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Appealing to Reason:

Policy and Reform Recommendations for Cook County's Property Tax Appeal System

About Impact for Equity

Founded in 1969, Impact for Equity (formerly known as BPI – Business and Professional People for the Public Interest) is a law and policy center based in Chicago dedicated to pursuing racial, economic, and social justice. Over more than 50 years, we have worked to fight residential segregation, support fair elections, win lower utility costs, and establish civilian oversight of police. Today, Impact for Equity works in two main program areas—Housing and Criminal Legal Systems—using a variety of tools, including research, direct advocacy, and coalition work with partners across the Chicago region.

About the Property Tax Appeals Coalition

The Property Tax Appeals Coalition is convened by Impact for Equity to address the systemic inequities inherent to the appeals process. The Coalition is currently comprised of 17 members representing 12 organizations, which include direct service organizations, small business leaders, realtors, scholars, financial institutions, and other advocacy organizations. We advocate for a property tax appeal system that is equitable, accessible, and transparent for all. Our work focuses on residential appeals with an emphasis on homeowner education; systemic reform; and engaging public officials, county offices, and other stakeholders to institute policy change.

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Policy and Reform Recommendations for Cook County's Property Tax Appeal System

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Executive Summary

In Cook County, property taxes are one of homeowners' most significant annual costs. These taxes are based on the assessed value of a home in accordance with the levies set by the numerous taxing jurisdictions throughout the county and the rates set by the County Clerk using those levies. If a home is incorrectly assessed, the owner has an opportunity to appeal to either or both the Cook County Assessor's Office (CCAO) and the Cook County Board of Review (BOR). However, the process of appealing—including when, how, and what evidence to submit—can be difficult to navigate successfully. This is especially true for homeowners of color, who are less likely to appeal, less likely to win, and receive a smaller reduction in assessed value when they do win.

Although the accuracy of property tax assessments in Cook County has greatly improved over the past few years, appeal rates are also drastically increasing. For tax year 2024, the BOR processed over 273,000 appeals, and for tax year 2025, they processed over 290,000. While more accurate assessments should mean that appeals are less common, this is not the case. The appeals filed each year continue to rise, in part, as a response to massive increases in homeowners' property tax bills following a reassessment. Additionally, some property owners appeal year over year as a matter of course. While some of the appeals filed are not meritorious, some homeowners do have valid claims of over-assessment that need to be corrected. For homeowners to successfully get those corrections, the appeal system in Cook County must be more equitable, accessible, and transparent. This report details some of the challenges present in the current appeals system and offers policy and reform recommendations organized into seven categories.

Accessibility

The property tax appeal system can be inaccessible to many homeowners, especially homeowners of color, low-income homeowners, homeowners whose primary language is not English, and homeowners with limited or no access to internet. Staff handling appeals can be difficult to contact, the online appeal system is not mobile-friendly, and most appeal application materials are only available in English. Recommendations for this category include providing forms in common languages other than English and upgrading the online appeal systems to be mobile-friendly, so as to not require access to a desktop computer or printer.

Data and Assessments

Because assessments are the basis of property taxes, and thus are at the center of appeals, the process of assessing properties and the ultimate valuations have an impact on who files appeals and why. If the assessed value of a home is incorrect, or if the data about a home is incorrect, homeowners may need to appeal in order to correct it. Recommendations for this category include ensuring property characteristics are reviewed by analysts and providing the CCAO with better access to data, so the accuracy of assessments continues to improve.

Outreach

Outreach and community education by the county offices is pivotal because the appeal system can be complicated and difficult to navigate, especially for homeowners unfamiliar with the process. While the CCAO and BOR have held a record number of outreach events in recent years and have developed strategies to share information across different platforms, there is still room for improvement. Recommendations for this category include revising online webinars to cater toward homeowners appealing online *or* via paper application and establishing local methods of filing appeals in-person to reduce barriers to applying.

Official Rules

Once a homeowner has decided to appeal, they have to follow the official rules of the CCAO and BOR. These rules can be vague, subjective, and full of legal jargon, but failure to comply can result in appeals being dismissed. Recommendations for this category include refining the organization of official rules to increase readability and revising both the rules and supplementary guidance to be written in plain language.

Appeal Review

After an appeal is filed, it is in the hands of CCAO and BOR analysts. However, it is not always clear how appeals are reviewed or whether there is a standard evaluation process to ensure consistency and equitable review, especially at the BOR. Without access to clear evaluation methods or objective review processes, homeowners cannot know what to expect or how to make a compelling argument. Recommendations for this category include publishing methods for the evaluation of appeals, along with any standards in place, and increasing the quantity and quality of communications with people who have active appeals.

Communication Between the CCAO and BOR

Although the property tax appeal system is complicated, the primary county offices involved—the CCAO and BOR—are staffed with experts and trained analysts who have the ability to streamline the process and share information with each other. However, communication between the offices is lacking. Without clear and consistent communication, appeals become unnecessarily redundant and each office lacks insight into the rational of the other. Recommendations for this category include establishing open lines of communication and sharing information on assessments and appeals between offices.

Public Transparency

Property taxes fund some of our most essential government services, but their history in Cook County includes controversy and uncertainty. The public has often been the last to know about the inner workings of the system, despite relying on that system to tax fairly and keep local governments operating. Access to information has improved in recent years, but the property tax system still lacks transparency and protections against conflicts of interest. Recommendations for this final category include adopting or extending office policies that ban elected officials from accepting donations from tax appeal attorneys and adopting and publishing comprehensive strategic plans.

Next Steps and Implementation

The recommendations in this report vary in scale, ease, timeframe, and necessary resources, and are designed to serve as a menu of options for stakeholders and leaders to choose from and prioritize. Each recommendation is based on a specific, evidence-backed concern with the property tax appeal system and, as such, addressing any would be a step toward a more equitable appeal process. Still, we recognize that this system is subject to real constraints, including funding and capacity. We also acknowledge that these recommendations are explicitly tied to the context of the existing property tax system. Current and future CCAO and BOR administrations have and will inherit systemic inequities they had no part in creating, including socioeconomic and racial disparities in housing generally. This is a challenging system to inherit and we appreciate the work that has already been done to make the system more just. The work needed to achieve an equitable system is, however, always ongoing. We welcome collaboration with the CCAO and BOR, in partnership with property tax experts and advocates across Cook County, in implementing the recommendations in this report. If you are interested in becoming involved with this work, please reach out to the authors.

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Introduction

The property tax appeal system in Cook County, Illinois is complicated and imperfect. Technically, the process allows homeowners who believe their property tax assessment is incorrect to appeal their property's assessed valuation. Two bodies can hear appeals at the county level: the Cook County Assessor's Office (CCAO), which also performs the initial assessment, and the Board of Review (BOR). The CCAO and BOR will review the application and determine if the property's valuation should stay the same, decrease, or, in rare instances, increase upon appeal. However, in practice, the appeal system is often inequitable, inaccessible, and lacking transparency. This means that for many homeowners, especially in low-income communities and communities of color, appeals cannot be navigated even when warranted, and homeowners end up paying more than their fair share of property taxes.

Barriers to fair appeals stem from a variety of causes, including systemic socioeconomic and racial inequities and inherited systems at both the CCAO and BOR. As a result, the current appeals system favors both commercial properties and affluent homeowners. In Cook County, commercial properties are more likely to challenge their assessments and win a reduction, leaving residential properties in the area with the burden of paying higher taxes to make up for the reductions awarded to commercial owners. Among homeowners, lower-income and homeowners of color are less likely to appeal, less likely to win, and receive a smaller proportional reduction in assessed value when they do win as compared to residents of more affluent and majority-White neighborhoods.

This report seeks not only to bring attention to these shortcomings, but to identify concrete opportunities for reform. The following menu of policy and reform recommendations outline current challenges with the appeals system in greater detail and suggest opportunities for improvement. They are organized into seven categories:

1. Accessibility
2. Data and assessments
3. Outreach
4. Official appeal rules
5. Appeal review
6. Communication between the CCAO and BOR, and
7. Public transparency

Within each category, individual recommendations are labeled as "short-term" and "long-term" reform, in recognition of the fact that current system constraints, such as budget and staffing, may mean that some goals—while possible—will take longer to achieve.

These recommendations are based upon a combination of publicly available information and reports on the property tax system and conversations with experts working in the Cook County property tax space, including practitioners, direct service providers, academics, and advocates. This report was also reviewed by the Property Tax Appeals Coalition—a coalition convened by Impact for Equity and comprised of direct service organizations, small business leaders, realtors, scholars, financial institutions, and other advocacy organizations. Pre-publication drafts were also shared with the CCAO and BOR for their feedback.

We would like to thank everyone involved in the creation of this document for their insights and expertise.

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Property tax assessments are a professional estimate of the value of real estate determined by the CCAO based on fair market/cash value and a property's classification. The assessment is required by state law to reflect the assessor's best judgment of "fair cash value", defined as "the amount for which a property can be sold in the due course of business and trade . . . between a willing buyer and a willing seller."[1] Assessments attempt to measure fair cash value and appeals are meant to correct any errors in those assessments, so that in the end, the estimate of fair cash value is as accurate as possible. Fair cash value is measured objectively with professional standards to be followed.[2] An appeal is intended to make a home's assessed value as accurate as possible. Appeal determinations should be judged by whether the reviewing body (e.g., CCAO and/or BOR) achieve that goal, following statutory and professional requirements.

Over the past eight years, assessment accuracy in Cook County has greatly improved.[3] Prior to 2019, property values were not checked by the assessor for fairness and accuracy. Notably, an analysis by the *Chicago Tribune* found that "regressivity problems exploded in Cook County beginning in 2009" and got even worse in 2012.[4] Assessments are regressive when lower-priced properties are routinely assessed at higher rates, relative to their actual sale price, than higher-priced properties.[5] Since new leadership took over the Cook County Assessor's Office in 2019, regressivity has been dramatically reduced.[6] A 2025 evaluation of progress on assessment fairness by Dr. Chris Berry, a Professor at the University of Chicago Harris School of Public Policy and Director at the Mansueto Institute for Urban Innovation, found that reassessments since 2019 substantially improved inequities and significantly lowered the over-taxation of low- and middle-priced homes.[7]

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[1] 31 Ill. Comp. Stat. 200/1-50.
[2] *How Residential Property is Valued,* Cook Cnty. Assessor's Off., https://www.cookcountyassessoril.gov/how-residential-property-valued-0; *Standard on Mass Appraisal of Real Property*, Int'l Ass'n of Assessing Officers (2025), https://www.iaao.org/wp-content/uploads/Standard_on_Mass_Appraisal.pdf.
[3] Christopher Berry, *An Evaluation of Progress on Residential Assessment Fairness in Cook County*, Mansueto Inst. for Urb. Innovation & U. Chi. Harris Sch. Pub. Pol'y Ctr. for Mun. Fin. 1 (Sept. 3, 2025), https://bpb-us-w2.wpmucdn.com/voices.uchicago.edu/dist/6/2330/files/2025/09/Kaegi-Evaluation-9_04.pdf.
[4] Jason Grotto, *An Unfair Burden*, Chi. Trib. (June 10, 2017), https://apps.chicagotribune.com/news/watchdog/cook-county-property-tax-divide/assessments.html.
[5] Berry, *supra* note 3.
[6] *Id.*
[7] *Id.* at 4, 7.

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These improvements are likely in part due to the development of an assessment model now used by the CCAO that considers numerous home characteristics, paired with review from human analysts.[8] Prior to 2019, the CCAO used an old, faulty model in assessments.[9] Since the introduction and continued development of the new model, residential assessments have come within industry standards for fairness.[10]

While this should suggest that further corrections via appeal are not needed, the BOR has seen record increases in the number of appeals filed.[11] However, businesses are far more likely to appeal than homeowners, and they tend to appeal year after year, not just when an assessment might need corrected.[12] This practice can shift the tax burden from businesses onto homeowners, adding regressivity back into the property tax system through appeals.[13] Because appeal rates continue to increase, and the appeal process remains difficult to navigate for those unfamiliar with it, it is important to ensure an impartial and equitable appeal system—one that is accessible to anyone whose property has been over-assessed.

[8] *How Residential Property is Valued, supra* note 2.
[9] Grotto, *supra* note 4.
[10] Berry, *supra* note 3.
[11] *Tax Year 2023 – Fiscal Year 2024 Annual Report*, Cook Cnty. Bd. of Rev. 1, 7 (2024), https://www.cookcountyboardofreview.com/sites/g/files/ywwepo261/files/document/file/2025-10/Board%20of%20Review_AR24.pdf.
[12] *A Broken Property Tax Appeal System, How the assessment appeals system disproportionately shifts the tax burden onto homeowners in low-income, Black and Latino communities*, Cook Cnty. Treasurer Maria Pappas 1, 10 (May, 2025), https://www.cookcountytreasurer.com/pdfs/appealsreportanalysis/AppealsReportAnalysisEnglish.pdf.
[13] *Id.* at 2; *Chicago Reassessment Report 2024,* Cook Cnty. Assessor's Off. 1, 44-45 (Sept. 2025), https://prodassets.cookcountyassessoril.gov/s3fs-public/reports/2024/cookCountyAssessor_annualReport_chicago-2024_v2_export-forWeb_20250915-1921.pdf.

Section 1. Accessibility

The property tax appeal system in Cook County is inaccessible to many homeowners. CCAO and BOR staff are difficult to contact, making it a challenge for homeowners, practitioners, and advocates to ask appeal related questions. Appeal application forms are only available in English, which either completely excludes or significantly burdens non-English speakers seeking to appeal. The online appeal application is not mobile-friendly, which disadvantages people who do not have access to a desktop computer. And some evidence needed for appeal applications is difficult or costly to acquire, which discourages even meritorious appeals. The following recommendations seek to address these concerns specifically and advocate more generally for increased accessibility throughout CCAO and BOR processes and published materials.

1.1 CCAO AND BOR STAFF, ESPECIALLY ANALYSTS, SHOULD BE MORE ACCESSIBLE TO THE GENERAL PUBLIC TO ANSWER QUESTIONS REGARDING THE PROPERTY TAX SYSTEM. 8

1.2 THE CCAO AND BOR SHOULD PROVIDE APPEALS-RELATED FORMS IN COMMON LANGUAGES OTHER THAN ENGLISH, AND SHOULD PROVIDE ACCESS TO INTERPRETERS AND TRANSLATORS FOR LESS COMMON LANGUAGES. 10

1.3 THE CCAO AND BOR SHOULD UPGRADE THEIR ONLINE APPEAL SYSTEMS TO BE MOBILE-FRIENDLY FOR ACCESSIBILITY AND EASE OF USE, AND SO THAT SUBMITTING A SUCCESSFUL APPEAL DOES NOT REQUIRE ACCESS TO A DESKTOP COMPUTER OR PRINTER. 11

1.4 THE CCAO AND BOR SHOULD REDUCE EVIDENTIARY BARRIERS IN APPEALS APPLICATIONS. 12

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1.1 CCAO and BOR staff, especially analysts, should be more accessible to the general public to answer questions regarding the property tax system. Short-term

CCAO and BOR websites currently list names of senior staff, and the CCAO also lists email addresses, but analyst contact information is not publicly available.[14] Shielding analysts' identity and contact information is in part a response to legitimate privacy and anti-corruption concerns. For example, in the past, members of the public have offered bribes to analysts and other staff as a means to secure a lower tax bill.[15] In response to longstanding bribery practices, the CCAO under Assessor Fritz Kaegi implemented an employee ethics code forbidding the use of the Office for personal gain,[16] and made efforts to insulate analysts from property owners via anonymizing appeal filings.[17] At the BOR, the Chief Clerk's contact information is available on the website for questions or concerns.[18] The Clerk's team serves as an intermediary between the public and the analysts by relaying the information from the taxpayer to the analyst and vice versa.

While such anti-corruption and harassment efforts are important, without publicly available analyst contact information, homeowners, practitioners, and direct service organizations cannot reliably get in touch with analysts about appeals applications, and researchers, advocates, and journalists seeking to discuss the property tax system cannot reach analysts, who are subject matter experts. This is not to say that no communication between these county offices and the public is available. At both offices, communications and related departments (e.g., Civic Engagement, Data, and Taxpayer Resolution teams at the CCAO) respond to inquiries from the public.[19] However, the lack of access to appeals analysts specifically can translate to a lack of knowledge around their subject matter expertise, which, in turn, creates roadblocks regarding individual property valuations and appeals, and makes needed systemic change more difficult to achieve.

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[14] *Cook County Assessor and Executive Team*, Cook Cnty. Assessor's Off., https://www.cookcountyassessoril.gov/cook-county-assessor-and-executive-team; *District 3 Senior Staff*, Cook Cnty. Ill. Bd. of Rev., https://www.cookcountyboardofreview.com/district3staff; *District 2 Senior Staff*, Cook Cnty. Ill. Bd. of Rev., https://www.cookcountyboardofreview.com/district2staff.

[15] For more information about prior corruption, *see* discussion *infra* Section 7.1. *See e.g.,* Press Release, U.S. Attorney's Off. N. Dist. Ill., Three Charged With Participating in Cook County Property Tax Bribery Scheme (Apr. 21, 2023), https://www.justice.gov/usao-ndil/pr/three-charged-participating-cook-county-property-tax-bribery-scheme; *Cook County assessor's worker accused of accepting favors in exchange for help to lower tax bills*, ABC7 Chi. (Jul. 7, 2022), https://abc7chicago.com/post/cook-county-assessors-office-fritz-kaegi-bribery-lavdim-memisovski/12026661/; Jon Seidel, *Former Cook County assessor official gets probation after helping feds*, Chi. Sun-Times (Jul. 29, 2025), https://chicago.suntimes.com/2025/07/29/former-cook-county-assessors-official-gets-probation-after-helping-with-feds-lengthy-probe.

[16] *Cook County assessor's worker accused of accepting favors in exchange for help to lower tax bills*, *supra* note 15.

[17] This information was obtained through conversation with the CCAO.

[18] *Portal Guide – Property Owners*, Cook Cnty. Ill. Bd. of Rev., https://www.cookcountyboardofreview.com/portal-guide-property-owners.

[19] This information was obtained through conversation with the CCAO and BOR, and Impact for Equity's own experience communicating with these offices.

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To supplement current communication workflows at the CCAO and BOR, both offices should create a system that allows more communication between analysts and the general public, while also protecting against corruption of the type described above. For example, CCAO and BOR could designate one or more trained appeal analysts whose primary responsibility would be to answer phone calls from homeowners about appeals and assessments related to their individual properties. This role could also assist the communications departments regarding inquiries from researchers and the media about the broader system.

These appeal analysts would respond to general questions on assessments and appeals, relay case-specific questions to the assigned analyst, and generally act as a liaison between the public and other analysts on staff (thus warding against bribery or harassment concerns that may arise from direct contact). This model is precedented, as other government offices, such as senators and representatives, often designate staff—frequently interns—for this role. Both the CCAO and BOR do, to some degree, already have the mechanisms in place to expand access to staff. For example, the BOR has its front desk staffed by employees with analytical backgrounds who can assist homeowners and answer questions about the appeal process. Additionally, some district staff are already responsible for answering taxpayer phone calls and directing the message to the proper staff, and others regularly conduct callbacks. However, in-person assistance still requires individuals to travel to the BOR's downtown office, which can be prohibitive for some homeowners.[20] Many homeowners reach out through email or phone calls, so it is important to ensure staff are monitoring those lines of communication.

Additionally, the CCAO and BOR could, to the extent feasible under current and/or future staffing constraints, increase the number of office hours and townhalls hosted by both offices. These events should be available at regular intervals, as is feasible, to ensure that community members do not have to wait long periods for questions or concerns to be addressed. So too, the office hours and/or townhalls should be staffed by analysts or employees with analytical backgrounds who are able to answer assessment and appeal related questions from taxpayers, including potential appellants, direct service organizations, advocates, researchers, and other stakeholders.

Note: This document also recommends townhalls for additional purposes. For more information, *see* Section 3.5.

[20] This information was obtained through conversation with the BOR.

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1.2 The CCAO and BOR should provide appeals-related forms in common languages other than English, and should provide access to interpreters and translators for less common languages. Short-term Long-term

The CCAO and BOR allow homeowners to file an appeal by downloading and submitting a form or filing online.[21] The downloadable appeals forms provided by both offices, however, are only in English.[22]

The Chicago Metropolitan Agency for Planning found from the American Community Survey five-year estimates that a language other than English is spoken at home for approximately 35% of Cook County.[23] Cook County is incredibly diverse, as are its homeowners. The appeals system should reflect this diversity by increasing the availability of appeal forms in commonly spoken languages other than English, and by providing access to interpreters and translators for less common languages. This would allow all homeowners to access and navigate the property tax appeal system, as necessary, regardless of the language(s) they speak.

The CCAO currently has a project underway to translate the appeal form into languages other than English and has redesigned appeal brochures, making them available in English, Spanish, Polish, Chinese, Tagalog, and Arabic.[24] The BOR has, in the past, provided physical pamphlets explaining the appeal process that were available in languages other than English.[25] This could be replicated today and the BOR should make a similar effort to the CCAO to translate the appeal forms themselves into other languages to improve language accessibility.

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[21] *Overview of How Appeals Work*, Cook Cnty. Assessor's Off., https://www.cookcountyassessoril.gov/appeals; *Residential Appeals*, Cook Cnty. Ill. Bd. of Rev., https://www.cookcountyboardofreview.com/residential-appeals.

[22] *2026 Real Estate Assessed Valuation Appeal*, Cook Cnty. Assessor's Off., https://prodassets.cookcountyassessoril.gov/s3fs-public/form_documents/CCAO_form_realEstateAssessedValuationAppeal_consolidated_2026_fillable_2.pdf?VersionId=88LBWbQpN44_iMUSOJSCLPzPuZ8DEbqA; *2024 Real Estate Valuation Complaint*, Cook Cnty. Ill. Bd. of Rev., https://www.cookcountyboardofreview.com/sites/g/files/ywwepo261/files/document/file/2025-06/2025%20Complaint%20form%20%281%29_0.pdf; *Form Documents*, Cook Cnty. Assessor's Off., https://www.cookcountyassessoril.gov/forms?field_form_category_target_id=All&order=field_form_category&sort=asc&page=2; *Forms*, Cook Cnty. Ill. Bd. of Rev., https://www.cookcountyboardofreview.com/forms.

[23] *Cook County Community Data Snapshot County Series*, Chi. Metro. Agency for Plan. 1, 4 (June, 2026), https://cmap.illinois.gov/wp-content/uploads/dlm_uploads/Cook-County.pdf

[24] *Download our Guides*, Cook Cnty. Assessor's Off., https://www.cookcountyassessoril.gov/download-our-guides.

[25] This information was obtained through conversation with the BOR.

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1.3 The CCAO and BOR should upgrade their online appeal systems to be mobile-friendly for accessibility and ease of use, and so that submitting a successful appeal does not require access to a desktop computer or printer. Short-term

Both the CCAO and BOR allow homeowners to file their appeals online.[26] However, the same neighborhoods affected by systemic over-assessments that likely need to appeal are the ones with the lowest rates of internet access.[27] Citywide, approximately 15-20% of Chicago households lack any internet connection.[28] This gap is most severe in majority-Black communities such as Englewood, West Englewood, Fuller Park, and Burnside.[29] While residents in more affluent and majority-White areas can file appeals online with relative ease, the lower-income, majority-Black communities face heightened logistical burdens—one of which is access to a computer and internet. As such, many homeowners who may want to file an appeal may also attempt to do so with a cellphone through a mobile appeal application. For individuals with limited mobility or difficulty accessing transportation, the possibility of visiting a library for free computer use or appealing in-person is not realistic. Filing an appeal through the mobile application on their cellphone could be a homeowner's only feasible option.

We have heard from community organizations and the homeowners they serve that the online appeal applications available through both the CCAO and BOR are not mobile-friendly. We have also tested these online applications ourselves. There are numerous small boxes to click, "captcha" verifications, and pop-ups that block the questions asked or text boxes to submit answers. Additionally, the process to submit evidence in support of an appeal, by adding an attachment to the appeal form, frequently glitches on a cellphone or limits the number of attachments that can be added. All these issues are exacerbated if the homeowner is blind or visually impaired, since the appeal application on a cellphone is small and requires frequent zooming in or out and manually moving the page around to see all the information. Without a mobile-friendly appeal form, communities with low rates of internet access are limited to filing appeals in-person (and the travel required to do so) or finding other desktop computer and printer access to download and print forms and then send them via mail.

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[26] *Overview of How Appeals Work*, *supra* note 21; *Residential Appeals*, *supra* note 21.
[27] *Digital Divide: Data Highlights Internet Inequities in Chicago*, U. Chi. Data Science Inst. (May 9, 2022), https://datascience.uchicago.edu/news/digital-divide-data-highlights-internet-inequities-in-chicago/.
[28] *Id.*; *Chicago Digital Equity Plan*, City of Chi. (Jan., 2023), https://www.chicago.gov/content/dam/city/sites/digital-equity-council/pdf/Digital-Equity-Plan-2023.pdf.
[29] *Digital Divide: Data Highlights Internet Inequities in Chicago*, *supra* note 27.

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1.4 The CCAO and BOR should reduce evidentiary barriers in appeals applications. Short-term

Evidence for CCAO and BOR appeals can include comparable properties, purchase and sale documents, appraisals, affidavits, and more.[30] However, some of this documentation is not easily accessible. For example, professional appraisals of a home's fair market value can be prohibitively expensive for low-income homeowners, and there is a history of discrimination in the appraisal industry.[31] Additionally, homeowners may be confused on what counts as a comparable property, or "comp," or what information they should include in affidavits and briefs, since the CCAO and BOR do not provide much detail on these evidence types. To make evidentiary requirements more manageable, CCAO and BOR should provide additional guidelines and assistance regarding evidence for appeals.

For example, CCAO and BOR should clarify how and when appraisals are weighted in appeals, so homeowners do not feel pressured to pay for one when doing so is unnecessary. When appraisals are encouraged, there should be a fund available to low-income households and/or households in neighborhoods with low appeal rates and over-assessed homes, which could be administered by another Cook County office so as to avoid any conflicts of interest.

Regarding comps, homeowners should have access to the same databases *both* offices use to source comparables. Notably, CCAO does provide homeowners with the same data the office itself uses for comps via Cook Viewer's Interactive Map, an interface created by Cook County GIS to source comparables.[32] The BOR directs taxpayers to this CCAO feature,[33] at least in part because the BOR's own comps tool is based on data from the CCAO.[34] However, when homeowners include comps as part of their appeal application to the BOR, they could be submitting comps that differ from those the BOR draws when reviewing appeals. Instead, the BOR should either make a tool accessible to the public using their own data or share their data and internal system with the CCAO so it may be included in the cook Viewer's Interactive Map that homeowners already have access to.

Additionally, homeowners should be given the option to go over comparables with analysts so the homeowner can understand what properties qualify and why. This is possible at the BOR if a homeowner requests a hearing,[35] during which they can speak directly to an analyst and discuss comps, property characteristics, and other things that might not be covered well by an appeal application. Given current constraints on staff capacity, deep dive communications about comparable properties outside of hearings could be consolidated to a select number of in-person events or digital engagement.

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[30] *Property Tax Appeal Toolkit*, Impact for Equity, https://impactforequity.org/wp-content/uploads/2026/06/English-Property-Tax-Appeal-Toolkit.pdf.
[31] Bradley Pough, *The Property Appraisal Pinch* 93 Tenn. L. Rev. 145 (2025).
[32] *What are Comparable Properties?*, Cook Cnty. Assessor's Off., https://www.cookcountyassessoril.gov/what-are-comparable-properties.
[33] *How to Present a Case*, Cook Cnty. Ill. Bd. of Rev., https://www.cookcountyboardofreview.com/how-present-case.
[34] This information was obtained through conversation with the BOR.
[35] *Board of Review Official Rules*, Cook Cnty. Ill. Bd. of Rev., https://www.cookcountyboardofreview.com/board-review-official-rules.

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For example, the CCAO and BOR could record digital webinars explaining each office's approach to comps and how homeowners can source them, which can be viewed on the offices' respective YouTube accounts.[36] Staff capacity permitting, the CCAO and BOR could also designate a small number of in-person events per year to a discussion of comparable properties generally (recorded and shared online) with time built in for attendees to ask specific comps-related questions.

The CCAO and BOR should also publish in writing how they review comparable properties and what they are looking for in comparables for each appeal type where this evidence is encouraged (e.g., for appeals based on a lack of uniformity, the unit of comparison should be the home's assessed value divided by its square footage). Additionally, CCAO and BOR should provide additional, in-depth written guidelines regarding what substantive information should be included in affidavits and briefs for each applicable appeal type, and logistical requirements such as preferred length.

[36] These webinars could be similar in format and depth to the CCAO's "Property Details Search 101" webinar, posted on the Office's YouTube channel. *See Property Details Search 101*, YouTube (Oct. 5, 2022), https://www.youtube.com/watch?v=rc7dceDTXP8.

Section 2. Data and Assessments

Both the process of assessing properties and the ultimate valuation impact appeals. If the data used in assessments is incorrect in any way, the valuation produced could indicate to a homeowner that they need to appeal. Inaccurate data could come from many sources, including incorrect peer comparisons, property characteristic errors, and even systemic over-assessment of entire neighborhoods from racist historical practices of redlining and segregation. The CCAO's goal is accurate and fair assessments,[37] and these suggestions are in furtherance of that goal.

2.1 BECAUSE THE CCAO USES ALGORITHMIC PEER COMPARISONS IN ASSESSMENTS AND APPEALS, IT SHOULD MAINTAIN CONSISTENT ANALYST REVIEW OF ALL MODEL VALUES AND ENSURE PROPERTY CHARACTERISTICS ARE REVIEWED, AS WELL. **15**

2.2 DURING THE APPEALS PROCESS, THE CCAO AND BOR SHOULD CONSIDER THE SYSTEMIC OVER-ASSESSMENT OF ENTIRE NEIGHBORHOODS. **16**

2.3 THE CCAO SHOULD BE GIVEN IMPROVED ACCESS TO DATA SO THAT IT MAY CONTINUE IMPROVING THE ALGORITHM AND MACHINE LEARNING MODEL OF ASSESSMENTS TO INCLUDE FACTORS LIKE PROPERTY CONDITIONS AND INTERIOR FEATURES. **18**

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[37] *Cook County Assessor's Office Mission and Values*, Cook Cnty. Assessor's Off., https://www.cookcountyassessoril.gov/cook-county-assessors-office-mission-and-values.

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2.1 Because the CCAO uses algorithmic peer comparison in assessments and appeals, it should maintain consistent analyst review of all model values and ensure property characteristics are reviewed, as well. Long-term

The CCAO uses an automated valuation model to assess properties, which is among a suite of tools used by analysts in reviewing appeals to refine the accuracy of property characteristics and assessments, though only peripherally. The model essentially works by estimating what a property would sell for on the open market. This tool is a machine-learning model, meaning that it must be trained to recognize patterns. The CCAO's model automatically finds and uses comparable properties and patterns from them when producing a valuation estimate, but it does not explicitly produce a set of comparable properties. However, the CCAO has developed a method for finding significant sales that underlie the model estimates. Using the CCAO's Home Value Reports, any homeowner can review the top five most significant sales, as well as all the data about a home, used by the model.[38] The CCAO reviews comparable sales before they are used as inputs for the model. Before assessments are mailed out to homeowners, analysts review the values that the model produces and adjust them as necessary.

Still, the CCAO has acknowledged that they face a number of data-related challenges specific to their office. Property characteristics are reviewed and updated somewhat separately from the valuation and appeal process, and the property characteristics tracked can sometimes be incorrect or outdated. The major sources of characteristic errors are (1) data entry or processing errors—records collected by the office often need to be digitized and mistakes happen—and (2) update error—the systems updating the characteristics for the CCAO can be slow to detect changes or otherwise unreliable.[39] If property characteristics are not up to date and accurate, any peer comparison based on them will be flawed.

The practice of reviewing model values prior to finalizing and mailing assessments, and adjusting them as needed, demonstrates a strong commitment to fairness and accuracy. The CCAO should maintain this consistent analyst review and ensure property characteristics are given similar scrutiny so any property characteristic errors can be identified and corrected.

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[38] *Home Value Report*, Cook Cnty. Assessor's Off., https://www.cookcountyassessoril.gov/home-value-report; *Finding Comparables with LightGBM*, Cook Cnty. Assessor's Off., https://ccao-data.github.io/lightsnip/articles/finding-comps.html.
[39] *CCAO-data / Model-res-avm*, Cook Cnty. Assessor's Off., https://github.com/ccao-data/model-res-avm?tab=readme-ov-file#model-overview.

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2.2 During the appeals process, the CCAO and BOR should consider the systemic over-assessment of entire neighborhood.

Long-term

The CCAO and BOR advise residential property owners to compare their property's assessed value to that of similar properties within the same neighborhood and property classification.[40] The underlying assumption is that this peer-to-peer comparison provides a reasonable benchmark for fairness and accuracy in valuations.[41] However, if most or all properties in each area are undervalued and over-assessed, using them as a reference point only reinforces inflated assessments rather than correcting them. For example, in many majority-Black neighborhoods, systemic over-assessments caused by outdated industry practices and racial bias created inflated benchmarks.[42] As a result, legitimate appeals could appear "normal" when compared to equally over-assessed peers.

CCAO analysts review assessments neighborhood by neighborhood even before assessments are mailed and, if they determine that a neighborhood or other geographic area has been systemically over-assessed, they can modify assessments before reassessment notices go out. Additionally, they may "re-notice" a neighborhood to correct assessment errors. The CCAO does this over-assessment review by computing sale ratio statistics for each township following the International Association of Assessing Officers' (IAAO's) standards.[43] If the model is not compliant with IAAO standards, the CCAO makes adjustments to ensure it is as fair as possible across all areas, or it flags specific areas in need of extra attention during desk review. The CCAO also recomputes the statistics for each township at the end of the desk review process to ensure any and all issues were fixed, and later publishes a summary of each township's ratio statistics as part of their public valuation reporting.[44]

This concerted effort to ensure neighborhoods are not being systemically over-assessed should be continued and should serve as an example to other offices involved in property tax assessments and appeals. The BOR can and should take into consideration the potential systemic over-assessment of entire neighborhoods by reviewing them on a neighborhood-by-neighborhood basis, or another geographic aggregation of assessments based on internal process.

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[40] *What are Comparable Properties?*, *supra* note 32; *How to Present a Case*, *supra* note 33.
[41] *Id.*
[42] Jordan M. Fields, Andre M. Perry, & Manann Donoghoe, *How the Property Tax System Harms Black Homeowners and Widens the Racial Wealth Gap*, Brookings Inst. (Aug. 22, 2023), https://www.brookings.edu/articles/how-the-property-tax-system-harms-black-homeowners-and-widens-the-racial-wealth-gap/.
[43] *Standard on Ratio Studies, A criterion for measuring fairness, quality, equity and accuracy,* Int'l Assoc. Assessing Officers, (Apr. 2013), https://www.iaao.org/wp-content/uploads/Standard_on_Ratio_Studies.pdf.
[44] *Riverside: Residential Valuation*, Cook Cnty. Assessor's Off., https://www.cookcountyassessoril.gov/riverside-residential-valuations#paragraph-2104.

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In December 2025, the BOR did show consideration for potential over-assessment by reopening townships to address the reassessment of certain neighborhoods in Chicago and give people the opportunity to be heard.[45] The BOR should also follow the CCAO's example of publishing a summary of their review for each township so the public can know how and what efforts are being made to ensure their neighborhoods are not systemically over-assessed, although state law directs that the BOR can only assume jurisdiction over the properties that are appealed to the office.[46] The CCAO and BOR could also introduce regular training for analysts on systemic over-assessment, its history, and what to look for when reviewing appeals or reassessments.

[45] Quinn Myers, *Reopened Property Tax Appeals Process Available for Another Week Following Massive Bill Spikes*, Block Club Chi. (Dec. 5, 2025), https://blockclubchicago.org/2025/12/05/reopened-property-tax-appeals-process-available-for-another-week-following-massive-bill-spikes/.

[46] 35 Ill. Comp. Stat. 200/16-95.

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2.3 The CCAO should be given improved access to data so that it may continue improving the algorithm and machine learning model of assessments to include factors like property conditions and interior features. Long-term

Many features of a residential property are not included in the machine learning model used in assessments. These include property conditions, crime, interior features, blighted buildings, and neighborhood desirability. Some of these are excluded because they cannot be tracked effectively or reliably observed, but others are excluded because they are otherwise correlated with separate features like income or neighborhood. Still, studies show that assessments are less responsive to neighborhood characteristics than market prices, which generates inequality between neighborhoods. For example, communities of color often have less access to amenities that would increase the market values of their homes because of residential segregation and community disinvestment. While the market would reflect this disparity in the ultimate sale price, assessments often fail to capture these details.[47] In contrast, homes in high-income communities are being under-assessed because assessments are less responsive than the market to the neighborhood characteristics that arose and benefitted from residential segregation and targeted community disinvestment.

Since Black and Latiné residents often face a different average set of neighborhood characteristics than White residents, the misvaluation of characteristics contributes to the assessment gap.[48] The CCAO's expansion of analyst reviews, and analyst decisions superseding any conflicting algorithmic outcomes, is a step in the right direction, but ongoing improvements to the model can help make the assessment more responsive to neighborhood characteristics in a similar way to market prices, making the assessments more accurate from the beginning.[49] The CCAO's ongoing nationwide campaign to improve property characteristics data through access to federal appraisal data is likely the most straightforward way to ensure more accurate data and, thus, more accurate assessments.[50]

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[47] Caitlin Young, *What Policymakers Need to Know about Racism in the Property Tax System*, Hous. Matters, Urb. Inst. (Mar. 15, 2023), https://archive-housingmatters.urban.org/articles/what-policymakers-need-know-about-racism-property-tax-system/.
[48] Carlos F. Avenancio-León & Troup Howard, *The Assessment Gap: Racial Inequalities in Property Taxation* 1, 30 (Feb. 2022), http://www.trouphoward.com/uploads/1/2/7/7/127764736/avenancio-leon_and_howard_the_assessment_gap_feb_2022.pdf.
[49] *CCAO-data / Model-res-avm*, *supra* note 39; *Practices and Procedures Audit of the Cook County, Illinois Assessor's Office*, Pro. Consulting Servs. IAAO 1, 16 (May 2019), https://prodassets.cookcountyassessoril.gov/s3fs-public/reports/PCS_Cook-County_Report_final.pdf.
[50] *Academics Support Assessors' Better Home Data Campaign,* Cook Cnty. Assessor's Off., https://www.cookcountyassessoril.gov/news/academics-support-assessors-better-home-data-campaign.

Section 3. Outreach

Outreach and community education by the CCAO and BOR is extremely important given how complicated and difficult it is to understand the property tax appeal system. As this section details, both the CCAO and BOR have hosted a record number of community outreach events in recent years, and the CCAO especially has developed an outreach strategy that tackles information sharing from multiple angles. The following recommendations outline ways the CCAO and BOR could increase or fine-tune outreach across the county, with the goals of (1) reducing barriers to appeals, especially for neighborhoods who have historically been over-assessed, and (2) alleviating stress on both offices by helping homeowners in communities that apply as a matter of course understand how to identify meritorious appeals.

3.1 THE CCAO AND BOR SHOULD INCREASE PUBLIC EDUCATION EFFORTS AROUND WHEN HOMEOWNERS SHOULD APPEAL. **20**

3.2 THE CCAO AND BOR SHOULD REVISE THEIR ONLINE WEBINARS TO CATER TOWARD HOMEOWNERS WHO ARE APPEALING NOT ONLY VIA PAPER APPLICATIONS, BUT ALSO ONLINE. **21**

3.3 THE CCAO AND BOR SHOULD CONTINUE TO EXPAND OUTREACH EFFORTS—PRIORITIZING OUTREACH IN COMMUNITIES THAT HAVE LESS ACCESS TO, KNOWLEDGE OF, AND RESOURCES RELATED TO THE APPEALS PROCESS. **22**

3.4 THE CCAO AND BOR SHOULD ESTABLISH REGULAR LOCAL METHODS OF FILING APPEALS IN-PERSON TO REDUCE BARRIERS TO FILING. **25**

3.5 THE CCAO SHOULD HOLD OFFICE HOURS AND REGULAR TOWNHALLS TO GIVE POTENTIAL APPELLANTS THE OPPORTUNITY TO DISCUSS THEIR VALUATION AND ADDRESS ERRORS IN THEIR PROPERTY'S RECORD BEFORE OR IN LIEU OF FILING A FORMAL APPEAL. **26**

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3.1 The CCAO and BOR should increase public education efforts around when homeowners should appeal. Short-term

When homeowners and businesses automatically appeal despite lacking strong claims supporting decreased valuation, they may clog the appeal process and increase regressivity. Currently, homeowners in high-income neighborhoods are more likely to appeal as a matter of course in an attempt to decrease their tax bill, despite the greater likelihood that properties in these communities are already undervalued, suggesting that an appeal to *lower* the valuation is not warranted.[51] In contrast, homeowners in low-income, majority-Black and -Latiné neighborhoods are significantly less likely to appeal, even though homes in these communities are more likely to be over-assessed, meaning that an appeal to decrease valuation may be warranted and in the interest of equity.[52]

These trends suggest that homeowners, and the appeal system writ large, would benefit from increased general homeowner education around the types of appeals that are more likely to be meritorious and encouraged, versus when an appeal may be weakly supported. Ultimately, every property owner has the right to appeal at the CCAO and BOR,[53] regardless of whether evidence suggests a strong case. Bearing this in mind, the education suggestion herein would not include specific recommendation on whether an *individual* should appeal. That decision is the taxpayer's alone. Rather, education could include clearer, more robust, and more widely accessible written materials in multiple languages on appeal guidance generally (i.e., common appeals scenarios, helpful evidence to include, etc.). Additionally, more robust distribution and outreach efforts of these materials throughout Cook County would help homeowners make an independent, but more informed, choice on whether to file an appeal.

In addition to education efforts concentrated in low-income neighborhoods with lower appeal rates, CCAO and BOR could consider ways to discourage clearly non-meritorious appeals of the type that occur when property owners in high-income neighborhoods appeal as a matter of course, even when there is no evidence suggesting an inaccurate valuation. This could include information around how appealing as a matter of course burdens the system to the detriment of homeowners. Education around this topic from the CCAO and BOR is particularly important given the ubiquity of the for-profit tax appeal industry in Cook County, which benefits when more appeals are filed using their services.[54] For example, according to data published in 2025, approximately 80% of homeowners who filed appeals and had a median household income of $100,000 to $149,000 hired a lawyer or tax representative.[55] As this report illustrates, more appeals are not necessarily better. The aim is to correct valuations that are inaccurate, not overburden the system unnecessarily. General education from the CCAO and BOR around appeals can help achieve this goal.

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[51] *A Broken Property Tax Appeal System, supra* note 12, at 15.
[52] *Id.* at 1.
[53] *How the Illinois Property Tax System Works*, Off. Cook Cnty. Treasurer Maria Pappas 15 (updated Oct. 2025), https://www.cookcountytreasurer.com/pdfs/understandingyourtaxbill/propertytaxprimer.pdf.
[54] Jason Grotto & Sandhya Kambhampati, *Commercial Breakdown*, ProPublica & Chi. Trib. (Dec. 7, 2017), https://apps.chicagotribune.com/news/watchdog/cook-county-property-tax-divide/index.html.
[55] *A Broken Property Tax Appeal System, supra* note 12, at 25. For more information on the tax appeal industry, *see* Section 7.1.

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3.2 The CCAO and BOR should revise their online webinars to cater towards homeowners who are appealing not only via paper applications, but also online. Short-term

The CCAO and BOR both host events to help homeowners understand the property tax system and appeal application, which can be filled out online or on paper.[56] Homeowners use both application types based on which format is easiest and/or most accessible to their situation. See Section 1.3 for more information about the online application. Accordingly, some appeals events focus on the online application,[57] while others focus on the paper application.[58] If an event is very likely to attract an audience preferring one application method over another, or a partner organization requests a specific type of workshop, then it makes sense for an event to focus on one application type. However, in other instances like a general explainer event where the audience is an entire township, it would be helpful for the CCAO and BOR to include information about how to apply both online *and* on paper in one event. That way, audience members can gain information about both application formats and decide which works best for them.

[56] *Outreach and Education Events*, Cook Cnty. Assessor's Off., https://www.cookcountyassessoril.gov/event-list; *Events Calendar*, Cook Cnty. Ill. Bd. of Rev., https://www.cookcountyboardofreview.com/calendar/full; *Property Tax Appeal Toolkit*, *supra* note 30, at 23.

[57] *See Understanding Your Reassessment Notice, Lyons Township*, YouTube (Aug. 11, 2026), https://www.youtube.com/watch?v=yhXl-8mBGpc&t=63s.

[58] Impact for Equity staff attended a virtual property tax appeal forum, hosted by the Office of Commissioner Larry Rodgers Jr., on October 9, 2025. This event walked through the paper application.

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3.3 The CCAO and BOR should continue to expand outreach efforts—prioritizing outreach in communities that have less access to, knowledge of, and resources related to the appeal process. Short-term

Research shows that homeowners in low-income neighborhoods are less likely to appeal.[59] At the same time, homes in these communities are more likely to be over-assessed, meaning that individual homeowners in low-income neighborhoods are more likely to be paying property taxes based on an incorrect valuations, suggesting that at least some property owners in these areas have meritorious appeal claims.[60] Increased rates of successful appeals in low-income neighborhoods could at least partially address and correct for this systemic over-assessment.

Efforts have been made to conduct outreach in all Cook County communities, including those that appeal at lower rates. For example, in 2024, the CCAO held a record-breaking 218 events across the county to educate homeowners about the property tax system and help them file appeals and/or apply for exemptions—with 62 events conducted in Spanish.[61] As of publication, at only halfway through the assessment cycle, the CCAO has held 127 outreach events—23 of which focused on the south and west suburbs—which puts the office on track to outpace 2025's 214 events by the end of the current cycle. When scheduling events, CCAO's outreach team prioritizes townships undergoing reassessment and historically underserved areas that may have, for example, a lower property tax exemption enrollment rate.[62] The team also plans events around property tax exemption filing periods and the mailing of second installment property tax bills.[63]

The CCAO hosts a minimum of two virtual workshops (one in English and one in Spanish) for each township when it opens for appeals.[64] The CCAO outreach team also coordinates closely with local township assessors to provide additional in-person and virtual workshops, and facilitate in-person "pop-"ups" or "open houses," which are spaces for property owners to ask questions about their assessments.[65] The CCAO also provides townships with relevant data and briefings on assessments, "train-the-trainer" workshops, and a custom township assessor filing tool in the appeal and exemption online applications.[66]

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[59] *See A Broken Property Tax Appeal System, supra* note 12, at 1, 15-16.
[60] *Id.* at 1-3.
[61] *Assessor's Office Takes Part in Record Number of Events for Homeowners*, Cook Cnty. Assessor's Off. (Dec. 10, 2024), https://www.cookcountyassessoril.gov/news/assessors-office-takes-part-record-number-events-homeowners.
[62] This information was obtained through conversation with the CCAO.
[63] This information was obtained through conversation with the CCAO.
[64] *See e.g., Understanding Your Reassessment Notice, Lyons Township, supra* note 52; *Cómo Apelar el Valor de su Propiedad, Municipio de Lyons,* Cook County Assessor (YouTube), https://www.youtube.com/live/rg0DfQBXdAU. Additional information was obtained through conversation with the CCAO.
[65] *See e.g., Receive Property Tax Assistance: Berwyn Township*, YouTube (May 15, 2023), https://www.youtube.com/watch?v=VXhOz60ATtc. Additional information was obtained through conversation with the CCAO.
[66] Janel Moreland Village Clerk, Facebook (Aug. 16, 2024), https://www.facebook.com/100068936295007/posts/maywood-mayor-nathaniel-booker-hosted-a-train-the-trainer-session-with-the-cook-/817501393891063/. Additional information was obtained through conversation with the CCAO.

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Upon request from local governments, community organizations, and other stakeholders, the CCAO sends representatives to local events which range from workshops to townhalls to one-on-one appointments.[67] Marketing for these events is generally conducted via digital channels (e.g., advertised via email campaigns, posted on CCAO's website and social media, listed on NextDoor).[68] Additionally, the CCAO will create event flyers upon request from partner organizations, which can be shared electronically or printed for physical distribution.[69] Many CCAO in-person events are held at community hubs and all virtual workshops are archived on the CCAO YouTube page, so that potential appellants and other interested parties can watch at any time.[70]

Another CCAO-led outreach initiative is the annual Homeowner Resource Fair, which is an opportunity for taxpayers to connect with local agencies and community partners offering supportive services for homeowners.[71] Additionally, the CCAO convenes advisory committees comprised of county leaders and residents that provide input and guidance on the office's outreach efforts and advise on where to focus outreach resources.[72]

In 2025, the BOR hosted a record-breaking 201 outreach events across all three Cook County BOR districts.[73] However, less is known about the BOR's outreach approach. Each elected commissioner (representing one of the three districts)[74] hires their own outreach teams and hosts their own in-person and virtual events for constituents.[75] Events are held in multiple languages—including Spanish, Polish, Cantonese, and Mandarin—and in partnership with alders, townships, and community partners.[76] Commissioners determine whether their events will focus on the paper or digital appeal application (or both)—a decision which may be based on anticipated audience and their access to or fluency with technology.[77] Notably, the BOR does not post their events on the office's main YouTube channel.[78]

[67] *See e.g., Id.*; *Receive Property Tax Assistance: Berwyn Township, supra* note 65.
[68] *See Outreach and Education Events*, *supra* note 56; *see Join the Cook County Assessor's Office for a workshop to learn about exemptions*, NextDoor (Mar. 12, 2024), https://nextdoor.com/agency-post/il/cook-county/cook-county-government/join-the-cook-county-assessors-office-for-a-workshop-to-learn-about-exemptions-324270239/.
[69] This information was obtained through conversation with the CCAO.
[70] Cook County Assessor (YouTube), https://www.youtube.com/@CookCountyAssessorsOffice/streams.
[71] *2025 Homeowner Resource Fair*, Flickr, https://www.flickr.com/photos/cookcountyassessor/albums/72177720330561166/.
[72] This information was obtained through conversation with the CCAO.
[73] This information was obtained through conversation with the BOR.
[74] *Welcome to the Board of Review,* Cook Cnty. Ill. Bd. of Rev., https://www.cookcountyboardofreview.com/welcome-board-review. Additional information was obtained through conversations with the BOR.
[75] *Upcoming Events,* Cook Cnty. Ill. Bd. of Rev., https://www.cookcountyboardofreview.com/news/events.
[76] *Cook County Board of Review Annual Report, Assessment Year 2024, Fiscal Year 2025*, Cook Cnty. Ill. Bd. of Rev. 40 (2025), https://www.cookcountyboardofreview.com/sites/g/files/ywwepo261/files/document/file/2026-08/Cook%20County%20Board%20of%20Review%20Annual%20Report%20-%20Tax%20Year%202024_Fiscal%20Year%202025_.pdf.
[77] Impact for Equity staff attended a virtual property tax appeal forum, hosted by the Office of Commissioner Larry Rodgers Jr. on October 9, 2025. This event walked through the paper application. Additional information was obtained through conversations with the BOR.
[78] *Cook County Board of Review*, YouTube, https://www.youtube.com/channel/UCoGigqKTjptERpWCi4wl4hw/videos.

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This increase in outreach events at the CCAO and BOR in recent years indicates a commendable focus on community engagement from both offices. We recommend that the CCAO and BOR continue to prioritize digital and in-person outreach in partnership with community organizations—fine-tuning existing operations and adding additional initiatives as needed and as feasible given staffing and budgetary constraints. Specifically, we recommend that both offices continue to focus outreach in communities with low appeal rates and neighborhoods that historically or currently have less access to appeal resources (e.g., attorneys, digital access, etc.). We also propose that the BOR implement some of the outreach practices that have worked well for the CCAO. For example, we suggest that the BOR post recordings of their events on the office's YouTube page, and that at least some of these events cover *both* paper and online appeal applications, rather than walking through one or the other.

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3.4 The CCAO and BOR should establish regular local methods of filing appeals in-person to reduce barriers to filing. Short-term

The CCAO and BOR allow homeowners to file appeals in-person or online.[79] The BOR also allows homeowners to file appeals by mail, but disclaims responsibility for forwarded mail, placing an extra burden on residents without internet access.[80] The CCAO allows email filing if homeowners cannot access the online appeal system and provides "self-service stations" that homeowners may use, but these options still require either internet access or travel to the CCAO's downtown office.[81]

The encouragement of the CCAO and BOR to submit appeals online, combined with the general unreliability of mail-in options and travel required to file appeals in-person, creates barriers for elderly, disabled, and low-income residents, as well as those without the resources to commute or access the internet. As detailed above, majority-Black communities lack internet access at much higher rates than majority-White communities, and submitting an online appeal through a cellphone or other mobile device poses unique issues around accessibility and usability. With evidence attachment limitations, small font, and frequent zooming in and out needed to see the text, appealing online via mobile device is not feasible for blind or visually impaired homeowners, and it creates additional barriers to anyone without internet access or ability to travel to the county offices.[82] The appeals process, though facially neutral, functions in practice as a system that privileges digital literacy and access; thereby disproportionately excluding those already overburdened by inaccurate assessments. By establishing regular community-based and local methods of filing appeals in-person, some of the inherent barriers to filing an appeal will be reduced, and the communities most affected by over-assessments and a lack of internet access will face less disparities around access. The CCAO could even extend in-person filing options beyond their downtown office to include the branch offices in Markham, Skokie, and Bridgeview. This would allow homeowners living in those areas to more easily file in-person, instead of having to choose between commuting downtown or filing online.

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[79] *Overview of How Appeals Work*, *supra* note 21; *Residential Appeals*, *supra* note 21.
[80] *Board of Review Official Rules, supra,* note 35. (Rule 8).
[81] *Official 2026 Appeal Rules of the Cook County Assessor*, Cook Cnty. Assessor's Off. (Mar. 13, 2026), https://prodassets.cookcountyassessoril.gov/s3fs-public/event/2026%20Appeal%20Rules%20-3.13.2026.pdf (Rule 5).
[82] For more information on appeal accessibility, *see* discussion *supra* Section 1.

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3.5 The CCAO and BOR should hold office hours and regular townhalls to give potential appellants the opportunity to discuss their valuation and address errors in their property's record before or in lieu of filing a formal appeal. Short-term

Boards of Review in other Illinois counties such as DuPage, Lake, and Will encourage taxpayers to contact their local assessor's office before filing formal appeals with the county BOR.[83] These informal meetings sometimes eliminate the need for an appeal because the assessor's office is (a) provided the opportunity to clear up confusion through an explanation of their valuation; and/or (b) able to immediately correct errors in the property record brought to their attention by the homeowner. In Cook County, this type of informal conversation between homeowners and the CCAO may not be feasible at scale due to the area's large population. However, the spirit of these communications is worth replicating.

A Cook County-specific alternative to the informal conversation model employed in other counties could include CCAO office hours and regular townhalls staffed by CCAO analysts. Unlike webinars, these events would be exclusively designed for homeowners to ask questions of and gain clarity from staff about their specific situation, rather than being centered around a general presentation. At these events, analysts should come prepared to talk to homeowners about their specific property, including property records and property valuations. These events would benefit Cook County homeowners because they would provide a venue for homeowners to ask questions, have their concerns addressed, and correct errors. Similarly, office hours and townhalls would benefit the CCAO and BOR by potentially reducing the number of appeals formally filed with both offices. In turn, reducing appeal filings would likely increase CCAO and BOR analyst capacity, reduce the burden on homeowners to ensure the accuracy of their property assessments, and in the long-term could minimize tax-burden shifting that can be exacerbated by the appeals process.

[83] *Appeal Process*, Lake Cnty. Chief Cnty. Assessment Off., https://www.lakecountyil.gov/503/Appeal-Process; *2026 Rules and Procedures*, Will Cnty. Bd. of Rev. 1, 9, https://www.willcountysoa.com/Content/pdf/2026_BORRulesAndProcedures.pdf; *Appeal Process*, Cnty. of DuPage, https://www.dupagecounty.gov/government/departments/supervisor_of_assessments/appeal_process.php.

Section 4. Official Rules

For a homeowner going through the appeal process, the system can be complicated and difficult to navigate. Although the official appeal rules offered by the CCAO and BOR are intended to provide parameters for appeals and ensure consistency in filings and process, they currently stand as another source of confusion for homeowners. The rules are often vague, hard to understand, and lack definitions for legal terms. To help ensure the efficacy of each office's rules, and to help guarantee that homeowners can actually follow the rules, they must be clearer and more accessible to those appealing.

4.1 THE CCAO AND BOR SHOULD REVISE THEIR OFFICIAL APPEAL RULES TO REDUCE SUBJECTIVITY AND VAGUENESS. **28**

4.2 THE CCAO AND BOR SHOULD CONTINUE TO REFINE ORGANIZATION OF THEIR OFFICIAL RULES TO INCREASE READABILITY. **30**

4.3 THE CCAO AND BOR SHOULD REVISE THEIR PUBLISHED MATERIALS, INCLUDING OFFICIAL RULES AND SUPPLEMENTARY APPEALS PROCESS EXPLAINERS, SO THAT THESE DOCUMENTS ARE WRITTEN IN PLAIN LANGUAGE WITH MINIMAL TECHNICAL OR LEGAL JARGON. **31**

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4.1 The CCAO and BOR should revise their official appeal rules to reduce subjectivity and vagueness. Short-term Long-term

The CCAO and BOR establish and publish official rules for any person filing an appeal before that office.[84] Both offices have 27 rules, which include that the failure to follow any rule may result in denial of an appeal.[85] However, the rules themselves are often vague and subjective, which can result in confusion for homeowners on what must be included in an appeal, whether they are correctly following the rules, and, generally, how to navigate an appeal.

For example, CCAO Rule 11 states that "[f]ilers must specify the estimated fair market value of the property in their CCAO appeal. Filers must provide sufficient information and/or evidence in support of their arguments for valuation reduction." However, it is not clear from this rule what information or evidence would be "sufficient," nor what types of evidence the CCAO would find compelling in support of a homeowner's argument. Additionally, BOR Rule 14 states that "all parties shall submit a brief as part of their evidence. In the brief it is highly recommended that the Taxpayer provide a Summary of the Characteristics/Description of the Subject; Assessment History including the current Tax Year; the Rationale of the Requested Relief and the Valuation Evidence relied upon for said request including any and all legal arguments and the caselaw and/or statutes relief upon." It is helpful in these recently revised rules that the BOR specifically lists what should be included in the brief, but it is not clear what would satisfy the "rationale of the requested relief" or how an average homeowner would build sufficient legal arguments with citations to caselaw.

Since both offices establish their own rules, they have the opportunity to work together to standardize rules and processes, and make them as clear as possible. Although the CCAO has taken steps to provide additional guidance to appellants,[86] such efforts have not been made by the BOR, and the CCAO's guidance still does not meaningfully clarify the rules that homeowners must follow.

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[84] *Official 2026 Appeal Rules of the Cook County Assessor, supra* note 81; *Board of Review Official Rules, supra* note 35.
[85] *Official 2026 Appeal Rules of the Cook County Assessor*, *supra* note 81 (Rule 1); *Board of Review Official Rules, supra,* note 35. (Rule 2).
[86] *2026 Guidelines for Filing Appeals and Certificates of Error with the Assessor's Office*, Cook Cnty. Assessor's Off. (Mar. 13, 2026), https://prodassets.cookcountyassessoril.gov/s3fs-public/event/2026%20Appeal%20Guidelines%203.13.2026.pdf.

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These Cook County offices have an opportunity to learn from other Illinois counties in their provision of appeal rules. For example, the Champaign County Board of Review's rules are significantly more detailed than the Cook County BOR.[87] These rules explicitly list required documentation for different bases of appeals, outline specific procedures for filing, and go so far as to provide a template to help people organize their evidence for peer comparisons. Such efforts can and should be replicated in Cook County to help homeowners navigate the appeal process and file the best appeal possible. The CCAO has, in partnership with Literacy Works, made an effort to redesign forms, website pages, marketing materials, and guides to be written in plain language.[88] They have also worked to redesign assessment notices and are actively working to redesign several appeal pages on the website. Their efforts in this sphere have been nationally recognized. For example, in 2025, the CCAO was a National Association of Counties (NACo) Achievement Award Winner for their work "explaining the property tax system using plain language and inclusive communications strategies.[89] While there is additional work to be done, this is a meaningful step toward appeal accessibility by the CCAO that should serve as a clear path for the BOR to follow.

[87] *Rules and Procedures*, Champaign Cnty. Bd. of Rev. (2026), https://www.champaigncountyil.gov/BoardofReview/pdfs/2026rules.pdf.
[88] *Assessor's Office Publishes New Commercial Assessment Guide*, Cook Cnty. Assessor's Off. (Aug. 22, 2025), https://www.cookcountyassessoril.gov/news/assessors-office-publishes-new-commercial-assessment-guide.
[89] *Awards and Achievements,* Cook Cnty. Assessor's Off. (last visited Aug. 19, 2026), https://www.cookcountyassessoril.gov/awards.

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4.2 The CCAO and BOR should continue to refine organization of their official rules to increase readability. Short-term

Both the CCAO and BOR currently organize their respective official rules into broad categories (e.g., rules regarding assessed valuation appeals, rules on filing appeals, etc.).[90] Grouping rules like this is helpful for readability and, as such, we recommend keeping and refining this organization so that readers can more quickly identify the part of the document or webpage applicable to their appeal situation. For example, the rules could be regrouped to make clearer which types of evidence are needed and the procedural requirements that apply for the six most common types of appeals: lack of uniformity, market approach, correcting a factual error, special circumstances, condominium or townhome, and recently purchased property.[91]

A good example of this rule organization is in Champaign County, Illinois, where the local BOR includes a section in its official rules titled "basis for appeal," with subcategories for "appeals based upon incorrect assessor data," "appeals based on the recent sale or listing of a property," "appeals based on fair cash value," "appeals based on equity (also known as uniformity)," and "appeals based upon matters of law."[92] In addition to regrouping official rules based on evidence and procedural requirements, the BOR could adopt the CCAO's format, where broad categories of rules (e.g., rules on filing appeals) and specific rule numbers nested therein (e.g., "Rule 5: Appeal Filing General")[93] are bolded and/or underlined, which helps readers skim a text-heavy and often overwhelming document or webpage.

For further guidance and best practices, the CCAO and BOR should refer to existing literature and handbooks on how to make government documents easier to read. For example, 18F, a digital service team within the federal government that operated between 2014 and 2025, published a series of widely used and cited guides designed to improve digital experiences for users of public services.[94]

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[90] *Rules and Procedures*, *supra* note 87.
[91] *See Common Types of Property Tax Appeals,* Impact for Equity https://impactforequity.org/wp-content/uploads/2026/04/IFE_2026-Cook-County-Property-Tax-Appeal-System_Common-Types-of-Property-Tax-Appeals_F.pdf.
[92] *Rules and Procedures*, *supra* note 87.
[93] *Official 2026 Appeal Rules of the Cook County Assessor*, *supra* note 81.
[94] *See e.g., 18F Guides*, GitHub (last visited Jul. 20, 2026), https://github.com/18F/guides; *18F User Experience Design Guide*, Digital Gov. Hub (2023), https://digitalgovernmenthub.org/library/18f-user-experience-design-guide/.

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4.3 The CCAO and BOR should revise their published materials, including official rules and supplementary appeals process explainers, so that these documents are written in plain language with minimal technical or legal jargon. Long-term

CCAO and BOR official appeal rules can be dense and difficult to understand, in part because they are often written in technical jargon and legalese. For example, BOR Rule 18 states the following: "Both the seller's and the buyer's identity must be revealed, as well as any other relationship between them (other than seller and buyer) including, but not limited to, those existing by blood, marriage, corporate parent-subsidiary companies, or by virtue of ownership of non-publicly held stock and whether the transaction was arms-length."[95] This type of language, which is longwinded and riddled with undefined legal terms, makes it difficult for homeowners to understand the appeal process and comply with requirements, even though failure to do so could result in an appeal being denied.[96]

To increase accessibility and compliance, the CCAO and BOR official rules should be written in plain language whenever possible, so a homeowner can understand what appeals require without consulting a lawyer or other property tax expert. Occasionally, however, legal terms of art may be necessary to include in CCAO and BOR official rules. Terms of art are words or phrases within a profession's lexicon that, while typically not recognizable to the general public, are used to convey a very precise meaning. Examples of overt legalese currently used in official rules include "affidavit," "lien date," and "arms-length" transaction.[97] When such technical language is required, it should be clearly defined and, if applicable, accompanied by examples. Plain language and definitions of tax or legal terminology should also be prioritized in all other documents published by the CCAO and BOR, such as supplementary explainer materials. For additional recommendations on supplementary explainer materials, see Section 7.2.

Notably, the CCAO does contract with Literacy Works, a nonprofit specializing in plain language.[98] Past projects have included the revision of assessment notices, several forms, website pages, marketing materials, and guides. For more information on the CCAO's partnership with Literacy Works, see Section 4.1. We recommend the CCAO continue their work toward implementing plain language across all external communications. For example, a future collaboration with Literacy Works or a similar organization could focus on revising the office's official appeal rules to incorporate plain language where possible. However, the CCAO does engage in other efforts to make the official rules more digestible. For example, the office holds an annual appeal rules meeting that explains new rules, policies, and guidelines for the year. This meeting is posted on their website for homeowner review.[99] We recommend that the BOR implement a similar practice.

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[95] *Board of Review Official Rules, supra,* note 35.
[96] *Id.* at Rule 3.
[97] *Board of Review Official Rules, supra,* note 35.
[98] *Assessor's Office Publishes New Commercial Assessment Guide*, *supra* note 88.
[99] *Official Appeal Rules of the Cook County Assessor*, Cook Cnty. Assessor's Off. (last visited Aug. 21, 2026), https://www.cookcountyassessoril.gov/official-appeal-rules-cook-county-assessor.

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As mentioned in Section 4.2, for further guidance on best practices, the CCAO and BOR should refer to existing literature and handbooks on how to make government documents easier to read. For example, 18F, a digital service team within the federal government that operated between 2014 and 2025, published a series of widely used and cited guides designed to improve digital experiences for users of public services, including a content guide.[100]

[100] *See e.g., 18F Guides*, *supra* note 94; *18F User Experience Design Guide*, *supra* note 94.

Section 5. Appeal Review

How appeals are reviewed at the BOR, what evidence is compelling, and whether there is a standard evaluation process that each analyst follows is unclear from publicly available information. This makes successfully appealing a property tax assessment significantly harder, especially when it is difficult to get in touch with staff to ask clarifying questions. The appeal review process itself should be standardized so all analysts follow the same review process, and the evaluation methods should be public so homeowners know what to expect and what materials to submit. To ensure appeal reviews are standard and that homeowners can get assistance as needed, the CCAO and BOR should also be fully staffed with analysts, and those analysts should both attend appeal hearings and be available to homeowners going through the appeal process.

5.1 THE BOR SHOULD TAKE MEASURES TO STRENGTHEN ITS APPEAL APPLICATION REVIEW PROCESS (E.G., OBJECTIVE STANDARD OF REVIEW, ANALYSTS NEED TO BE ABLE TO DEFEND THEIR ANALYSIS, ETC.). THE BOR SHOULD ALSO PUBLISH THEIR METHODS FOR EVALUATING APPEALS, ANY STANDARDS IN PLACE, AND DISCLOSE WHAT INFORMATION THEY FIND "COMPELLING". **34**

5.2 THE BOR SHOULD INCREASE THE QUANTITY AND QUALITY OF COMMUNICATIONS WITH PEOPLE WHO HAVE ACTIVE APPEALS WITH THE OFFICE. **35**

5.3 THE CCAO AND BOR SHOULD HIRE ADDITIONAL ANALYSTS TO ENSURE EACH OFFICE IS SUFFICIENTLY STAFFED AND CAN CONDUCT CAREFUL REVIEWS OF ALL APPEALS. **36**

5.4 THE CCAO AND BOR SHOULD ESTABLISH CONSISTENT COMMUNICATION BETWEEN ANALYSTS REGARDING RESIDENTIAL APPEAL DETERMINATIONS, EITHER VIA CCAO ATTENDANCE AT A SMALL NUMBER OF BOR RESIDENTIAL HEARINGS OR MEETINGS BETWEEN OFFICES. **37**

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5.1 The BOR should take action to strengthen its appeal application review process (e.g., objective standard of review, analysts need to be able to defend their analysis, etc.). The BOR should also publish their methods for evaluating appeals, any standards in place, and disclose what information they find "compelling". Short-term Long-term

In speaking with attorneys who have practiced in front of the BOR and former BOR staff, we have been able to put together some pieces of the office's appeal review process. We have heard that three analysts review each appeal and the first analyst generally sets the tone. Anecdotally, this means the subsequent analyst reviews are unlikely to contradict the first analyst's determination. Additionally, while BOR analysts undergo comprehensive training and start out by "shadowing" more experienced analysts, there is no documented formal internal process for analysts to follow when reviewing an appeal. This means that, aside from what the official rules provide, analysts are not consistently reviewing appeals in the same way.

In the analysis of commercial valuation practices in Cook County done in 2024, the authors noted "a lack of documentation of what the review process consisted of and particulars on how common subjective issues were handled" at the BOR.[101] Various interviews by the authors demonstrated that even CCAO staff do not understand what processes are used by BOR analysts. Without official documented standards and processes for internal and external review, there could be inconsistencies between different analysts for the same appeal review, and homeowners have no insight into how subjective aspects of their appeal will be handled.

While the BOR is working on a board-wide training for uniformity appeals, appeal review is case-by-case, subject to the evidence provided, and not one-size-fits-all.[102] Creating a standard approach to appeal review could be helpful as it would ensure all analysts take the same initial steps in considering an appeal. Although a rigid checklist intended to encompass all appeals is unlikely to be beneficial, some documentation of the processes for review and a standard that analysts are held to would help homeowners better understand how appeals are considered and would ensure a baseline level of objectivity.

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[101] Joshua Myers, David Cornell, & Rick Rape, *Analysis of Commercial Valuation Practice in the Cook County Property Tax System*, Josh Myers Valuation Sols. 1, 34 (Dec. 11, 2024), https://www.cookcountyil.gov/sites/g/files/ywwepo161/files/documents/2024-12/12.11.2024%20-%20%20Commercial%20Valuation%20Cook%20County%20Study.pdf?utm_medium=email&utm_source=govdelivery.

[102] This information was obtained through conversation with the BOR.

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5.2 The BOR should increase the quantity and quality of communications with people who have active appeals with the office. Short-term

In their guidelines for filing appeals, the CCAO states that their staff stand ready to assist taxpayers and their representatives with inquiries to the office.[103] The CCAO's appeal guide also explains how to make an appointment at a branch office for in-person assistance, encourages contact by phone, email, or social media if homeowners have questions, and uplifts the in-person and virtual workshops that the office frequently hosts.[104] However, the BOR does not provide the same support to homeowners. Guides provided by the BOR are limited to navigating the online portal for filing an appeal, or materials targeted toward attorneys.[105] While the BOR website does offer information on how to present a case, such guidance is limited in detail and often directs homeowners to view an outreach events calendar.[106]

Additionally, final appeal decision letters from the BOR contain valuations and a brief description of why the appeal was or was not successful, but they do not go into detail. Even if the appeal was successful, the letter only states that the BOR has directed the CCAO to reduce the assessed value of the property and documents the BOR final assessed valuation. It provides no additional information regarding why the appeal was successful and goes on to explain what homeowners may do if they are dissatisfied with the assessment. If unsuccessful, the letter merely states that the BOR has determined that a change in assessed valuation is not warranted.

The most frequent change or no change description offered by the BOR is "analysis of comparable properties, a recent sale, and/or an update of property characteristics."[107] This description does not explain what differed, if anything, between their comparable property search and the homeowner's, nor what recent sale information or updated property characteristics meant for the valuation of the property. Additional detail in decision letters and more frequent communication from the office could help homeowners bring more successful appeals when warranted, or help explain whether they should be filing an appeal at all. The BOR's online appeal system, however, does provide homeowners with the opportunity to review additional details about their appeal. If homeowners create an account through the online system, they have access to analysts' notes and documentation reviewed when considering the appeal, and homeowners can review various tax years for as long as they have had the account.

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[103] *2026 Guidelines for Filing Appeals and Certificates of Error with the Assessor's Office*, *supra* note 86.
[104] *A Guide to Understanding Property Assessment Appeals for Residential Properties*, Cook Cnty. Assessor's Off., https://prodassets.cookcountyassessoril.gov/s3fs-public/event/Brochure_Appeals_2024_EN.pdf.
[105] *Guides*, Cook Cnty. Ill. Bd. of Rev., https://www.cookcountyboardofreview.com/what-we-do/guides.
[106] *Upcoming Events*, *supra* note 75.
[107] *Board of Review Appeal Decision History*, Cook Cnty. Gov. Open Data, https://datacatalog.cookcountyil.gov/Property-Taxation/Board-of-Review-Appeal-Decision-History/7pny-nedm/data_preview.

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5.3 The CCAO and BOR should hire additional analysts to ensure each office is sufficiently staffed and can conduct careful reviews of all appeals. Long-term

As mentioned in Section 1.1, the CCAO and BOR do not post the names, contact information, or job titles of staff (with some exceptions for executive leadership), nor does either office publish a detailed organization chart. As a result, it is unclear the exact number of staff currently employed by each office, as well as the specific number of analysts reviewing appeals. However, what information we do have suggests that both the CCAO and BOR are currently understaffed.

In his Fiscal Year 2025 budget remarks to the Cook County Board, Assessor Fritz Kaegi noted that the CCAO has fewer full-time employees per parcel of property compared to similarly sized jurisdictions across the country.[108] Additionally, a 2019 audit found that CCAO was at one fourth of its recommended staffing levels.[109] Since then, the CCAO has added many employees, but it is has only barely reached the minimum number of residential valuation staff necessary to meet IAAO standards, based on property data and number of parcels in the county from 2019.[110] Additionally, anecdotal information indicates that BOR appeals analysts are responsible for reviewing between 50 and 80 appeals each day, which requires analysts to spend only five to ten minutes on each case. This quick turnaround period has, in the past, led to instances where crucial evidence was not caught until multiple analysts had conducted individual reviews of the same case. In 2025, for the 2024 tax year, the BOR processed over 273,000 appeals.[111] In the same year, the BOR had 95 full-time employees conducting desk reviews, oral hearings, outreach, and taxpayer services.[112] While the BOR increased this amount of employees to 102 in 2026,[113] there may be even more appeals to review this year.

Hiring more staff at both offices would increase capacity, reduce individual employee workloads, and minimize the likelihood of appeal review errors due to quick turnaround times. Notably, current budget constraints may make it difficult or infeasible for the CCAO and BOR to hire staff at the scale needed in the short-term. Indeed, this recommendation would likely require increased funding to both offices. However, we believe it is crucial in the long-term for creating a more equitable and accurate property tax system.

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[108] Cook County Assessor, *Cook County Board FY2025 Budget Remarks*, Medium (Nov. 6, 2024), https://medium.com/@AssessorCook/cook-county-board-fy2025-budget-remarks-552cad2a22bf.
[109] *Practices and Procedures Audit of the Cook County, Illinois Assessor's Office*, *supra* note 49, at 8.
[110] *Id.*; *Fiscal Year 2026 Annual Appropriation Bill, Volume 2 Department Line Item*, President of the Cook County Bd. of Commissioners I, H-9, H-10 (2026), https://www.cookcountyil.gov/sites/g/files/ywwepo161/files/documents/2026-01/Volume%202%20%20Adopted%202026_Website.pdf.
[111] *Cook County Board of Review Annual Report, Assessment Year 2024, Fiscal Year 2025*, *supra* note 76.
[112] *Fiscal Year 2026 Annual Appropriation Bill, Volume 2 Department Line Item*, *supra* note 110, at I-3.
[113] *Id.*

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5.4 The CCAO and BOR should establish consistent communication between analysts regarding appeal determinations, either via CCAO attendance at a small number of BOR residential hearings or meetings between offices.

Long-term

Hearings in front of the BOR provide taxpayers the opportunity to discuss their appeal directly with a BOR analyst. Hearings can be particularly helpful in complex cases where a property's unique circumstance cannot be easily conveyed via the written appeal application. However, while all taxpayers have a right to request a BOR hearing, they are not required, and many appeals are determined without a hearing.[114] Currently in Cook County, analysts from the Assessor's Office *may* opt to join a BOR hearing but are not required to do so.[115]

Given the volume of appeals filed at the BOR,[116] it is unlikely that the CCAO would be able to attend every hearing at the BOR, as this would require a significant increase in staff. This means that the CCAO has to prioritize which hearings the office's intervention team (i.e., appeals defense team) will attend. Generally, the intervention team appears at hearings for appeals of high-value commercial properties. Commercial properties are typically higher value and receive larger (absolute and proportional) reductions on appeals, which can shift the tax burden from commercial properties to residential.[117] For more information on burden-shifting, see the Property Tax Background section above.

For example, during the 2025 appeals cycle, the CCAO appeared in front of the BOR 14 times to defend their assessments of large commercial properties. In four of those cases, the BOR agreed with the CCAO's assessment and did not grant the property owner's requested reduction (which ranged from 24% to 90%). In another four of these cases, property owners received assessment reductions of less than 25%. By maintaining assessments or minimizing reductions where warranted, the outcomes of these eight cases—and the collaboration between the CCAO and BOR that these cases represent—helped preserve the property tax base in the area and reduce burden shifting to homeowners.[118]

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[114] *Residential Hearings*, Cook Cnty. Ill. Bd. of Rev., https://www.cookcountyboardofreview.com/residential-hearings.
[115] *Board of Review Official Rules, supra,* note 35. (Rule 11).
[116] *Cook County Board of Review Commissioner Larry Rodgers, Jr. Helps Homeowners Understand the Property Tax Appeals Process on WFLD's Good Day Chicago*, Cook Cnty. Ill. Bd. of Rev., https://www.cookcountyboardofreview.com/news/cook-county-board-review-commissioner-larry-rogers-jr-helps-homeowners-understand-property-tax. ("For tax year 2025, the BOR processed a record 290,533 appeals.").
[117] *See Chicago Homeowners See Tax Burden Increase After Appeals Conclude*, Cook Cnty. Assessor's Off. (May 20, 2025), https://www.cookcountyassessoril.gov/news/chicago-homeowners-see-tax-burden-increase-after-appeals-conclude.
[118] *Assessor's Office Defends Higher Data Center Assessments at Appeal Hearings*, Cook Cnty. Assessor's Off. (Jul. 24, 2026), https://www.cookcountyassessoril.gov/news/assessors-office-defends-higher-data-center-assessments-appeal-hearings.

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The CCAO's focus on commercial property hearings makes sense given (1) the way commercial property appeals can result in burden shifting, and (2) that, in the aggregate, the BOR adjusts the CCAO's residential valuations very little, with total reductions of 2% or less annually.[119] However, it may be useful for the interventions team to attend a small number of residential hearings, while still maintaining a focus on hearings for commercial properties. The reason for this is that when a CCAO analyst does not join a BOR hearing, that means both homeowners and BOR analysts may lack valuable insights into CCAO analysis around initial property valuation and/or appeals determination (if the taxpayer appealed first to the CCAO).

Conversations between CCAO and BOR analysts at residential hearings could provide valuable insight into each office's methodology, which is especially important given that the BOR and CCAO currently do not share databases or appeals related documentation across the board (although, commendably, the offices have implemented data-sharing regarding commercial properties).[120] Additionally, communication between offices during the hearing could increase the accuracy and credibility of appeal determinations. For example, when a CCAO analyst shares at a residential hearing their rationale for either a property's valuation or a CCAO appeal determination, that becomes an opportunity for the BOR analyst to check their own understanding and/or approach to the appeal.

The CCAO and BOR analysts may not ultimately agree on an appeal determination post-hearing, but the system's credibility is enhanced because the BOR's decision was made after discussing methodology and rationale with the CCAO. This consultation allows both offices the opportunity to learn from each other and gather more information, which has the potential to increase the accuracy and fairness of appeals determinations. That said, the BOR is an independent agency, separate from the CCAO, charged with reviewing and correcting assessments.[121] The BOR serves as a check on the CCAO and the property tax system and, thus, must be able to make its own determinations about appeals given the evidence provided.

As Section 6 of this report outlines in greater detail, a central goal of property tax appeal reform is to increase communications between the CCAO and BOR. Having the CCAO attend a small number of BOR hearings is one step, or one way, to achieve this goal, but it is not the only option. An addition or alternative to the above recommendation around hearing attendance is for the CCAO and BOR to establish regular meetings to review and discuss residential valuations and appeal decisions. This would allow both offices to share information about methodology and analysis, and it could increase understanding between the two offices outside of a hearing environment.

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[119] *See Data Dashboard: Townships*, Cook Cnty. Assessor's Off. (last visited Aug. 20, 2026), https://www.cookcountyassessoril.gov/data-dashboard-townships; *How assessments and appeals in your community affect property tax bills*, Cook Cnty. Assessor's Off. (last visited Aug. 20, 2026), https://www.cookcountyassessoril.gov/news/how-assessments-and-appeals-your-community-affected-property-tax-bills.

[120] *Property Tax Appeal Toolkit*, *supra* note 30. Additional information was obtained through conversation with the BOR.

[121] *Cook County Board of Review Annual Report, Assessment Year 2024, Fiscal Year 2025*, *supra* note 76.

Section 6. Communication Between the CCAO and BOR

In order for the property tax appeal system to run smoothly, communication between the primary county offices involved, the CCAO and BOR, is essential. However, as this section details, these offices do not frequently share information. This lack of communication means that appeal processes are unnecessarily redundant, especially for homeowners. The following recommendation outlines how the CCAO and BOR could increase communications and streamline the appeal process.

6.1 THE CCAO AND BOR SHOULD ESTABLISH OPEN LINES OF COMMUNICATION AND SHARE INFORMATION ON ASSESSMENTS AND APPEALS. **40**

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6.1 The CCAO and BOR should establish open lines of communication and share information on assessments and appeals. Short-term

The CCAO and BOR do not often share appeals information,[122] aside from, when available, the CCAO passes along an appeal worksheet to the BOR that includes certain historical assessment data, valuation calculations, and documentation of the evidence relied upon to reach certain valuation conclusions. When a homeowner appeals to the CCAO before appealing to the BOR, the BOR does not receive copies of the evidence originally submitted to the CCAO, nor does the office receive a detailed explanation of the CCAO's appeal determination. This means that if a homeowner appeals twice—once to the CCAO and then to the BOR—they must also submit essentially the same evidence twice because both offices ask for the same or very similar documentation for each appeal type.[123] For example, when homeowners appeal based on lack of uniformity or market approach, the CCAO and BOR request comparable properties as evidence, and for appeals of a recently purchased property, both offices look for purchase and sale documents.[124] The lack of information sharing between offices means that if the BOR is appealed to after the CCAO, then the BOR is not privy to relevant data on the lifecycle of the appeal—for example, why the CCAO made the appeal determination that it did.

CCAO and BOR information sharing would help streamline the appeal process. For example, the CCAO and BOR could collaborate on a system where, when a homeowner appeals to the BOR after appealing to the CCAO, the CCAO automatically shares the homeowner's application material with the BOR. This would allow the BOR to review the homeowner's previously submitted evidence to identify whether it met their evidence requirements and identify any additional documentation needed. In this way, the appellant would avoid having to submit the same documentation multiple times, which can be burdensome and time consuming, in addition to feeling redundant, which may decrease taxpayer satisfaction with and perception of both the CCAO and BOR.

[122] *A Broken Property Tax Appeal System, supra* note 12, at 25; Myers, Cornell, & Rape, *supra* note 101, at 34-35.
[123] *Property Tax Appeal Toolkit*, *supra* note 30.
[124] *Id.*

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Additionally, information sharing has the potential to increase the quality of appeals decisions in both offices. While the CCAO and BOR under the current system generally do not provide detailed explanations about appeal determinations, they do sometimes provide brief explanations regarding how an appeal determination was reached.[125] These explanations, even when sparse, might provide insight for the BOR regarding the methodology and logical reasoning used by the CCAO. So too, these explanations could illustrate different ways of approaching the same appeal and thus work to ensure that a homeowner receives a second appeal determination that is well-informed and explored via multiple angles. This would be especially true if the CCAO and BOR provided more detail in appeal determination letters than either office currently does, as a way for each office to show their work and also defend the logic of their determination.

Following the BOR's certification of a township the CCAO does have access to BOR complaints on a rolling basis, and the BOR can access to the CCAO's initial assessment worksheets posted to their website, but this does not necessarily result in increased communication around appeals. Although the offices do meet with some consistency to discuss appeal schedules and valuation methodology, this is primarily in regard to commercial valuation and there could be benefits to expanding these meetings to include discussions of residential valuations and appeals. Informally, there may be communication between each office's analytical and legal teams, but formalizing a structure in which residential valuation methodology and appeals are discussed on a regular basis could improve the quality and consistency of communication between the offices.

[125] For additional information about appeal decision letters, *see* discussion *supra* Section 5.2.

Part 7: Public Transparency

The history of property taxes in Cook County includes controversy, scandal, and uncertainty. From county staff accepting bribes to the intentional undervaluation of certain properties, the public—who rely on the property tax system to tax them fairly and fund government services—has been the last to know about the inner workings of each office. Although steps have been taken in the last few years to improve access to information, the property tax system still lacks clarity and defenses against conflicts of interest. To improve transparency, the CCAO and BOR should ensure elected officials cannot take donations that create conflicts of interest, write and execute strategic plans mapping out a pathway forward and documenting changes, adopt and implement policies that prevent further racial disparities in property taxes, and publish clear explanatory materials to help everyone navigate the system regardless of their previous familiarity with it.

7.1 THE CCAO AND BOR SHOULD ADOPT OR EXTEND OFFICE POLICIES BANNING ELECTED OFFICIALS FROM TAKING DONATIONS FROM PROPERTY TAX APPEAL ATTORNEYS. **43**

7.2 THE CCAO AND BOR SHOULD INCREASE THE QUANTITY AND QUALITY OF SUPPLEMENTAL MATERIALS EXPLAINING THE APPEALS PROCESS. **45**

7.3 THE CCAO AND BOR SHOULD ADOPT AND PUBLISH COMPREHENSIVE STRATEGIC PLANS. **46**

7.4 THE CCAO AND BOR SHOULD ADOPT POLICIES TO SAFEGUARD AGAINST RACIAL DISPARITIES IN ASSESSMENTS AND APPEALS. **47**

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7.1 The CCAO and BOR should adopt or extend office policies banning elected officials from taking donations from property tax appeal attorneys. Short-term

During his 2018 campaign for Cook County Assessor, Fritz Kaegi pledged not to take contributions from tax attorneys who appear before the CCAO, appraisers assessing the market value of properties, and appeal consultants.[126] Kaegi went on to win his election and in 2019, the CCAO under Kaegi employed a series of reforms that included ending the practice of accepting donations from tax appeal lawyers.[127] These reforms have generally been viewed as successful.[128]

In particular, the ban on accepting donations from tax appeal lawyers has been an important step towards building and maintaining public trust in the tax system, given past corruption concerns. Notably, a 2017 investigation by the *Chicago Tribune* and *ProPublica Illinois* found that Kaegi's predecessor implemented valuation practices that benefited the property tax appeal industry—an industry that had provided the majority of his campaign contributions.[129] Additionally, a former CCAO employee was recently sentenced to 18 months of probation for helping to lower taxes on certain properties in exchange for personal benefits dating back to the tenure of the former Assessor.[130]

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[126] Hal Dardick & Ray Long, *Cook County tax officials take excess campaign donations from appeals firms, ethics panel says*, Chi. Trib. (June 14, 2024, 6:41 PM), https://www.chicagotribune.com/2018/04/13/cook-county-tax-officials-take-excess-campaign-donations-from-appeals-firms-ethics-panel-says/.

[127] *Executive Order 2019-01*, Off. Cook Cnty. Assessor Frederick "Fritz" Kaegi (Feb. 11, 2019), https://prodassets.cookcountyassessoril.gov/s3fs-public/page_comm/ExecutiveOrder.pdf; Kristina Kim, *The Role of the Cook County Assessor in Mitigating and Correcting a Long History of Housing and Property Tax Inequity, in* Chicago Through a Policy Lens 21, 26 (Aug. 28, 2023), https://harris.uchicago.edu/files/inline-files/Chapter%202%2C%20Kristina%20Kim.pdf.

[128] Press Release, Cook Cnty. Assessor's Off., Federal Oversight of Cook County Assessor's Office Ends Under Assessor Fritz Kaegi (Nov. 1, 2022), https://content.govdelivery.com/accounts/ILCOOK/bulletins/3358ac0; The Editorial Board, *Editorial: Fritz Kaegi for Cook County Assessor*, Chi. Trib. (Feb. 7, 2026, 5:00 AM), https://www.chicagotribune.com/2026/02/07/editorial-fritz-kaegi-cook-county-assessor-endorsement-patrick-hynes/.

[129] Jason Grotto & Sandhya Kambhampati, *How the Cook County Assessor Failed Taxpayers*, ProPublica & Chi. Trib. (Dec. 7, 2017), https://features.propublica.org/the-tax-divide/cook-county-commercial-and-industrial-property-tax-assessments/.

[130] Jon Seidel & Mary Norkol, Ex-assessor's office employee avoids prison after cooperating with feds in bribery probe, Chi. Sun-Times (Aug. 13, 2026,, 6::44 PM), https://chicago.suntimes.com/crime/2026/08/13/cook-county-assessor-crime-lavdim-memisovski.

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Both the CCAO and BOR are subject to the Cook County Ethics Ordinance, which does, to an extent, prohibit the use of the offices for personal gain.[131] However, the BOR has not separately implemented a ban on donations from tax appeal lawyers, despite similar concerns as the CCAO around conflicts of interest. In 2021, the FBI investigated BOR employees for the practice of taking bribes in exchange for reducing property valuations (and the BOR also conducted an internal investigation regarding the allegations).[132] The Chicago Tribune reported in 2024 that a BOR Commissioner raised most of his campaign cash from property tax interests and others who have done business before the BOR.[133] Over the course of 10 years, the Commissioner collected over $800,000 in campaign funds from property tax attorneys.[134]

While the Cook County Ethics Ordinance does prohibit employees and officials from accepting gifts from any person or entity that has interests which may be substantially affected by the performance or nonperformance of the official duties of an official or employee, it does not prohibit campaign contributions from those persons or entities.[135]

With a new Cook County Assessor and BOR Commissioner scheduled to take office in December, and in light of the BOR having never adopted a policy of refusing donations from property tax interests and attorneys doing business before the BOR, both offices should adopt or extend a thorough policy prohibiting such conflicts of interest. Such policies would help both offices (1) avoid the appearance or reality of a conflict of interest and "pay to play" system, and (2) increase decision-making autonomy, thus enabling both offices to more easily implement reforms that create a fairer system, even when such policies may not be popular with the tax appeal industry.

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[131] Cook County, Ill. Code of Ordinances ch. 2, Art. 7.

[132] Jon Seidel, *Bribes for Tax Breaks: FBI investigating Board of Review employee who allegedly offered to lower property assessments for cash*, Chi. Sun-Times (Jul. 12, 2021, 8:15 PM), https://chicago.suntimes.com/crime/2021/7/12/22574718/fbi-investigates-cook-county-board-review-employee-allegedly-offer-lower-property-assessments-bribes.

[133] A.D. Quig, *County property tax official running for sixth term rakes in cash from appeals industry*, Chi. Trib. (Feb. 15, 2024, 5:00 AM), https://www.chicagotribune.com/2024/02/15/tax-official-rakes-in-cash-from-appeals-industry/.

[134] *Id.*

[135] Cook County, Ill. Code of Ordinances ch. 2, §§ 2-562, 2-574, 2-585.

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7.2 The CCAO and BOR should increase the quantity and quality of supplemental materials explaining the appeals process. Long-term

Both the property tax appeal system and the official rules outlining the appeal process are complex, often cumbersome, and thus difficult for the general public to navigate without aid. To relieve the burden on potential appellants, the CCAO and BOR should publish and regularly update comprehensive and accessible supplemental materials. These documents should explain in plain language (and in multiple languages) how the property tax system works, the appeals process, exemptions and certificates of error, common types of appeals, evidence required for each appeal type, and any other explainers that would help the public better understand how the CCAO and BOR operate. The CCAO and BOR currently publish some supplemental materials,[136] however, much of the available information on appeals are found only by a thorough reading of the official rules for both offices, which, as discussed above, can be difficult to understand. For more information on the official appeal rules, see Section 4.

In contrast, other Illinois counties provide detailed system explainers in addition to their official rules. For example, McHenry County's "How to File a Complaint" explainer provides centralized guidance on appeals-related paperwork and procedures, definitions of relevant concepts, information on hearings and final decisions, advice on whether or not to hire an attorney, and more.[137] Similarly, Will County publishes a comprehensive guide to residential appeals that walks readers through filling out the appeal form, provides explanatory visuals of the application, highlights reminders or warnings on parts of the appeal process that are particularly challenging to navigate, advises on evidence needed, and more.[138] Additionally, Winnebago County publishes a checklist homeowners can follow to successfully file a complaint,[139] and the Madison County Board of Review dedicates a page on their website to the types of evidence required when filing an appeal.[140] These types of comprehensive or step-by-step "how-to" documents, coupled with short form explainers, help provide homeowners with the information they need to file an appeal without confusion or overwhelm, and reduce the risk of application mistakes, which helps streamline analyst review at the CCAO and BOR.

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[136] *Overview of How Appeals Work*, *supra* note 21; *Guides*, *supra* note 102.
[137] *How to File a Complaint for 2026*, McHenry Cnty., https://www.mchenrycountyil.gov/home/showpublisheddocument/120072/638877342788730000.
[138] *Residential Appeals – A Helpful Guide,* Will Cnty. Supervisor of Assessments, https://willcountysoa.com/Content/pdf/2022_ResidentialAppealInstructionsAndFAQs.pdf.
[139] *Complaint Form Checklist Before Filing,* Winnebago Cnty. Bd. of Rev., https://wincoil.gov/images/departments/Supervisor_of_Assesments/Documents/PDFs/board_of_review/Forms/2025/2025_Complaint_Packet_Fillable.pdf.
[140] *Types of Evidence,* Madison Cnty. Il., https://www.madisoncountyil.gov/departments/board_of_review/types_of_evidence.php.

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7.3 The CCAO and BOR should adopt and publish comprehensive strategic plans. Long-term

In recent years, the CCAO and BOR have published annual reports with some consistency,[141] and in 2024, the Assessor's Office made public materials summarizing its strategic plan.[142] However, neither the CCAO nor BOR have current, comprehensive, multi-year strategic plans on their websites. This absence may work to the detriment of both offices. Publicly available strategic plans can be hugely helpful as a roadmap for achieving long-term organizational goals; for supporting arguments around a need for increased resources (e.g., staff or funding); and for building stakeholder engagement and substantive understanding, thus potentially garnering support for future reforms.

For example, the Assessor's Office in Maricopa County, Arizona has recently earned state and national recognition for workplace culture, development, and innovation.[143] These accomplishments come on the heels of a comprehensive, multi-year, publicly available strategic plan from the Maricopa County Assessor's Office, detailing goals for customer experience, digital literacy, process development and improvements, proactive workload management, culture development, and team development and collaboration.[144]

In 2017, the Cook County offices, including the CCAO and BOR, came together as members of a steering committee working with the Civic Consulting Alliance and agreed on "four goals that the County's end-to-end assessment process must meet."[145] These goals included uniformity of assessment, timeliness of assessment and property tax bills, compliance with regulatory framework, and transparency of the process.[146] Although not a strategic plan per se, such collective goal setting and the extended time spent on evaluating and working toward the goals demonstrated an interest in continued improvement and facilitated joint solutions to system-specific issues. While strategic plans do not guarantee success or accountability, they do help construct the type of solid organizational infrastructure that can withstand change, which is inevitable in offices such as the CCAO and BOR, where leadership cycles depend on election results.

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[141] *Annual Reports,* Cook Cnty. Assessor's Off., https://www.cookcountyassessoril.gov/annual-reports; *Annual Reports*, Cook Cnty. Ill. Bd. of Rev., https://www.cookcountyboardofreview.com/annual-reports.
[142] *Cook County Assessor's Office Strategic Plan,* Cook Cnty. Assessor's Off., https://prodassets.cookcountyassessoril.gov/s3fs-public/form_documents/2024%20Strategic%20Plan%20slides_CCAO.pdf.
[143] *News*, Maricopa Cnty. Assessor's Off., https://mcassessor.maricopa.gov/news/?page=0&c_year=2026.
[144] *Strategic Plan*, Maricopa Cnty. Assessor's Off., https://www.mcassessorstrategicplan.com/.
[145] *Residential Property Assessment in Cook County, Summary of Analytical Findings*, Civic Consulting Alliance 1, 8 (Feb. 2019), https://prodassets.cookcountyassessoril.gov/s3fs-public/reports/CivicConsultingAllianceStudyResults.pdf.
[146] *Id.*

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7.4 The CCAO and BOR should adopt policies to safeguard against racial disparities in assessments and appeals. Long-term

A study in Indianapolis, Indiana found that discrimination by assessors may lead to differential appeals outcomes between minority (Black and Hispanic) and non-minority populations.[147] Through a field experiment with appeal applications, the authors found that while non-minorities tend to win reductions more frequently than minorities when appealing, there are "minimal differences" in the quality of evidence provided in their applications.[148] They noted that "[i]f anything," they would expect greater success from minority populations because they provided slightly less risky evidence. Because of this, the authors concluded that both perceived and actual discrimination likely plays a role in the racial gap with appeal success.[149] In a complementary experiment, the authors posed as homeowners and emailed assessors in 410 counties across five states. These emails consisted of identical requests for information, save for names which signaled racial differences. The study found that assessors responded at lower rates to Black homeowners than to White homeowners.[150]

Although this was not a study investigating the existence of racial discrimination in Cook County's property tax appeal process, it should still be safeguarded against. Studies have shown that in Cook County, property owners from majority-Black and -Latiné neighborhoods are significantly less likely to appeal assessments than owners from White neighborhoods, even when accounting for income.[151] Successful appeals by homeowners from Black and Latiné neighborhoods also result in smaller decreases in assessed value when compared to successful appeals by homeowners from White neighborhoods.[152] Cook County is a diverse community that sees hundreds of thousands of appeals each year from homeowners of all races and income-levels. Knowing that perceived and actual discrimination are present in property tax appeals in other major cities, the CCAO and BOR should adopt policies to help safeguard against such discrimination in Cook County. These policies could consist of staff trainings or protocols that limit personal discretion by assessors or analysts which may be skewed by racial bias.

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[147] Justin Holz, David Novgorodsky, & Andrew Simon, *Racial Inequality in Property Tax Appeals: Evidence from Field Experiments with Homeowners and Assessors* (July, 2024), https://wwws.law.northwestern.edu/research-faculty/events/colloquium/law-economics/documents/racial-inequality-holz.pdf.

[148] *Id.* at 30.

[149] *Id.* at 2, 30.

[150] *Id.* at 35-36. The authors picked first names to signal race and gender and, for each email, observed whether the assessor responded to the fictitious homeowner and the content of the response, if any.

[151] *A Broken Property Tax Appeal System, supra* note 12, at 3.

[152] *Id.* at 19.

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7.5 The CCAO and BOR should implement policies to safeguard against racial disparities. Long-term

Adopting policies to combat racial discrimination in property tax appeals is merely one piece of making the system more equitable. Any policy adopted by the CCAO or BOR must also be implemented, evaluated over time, and adjusted for efficacy.

Although many policies could be adopted to help address racial disparities in property tax appeals, reform could also include initiating a study of the Cook County property tax appeal system to analyze where and why any racial disparities exist and begin devising a long-term strategy to evaluate and make changes in each office.

The CCAO has already taken steps in this direction by launching a series entitled Racial Equity and Real Estate Conversations.[153] The series is free, open to the public, and convenes industry experts such as academics, authors, real estate professionals, historians, and public officials to discuss housing, real estate, and racial equity. To date, the series has included conversations about affordable housing and advocacy in Chicago's AAPI (Asian American and Pacific Islander) community, empowering Latiné homeowners and building generational wealth, the "Black Tax" and America's history of racist and predatory real estate practices, and how local government can address inequities in American homeownership. While not a specific evaluation of the CCAO itself, this series is an investigation into racial discrimination in property taxes and housing, and it does consider what changes could be made.

[153] *Racial Equity and Real Estate Conversations,* Cook Cnty. Assessor's Off., https://www.cookcountyassessoril.gov/racial-equity-and-real-estate-conversations.

Implementation and Next Steps

As stated in the introduction to this document, the recommendations outlined above vary in scale of reform, and ease and timeframe of implementation. Each recommendation responds to a specific evidence-backed concern with the current property tax system and, as a result, we believe that each recommendation is a step toward creating a more equitable assessment and appeal process. However, we recognize that reform is a long road subject to real constraints, and, with that in mind, these recommendations are presented as a menu of options for stakeholders to choose from and prioritize.

We also recognize that these reforms cannot and should not be read outside the context of the existing property tax system. Current and future CCAO and BOR administrations have and will inherit a legacy of systemic inequities, including past corruption scandals at both offices, and socioeconomic and racial disparities in housing generally. We recognize both that this is a challenging system to inherit and that work has already been done to make assessments and appeals more just.

We believe there is still work to be done and welcome collaboration with the CCAO and BOR, in partnership with property tax experts across Cook County, in implementing the reforms outlined in this report. In the coming months, both leading up to and following the change in CCAO and BOR leadership, Impact for Equity hopes to meet with the relevant county offices and other stakeholders to advocate for and discuss next steps to implementation.

If you are interested in becoming involved in this work, please reach out to Mallory Verez (mverez@impactforequity.org) and Simone Montgomery (smontgomery@impactforequity.org).

Appendix

Table 1: Summary of Policy Recommendations

Accessibility	**1.1** CCAO and BOR staff, especially analysts, should be more accessible to the general public to answer questions regarding the property tax system.
	1.2 The CCAO and BOR should provide appeals-related forms in common languages other than English, and should provide access to interpreters and translators for less common languages.
	1.3 The CCAO and BOR should upgrade their online appeal systems to be mobile-friendly for accessibility and ease of use, and so that submitting a successful appeal does not require access to a desktop computer or printer.
	1.4 The CCAO and BOR should reduce evidentiary barriers in appeals applications.
Data and Assessments	**2.1** Because the CCAO uses algorithmic peer comparisons in assessments and appeals, it should maintain consistent analyst review of all model values and ensure property characteristics are reviewed, as well.
	2.2 During the appeals process, the CCAO and BOR should consider the systemic over-assessment of entire neighborhoods.
	2.3 The CCAO should be given improved access to data so that it may continue improving the algorithm and machine learning model of assessments to include factors like property conditions and interior features.
Outreach	**3.1** The CCAO and BOR should increase public education efforts around when homeowners should appeal.
	3.2 The CCAO and BOR should revise their online webinars to cater toward homeowners who are appealing not only via paper applications, but also online.
	3.3 The CCAO and BOR should continue to expand outreach efforts—prioritizing outreach in communities that have less access to, knowledge of, and resources related to the appeals process.
	3.4 The CCAO and BOR should establish regular local methods of filing appeals in-person to reduce barriers to filing.
	3.5 The CCAO should hold office hours and regular townhalls to give potential appellants the opportunity to discuss their valuation and address errors in their property's record before or in lieu of filing a formal appeal.
Official Rules	**4.1** The CCAO and BOR should revise their official appeal rules to reduce subjectivity and vagueness.
	4.2 The CCAO and BOR should continue to refine organization of their official rules to increase readability.
	4.3 The CCAO and BOR should revise their published materials, including official rules and supplementary appeals process explainers, so that these documents are written in plain language with minimal technical or legal jargon.

Appeal Review	**5.1** The BOR should take measures to strengthen its appeal application review process (e.g., objective standard of review, analysts need to be able to defend their analysis, etc.). The BOR should also publish their methods for evaluating appeals, any standards in place, and disclose what information they find "compelling".
	5.2 The BOR should increase the quantity and quality of communications with people who have active appeals with the office.
	5.3 The CCAO and BOR should hire additional analysts to ensure each office is sufficiently staffed and can conduct careful reviews of all appeals.
	5.4 The CCAO and BOR should establish consistent communication between analysts regarding residential appeal determinations, either via CCAO attendance at a small number of BOR residential hearings or meetings between offices.
Communication Between the CCAO and BOR	**6.1** The CCAO and BOR should establish open lines of communication and share information on assessments and appeals.
Public Transparency	**7.1** The CCAO and BOR should adopt or extend office policies banning elected officials from taking donations from property tax appeal attorneys.
	7.2 The CCAO and BOR should increase the quantity and quality of supplemental materials explaining the appeals process.
	7.3 The CCAO and BOR should adopt and publish comprehensive strategic plans.
	7.4 The CCAO and BOR should adopt policies to safeguard against racial disparities in assessments and appeals.
	7.5 The CCAO and BOR should implement policies to safeguard against racial disparities.