



# Draft Action Plan



## 2021 Program Year

October 1, 2021 - September 30, 2022

Village of Oak Park  
Development Customer Services Department  
Neighborhood Services Division  
123 Madison Street  
Oak Park, Illinois 60302

**Village of Oak Park, IL**  
**Draft PY 2021 Action Plan**

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## 1. Executive Summary

### ***Purpose of the Annual Action Plan***

Connected to the Village of Oak Park's Draft Program Year (PY) 2020-2024 Consolidated Plan for Housing and Community Development (Draft Consolidated Plan), the Village has prepared the Year Two Draft Action Plan as required under 24 CFR 91.220. The Draft Action Plan for PY 2021 identifies the activities to be funded with the Village's Community Development Block Grant (CDBG) program funds that it will receive during the program year, which runs from October 1, 2021 to September 30, 2022. Similar to PY 2020, for PY 2021, the Village will not receive Emergency Solutions Grant (ESG) program funds.

### ***Lead Agency***

The lead agency for the Action Plan is the Neighborhood Services Division of the Development Customer Services Department of the Village of Oak Park, a general-purpose unit of municipal government. The Division initiated the administration, organization and preparation of the draft Action Plan and will coordinate the public and nonprofit entities through which it will carry it out. The entire list of recommendation-awarded agencies is included in the table on page 8.

### ***Basis for Allocating CDBG Investments***

The federal CDBG funds are intended to provide low and moderate income (LMI) households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include fair housing outreach, housing rehabilitation and preservation, public services, infrastructure improvements, code enforcement, public facilities improvements and administration.

The system for establishing the priority for the selection of these projects is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG Program;
- Being consistent with the Village's PY 2020-2024 Consolidated Plan;
- Meeting the needs of LMI Oak Park residents;
- Focusing on LMI areas or neighborhoods in the Village (if applicable);
- Coordination and leveraging of resources;
- Response to expressed needs;
- Sustainability and/or long-term impact;
- Ability to demonstrate measurable progress and success; and
- When possible, continue to assist with COVID-19 effects.

### ***Obstacles to Meeting Underserved Needs***

The primary obstacle to meeting underserved needs is the limited resources available to address identified priorities. The Village of Oak Park will partner with other public agencies and non-profit organizations, when feasible, to leverage resources and maximize outcomes in housing and community development. It should be noted that, as with most persons worldwide, the COVID-19 pandemic was a huge strain on Village of Oak Park residents, and the Village has done its best to (and

will continue to) provide resources and assistance to persons affected by COVID-19. This will continue to be done mainly with CDBG-CV funds during the program year.

***Funds Expected to be Available***

The Village of Oak Park CDBG allocation for PY 2021 is **\$1,629,530**. The Village will be adding \$130,667 in prior year, returned funds (funds that were previously returned by grant subrecipients because the entire allocation was not needed) for a PY 2021 CDBG amount of \$1,760,197. With the Single Family Housing Rehabilitation program revolving loan fund balance of \$135,826 added to this amount, there is a total PY 2021 CDBG amount of \$1,896,023.

Proposed planning/administration set-asides include \$80,000 for the Oak Park Regional Housing Center, \$11,000 for Housing Forward/Oak Park Homelessness Coalition and \$234,906 for the Village of Oak Park. In addition, \$13,000 is set-aside, in the Public Services category, for the Village of Oak Park Development Customer Services Department.

The proposed PY 2021 funding amount for non-profit CDBG subrecipients is as follows: \$231,429 (\$244,429 minus \$13,000 set aside for the Oak Park Development Customer Services Department) for Public Services and \$38,862 for Public Facilities and Improvements.

The remainder of the expected CDBG funding is proposed to be allocated as follows: \$276,000 for Housing; \$800,000 for Infrastructure; and \$75,000 for Code Enforcement.

As noted above, the Single Family Housing Rehabilitation program will also begin the 2021 program year with \$135,826 in repaid CDBG loans for its revolving loan fund. In addition, prior year, returned funds in the amount of \$100,000 will be utilized for Single Family Housing Rehabilitation homeowner rehabilitation loans. These funds are part of a contingency plan for housing at a time when loans are not scheduled to be paid back. This amount is not included in the total listed above.

For PY 2021, the Village will not receive Emergency Solutions Grant (ESG) program funds.

The Village continues to market a Section 108 loan program for businesses, in the amount of \$3 million. For PY 2020, the Village has the opportunity to continue to implement a CDBG activity that began in PY 2016 for Section 108 program underwriting consultation.

***Coordination/Cooperation Between Agencies***

The Neighborhood Services Division, within the Development Customer Services Department of the Village of Oak Park, is responsible for administering and managing the Action Plan process. In administering its programs, the Village works cooperatively within a local government landscape that includes all of the local taxing bodies. Many of these entities assist persons with housing, health, and social services.

In contracting with public and non-profit agencies to deliver the community programs and services outlined in the draft Action Plan, the Village uses its annual budget process to coordinate and allocate funding. The Village's governing body, the Village Board, receives public input via the citizen volunteer-led Community Development Citizens Advisory Committee (CDCAC) regarding the allocation of some CDBG funds. Staff and elected officials consider community needs and public opinion to determine project prioritization. Above all else, the Consolidated Plan is the guiding document.

Coordination among agencies, in the development and implementation of housing and community development programs and services, is critical in efforts to maximize the use of limited resources. The Village is committed to the close coordination of all of its programs with other agencies at a variety of levels.

### ***Citizen Participation***

During the Draft PY 2021 Action Plan process, the Village encouraged a high level of agency consultation in an effort to demonstrate its commitment to the following: 1.) Identifying priority needs; and 2.) Engaging the participation of citizens, public agencies and non-profit organizations in a positive and collaborative manner.

The development of the Village of Oak Park PY 2021 Action Plan began on January 20, 2021 when a Notice of Federal Funding Availability was published in the *Wednesday Journal* newspaper. In addition, all agency representatives on the Development Customer Services Department grants mailing list were sent a notice, and notices were sent out in social media, as well.

After soliciting applications, the Community Development Citizens Advisory Committee (CDCAC) held hearings and conducted an in-depth review of each application. This process began on April 7, 2021, when a Notice of these meetings was published in the *Wednesday Journal* newspaper. Three public CDCAC meetings were held in April and May, 2021.

The Village of Oak Park CDCAC reviewed proposals, heard applicant presentations and made funding recommendations to the Village President and Board of Trustees for a portion of the Village's PY 2021 CDBG entitlement allocation. All of these recommendations are now included in this Draft Action Plan.

On June 7, 2021, the Village Board voted on releasing the draft PY 2021 Action Plan for a 30-day public comment period to begin June 10, 2021. The Notice of Document Availability for the draft PY 2021 Action Plan will be published in the *Wednesday Journal* on June 9, 2021 and advertised on the Village website, with the 30-day comment period running from June 10, 2021 to 5 p.m. on July 9, 2021. A virtual Public Hearing will be held from 3 p.m. to 5 p.m. on July 9, 2021. After being released, the draft PY 2021 Action Plan will be available at the following locations:

- Village of Oak Park Development Customer Services, 123 Madison Street, Oak Park; and
- The Village's Website, on the Housing-Grants page.

## **2. Expected Resources**

As noted above, the Village of Oak Park CDBG allocation for PY 2021 is **\$1,629,530**. The Village will be adding \$130,667 in prior year, returned funds (funds that were previously returned by grant subrecipients because the entire allocation was not needed) for a PY 2021 CDBG amount of \$1,760,197. With the Single Family Housing Rehabilitation program revolving loan fund balance of \$135,826 added to this amount, there is a total PY 2021 CDBG amount of \$1,896,023.

Federal funding will leverage private, state and local funds by enabling the Village of Oak Park to serve those with the greatest need at the highest capacity.

Every CDBG subrecipient will be contributing private, local, state, and/or other federal funds to their respective activity. Additionally, federal funds will serve as funding for Village programs or service provider applications that require additional funding in order to have their program, project, or service meet a need in the community. The grant money provided by HUD will allow organizations and the Village to successfully meet the needs of the community's most vulnerable members. The Village also has a Section 108 loan fund for businesses, in the amount of \$3 million.

For PY 2021, the Village will not receive Emergency Solutions Grant (ESG) program funds.

### 3. Annual Goals and Objectives

#### PY 2021 Priorities and Strategies

During the 2021 Action Plan program year (October 1, 2021 - September 30, 2022), the Village will focus on the following objectives, as identified in the Consolidated Plan: 1.) Working to address the communities priority needs and outcomes of affordable and decent housing; 2.) Working to address the accessibility and availability of a suitable living environment; and 3.) Expanding economic opportunities for low- and moderate-income persons.

After the aforementioned Consolidated Plan citizen participation process and input from Village stakeholders, the highest priorities were found to be Public Services, Housing, Homelessness and Infrastructure for CDBG funding.

With regard to CDBG Public Services subcategory priorities, the highest priorities were mental health services, fair housing, and emergency food provision and nutrition services.

With regard to Homelessness subcategory priorities, the highest priorities were homelessness prevention, emergency shelter, rapid re-housing and street outreach.

With regard to Housing subcategory priorities, the highest priorities were the Small Rental Rehabilitation Program, the Single Family Rehabilitation Loan Program, and code enforcement. The Small Rental Rehabilitation Program increases affordability for renters in multi-family buildings having 7 or fewer units, and the Single Family Rehabilitation Loan Program provides zero percent loans deferred for 20 years for low and moderate income homeowners. Code enforcement enhances the health and safety of Oak Park's population by inspecting the local housing stock and ensuring that it is in good shape.

With regard to Infrastructure Improvements subcategory priorities, the highest priorities were alley improvements, water mains and lines improvements, street improvements, and sidewalk and sidewalk ramp improvements.

Other high priorities were Economic Development, Administration and Planning, and Public Facility Improvements for CDBG funding.

Because the COVID-19 pandemic is a huge strain on Village of Oak Park residents, the Village will continue to provide resources and assistance to persons affected by COVID-19. The primary method to achieve this goal is the Village's CDBG-Corona Virus (CV) grant that is ongoing.

Over program years 2020 to 2024, the Village has a strategy to prioritize proposed projects each year that meet these high priorities.

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**Consolidated Plan/Action Plan Goal Descriptions**

1	<b>Goal Name</b>	<b>Public Services</b>
	<b>Goal Description</b>	Expanding the availability of and increasing access to needed services is a key goal. Services include, but are not limited to, mental health services, fair housing, and emergency food provision and nutrition services. The Village also determined a highest priority as to prevent, prepare for, and respond to COVID-19, as well as to facilitate assistance to eligible persons economically impacted by COVID-19.
2	<b>Goal Name</b>	<b>Public Infrastructure</b>
	<b>Goal Description</b>	Creating livable communities through improvements to public infrastructure. Maintaining and improving the quality of Oak Park’s existing infrastructure is instrumental to ensuring that residents live in a safe, clean, and decent environment; one that is free of COVID-19 threats.
3	<b>Goal Name</b>	<b>Homelessness</b>
	<b>Goal Description</b>	Oak Park aims to support services to prevent homelessness and to assist those currently experiencing homelessness. These services include, but are not limited to, homelessness prevention, emergency shelter, rapid re-housing and street outreach. Facilitate assistance to persons impacted by COVID-19.
4	<b>Goal Name</b>	<b>Affordable Housing</b>
	<b>Goal Description</b>	The Village of Oak Park aims to maintain, and improve affordable housing, both renter-occupied and owner-occupied. The highest priorities were the Small Rental Rehab Program, the Single Family Rehab Loan Program, and code enforcement. The Small Rental Rehabilitation Program increases affordability for renters in multi-family buildings having 7 or fewer units, and the Single Family Rehabilitation Loan Program provides zero percent loans deferred for 20 years for low and moderate income homeowners. Code enforcement enhances the health and safety of Oak Park’s population by inspecting the local housing stock and ensuring that it is in good shape. Facilitate assistance to persons impacted by COVID-19.
5	<b>Goal Name</b>	<b>Public Facilities</b>
	<b>Goal Description</b>	Maintaining and improving the quality of Oak Park’s exiting public facilities is instrumental to ensuring that residents have access to safe and accessible facilities, and those that are free of COVID-19 threats.
6	<b>Goal Name</b>	<b>Economic Development</b>
	<b>Goal Description</b>	Economic development will promote the vitality of Oak Park’s economy in depressed areas of the community. Fostering growth in these areas will, in turn, provide greater opportunities for the Village’s low and moderate-income residents. The Oak Park Section 108 Loan Program is a business loan fund focused on the expansion of businesses. Facilitate assistance to eligible persons economically impacted by COVID-19.
7	<b>Goal Name</b>	<b>Administration and Planning</b>
	<b>Goal Description</b>	Administration of the CDBG and ESG Programs by Village staff, homelessness assistance administration and planning, and fair housing administration.

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#### 4. Proposed CDBG Activities for PY 2021 - Funding

PY 2021 CDBG Agency	Proposed Activity	Grant Amount
<b>ADMINISTRATION</b>	<b>(Capped at 20% of total award)</b>	
Village of Oak Park (VOP)	VOP CDBG Administration	\$234,906
Oak Park Regional Housing Center	Fair Housing Administration	\$80,000
Housing Forward/OP Homeless Coalition	Homelessness Assistance Planning & Admin	\$11,000
<b>Total Admin</b>		<b>\$325,906</b>
<b>PUBLIC SERVICES</b>		
Beyond Hunger	Direct Hunger Relief	\$22,000
Community Support Services	Respite and Case Management	\$8,111
Hephzibah Children's Association	Svcs & Support for Abused/Neglected Children	\$17,000
Housing Forward	Interim Housing	\$40,000
Housing Forward	Employment Readiness	\$10,000
NAMI-Metro Suburban	Drop In Center	\$11,000
New Moms, Inc.	Family Support	\$17,000
North West Housing Partnership	Handyman Services for Seniors	\$6,125
Oak Park Regional Housing Center	Fair Housing Outreach	\$42,500
Oak Pk-River Forest Infant Welfare Society	Dental Care for Children and Youth	\$21,500
Sarah's Inn	Domestic Violence Services	\$12,000
Thrive Counseling Center	Psychiatric Services for Medicaid Clients	\$18,631
Way Back Inn	Counseling for Recovery Family Members	\$5,562
VOP Dev. Customer Services (set aside)	Healthy Nutrition Incentives at Farmers Market	\$13,000
<b>Total Public Services</b>		<b>\$244,429</b>
<b>PUBLIC FACILITIES &amp; IMPROVEMENTS</b>		
UCP-Seguin Services	Public Facility Improvements	\$33,000
Way Back Inn	Public Facility Improvements	\$5,862
<b>Total Facility Improvements</b>		<b>\$38,862</b>
<b>HOUSING</b>		
VOP Housing Programs	Lead, SFR, SRP, and SFR & SRP delivery	\$411,826
<b>Total Housing</b>		<b>\$411,826</b>
<b>INFRASTRUCTURE</b>		
VOP Public Works	ADA Sidewalks & Ramps, Alleys & Water Lines	\$800,000
<b>Total Infrastructure</b>		<b>\$800,000</b>
<b>CODE ENFORCEMENT</b>		
VOP Property Maintenance, Neigh. Svcs.	CDBG Code Enforcement	\$75,000
<b>Total Code Enforcement</b>		<b>\$75,000</b>
<b>GRAND TOTAL</b>		<b>\$1,896,023</b>

Proposed activities for the Public Services, Housing, Administration, Infrastructure, Code Enforcement, and Facility Improvements categories are listed above. Allocation priorities for Village units were determined to be property maintenance code enforcement, housing, infrastructure, facility

improvements, administration and public services, based on consultation. The CDBG housing breakdown is \$99,150 for Lead Hazard Reduction, \$90,950 for the Small Rental Rehabilitation Program and \$85,900 for Housing Programs Project Implementation, as well as \$135,826 in revolving loan funds to be used for the Single Family Rehabilitation Program. CDBG Public Service and Public Facilities Improvements funds are allocated through the Community Development Citizen Advisory Committee for subrecipients.

With regard to the CDBG table listed above, the Village has identified these activities proposed to be implemented in PY 2021 to achieve the priorities, strategies and goals listed in the Consolidated Plan.

## 5. Geographic Distribution

Priority CDBG funding areas, in the Village of Oak Park, include spaces where the percentage of low- and moderate-income (LMI) persons is 36.29% or higher. While the general rule is that an area benefit activity must serve an area where the concentration of LMI persons is at least 51% of the total population within the geographical boundary, Section 570.208(a)(ii) of the HUD regulations allows the "exception criteria," also referred to as the "upper quartile."

A grantee qualifies for this exception when less than one quarter of the populated block groups, in its jurisdiction, contain 51 percent or more LMI persons. HUD assesses the grantee's census block groups to determine whether a grantee qualifies to use this exception and identifies the alternative percentage the grantee may use, instead of 51 percent, for the purpose of qualifying activities under the LMI Area Benefit category. HUD uses the following steps in computing the upper quartile for a given community:

- Identifies the total number of block groups in the grantee's jurisdiction;
- Subtracts the block groups with zero persons to determine the net number of block groups in the jurisdiction;
- Arranges the remaining block groups in descending order, based on LMI residents in the block group;
- Computes the last block group in the upper quartile by multiplying the net number of block groups by 25 percent; and
- Applies the "exception criteria" if the percentage of LMI persons in the last census block group in the top quartile is less than 51 percent.

HUD determines the lowest proportion a grantee may use to qualify an area for this purpose and advises the grantee accordingly. Oak Park, as an exception jurisdiction, has been allowed 36.29%.

The following narrative describes the characteristics of Village areas.

### Low and Moderate Income Areas

The following table presents information regarding low and moderate income (LMI) persons in Oak Park. LMI persons, as determined by HUD, have incomes at or below 80% of the median family income (MFI). HUD estimates determined that there were 13,580 LMI persons in Oak Park, equivalent to 26.34% of the population for whom this rate is determined.

HUD defines an LMI census block group, in the Village of Oak Park, as one in which 36.29% or more of the population have incomes of 80% or less of MFI. According to these criteria, 14 of the Village’s 53 census block groups qualify as LMI areas, as shown in the table below.

**LMI Census Block Groups**

Census Tract	Block Group	Number of LMI Persons	Universe of LMI Block Group	Percent of LMI Persons
8121	1	385	1000	38.50
8123.01	2	655	1805	36.29
8125	1	550	1145	48.03
8125	2	375	720	52.08
8125	3	380	785	48.41
8126	2	450	865	52.02
8126	3	470	1035	45.41
8128.01	1	1005	1935	51.94
8128.01	2	405	985	41.12
8128.02	3	520	1160	44.83
8130	1	300	680	44.12
8131	1	495	1000	49.50
8131	4	370	805	45.96
8132	4	330	845	39.05

Source: HUD

UCP Seguin is an agency with a proposed Public Facilities Improvements project at one Oak Park site that is in a LMI area – census tract 8131, block group 4.

**Concentrations of Minority Persons**

The Village of Oak Park defines areas of racial or ethnic concentration as geographical areas where the percentage of a specific minority or ethnic group is 10 percentage points higher than in the Village overall.

In Oak Park, African-American residents comprised 19.8% of the population. Therefore, an area of racial concentration includes census tracts where the percentage of African-American residents is 29.8% or higher. According to the latest American Community Survey five-year estimates, there are two census tracts that met the criteria for areas of racial concentration. These areas are:

- Census tract 8121 immediately to the north of census tract 8125 along the boundary of Chicago – 34.5%; and
- Census tract 8125 along the eastern boundary of Chicago in the central area of the Village – 31.6%.

There were no other areas of racial or ethnic concentration in the Village, as of the latest federal data.

**Concentrations of LMI Persons and Minority Persons**

Of the nine census tracts which contained block groups identified as LMI areas, two tracts were also noted to be areas of racial concentration. With the inclusion of the specific block groups, these areas were census tract 8121, block group 1; and census tract 8125, block groups 1, 2 and 3.

## 6. Homeless Assistance Activities

For PY 2021, the Village will not receive Emergency Solutions Grant (ESG) program funds. For information on the Village's homelessness strategy, see the Consolidated Plan. There are, however, two proposed CDBG activities to be carried out by Housing Forward that will assist persons experiencing homelessness. One is an interim housing shelter activity and the other is an employment readiness activity. Other PY 2021 CDBG Public Services activities also will contribute to the reduction of homelessness. One example is a hunger relief activity to be carried out by Beyond Hunger.

The Village of Oak Park will continue to collaborate with the Alliance to End Homelessness in Suburban Cook County Continuum of Care in order to address the needs of homeless individuals and families in Oak Park. The Village regularly attends Continuum of Care Prevention Committee and West Suburban Council on Homelessness meetings.

## 7. Other Actions

### Introduction

The following are actions to be undertaken by the Village of Oak Park to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead based paint hazards, reduce the number of poverty-level families, develop institutional structure and enhance coordination between public and private housing and social service agencies.

### Actions Planned to Address Obstacles to Meeting Underserved Needs

The Village has identified several obstacles that will impede its ability to address the needs outlined in the Consolidated Plan and this draft Action Plan. These obstacles are listed below.

- The primary obstacle to meeting underserved needs in the Village of Oak Park is the limited financial resources available to address identified priorities. For example, the amount of CDBG funds available due to the 15% Public Service cap is consistently and significantly less than the amount requested to meet local goals. Thus, many worthwhile projects are funded at lower levels due to the ceiling on these funds. Even in the COVID-19 era, Public Service funds still need to be funded at historical levels, as there is a limit to the overall funding.
- The relative absence of available developable land for new affordable housing construction, coupled with the extremely limited availability of existing residential structures available for purchase and rehabilitation, severely restrict the capacity of the Village to facilitate the expansion of the affordable housing stock (both owner and renter) in Oak Park.
- Another obstacle is the impact of limited available funding sources. The Village, along with most other communities, has even fewer resources available to address issues, as municipalities face revenue reductions. The ongoing COVID-19 pandemic was, is and will continue to be a huge financial strain on the Village of Oak Park.

To address one obstacle, the Village is part of a funder coordination group that is working towards developing ways to better collaborate, coordinate and streamline the grant application and awarding process so that more can be achieved with limited resources. This will help to address the need for

additional financial resources by lessening the level of grant management undertaken by subrecipients and providing clear and measurable outcomes to ensure resources are being utilized in the most effective and efficient way possible.

The Village is also identifying new and innovative ways to increase the affordable housing stock by coordinating with local agencies to identify areas of opportunity.

To address the need for a more vibrant economy, the Village has made economic development a priority by continuing to market the Oak Park Section 108 business loan fund that was previously approved by HUD.

### **Actions Planned to Foster and Maintain Affordable Housing**

Oak Park has been investing its CDBG funds in housing rehabilitation for many years, but now, more than ever, an emphasis is being placed on identifying ways to foster affordable housing. The following are actions that will be taken to increase the affordable housing stock in the community.

#### ***Overcoming Barriers to Affordable Housing***

Several of the public policies that negatively impact affordable housing in Oak Park are not under the control of Village government. Nonetheless, the Village is an active and supportive partner to area non-profit housing developers and other organizations involved in the creation of affordable housing opportunities for Oak Park residents. In addition to the Village's willingness to work with affordable housing developers, the Village implements several programs and initiatives to address existing barriers to affordable housing that can be funded by CDBG and other funds. Several of these initiatives are listed below.

- The Village will continue to administer the Single Family Housing Rehabilitation Program. Under this program, low- and moderate-income homeowners may qualify for no-interest loans to correct code violations and serious housing quality deficiencies. The program is funded using an established revolving loan fund comprised of recaptured CDBG loan funds. This program usually goes hand in hand with a Lead Hazard Reduction Grant program, which is primarily funded by CDBG but also will benefit from a grant from Cook County. This Cook County grant is called the *Lead Poisoning Prevention Program Grant*.
- The Village will continue to operate the CDBG-funded Small Rental Rehab housing program, which assists owners of rental properties in rehabilitating their rental units. The property must be either a single-family detached rental dwelling or a multi-family rental building with fewer than eight units. A minimum project budget is \$2,000 per rental unit and the maximum is up to \$5,000 per rental unit, inclusive of contingency. The program provides forgivable loan funds to rental owners to correct code violations and serious housing quality deficiencies. The owners will be contracted to rent 51% of their rental units to low- and moderate-income households, at affordable rents for at least two years.

- Though not funded by CDBG, the Village of Oak Park may continue its Multi-family Housing Incentives Program, which provides grants to owners of multi-family apartment buildings. Owners are required to provide matching funds. Funds are to be used to improve the marketability of specific apartment units and for major system repairs. In exchange for the grants, multi-family owners commit to listing vacancies with the Oak Park Regional Housing Center. The Oak Park Regional Housing Center engages in affirmatively furthering fair housing choices to ensure that the Village maintains its diversity.
- Recognizing that property taxes can increase the cost of housing and affect the Village's ability to provide affordable housing, the Village continues to promote new commercial development to ease the reliance on residential real estate property taxes. Oak Park is also aware of the possibility of Village persons being displaced, and thus works with Housing Forward to assist persons in need.

### ***Available Funds***

The Village of Oak Park will apply \$276,000 in PY 2020 CDBG funds to Village lead hazard reduction grant activities, single family and small rental housing rehabilitation activities, and a programs delivery activity. The Single Family Housing Rehabilitation program will begin the 2021 program year with \$135,826 in repaid CDBG loans for its revolving fund, bringing the total amount for Housing Programs to \$411,826. Moreover, prior year, returned funds in the amount of \$100,000 will be utilized for Single Family Housing Rehabilitation homeowner rehabilitation loans. These \$100,000 in funds are part of a contingency plan for housing at a time when loans are not scheduled to be paid back.

### **Actions to Evaluate and Reduce Lead-Based Paint Hazards**

The following activities constitute the Village's strategy to minimize exposure to, and damage from, lead-based paint.

#### ***Oak Park Public Health Department Efforts***

The Illinois Department of Public Health has identified all three of Oak Park's ZIP codes as high-risk ZIP codes for pediatric blood lead poisoning. High-risk ZIP codes are based on housing data and family economic status obtained from the latest census. Given the prevalence of an older housing stock in Oak Park and the corresponding probability that many of the Village's children are exposed to lead, the Village has committed to strong efforts in lead education, prevention and abatement. As a result, Oak Park children, with elevated blood levels receive local professional case management services through the Oak Park Public Health Department. The following activities constitute the Village's strategy to minimize exposure to and damage from lead-based paint.

- The Village of Oak Park Department of Public Health is committed to eliminating elevated levels of lead in children in Oak Park. The Village has an agreement with the Illinois Department of Public Health to provide case management services for all children that live within the boundaries of the Village. The Health Department is considered the State's "delegate agency" for childhood lead. The Health Department participates in public awareness and education campaigns, provides nursing lead case

management and will conduct environmental investigations, when required, under the Illinois Lead Poisoning Prevention Act and the Illinois Lead Poisoning Prevention Code.

- Because of the age of the Village's housing stock, all of Oak Park's ZIP codes are defined as high risk for pediatric blood lead poisoning. As a result, every physician licensed to practice medicine is required to provide annual testing of children from 6 months of age through 6 years of age. In addition, child care facilities must require that all parents or guardians of a child 6 months through 6 years of age provide a statement from a physician or health care provider as proof that a blood test occurred prior to admission. Physicians are required to submit lead sampling results to the Illinois Department of Public Health, where the sampling data is then entered into a data surveillance system called *HLPPS*. The Health Department's Nursing Division is responsible for reviewing incoming blood lead sample test results using the *HLPPS* data management system. Nursing staff review incoming lead results to determine whether nursing case management is required and/or whether a childhood lead case should be referred to the Environmental Health Division for an environmental investigation of the child's dwelling.
- The Health Department is responsible for managing and maintaining *HLPPS*. In PY 2021, the Health Department will manage childhood blood lead test results through *HLPPS*.

Nursing Case Management – Case management of children begins at 5 µg/dl on all children six years of age and under. Children with a lead level at or above 5 µg/dl are at risk of decreased IQ, behavior problems, poor grades in school and growth delays. The case manager is responsible for contacting the parent and providing case management, including:

- Interviewing the parent or guardian regarding the child's behavior, habits and general health;
- Emphasizing the importance of follow-up lead screening to make sure levels do not increase;
- Providing the parent with educational brochures from the "Get the Lead Out" series;
- Referring all cases for a developmental screening;
- Routine case follow-up until the child's lead levels reach a safe level; and
- Referring the case to the Health Department's Environmental Health Division for environmental investigation/assessment.

Environmental Investigation/Assessment: An environmental investigation is conducted under the following circumstances:

- A child six years of age and younger with a confirmed lead blood lead level of 5 µg/dl or above.

Environmental investigations are conducted by one or more of the Health Department's Licensed Lead Assessors. Dwelling investigations are conducted in accordance with the Illinois Lead Poisoning Prevention Code and the Lead Poisoning Prevention Act. Each investigation includes a visual assessment, a dwelling diagram, an interview of the parent and, if applicable, collecting dust and/or wipe samples to determine if any lead hazards exist. The results of the investigation are shared with the parent and the property owner. If lead hazards are found, the property owner is required to submit a plan to mitigate and/or abate all lead hazards. Case follow-up is conducted to determine compliance with State laws. Cases will be

closed if the lead hazards are mitigated or abated. If lead hazards are not mitigated or abated within specific time frames, the case will be referred to the Illinois Attorney General and/or the Cook County State's Attorney for prosecution.

### ***Federally Assisted Housing Programs/Activities to Reduce Lead Hazards***

Since HUD implemented new, more stringent lead-based paint regulations in 2001, the Village's Single Family Rehabilitation (SFR) program, and all other housing projects assisted with CDBG funding, have adhered to these requirements.

Housing Programs staff will continue to advise prospective loan recipients about lead-based paint issues and any required corrective action or construction. The SFR program will continue to incorporate lead hazard reduction in its applicable activities for rehabilitation of owner-occupied LMI properties, using CDBG and Cook County dollars.

Staff will continue to keep current in asbestos and lead hazard reduction training opportunities, and in recruiting certified contractors to bid on this work. Village staff will also notify applicants who may receive CDBG funds of the requirements of lead-based paint hazard reduction and mandate compliance as a condition of funding housing activities. Activities will be closely monitored for adherence to the regulations.

The Village's process for lead paint hazard reduction will include hiring general contractors with licensed workers or subcontractors to perform the lead hazard reduction construction work. A specification-writing software system, that includes lead reduction work, is in place. If warranted, relocation assistance will be provided.

Lead inspections and environmental reviews will be conducted on the activities. The lead and general rehab specifications will be written and the jobs will be bid. Preconstruction meetings will be held and the work will be completed.

### **Actions to Reduce the Number of Poverty Level Families**

There are a variety of actions the Village will undertake, throughout the upcoming program year, in an effort to reduce the number of poverty-level families and increase self-sufficiency. Several activities funded through the CDBG program will work towards this goal. Additionally, under normal circumstances, the Village Community Relations Department hosts a youth employment program in the summer months that provides job training and skills development to participants.

The Village is committed to helping to reduce poverty by making housing more affordable, preserving the condition and availability of existing housing stock and helping citizens build assets of all kinds: human, social, financial, physical and natural. To this end, the Village and its community partners have incorporated an integrated system of services and programs to meet the various needs of individuals as they progress toward financial self-sufficiency.

In addition to supporting the initiatives of local organizations that serve low- and moderate-income residents, by providing employment training, case management, interim housing shelter and other social services, the Village of Oak Park administers programs that aim to mitigate poverty. The Village can directly impact some of poverty's primary causal factors, which include poor-quality housing, expensive housing, lack-of education, unemployment, low income and ill health. The Village can make an impact by utilizing resources, improving housing

stock, and assisting in the provision of vital social services, employment opportunities, public health services and an excellent educational system. The multi-pronged approach provided by the programs run by the Village and its subrecipients have the ability to reduce the number of households with incomes below the poverty level. Specific components of the Village's poverty-reduction strategy are listed below.

### ***Housing***

A lack of affordable housing places residential cost burdens on low- and moderate-income persons, limiting their ability to pay for other goods and services, such as quality education or needed prescriptions. The Village's housing efforts are aimed at improving and maintaining a high standard of housing quality while also creating or maintaining affordability.

The Village's Single Family Housing Rehabilitation Program helps lower-income owners make much-needed repairs, which enables them to remain in their homes. The Small Rental Rehabilitation Program provides assistance to building owners to make needed repairs on their multi-family rental properties. After rehabilitation, these owners will provide those repaired units to renters under affordable rent limits, for a period of two years.

The Village will also work closely with agencies that provide expanded housing options to current and potential Oak Park residents. One such agency is the Oak Park Regional Housing Center, which assists many lower-income renters, including persons with disabilities. The Village is committed each program year to continuing to remove the impediments to fair housing choices for all protected classes and affirmatively furthering fair housing choices, as evidenced by Oak Park allocating a large part of its total CDBG allocation to Oak Park Regional Housing Center's fair housing activities.

### ***Social Services***

The Village Health Department is a state-certified local health department that is responsible for protecting the community's health from preventable death, disease, illness and injury. The Health Department identifies community problems and potential epidemics, develops health policies, enforces local ordinances and links residents to a wide range of direct services. Programs include community nursing and childhood lead reduction, both of which provide for health education, prevention services, case management, counseling and referral to other community health partners. The Health Department often provides consultation and referral services for those in poverty. During the COVID-19 pandemic, the Health Department was invaluable to the residents and businesses of Oak Park.

The Village's Development Customer Services administers the CDBG-funded Healthy Nutrition Incentives project. This program provides incentives for LINK card users to purchase farm-fresh healthy products from the Oak Park Farmers Market.

Many social service programs are also offered by subrecipients of CDBG funds in the Village to provide assistance to persons with incomes below the poverty level. For example, the Village increases family self-sufficiency by funding Housing Forward, which prevents, eliminates or ameliorates homelessness. During the COVID-19 pandemic, Housing Forward greatly assisted Oak Park persons experiencing, and those at risk of, homelessness.

Housing Forward provides supportive services such as job training, job placement, substance abuse treatment, case management, education (G.E.D.), day care, short-term mental health

services, independent living skills education and the provision of basic needs. In addition, Housing Forward provides other homelessness preventative services that promote emotional and economic independence and create long-term change in the lives of persons experiencing homelessness. The pandemic has changed but not stopped the efforts.

Other CDBG-funded agencies also provide services that make a huge impact. The Village supports other important services by allocating 95 percent of its PY 2020 CDBG Public Services category dollars to local social service agencies.

### ***Economic Development***

Recognizing that property taxes can increase the cost of housing and affect the Village's ability to provide affordable housing, several years ago the Village initiated an effort to promote new commercial development to ease the reliance on property taxes.

The Village has an array of business services programs designed to enhance local business activity. Examples of these programs include the Village's efforts to increase the number of minority- and women-owned businesses doing business in Oak Park. Moreover, the Village and the Village-funded Oak Park Economic Development Corporation both work on business retention and economic development expansion. Additionally, the Oak Park Economic Development Corporation works diligently to grow the Village's economy, specifically by working to redevelop vacant or underperforming commercial corridors. The creation of good jobs locally will increase employment opportunities, giving low-income residents a chance to increase their incomes.

Through the HUD Section 108 Loan Guarantee Program, the Village has a Section 108 loan fund for businesses in the amount of \$3 million. These funds will be loaned by the Village to promote businesses expansion and improvement, create and/or retain jobs, assist low- and moderate-income persons, and deliver positive economic benefits for the Village and its residents.

Developing a variety of businesses in Oak Park is critical to providing living-wage jobs for a diverse population with multiple jobs skills and experiences. Economic Development is accomplished by utilizing many different funding sources including, but not limited to, CDBG, Section 108-CDBG, tax-increment financing (TIF) and local funds.

### **Actions Planned to Develop Institutional Structure**

Village staff works throughout the year to increase institutional structure, both within the Village and with our partner agencies. Staff maintains contact with partner agencies, offering referrals for funding and training opportunities, where appropriate. Staff also attends relevant virtual training and conferences, where available, on all aspects of grant and project management.

As mentioned previously, the Village participates in the Oak Park Homelessness Coalition, which is comprised of a variety of service providers in the community. The Coalition has a primary goal of ending homelessness in the community which has, and will continue to, increase coordination and collaboration between organizations. The Village has also initiated a meeting of funders operating both in the community and in surrounding areas to investigate ways to better coordinate funding and more effectively fund services that meet the community need and provide measureable outcomes.

The Neighborhood Services Division, within the Development Customer Services Department of the Village of Oak Park, works with the network of public agencies and local non-profit organizations through which it will eventually carry out the Action Plan. In administering its programs, the Village works cooperatively within a local government landscape that includes Oak Park Township, Elementary School District 97, High School District 200, the Park District of Oak Park, the Oak Park Library District, the Oak Park Housing Authority/Residence Corporation and the Oak Park Township Mental Health Board.

In contracting with public, private and non-profit agencies to deliver the community programs and services outlined in the draft Action Plan, the Village uses its annual budget process to coordinate and allocate funding. The Village's governing body, the Village Board, receives public input from the Community Development Citizens Advisory Committee (CDCAC) regarding the allocation of CDBG funds.

Non-profit CDBG subrecipients are monitored based on a risk analysis, and previous performance is reported, by Village staff, to the CDCAC when agencies apply for funding. Many of the Village's largest contract service providers, or "community partners," receive funding from other sources. The community partners funding includes local Village funds, other government or private grants, user fees, operating income and member support. Private sector agencies also play a role in meeting the goals outlined in the Action Plan.

Coordination among agencies in the development and implementation of housing and community development programs and services is critical in efforts to maximize the use of limited resources. The Village is committed to the close coordination of all of its programs with other agencies at a variety of levels:

- **Local level:** The Village participates in the Oak Park Homelessness Coalition, a local body with the purpose of helping persons experiencing homelessness and those at risk. Also, the Village maintains relationships with private entities and local economic development agencies. The Village's primary means of coordination with non-profit partners is through yearly contracts with grant subrecipients. The proposal process, whereby the Village allocates funds to community partners, as well as the ensuing agreements, gives the Village a clear view of the provided services and related costs. The Village's extensive project performance review process also enhances coordination.
- **Regional level:** The Village participates in the Alliance to End Homelessness in Suburban Cook County (Continuum of Care lead agency). The Village also participates in a group of area funders in order to better coordinate services to non-profits and to increase the impact of west Cook County grants funding efforts.
- **National level:** The Village is affiliated with and implements best practices from the National Community Development Association and other organizations that support local governments.

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## **Actions Planned to Enhance Coordination Between Public and Private Housing and Social Service Agencies**

Through the Consolidated Plan consultation process, good coordination and collaboration was identified as a key priority for the Village and its partners. To address this need, the Village is involved with the meeting of community funders, as discussed above.

Beginning with the PY 2015 application process about seven years ago, CDBG Public Service applicants had to include in their written narrative a discussion of how they are coordinating with other agencies in the community. If the applicants did not have these connections, they were asked to describe their detailed plans and timeline for implementing a collaborative process. This effort improves collaboration for awarded agencies and allows the Village the ability to identify other areas for additional coordination.

Additionally, many of the funded agencies participate in the Continuum of Care and work closely with other non-profits to identify other opportunities for persons in the community. The Village attends Continuum of Care Prevention-Diversion Committee and West Suburban Council on Homelessness meetings. The Village also served on the core committee that evaluated the RFP for comprehensive Coordinated Entry services and operations in Suburban Cook County.

The Village of Oak Park is committed to increasing community partnerships and investing in economic and neighborhood development. The actions identified above will further this commitment and will increase opportunities for low- and moderate-income residents to receive necessary services and obtain access to affordable housing options.

## **8. Program Specific Requirements**

Grants staff is responsible for ensuring compliance with all program specific requirements, as well as for program monitoring and reporting. In addition, staff ensures that federal cross-cutting requirements (such as Davis-Bacon and Related Acts) are met. A vital way to ensure compliance is by monitoring.

### **Monitoring of Activities**

The Village of Oak Park has standards and procedures to evaluate its own performance in meeting the goals and objectives outlined in the Action Plan, as well as ensuring the adequate performance of subrecipients each program year.

### ***Administrative Monitoring***

The Village reports its performance in the annual Comprehensive Annual Performance and Evaluation Report (CAPER). The CAPER contains a summary of program year accomplishments, the status of activities taken to fulfill the strategic plan component of the Consolidated Plan, and an evaluation of progress made to address identified priority needs and objectives during the program year.

### ***Subrecipient Monitoring***

The Village of Oak Park maintains a high standard in compliance and monitoring for CDBG subrecipients.

The Village uses an extensive monitoring standard and format for on-site monitoring, involving several layers of examination in the areas of project/program management, internal controls, beneficiary review and service, and financial records and tracking. The monitoring standards and procedures used by the Village of Oak Park follow the standards and procedures set forth in HUD monitoring handbooks, guidelines and technical assistance publications, and follow a risk-analysis approach.

Additional meetings and technical assistance are provided for subrecipients as needed or requested to ensure compliance and improve the timeliness of expenditures. Throughout the program year, subrecipients are urged to spend and request funds in a timely manner.

Village staff tracks the progress of projects, calling to inquire about progress if inconsistencies arise. Forty days before the end of each program year, the Village sends a letter to subrecipients reminding them that project expenses must be incurred before the end of the program year and that requests for payment must be received within 30 days after the program year's end.

Finally, every CDBG program subrecipient submits quarterly reports describing activities of the previous quarter. The reports are required in order to draw down funds. Subrecipients also submit an annual report at the end of the program year, summarizing the events and numbers of the entire program year. All of these reports require extensive documentation of project progress and beneficiaries, as well as items to be reported quarterly and annually in the Integrated Disbursement and Information System (IDIS).

IDIS is a HUD-administered financial and programmatic grants information management system, connected nationally through the Internet. The system is a mandatory reporting instrument, which was first accessed by the Village of Oak Park in 1998.

With the annual progress reports that are submitted by subrecipients, if the target goal is not met by a subrecipient, they are required to provide a detailed reason. In addition, subrecipients are also required to list all other funding sources for the project. Analyzing these reports enables the Village to better and more frequently assess how it is meeting the goals and objectives listed in each Action Plan.