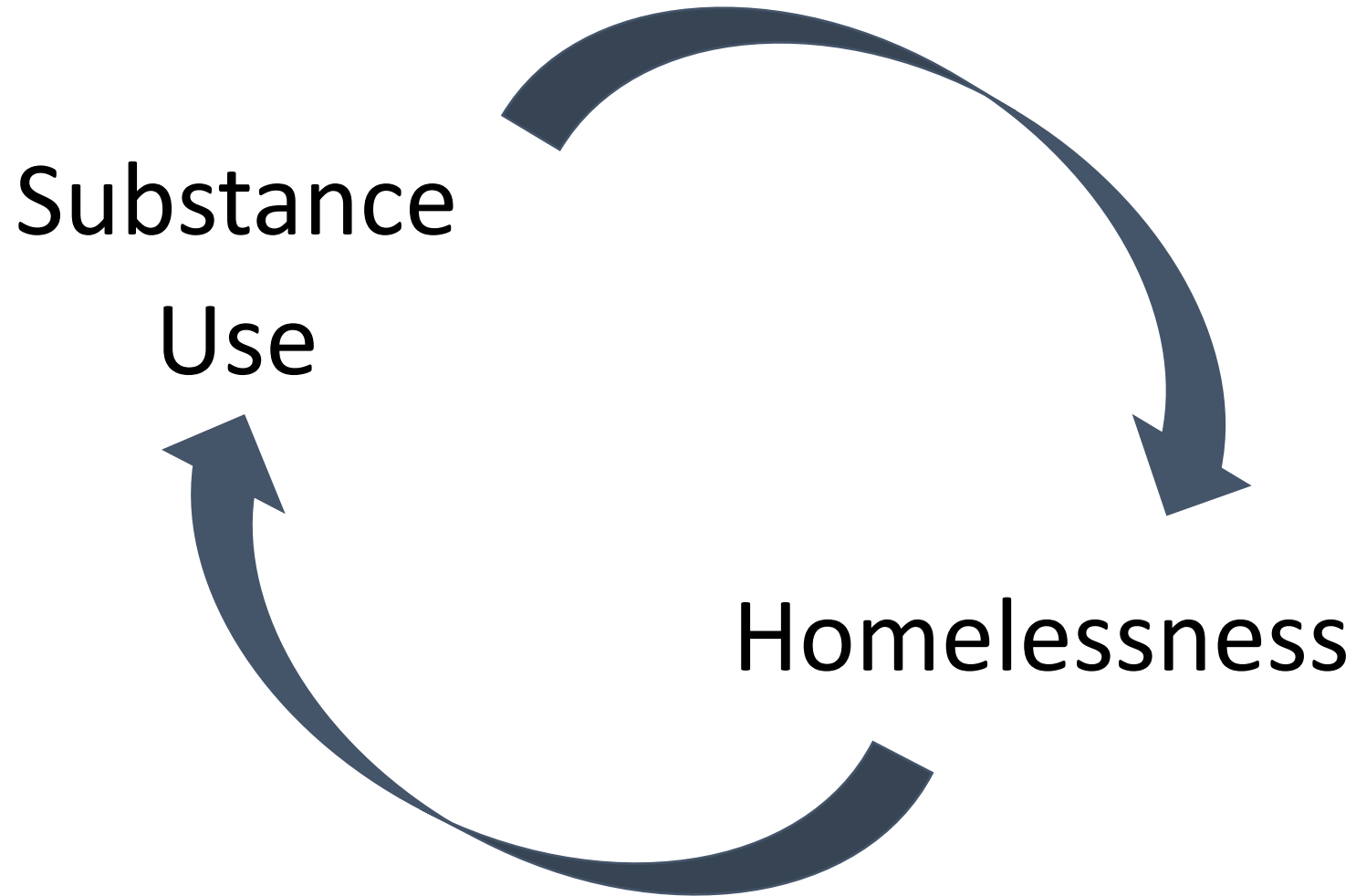


Mission Statement

The mission of the Division of Substance Use Prevention and Recovery is to provide a recovery oriented system of care along the continuum of prevention, intervention, treatment and recovery support where individuals with SUD, those in recovery and those at risk are valued and treated with dignity and where stigma, accompanying attitudes, discrimination, and other barriers to recovery are eliminated.



Homelessness and Substance Use: Bidirectional Relationship



SAMHSA's Definition of Recovery

A process of change through which individuals improve their health and wellness, live a self-directed life, and strive to reach their full potential.

A life in recovery is supported by four dimensions

- Home
- Health
- Purpose
- Community



(Substance Abuse and Mental Health Services Administration, 2012)

American Society of Addiction Medicine (ASAM)

ASAM Criteria

- Biopsychosocial assessment tool
- Used for treatment planning
- Acknowledges the importance of housing and its impact on recovery

The ASAM Criteria Dimensions and Subdimensions

Dimension 1 – Intoxication, Withdrawal, and Addiction Medications

- Intoxication and associated risks
- Withdrawal and associated risks
- Addiction medication needs

Dimension 2 – Biomedical Conditions

- Physical health concerns
- Pregnancy-related concerns
- Sleep problems

Dimension 3 – Psychiatric and Cognitive Conditions

- Active psychiatric concerns
- Persistent Disability
- Cognitive Functioning
- Trauma exposure and related needs
- Psychiatric and cognitive history

Dimension 4 – Substance Use Related Risks

- Likelihood of risky substance use
- Likelihood of risky SUD-related behaviors

Dimension 5 – Recovery Environment Interactions

- Ability to function in current environment
- Safety in current environment
- Support in current environment
- Cultural perceptions of substance use

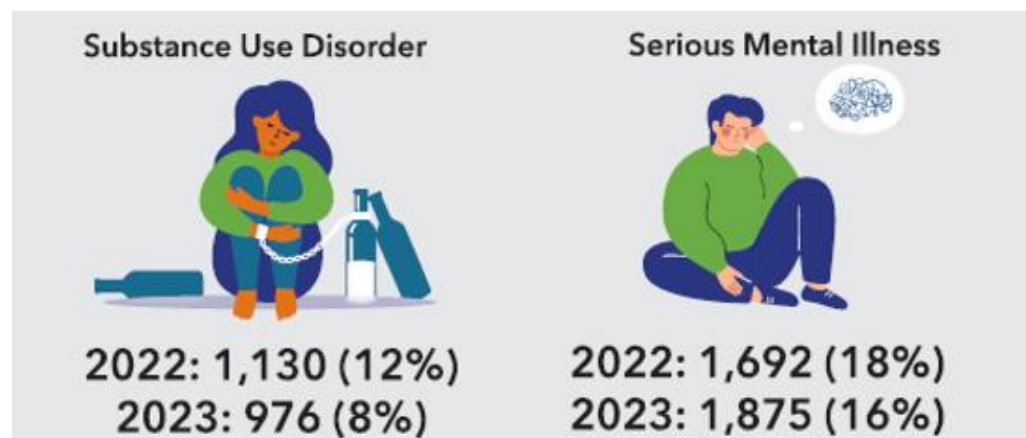
Dimension 6 – Person-Centered Considerations

- Patient preferences
- Barriers to care
- Need for motivational enhancement



PEOPLE EXPERIENCING HOMELESSNESS IN ILLINOIS 2022 AND 2023

HUD POINT-IN-TIME (PIT) COUNT & HOUSING INVENTORY CHART DATA



Help
is here

Homelessness Mortality & Morbidity

- At least 2,520 people experiencing homelessness (PEH) in Illinois died from 2017-2022
- Compared to the general population of Illinois, the average age of death was almost 20 years younger among PEH (56.3 vs 74.2 years old)
- PEH disproportionately died from acute conditions, particularly drug-related overdoses (32.9% vs 3.4%)
- **1 in 3 PEH died from a drug overdose**



Homelessness Mortality & Morbidity

- At least 1,428,984 hospital visits for people experiencing homelessness (PEH) in Illinois from 2017-2022
- Emergency Department visits peak in cold weather months (NOV – JAN)
- Over \$16 billion in total costs billed for PEH in Illinois hospitals 2017-2022
- Mental disorders and SUD were two of the most common primary diagnoses
- **More than half of visits were by patients with a substance use disorder (52.1%)**



Reaching Functional Zero Homelessness

Beds/Housing Units Needed by Population Group and Housing Type

Population: Homeless Programs**

	Emergency Shelter (ES) Beds***	Transitional Housing (TH) Units	Rapid Rehousing (RRH) Units*	Permanent Supportive Housing and other Permanent Housing (PSH/OPH) Units	Total
Current	10,044	1,804	2,342	11,181	23,371
Needed	15,424	2,172	12,770	22,153	52,519
Additional Units Needed	5,379	368	10,428	10,972	27,147

Engaging and
Supporting People
Who Use Drugs
Experiencing
Homelessness





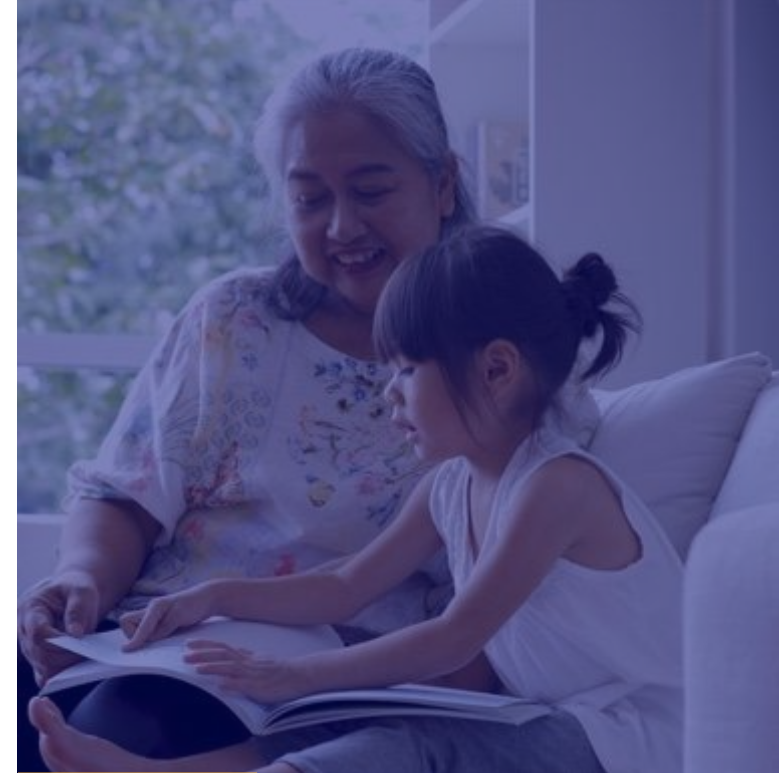
Recovery Residences in Illinois

Transitional Housing Options

- Licensed Recovery Homes
- Sober Living Facilities
- Peer-Run Recovery Residences

Peer-Run Recovery Residence: Oxford House

- Established in Maryland in 1975
- Oxford House is a self-run, self-supported recovery house program for individuals recovering from a substance use disorder.
- Oxford Houses provide an alcohol and drug-free living environment. Support people accessing Medication Assisted Recovery.
- IDHS/SUPR started working with Oxford House in 2021 to expand availability.



A Housing Resource for People Experiencing Homelessness

- 564 Oxford House residents surveyed in Spring 2024
- **17.8%** were homeless prior to moving into Oxford House
- **32.1%** reported prior homelessness
- 3.1 average number of times members have been homeless
- 9.8 months average longest period of homelessness



Programs Incorporating Street Outreach Services

- Illinois Prevent Prescription Drug/Opioid Overdose Deaths: Overdose Education and Naloxone Distribution (OEND), 2017
- Recovery Support Services: peer-based street outreach to engage people in recovery supports including housing navigation, 2017
- Access to Medication Assisted Recovery (MAR) in Community: MAR Mobile Health Units (MMHU), 2020





Program Overview

- Established in April 2022 using funds from the Cannabis Revenue and Tax Act (CRTA)
- Six providers funded to house **60 households each** (individuals or families)
- Located across the state (Chicago-2, Suburban Cook, Will/Kankakee, Macon, and Madison/St. Clair)
- **Eligibility requirements:** homelessness and history of substance use disorder
- **Priority populations:** women, young adults (18 – 25), and families
- Serves low-income individuals
- Uses a **Housing First Model**
- Primary goals: promote housing stability and recovery

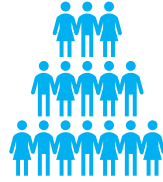


Partners

- IDHS/SUPR Staff
 - PSH Coordinator: Courtney Kelbel
 - Integrated Recovery Support Services Administrator: James Kowalsky
 - Deputy Director: Stephanie Frank
- Learning Collaborative and Technical Assistance
 - Great Lakes Addiction Technology Transfer Center (GLATTC)
 - CSH
- Evaluation Team
 - Jane Addams College of Social Work at the University of Illinois-Chicago
 - NORC at University of Chicago



Program at a Glance



590 participants housed
since April 2022



410 participants
currently housed



29% participants with children



100% participants have a SUD
57% with co-occurring mental illness



67% participants involved with criminal justice system
9% involved with child welfare system



98% participants received services/support past 30 days



<5% participants hospitalized or arrested



98% stably housed at 6 months
95% stably housed at 12 months
75% discharged to stable housing

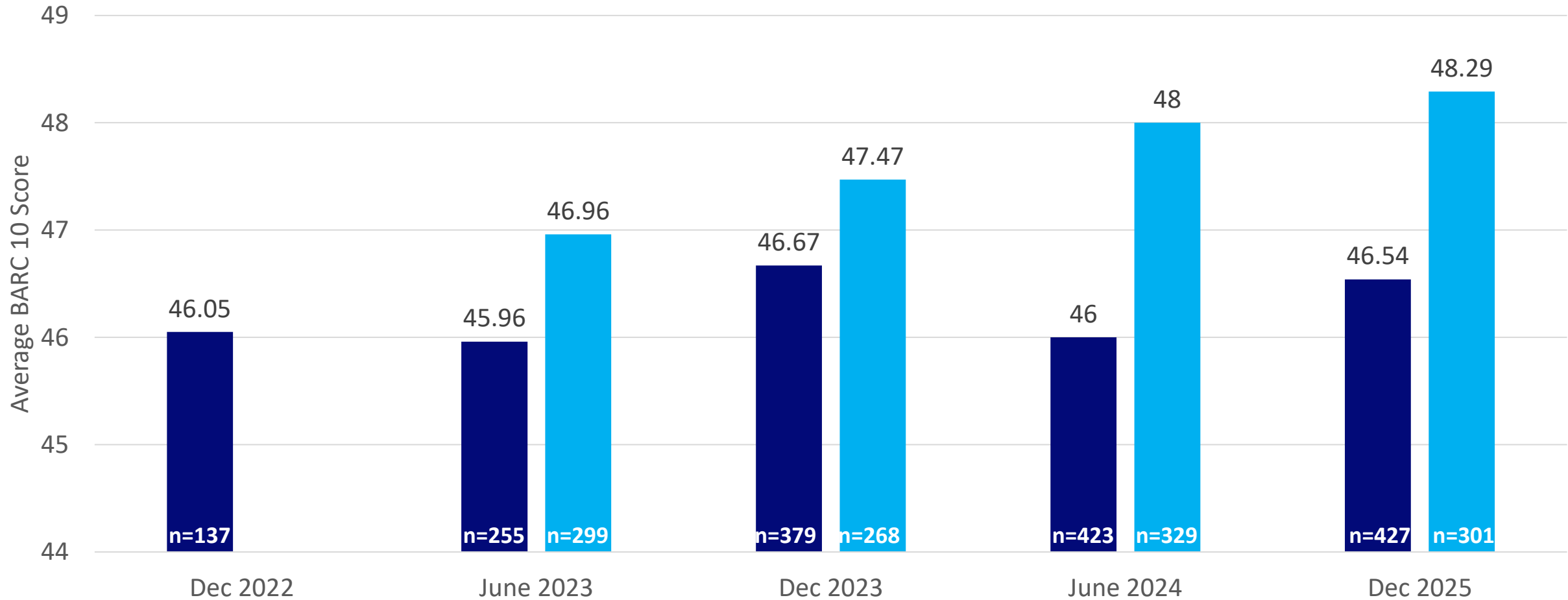
Brief Assessment of Recovery Capital (BARC 10)

- Every six months (December & June) the evaluation team collects BARC10 data
- BARC10 questions are on a 6-point scale:
 - 1=Strongly Disagree
 - 2=Disagree
 - 3=Somewhat Disagree
 - 4=Somewhat Agree
 - 5=Agree
 - 6=Strongly Agree
- Total scores range between 10 and 60

BARC 10 Questions

1. There are more important things to me in life than using substances.
2. In general, I am happy with my life.
3. I have enough energy to complete the tasks I set for myself.
4. I am proud of the community I live in and feel a part of it.
5. I get lots of support from friends.
6. I regard my life as challenging and fulfilling without the need for using drugs or alcohol.
7. My living space has helped to drive my recovery journey.
8. I take full responsibility for my actions.
9. I am happy dealing with a range of professional people.
10. I am making good progress on my recovery journey.

BARC 10 – Average Scores at Intake and 6 Month Follow-Up



■ Intake ■ 6-Month Follow Up

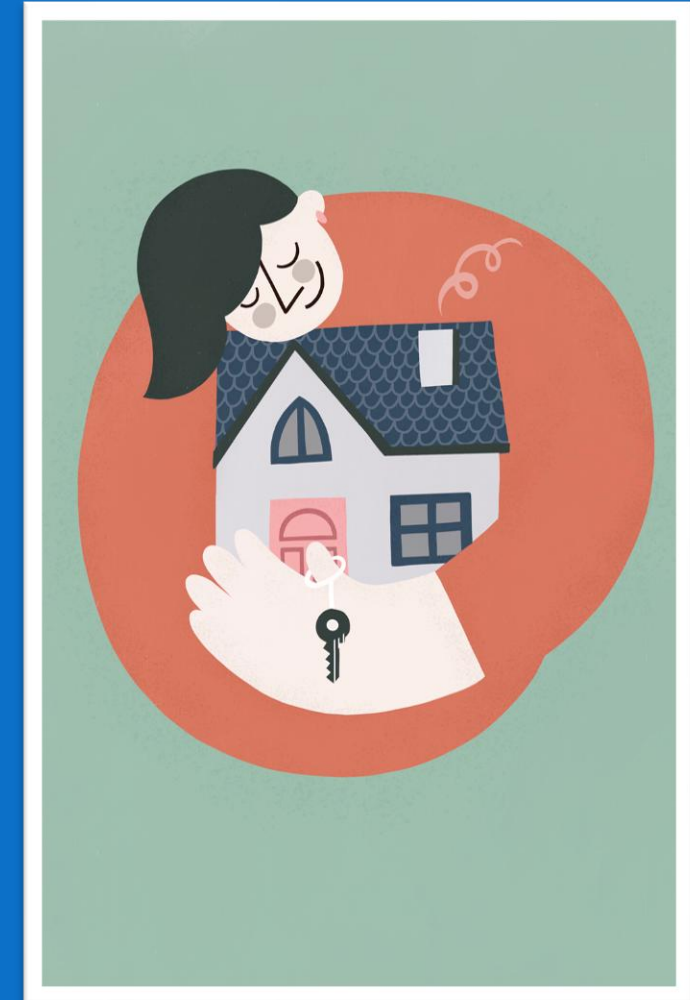
Challenges

- Rising cost of housing
- Housing the priority population
- Rehousing clients
- Lease violations
- Maintaining consistent engagement
- Promoting behavior changes
- Death



Successes

- 579 clients housed and almost 1,000 total people including over 300 children
- High rates of housing stability
- Increased recovery capital
- Employment and increased income
- Housing large number of people receiving MAR
- Family reunification
- SUPR PSH babies!
- Breaking cycles of addiction



Using Opioid Settlement Funds to Expand Homeless Services

- \$15M over 3 years for Community Outreach and Recovery Supports (CORS)
- \$20M for capital investments into Permanent Supportive Housing
- To learn more, visit:
<https://www.ilopioidsettlements.com/>



Questions and Comments



The Illinois Human Rights Act: Non-Discrimination in Public Spaces and Persons Experiencing Homelessness

Presented by:

Betsey Madden, Chief Legal Counsel & Ethics Officer

Illinois Department of Human Rights

Betsey.M.Madden@Illinois.gov

Introduction/Who We Are

Illinois Department of Human Rights (IDHR)

OUR MISSION

- To secure for all individuals within the State of Illinois freedom from unlawful discrimination.
- To establish and promote equal opportunity and affirmative action as the policy of this state for all its residents.
- To conduct neutral and fair investigations of discrimination in employment, real estate transactions, financial credit, and public accommodations, including in education.
- To conduct outreach and provide training for public and private entities.
- To enforce the Illinois Human Rights Act.

IDHR AT A GLANCE

- **Investigation & Enforcement:**
 - **Charge Processing Division:** Intake and Investigation of Employment, Financial Credit, Public Accommodations, Elementary, Secondary, and Higher Education
 - **Fair Housing Division:** Intake and Investigation of Real Estate Transactions
 - **Legal Division:** Advise and review investigations; respond to FOIAs. At the HRC: file complaints, litigate housing cases; respond to requests for review
 - **Mediation Unit:** Provides no cost mediation services as an alternative to an investigation where parties agree to participate.
- **Institute for Training and Development:** Develops & delivers training modules
- **Public Contracts Unit (PCU) & Liaison Unit (LU):** Monitors compliance of public contractors and eligible bidders, as well as state government
- **Office of Public Affairs**
- **Office of Legislative Affairs**

IDHR Select Initiatives: Technical Assistance and Guidance Documents

Examples of Technical Assistance and Guidance Documents (see IDHR website):

- FAQ on Source of Income Discrimination in Housing (2024).
- FAQ on Immigration Status Discrimination in Housing (2024).
- Non-Regulatory Guidance on Illinois Protections Against Discrimination Based on Pregnancy, Childbirth, and Related Conditions, Including Reproductive Decision-Making. (2023).
- Guidebook on Fair Housing Implications of Nuisance and Crime-Free Ordinances (2023).
- Guidance on Protection of Students: A Non-Regulatory Guidance Relating to Protection of Transgender, Nonbinary, and Gender Nonconforming Students (2021).
- Letter to Public Officials on Non-Discrimination in Public Spaces and Persons Experiencing Homelessness (2025).

Illinois Human Rights Act: Unlawful Discrimination Described

Illinois Human Rights Act (775 ILCS 5/)

- Article 1 – General Provisions
- Article 2 – Employment
- Article 3 – Real Estate Transactions
- Article 4 – Financial Credit
- Article 5 – Public Accommodations
- Article 6 – Additional Civil Rights Violations

Unlawful Discrimination Described

- **Disparate Treatment:** unfair or unequal treatment of an individual (or group) based on that person's protected class.
- **Disparate Impact:** employment policies, rules and/or practices that appear to be neutral but have a disproportionately negative impact on applicants or employees of a particular protected class.
- **Harassment:** behavior based on a protected class that becomes so severe or pervasive that it creates a hostile environment.
- **Denial of Reasonable Accommodation:** refusing to grant a requested change, exception, or adjustment that would provide equal access for the protected person and does not impose an undue hardship.
- **Retaliation:** a form of unlawful discrimination. This includes taking action against anyone who reports discrimination or participates in any way in an investigation of a charge of discrimination.

PROTECTED CLASSES	PROTECTED AREAS
RACE, COLOR, ANCESTRY	All (Employment, Real estate transactions, Public accommodations, Financial credit)
NATIONAL ORIGIN (place where person or ancestors were born)	All
DISABILITY (Physical or Mental) (includes actual, perceived, or history of a condition; or association with a person with a condition)	All
RELIGION (all aspects of religious observance, practice, and belief unless undue hardship in an accommodations context)	All
SEX (status as male or female)	All
SEXUAL ORIENTATION (Including Gender Identity)	All
AGE (40 and older)	All

PROTECTED CLASSES	PROTECTED AREAS
PREGNANCY (pregnancy, childbirth, or medical or common conditions related to pregnancy or childbirth; includes accommodations)	All
REPRODUCTIVE HEALTH DECISIONS (includes decisions on contraception; fertility treatments; sterilization; miscarriage management; pregnancy continuation or termination; prenatal, intranatal, or postnatal care)	All
MILITARY STATUS (active duty, veteran, or member of reserves)	All
UNFAVORABLE MILITARY DISCHARGE (includes RE-3 classification but not RE-4 or dishonorable discharge)	All
ORDER OF PROTECTION STATUS (status as a person protected under an order of protection in Illinois law, including Domestic Violence Act)	All
MARITAL STATUS (legal status of married, single, separated, divorced, or widowed)	All

PROTECTED CLASSES	PROTECTED AREAS
FAMILY RESPONSIBILITIES (actual or perceived provision of personal care to a family member)	Employment
CITIZENSHIP STATUS (born/naturalized U.S. citizen, U.S. national, or documented immigrant)	Employment
WORK AUTHORIZATION STATUS (status accompanying legal work authorization, including temporary authorization)	Employment
LANGUAGE (any language use not related to job duties)	Employment
IMMIGRATION-RELATED PRACTICES (includes request for more/different documents than those required by 8 USC. 1324a(b); refusing to honor documents that appear genuine)	Employment
CONVICTION RECORD (includes conviction, probation, fine, imprisonment, or parole)	Employment

PROTECTED CLASSES	PROTECTED AREAS
ARREST RECORD (arrests not leading to a conviction, juvenile records, or expunged/sealed/impounded records)	Employment, Real estate transactions
FAMILIAL STATUS (Families with Children Under 18 Years Old, expectant mothers, persons seeking custody)	Real estate transactions
SOURCE OF INCOME (lawful manner of supporting self/dependents; includes Section 8/Housing Choice Vouchers)	Real estate transactions
IMMIGRATION STATUS (actual or perceived citizenship or immigration status, including being undocumented)	Real estate transactions

Non-Discrimination Protections in Illinois for Persons Experiencing Homelessness

U.S. Supreme Court:

City of Grants Pass v. Johnson, 603 U.S. ____ (June 28, 2024)

- Addressed laws that regulate camping and other sleeping activities on public property, such as parks.
- Prior to Supreme Court decision: Punishing homeless persons for sleeping outside when no other shelter was available violates the Eighth Amendment prohibition on cruel and unusual punishment.
- Supreme Court found: People experiencing homelessness can be arrested and fined for violating ordinances that penalize/criminalize camping or sleeping on public property – it is not cruel and unusual punishment when applied to the conduct, rather than the group.
- After *Grants Pass v. Johnson*: cities and local governments can continue to apply ordinances that penalize/criminalize the act of camping or sleeping on public property to persons experiencing homelessness, even when there are no available shelter options.

Illinois Human Rights Act Jurisdiction Over “Public Accommodations”

“Place of public accommodation” includes, but is not limited to:

- Inn, hotel, motel, or other place of lodging
- Restaurant, bar, or other establishment serving food or drink
- Theater, stadium, auditorium or other place of entertainment or public gathering
- Retail store or other sales or rental establishment
- Museum, library, park, or other place of public display or recreation
- Gym, health spa, golf course, or other place of exercise
- Health care provider or hospital
- Professional office or other service establishment
- Public transportation
- Homeless shelter, food bank, non-sectarian adoption agency, or other social service center
- Non-sectarian nursery, day care, K-12 school, undergraduate/graduate school, or other place of education

"Public official" means any officer or employee of the state or any agency thereof (including state, municipal, park districts, forest preserves, and schools).

(775 ILCS 5/5-101)

Other Illinois Laws that Govern Public Officials' Responsibilities and Duties

- **Illinois Bill of Rights for the Homeless Act (BHRA):** Under the BRHA, persons experiencing homelessness have the right to equal treatment by all State and municipal agencies, without discrimination based on housing status. Persons experiencing homelessness have the right to use and move freely in public spaces, including public sidewalks and parks, public transportation, and public buildings, in the same manner as any other person.
- **Illinois Civil Rights Act of 2003:** The Illinois Civil Rights Act of 2003 prohibits local and county governments from discriminating against any person based on race, color, national origin, or gender, and from adopting policies whose criteria or methods of administration impose a disparate impact on individuals based on those characteristics.
- **Constitutional Protections:** Public officials may not infringe on the constitutional rights of those who seek to use public spaces by, for example, denying equal protection, due process, or First Amendment rights to indigent persons or persons experiencing homelessness.

Letter to Public Officials on Non-Discrimination in Public Spaces & Persons Experiencing Homelessness

The Illinois Department of Human Rights (IDHR) and the Illinois Office to Prevent and End Homelessness (OPEH) issued a **letter** to remind public officials and local units of government of their obligations under the Illinois Human Rights Act (IHRA), the Illinois Civil Rights Act of 2003, and the Bill of Rights for the Homeless Act (BRHA).

Read the [Press Release](#)



March 13, 2025

Re: Non-Discrimination in Public Spaces & Persons Experiencing Homelessness

Dear Illinois local public officials:

As a valued government partner, this letter is being transmitted to provide you with guidance, analysis, and resources following the recent U.S. Supreme Court opinion addressing laws that regulate camping and other sleeping activities on public property.¹ The majority of localities have not changed their approach of providing care and compassion to people experiencing homelessness. Unfortunately, several units of local government have enacted or are considering enacting ordinances that may unduly restrict access to public spaces by creating penalties, fines and, in some instances, providing for the incarceration of persons experiencing homelessness. The information below serves to remind local public officials that Illinois law requires the administration of access to public spaces in a non-discriminatory manner, including to persons who may be seeking shelter. It is our collective responsibility to avoid any discriminatory infringement of these rights in violation of the Illinois Human Rights Act, the Illinois Civil Rights Act of 2003, and the Bill of Rights for the Homeless Act.²

We understand that local public officials face difficult challenges in responding to the needs of persons experiencing homelessness within their jurisdictions. While you have a responsibility to ensure public health and safety, you must do so in a way that protects the right to access public spaces in a nondiscriminatory manner. This can be accomplished by working collaboratively with local, state and federal agencies (especially social service agencies), non-governmental organizations, and public safety agencies. Persons experiencing homelessness are often targeted for discrimination, harassment, and violence and local public officials should exercise caution before penalizing or excluding persons from public spaces, including those who rely on access to those spaces for their survival.

As local public officials responsible for ensuring nondiscriminatory access to Illinois public spaces, we share the following obligations that govern the execution of your responsibilities and duties:

- **Bill of Rights for the Homeless Act (BRHA) protections.** Under the BRHA, persons experiencing homelessness have the right to equal treatment by all State and municipal agencies, without discrimination on the basis of housing status. Persons experiencing homelessness have the right to use and move freely in public spaces, including but not limited to public sidewalks, public parks, public transportation, and public buildings, in the same manner as any other person and without discrimination on the basis of their housing status. Persons experiencing homelessness also have the right to a reasonable expectation of privacy in their personal property.³
- **Illinois civil rights statutory protections.** Under the Illinois Human Rights Act (IHRA), no person may deprive another of the full and equal enjoyment of a place of public accommodation based

¹ See *City of Grants Pass, Oregon v. Gloria Johnson, et al.*, 603 U.S. ___ (June 28, 2024) (hereinafter, "*Grants Pass*").

² 775 ILCS 5/5-101 *et seq.*, 740 ILCS 23/1 *et seq.*, 775 ILCS 45/1 *et seq.*, respectively.

³ 775 ILCS 45/10.



on actual or perceived protected characteristics. A Public Official is specifically prohibited from denying or refusing the full and equal enjoyment of facilities and services under their care. Protected characteristics under the IHRA include military status, disability (physical or mental), order of protection status, sexual orientation (including gender identity), race, and color, just to name a few.⁴ The Illinois Civil Rights Act of 2003 (ICRA) also prohibits local and county governments from discriminating against any person based on race, color, national origin, or gender, and from adopting policies whose criteria or methods of administration have the effect of subjecting individuals to discrimination based on those characteristics.⁵

Ordinances that target persons experiencing homelessness for unequal treatment may have the effect of imposing unjustified harms based on protected characteristics under the ICRA or IHRA. For example, Black Illinois residents are almost eight times more likely to be homeless than white Illinois residents, a racial disproportionality that is double the national rate.⁶ People experiencing homelessness may also be disproportionately likely to be veterans,⁷ have a disability,⁸ or be survivors of domestic violence protected by an order of protection⁹ – all protected characteristics under the IHRA. Units of local government should take care to ensure that their ordinances are not enforced in a manner that imposes unjustified disproportionate harm on vulnerable populations.

- **Constitutional protections.** Public officials may not infringe on the constitutional rights of those who seek to use public spaces by, for example, denying equal protection, due process, or First Amendment rights to indigent persons or persons experiencing homelessness. As the Supreme Court observed in *Grants Pass*, regulations on homelessness may not infringe on these fundamental constitutional rights.¹⁰ For instance, the Supreme Court observed that a city that selectively enforces a public-camping ordinance only against homeless persons may be vulnerable to legal challenges under “due process and our precedents regarding selective prosecution.”¹¹
- **Reporting discrimination in public spaces.** Anyone who encounters discrimination, harassment, retaliation, or other civil rights violations in connection with their use of public accommodations (public spaces), may report the incident(s) to the Illinois Department of Human Rights (IDHR) or the Civil Rights Bureau of the Office of the Illinois Attorney General (OAG).
 - IDHR can be reached by calling (877) 236-7703, by *TTY to 7-1-1, by email to IDHR.Intake@illinois.gov, or by visiting IDHR online at dhr.illinois.gov.
 - OAG can be reached at (877) 581-3692, by email to CivilRights@ilag.gov, or by visiting OAG online at IllinoisAttorneyGeneral.gov.

⁴ See 775 ILCS 5/5-101 for the full definition of public accommodations and public officials covered by the IHRA.

⁵ 740 ILCS 23/5.

⁶ See Iván Arenas, William Scarborough, Aisha Lehmann, Karlia Brown, and Amanda E. Lewis, Institute for Research on Race and Public Policy (IRPP), University of Illinois Chicago, Black Homelessness in Illinois: Structural Drivers of Inequality at 1 (March 2024), available at <https://uofi.app.box.com/s/owosqr7f4pp3y5csxx4cszvmwt0n1se>.

⁷ See U.S. Department of Housing and Urban Development (HUD), The 2023 Annual Homelessness Assessment Report (AHAR) to Congress at 66 (Dec. 2023), available at

<https://www.huduser.gov/portal/sites/default/files/pdf/2023-AHAR-Part-1.pdf>.

⁸ See *Grants Pass* at 2.

⁹ *Id.*

¹⁰ *Grants Pass* at 15.

¹¹ *Id.* at 21, fn. 5.

- **Technical assistance for local public officials.** Local Public Officials in need of technical assistance in connection with the lawful administration of places of public accommodations (public spaces) may contact IDHR or the OAG for assistance.
 - **IDHR.** The IDHR Attorney of the Day can be reached by calling (312) 814-6262, by email to IDHR.Legal@illinois.gov, or by visiting IDHR online at dhr.illinois.gov.
 - **OAG.** The Civil Rights Bureau of the Office of the Attorney General (OAG) can be reached by calling (877) 581-3692, by email to civilrights@ilag.gov, or by visiting OAG online at IllinoisAttorneyGeneral.gov.
 - **OPEH.** The Office to Prevent & End Homelessness (OPEH) is available to provide technical assistance and other guidance to partners across the State. Please contact OPEH by email to homeless.office@illinois.gov, or by calling (312) 793-2922 for general questions and technical assistance.

Local public officials should be mindful of the broad protections under the BRHA, Illinois civil rights statutes, and the Constitution when considering ordinances that unduly restrict, create penalties/fines, or provide for incarceration of persons experiencing homelessness for seeking shelter in public spaces. Enacting and enforcing ordinances that interfere with the rights of persons experiencing homelessness to access public spaces may give rise to legal action.¹² Public officials are reminded that the IHRA prohibits retaliation against a person for complaining about discrimination or harassment, and prohibits the aiding, abetting, compelling, or coercing of a person to commit a violation of the IHRA – such conduct may also give rise to legal action.¹³

In Illinois, the commitment to safeguarding the civil rights of persons experiencing homelessness and the law governing access to public spaces is settled: health and safety in, and nondiscriminatory access to, Illinois public spaces is a right for all, and in certain circumstances a necessity.

Together, State and local governmental leaders work to ensure our communities are served and supported. We appreciate your commitment to upholding the laws of our State, including the Illinois Human Rights Act, Illinois Civil Rights Act of 2003, and Bill of Rights for the Homeless Act. Our respective offices remain available to you as vital resources in our shared effort to ensure public health and safety and protect the civil rights of persons experiencing homelessness.

Respectfully,

Jim Bennett
JAMES L. BENNETT
DIRECTOR

ILLINOIS DEPARTMENT OF HUMAN RIGHTS

Christine Haley
CHRISTINE HALEY
CHIEF HOMELESSNESS OFFICER

ILLINOIS OFFICE TO PREVENT & END
HOMELESSNESS

¹² 775 ILCS 5/5-101 et seq.

¹³ 775 ILCS 5/6-101.

Read the Official Letter: Letter to Public Officials - Persons Experiencing Homelessness - March 2025

Questions/Contact Us

Illinois Department of Human Rights Contact Information

Illinois Department of Human Rights
555 West Monroe Street, 7th Floor
Chicago, IL 60661
312-814-6262 (Legal Division)

Main Telephone Numbers:

Chicago: (312) 814-6200
Springfield: (217) 785-5100
Housing: (312) 814-6229
Toll free: (800) 662-3942
TTY: (866) 740-3953

Email Communication:

General: IDHR.Webmail@illinois.gov
Employment: IDHR.Intake@Illinois.gov
Housing: IDHR.FairHousing@illinois.gov
Legal: IDHR.Legal@illinois.gov

On the Web:

Website: www.illinois.gov/dhr
Illinois Laws: www.ilga.gov

Trainings and Speakers Bureau:

For information on trainings, workshops, webinars, presentations and speakers bureau, visit: dhr.illinois.gov/training



- Leading up to and since the *City of Grants Pass v. Johnson* decision, at least 26 Illinois localities have passed ordinances criminalizing unsheltered homelessness
 - Note: Illinois has approximately 1,300 cities, towns and villages
- Most ordinances in Illinois are modeled off of the same template legislation and include penalties of up to \$750 or incarceration

COMMUNITY RESPONSE



- Many of these ordinances have received strong local pushback with impassioned public testimony, outcry from people with lived expertise, providers, and community members, and media coverage, etc.
- In some cases, advocates have successfully defeated proposed ordinances, and/or negotiated for delayed enforcement.

COMMUNITY RESPONSE



- In the most recent General Assembly, advocates led by Housing Action Illinois and the Chicago Coalition to end Homelessness (CCH) introduced HB 1429, which proposed additional State-level protections to limit these local ordinances.
- See a presentation from providers in Alton about the effect of criminalization on their community (where a local ordinance was passed in November 2023) and CCH [here](#).

OPEH RESPONSE



- OPEH is clear in our understanding that these approaches perpetrate the trauma of homelessness, erode trust in communities, make poor use of public dollars, and move people further from housing
 - The Office funds extensive TA to communities to promote best practices
- OPEH collaborated with IDHR on the *Letter to Public Officials on Non-Discrimination in Public Spaces & Persons Experiencing Homelessness*
- Additionally, OPEH leadership has testified to express the Office's concern at two local City Council meetings considering passage of criminalization ordinances

RURAL HOMELESSNESS INITIATIVE



WAGE AND HOUR DIVISION
UNITED STATES DEPARTMENT OF LABOR

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RURAL HOMELESSNESS INITIATIVE PROJECT COMPONENTS



Rural 100-Day
Challenge

Rural
Homelessness
Report &
Recommendations

RURAL 100-DAY CHALLENGE



- Partnership with Re!nstitute and the Illinois Training & Technical Assistance Center funded by OPEH and administered by the Supportive Housing Providers Association (SHPA)
- Four Continuums of Care (CoCs) participated, representing 45 Counties
- Goals set included:
 - In 100 days, we will connect 29 people to safe and stable housing and connect 20 more people to behavioral health services in the eastern region of the South Central CoC.
 - In 100 days, we will work with 100 people experiencing homelessness in Mercer County, 75 of whom live outside of Aledo and 5 of whom identify as BIPOC.

RURAL 100-DAY CHALLENGE: KEY STRATEGIES AND LEARNINGS



- Extended Rapid Rehousing benefits from 6 months to 1 year
- Produced radio spots by the CoC lead agency to spread information regarding the extent of homelessness in the CoC's geographic areas and resources for people experiencing homelessness
- Tabling with flyers (QR code for easy access to resource information) during community events like the Rhubarb Festival
- Data collection is a challenge: Some agencies can only afford one Homeless Management Information System (HMIS) license, faith-based organizations are active but do not always participate in HMIS
- “Unsheltered or highly visible homelessness is uncommon in rural areas, so clients do not see themselves as homeless, which impacts who reaches out for help”. This also impacts political will.

RURAL HOMELESSNESS REPORT



- Written by Housing Assistance Council in partnership with SHPA and funded by OPEH
- Report inputs
 - Statewide listening session
 - Individual stakeholder interviews
 - Data analysis

REPORT



Photo: Shawn Paynter, There is More Work to Be Done

**Preventing and Eliminating
Homelessness in Rural Illinois**

FINDINGS



- Illinois has a robust, active and innovative ecosystem of rural homeless providers across the State.
 - Many programs have low staff turnover rates, compared to other CoCs nationwide, due to their personal investment.
- Rapid Rehousing was viewed as a valuable resource in Rural Illinois.
 - CoCs reported providing support services after being housed is what proved most successful.
- Rural CoCs cover large geographies with relatively few staff.
 - Service providers travel great distances to assist their clients, creating time constraints on services they provide.
- Rural CoCs need more mental health resources.
 - Many rural CoCs must reach out to other counties to help clients seeking health resources.
- The lack of market and subsidized housing stock is the number one concern among CoCs.

RECOMMENDATIONS



- Illinois should increase rural CoC capacity and coordination through dedicated staff
 - HUD Rural Homelessness Special Notice of Funding Opportunity; IL eligible to be awarded \$7,174,963 but received \$283,911
- Illinois should consider expanding the range of eligible populations and activities in rural areas for some of its targeted homelessness funding
 - IL Housing Development Authority created Court Based Rental Assistance Program with statewide reach
- Illinois should provide resources to rural CoCs to support their ability to (1) access accurate, real time, homelessness data more frequently than the annual Point-in-Time Count and (2) Identify the “hidden homeless”/at-risk
 - OPEH is supporting Community Solutions to provide technical assistance and training in a “Quality Data Cohort”; All rural CoCs are encouraged to participate
- Illinois should consider expanding additional housing resources to farmworkers
 - Part of research project for Roundtable on Latino Homelessness

MEDICAL RESPITE CAPACITY BUILDING INITIATIVE



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STATE COLLABORATION AND INNOVATION



- A **key Home Illinois Plan strategy** is working to **close the mortality gap** between people experiencing homelessness and the general population.
- To better understand the mortality gap, an **intergovernmental collaboration** between the Illinois Department of Public Health, the University of Illinois Chicago School of Public Health and the Institute for Healthcare Delivery Design, and the Illinois Office to Prevent and End Homelessness occurred.
- In 2023, this collaborative developed the **first Homelessness Mortality and Morbidity Report for Illinois**, which was delivered to the **Illinois General Assembly in July 2024**.
- An **updated report** including **2023 data** to be released this year (2025), with the plan to include process, program and policy **recommendations**.



IHMMR TOP LINES



56.3 v 74.2
age of death

32.9% v 3.4%
Overdose
Cause of Death

38X more likely to
die from cold
exposure

3x more likely to
die by homicide

Over 15,000 ER
visits for suicide
attempts

\$16B in
Healthcare billing

OPEH RESPONSE AND STRATEGIES



Increasing Medical
Respite

Increasing Health
Focused Permanent
Supportive Housing

Creating New
Funding Mechanisms
through Medicaid
1115 Waiver

Launched Substance
Use Disorder Focused
Street Outreach
Program

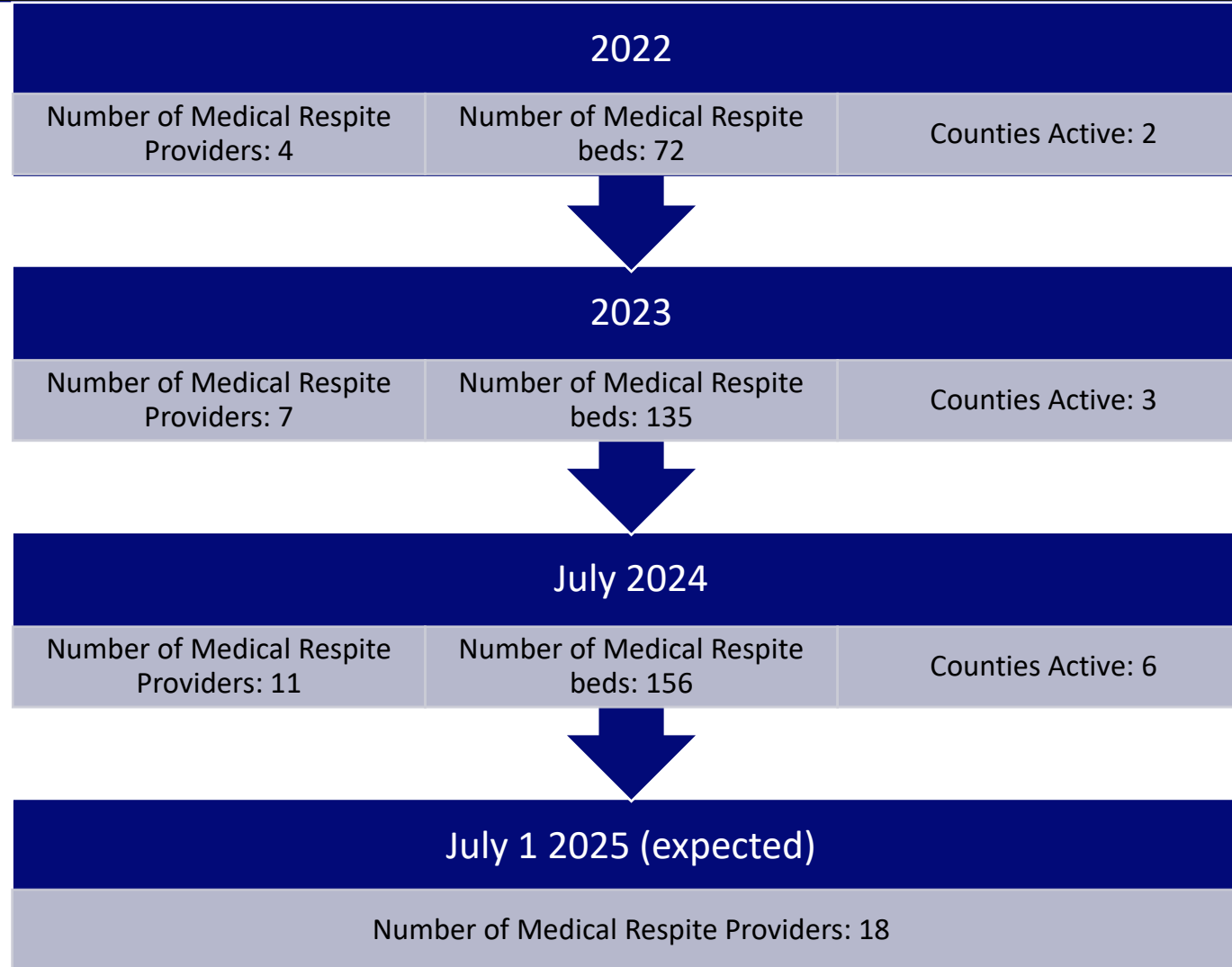
Hired OPEH Senior
Policy Advisors at
Medicaid & Public
Health Agencies

STRATEGY #1 INCREASING MEDICAL RESPITE



- OPEH funds partners at the Illinois Public Health Institute (IPHI) to operate the **Illinois Medical Respite Capacity Building Initiative**
- **Medical respite (MR)** is post-acute care for people experiencing homelessness who are too ill or frail to recover from an illness or injury on the street or in shelter, but who do not require hospital level care.
- MR Capacity Building Initiative includes:
 - Capacity building subgrants to individual providers to support medical respite planning, new project implementation, and existing project continued implementation
 - Statewide and regional learning collaboratives
 - Provider technical assistance with National Institute for Medical Respite Care (NIMRC)
 - Public communications and awareness-building on medical respite
 - Informing development of Illinois' Medicaid 1115 waiver for Medical Respite

MEDICAL RESPITE GROWTH – STATE OF ILLINOIS, BY YEAR



THANK YOU! STAY IN TOUCH AT:
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