



Draft Action Plan



2017 Program Year

October 1, 2017 - September 30, 2018

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

Village of Oak Park, IL
Draft PY 2017 Action Plan

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Executive Summary

Purpose of the Annual Action Plan

Connected to the Village of Oak Park's PY 2015-2019 Consolidated Plan for Housing and Community Development (Consolidated Plan), the Village has prepared the Draft Year 3 Action Plan as required under 24 CFR 91.220. The draft Action Plan for PY 2017 identifies the activities to be funded with the Village's Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) program funds that it will receive during the program year, which runs from October 1, 2017 to September 30, 2018.

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 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 tables on pages 9 and 10.

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 2015-2019 Consolidated Plan,
- Meeting the needs of LMI 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, and
- Ability to demonstrate measurable progress and success.

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 nonprofit organizations, when feasible, to leverage resources and maximize outcomes in housing and community development.

Funds Expected to be Available

The estimated Village of Oak Park CDBG allocation for PY 2017 is \$1,500,000. In addition to this amount, the Village proposes to add \$320,000 in prior year, returned CDBG funds, for a total of \$1,820,000. Minus the Oak Park Regional Housing Center administration set-aside allocation, the proposed PY 2017 funding amount for non-profit CDBG subrecipients is \$235,000, split between \$215,000 for Public Services and \$20,000 for Public Facilities Improvements. The Village has a contingency plan, which states that if PY 2017 Village CDBG and ESG funding is increased above the expected amount, or reduced below the expected amount, the Village will change all allocations proportionately.

The Village also has a Section 108 loan fund for small to midsize businesses, in the amount of \$3 million. For PY 2017, the Village plans to add further prior year, returned CDBG funds (as needed) to an extended PY 2016 CDBG activity for continued Section 108 program underwriting consultation. This may require an amendment to the PY 2016 Action Plan.

The estimated ESG amount for PY 2017 is \$135,000. After the Village ESG Administration amount is taken out, the proposed PY 2017 ESG funding amount for ESG subrecipients is \$124,875.

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 the local taxing bodies. Many of these entities assist persons with housing, health, and social services.

In contracting with public and nonprofit 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 Community Development Citizens' Advisory Committee (CDCAC) regarding the allocation of CDBG and ESG 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 maximizing 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

The Village made the decision during the 2015-2019 Consolidated Planning process to encourage a high level of agency consultation in an effort to demonstrate its commitment to (a) identifying priority needs and (b) engaging the participation of citizens, public agencies and nonprofit organizations in a positive and collaborative manner. A complete description of that process is available in the Consolidated Plan document.

The development of the Village of Oak Park draft PY 2017 Action Plan began on January 18, 2017 when a Notice of Federal Funding Availability, and of an application/grants programs workshop, was published in the *Wednesday Journal* newspaper. In addition, all agency representatives on the Development Customer Services grants mailing list were sent a Notice with all the details. After soliciting applications, the Community Development Citizens Advisory Committee (CDCAC) held a series of hearings and conducted an in-depth review of each application. This process began on

February 22, 2017 when a Notice of these meetings was published in the *Wednesday Journal* newspaper. Seven public CDCAC meetings were held in March, April and May, 2017.

The Village of Oak Park CDCAC reviewed proposals, heard applicant presentations and made funding recommendations to the Mayor and Board of Trustees for a portion of the Village's PY 2017 CDBG entitlement allocation and for most of the ESG funds. All of these recommendations were accepted, and are now included in this draft Action Plan. On June 5, 2017, the Village Board then released the draft PY 2017 Annual Action Plan for a 30-day public comment period that began June 8, 2017. The Notice of Document Availability for the draft PY 2017 Action Plan was published in the *Wednesday Journal* on June 7, 2017 and was advertised on the Village website, with the 30-day comment period running from June 8, 2017 to the close of business on July 7, 2017. There was no need for the Village to go with the shorter comment period that HUD allowed for PY 2017. The draft PY 2017 Action Plan is being made available at the following locations:

- Village of Oak Park, CDBG Programs Office, 123 Madison Street, Oak Park;
- All Three Oak Park Public Library branches; and
- The Village's Website

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

As noted above, the estimated Village of Oak Park CDBG allocation for PY 2017 is \$1,500,000. In addition to this amount, the Village proposes to add \$320,000 in prior year, returned CDBG funds, for a total of \$1,820,000. The Village has a contingency plan as such: If PY 2017 Village CDBG and ESG funding is increased above the expected amount, or reduced below the expected amount, the Village will change all allocations proportionately.

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. Additionally, federal funds will serve as funding for Village programs or service providers applications that require additional funding in order to have their program, project, or service meet the 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 small to midsize businesses, in the amount of \$3 million. For PY 2017, the Village plans to add further prior year, returned CDBG funds (as needed) to an extended PY 2016 CDBG activity for continued Section 108 program underwriting consultation. This may require an amendment to the PY 2016 Action Plan.

The estimated ESG amount for PY 2017 is \$135,000. After the Village ESG Administration amount is taken out, the proposed PY 2017 ESG funding amount for ESG subrecipients is \$124,875. Matched dollar for dollar, ESG funds also increase the investment made in the community.

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

PY 2016 Priorities, Objectives and Outcomes

During the 2017 Action Plan program year (October 1, 2017 - September 30, 2018), the Village will focus on the following objectives identified in the Consolidated Plan, working to address the

community priority needs and outcomes of affordable and decent housing, and the accessibility and availability of a suitable living environment, while also expanding economic opportunities for low- and moderate-income persons.

Housing: The housing and homeless needs in Oak Park center on the lack of affordable units. According to the 2007-2011 Comprehensive Housing Affordability Strategy (CHAS) data, 73% of all low/mod persons living in Oak Park are experiencing at least one of the four housing problems (lacks complete kitchen facilities, lacks complete plumbing facilities, more than one person per room, cost burden greater than 30%). A total of 34.9% of Oak Park residents are cost burdened, of which 13.9% are severely cost burdened (spending more than 50% income on housing). According to the National Alliance to End Homelessness, when housing accounts for 50 percent or more of a household's resources, any unexpected financial crisis could jeopardize housing stability and lead to an increased risk of homelessness. The Village is committed to providing affordable housing through fair housing outreach and education, by providing single-family and small rental housing rehab loan programs, by reducing lead hazards in homes, and by increasing and preserving affordable housing. Oak Park may also work with the County to determine how to utilize HOME funds to address housing priorities. In fact, the Village's Housing priorities are linked with Cook County's for this draft Action Plan, as the Village is a member of the Cook County HOME Consortium. In addition to being in sync with Cook County's Housing priorities, the consultation and citizen participation process – in conjunction with feedback from Village of Oak Park leadership and analysis of the data – determined three primary priorities within housing. Those are affordable housing, aging in place, and repair assistance for both renter-and owner-occupied units.

Public Infrastructure: While the Village is constantly upgrading and maintaining infrastructure, CDBG funding will focus primarily on Infrastructure improvements within CDBG Target Areas for improving streets, alleys and water/sewer mains. With regard to sidewalks, locations throughout the entire Village will be improved to allow for safer and more accessible mobility, particularly pedestrian mobility. Public Infrastructure needs were determined by obtaining a combination of input from Village leadership, subrecipient agencies (CDBG- or ESG-funded non-profits) and other non-profit service providers, community stakeholders, and Village residents. The consultation and citizen participation process, in conjunction with feedback from Village of Oak Park leadership and analysis of the data, determined that Public Infrastructure is a high priority.

Public Services: There is a wide range of need for Public Services in Oak Park and many of the eligible services received a high priority need rating from the public and the stakeholders. The top four Public Services priorities that emerged during the planning process include domestic violence programs, mental health programs, programs for persons with disabilities, and programs for youth/children. While these were rated as the top priorities, it was noted that having a wide range of public services is also a high priority and not narrowing the range of funded activities is important to the community. Each program year, the Village strives to improve services provided to LMI residents through the Public Services component of CDBG, although this category is capped at 15% of the Village's annual entitlement allocation, thereby limiting the amount of funds available to each subrecipient. However, the Consolidated Planning process encouraged the Village to work towards a more coordinated and collaborative system of funding and service delivery within Oak Park, thereby enabling the Village to distribute these funds strategically, as will be done in PY 2017.

Economic Development: Another high priority is Economic Development, particularly job creation for low- and moderate-income residents. Through consultation with the Oak Park Economic Development Corporation and other entities, advantages and barriers in the Village were analyzed to determine specifically what economic development strategy would help businesses open or expand and thus create jobs for LMI persons. Due to the existence of various barriers for businesses wanting to locate in the Village, Oak Park created a Section 108 business loan program utilizing HUD funds,

which will allow low interest financing to be made available to overcome barriers. Encouraging new businesses to locate in Oak Park through lowering barriers to entry, such as aging infrastructure and cost of building rehabilitation, will help to create jobs for low- and moderate-income residents and revitalize underutilized areas of the community. Discussions with the Oak Park Economic Development Corporation and others, resident surveys, and stakeholder meetings indicated that the community places a high priority on assisting businesses in the area to thrive and grow when job creation is the goal of CDBG assistance.

Through the HUD Section 108 Loan Guarantee Program, the Village now has a Section 108 loan fund for small to midsize businesses in the amount of \$3 million. These funds will be loaned by the Village to support start-ups, promote businesses expansion and improvement, create and/or retain jobs, assist low/moderate-income persons, and deliver positive economic benefits for the Village and its residents. For borrowers, the Village offers a very competitive interest rate, much lower than conventional financing. The Village charges a processing fee to applicants and a loan closing fee to approved borrowers. Each Section 108 loan activity will create and/or retain permanent jobs, at least 51 percent of which (computed on a full-time equivalent basis) will be made available to or held by low/moderate income persons. The Village's Section 108 Loan Fund will ensure that the Public Benefit standards are met, and that Oak Park will create or retain (or make available) one low- and moderate-income full-time equivalent job for at least every \$35,000 invested. The Village also plans to add further prior year, returned CDBG funds (as needed) to an extended PY 2016 CDBG activity for continued Section 108 program underwriting consultation.

Code Enforcement: Existing as a separate CDBG category under "Other Neighborhood Needs," Code Enforcement is a critical need for Oak Park to ensure that the properties – especially those within the CDBG Target Areas – are safe and well-maintained. While Other Neighborhood Needs was identified as a medium priority through much of the planning process, this category was elevated due to the fact that it is connected with housing (a high priority) and addresses a great need in the community according to Oak Park leaders, who felt that it was a high priority.

Homeless Needs: In addition to CDBG funds, the Village also typically receives an Emergency Solutions Grant (ESG) allocation that is focused on serving persons experiencing homelessness or at-risk of homelessness. The homeless needs priorities are primarily focused on ESG, though some CDBG dollars also can support these needs, as well. Oak Park represents approximately 3.7% of all persons experiencing homelessness in suburban Cook County, however, the Village often acts as a hub for persons experiencing homelessness due to the centralized location of Oak Park and the transportation services available in the community. Based on meetings with both the Alliance to End Homelessness in Suburban Cook County and Housing Forward, as well as through the survey and stakeholder meetings, the Village determined that the most effective way to focus ESG allocations moving forward is to focus on affordable housing, primarily through permanent supportive housing, transitional housing, emergency shelter, homelessness prevention, street outreach and rapid re-housing, as Housing Forward has an improved strategy for using rapid re-housing, funds, one that links with its Open Door Housing Program and takes advantage of its excellent relationship with local landlords. The need for supportive services to be coupled with housing programs was identified as a high priority, so housing programs that provide a broad spectrum of supportive services will be prioritized. In addition, rapid re-housing is a top priority for the Alliance to End Homelessness in Suburban Cook County (the County's Continuum of Care), and for HUD, as well. Its importance was emphasized in a Consolidated Plan interview.

Public Facilities Improvements: Public Facilities Improvements was determined to be a medium priority through the stakeholder input process. However, it is recognized that there are few available

resources available to assist with facility improvements, particularly for accessibility improvements. As funding is available, the Village will allocate resources to Public Facilities Improvements.

Con Plan/Action Plan Goal Descriptions

1	Goal Name	Public Services
	Goal Description	Expanding the availability of and increasing access to needed services is a key goal. Services include, but are not limited to, mental health, domestic violence, programs for persons with disabilities, and youth programs.
2	Goal Name	Public Infrastructure
	Goal Description	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.
3	Goal Name	Homelessness
	Goal Description	Oak Park aims to support services to prevent homelessness and to assist those currently experiencing homelessness. These services include but are not limited to street outreach, prevention, rapid re-housing, emergency shelter and HMIS.
4	Goal Name	Affordable Housing
	Goal Description	The Village of Oak Park aims to maintain, and improve affordable housing, both renter- and owner-occupied. The advanced age of Oak Park's housing supply necessitates the need for rehabbing of existing housing.
5	Goal Name	Public Facilities
	Goal Description	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. With accessibility improvements, this is a high priority.
6	Goal Name	Code Enforcement
	Goal Description	Code enforcement is an important tool to maintaining safe and sanitary housing; additionally, inspections will monitor vacant or abandoned properties and identify blighted properties for demolition.
7	Goal Name	Economic Development
	Goal Description	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. Beyond the actual Section 108 Loan Fund, which will be a business loan fund, the CDBG economic development activity will focus on providing project implementation (underwriting consultation, monitoring and more) for the Village's Section 108 program.
8	Goal Name	Administration
	Goal Description	Administration of the CDBG and ESG Programs by Village staff and fair housing administration carried out by the Oak Park Regional Housing Center.

AP-35 Projects - 91.420, 91.220(d)

Proposed Projects/Activities for PY 2017

Please note that an *activity* is the specific component of a CDBG or ESG *project*; the term "activity" will be used in this narrative.

The following chart lists the proposed CDBG activities for PY 2017:

PY 2017 CDBG Agency	Proposed Activity	Est. Grant Amount*
ADMINISTRATION	Capped at 20% of total award	
Village of Oak Park (VOP)	VOP CDBG Administration	\$207,000
Oak Park Regional Housing Center	Fair Housing Administration	\$93,000
Total Admin		\$300,000
PUBLIC SERVICES	Capped at 15% of total award	
AACF	Youth Employment Support	\$3,000
Hephzibah	At-Risk Services & Support	\$14,500
Housing Forward	Emergency Shelter	\$17,000
Housing Forward	Employment Readiness	\$15,000
NAMI-Metro Suburban	Drop In Center	\$10,000
New Moms, Inc.	Parenting & Family Support	\$17,000
Oak Park Regional Housing Center	Fair Housing Outreach	\$60,000
Oak Park-River Forest Food Pantry	Direct Hunger Relief	\$18,000
Oak Pk-Riv For Infant Welfare Soc.	Dental Clinic	\$23,000
Sarah's Inn	Domestic Violence Services	\$10,000
VOP Health Department	Healthy Nutrition Incentives at Farmers Market	\$10,000
Way Back Inn	Child Care at Grateful House	\$7,500
West Cook YMCA	Resident Program Services	\$20,000
Total Public Services		\$225,000
FACILITY IMPROVEMENTS		
UCP-Seguin Services	Public Facilities Improvements	\$20,000
VOP Public Works Engineering	VOP Council Chambers ADA Elevator	\$250,000**
Total Facility Improvements		\$270,000
HOUSING		
VOP Housing Programs	Lead Reduction, SRP and SFR & SRP delivery	\$269,000
Total Housing		\$269,000
INFRASTRUCTURE		
VOP Public Works Engineering	ADA Sidewalks, Alleys & ADA Ramps & Sidewalks	\$366,000
Total Infrastructure		\$366,000
CODE ENFORCEMENT		
VOP Property Maintenance	CDBG Code Enforcement	\$70,000
Total Code Enforcement		\$70,000

*HUD has not yet informed the Village of its PY 2017 CDBG Allocation

** \$320,000 in prior year, returned CDBG funds will be added for a total of \$570,000

Proposed activities for the Public Services, Housing, Administration, Infrastructure, Code Enforcement, and Facility Improvements categories are listed above.

Proposed PY 2017 ESG funding activities to be carried out by the Alliance to End Homelessness in Suburban Cook County, Housing Forward and the Village are listed below:

PY 2017 ESG Agency	Proposed Activity	Est. Grant Amount*
ESG ADMINISTRATION	Capped at 7.5% of total award	
Village of Oak Park (VOP)	VOP ESG Administration	\$10,125
Total Admin		\$10,125
ESG SUBRECIPIENTS		
Alliance to End Homelessness	HMIS	\$10,000
Housing Forward	Emergency Shelter	\$24,000
Housing Forward	Homelessness Prevention	\$31,000
Housing Forward	Rapid Re-Housing	\$41,500
Housing Forward	Street Outreach	\$18,375
Total ESG Subrecipients		\$124,875

*HUD has not yet informed the Village of its PY 2017 ESG Allocation

With regard to both the CDBG and ESG tables listed above, the Village has identified these activities proposed to be implemented in PY 2017 to achieve the priorities, strategies and goals listed in the Consolidated Plan. Looking at even the bigger picture of Village housing and community development, this will include activities from allocations from previous years that will be completed and/or funds disbursed in PY 2017. Oak Park is also undertaking a Section 108 business loan fund and may be utilizing prior year CDBG funds to ensure the implementation of this newer economic development program.

Allocation priorities for Village units were determined to be property maintenance, housing, infrastructure, administration and public services, based on consultation and public participation. As noted above, CDBG Public Service, Public Facilities Improvements and ESG funds are allocated through the Community Development Citizen Advisory Committee for subrecipients. Obstacles to addressing these underserved needs continue to be the high cost of housing and the diminishing resources allocated to our jurisdiction.

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AP-50 Geographic Distribution - 91.420, 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Priority CDBG funding areas in the Village of Oak Park include areas where the percentage of low- and moderate-income (LMI) persons is 37.7% 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 jurisdictions 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 Benefit Area 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 37.7%.

These areas also include areas of racial and ethnic concentration where the percentage of a specific racial or ethnic group is at least 10 percentage points higher than the Village's rate overall. The following narrative describes the characteristics of these areas.

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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 19.9% of the population. Therefore, an area of racial concentration includes census tracts where the percentage of African-American residents is 29.9% or higher. According to the latest American Community Survey five-year estimates, there are three 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 – 30.2%;
- Census tract 8125 along the eastern boundary of Chicago in the central area of the Village – 31.6%; and
- Census tract 8131 in the southeast corner of the Village – 31.6%

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

Two proposed UCP Seguin Facility Improvement CILA group home improvements are in census tract 8121 and census tract 8121, both areas of racial concentration.

Low 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). In its 2007 estimates, HUD determined that there were 15,034 LMI persons in Oak Park, equivalent to 28.8% 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 37.7% or more of the population have incomes of 80% or less of MFI. According to these criteria, 10 of the Village's 53 census block groups qualify as LMI areas.

LMI Census Block Groups (Source: HUD)

Census Tract	Block Group	Number of LMI Persons	Universe of LMI	Percent of LMI Persons
8121	1	355	890	39.9
8121	2	285	705	40.4
8123.01	2	730	1505	48.5
8125	1	415	955	43.5
8125	3	440	1135	38.8
8126	2	500	985	50.8
8127	3	405	1025	39.5
8128.01	1	965	1970	49
8128.02	1	465	930	50
8131	1	575	965	59.6

Two proposed UCP Seguin Facility Improvement CILA group home improvements are in LMI areas – one in census tract 8121 and one in census tract 8121. These proposed activities both are listed in the areas of racial concentration section above.

Concentrations of LMI Persons and Minority Persons

Of the eight census tracts which contained block groups identified as LMI areas, three were noted also to be areas of racial concentration. These areas were census tracts 8121, 8125 and 8131.

As noted in the two sections above, two proposed UCP Seguin Facility Improvement activities are in areas of racial concentration that are also LMI areas. One group home is in census tract 8125, block group 1, and the other is in census tract 8121, block group 1.

(Please note that Village of Oak Park Public Works Infrastructure Improvement CDBG activities' exact locations are not yet known. When they are, the Village will add to the list of CDBG activities that will take place in – if applicable – areas of racial concentration, LMI areas, and areas of racial concentration that are also LMI areas.)

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)

Introduction

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.

In addition, led by Catholic Charities, for approximately six years various members of the local Continuum of Care have administered the Suburban Cook Call Center Line as a centralized point of contact for persons seeking homelessness prevention assistance. Calls are received at this Center, with automatic call routing directed to participating non-profit agencies in each of the three Continuum of Care regions. The Village often refers persons in need to the Call Center Line. The Call Center is just one component in the new Suburban Cook County Coordinated Entry effort, of which the Village has been an important part. Both PY 2017 ESG subrecipients will enthusiastically and substantially follow Coordinated Entry practices.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Housing Forward's homeless outreach program is the largest provider of services to Oak Park's homeless population, including the unsheltered homeless. Housing Forward addresses a wide range of needs, including shelter, homelessness prevention, rapid re-housing and street outreach (CDBG also used; see the tables on pages 9, 10 & 15). Street outreach services include outreach and engagement to unsheltered persons experiencing homelessness, crisis case management, and linkage to basic needs and housing services. They also provide extensive services to persons experiencing homelessness through their emergency shelter programs. The ultimate goal of both programs is to transition persons to

transitional and permanent supportive housing. The Village considers rapid re-housing to be a high priority. Due to the difficulty of using rapid re-housing funds in Oak Park, with our high rents compared to neighboring municipalities, some Housing Forward ESG Rapid Re-housing funds will be used to house persons outside of Oak Park, but all such clients will originate in Oak Park shelters. PY 2017 ESG subrecipient Housing Forward will reach out to homeless persons (especially unsheltered persons) and assess their individual needs by following significantly planned and well thought out Coordinated Entry practices.

Addressing the emergency shelter and transitional housing needs of homeless persons

From mid-September through mid-May, Housing Forward's Emergency Shelter Program served scores of individuals at ten rotating sites, six of which are located in Oak Park, providing access to an array of supportive services aimed at reducing persons' length of homelessness. The summer Transitional Shelter program operates for a full 15 weeks (June 1-September 15) seven days a week at seven sites (five of them in Oak Park), and is designed to foster sustained stability by providing a combination of short-term shelter and supportive services for 15 participants nightly. Housing Forward will address these needs by following Coordinated Entry practices.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

ESG funds for homeless prevention address preventing individuals and families who were recently homeless from becoming homeless again. ESG-supported programs are required to provide case management and supportive services, and to connect clients with mainstream resources to increase their likelihood of achieving long-term housing stability. ESG clients will receive follow-up contact to determine their housing status after termination of assistance, as required, and provide additional supports as needed to prevent households from becoming homeless again, as well as determine program outcomes. It should be noted that Village Rapid Re-housing funds will be used to settle some clients outside of Oak Park, though all clients will be coming from an Oak Park shelter. We must repeat that Housing Forward will improve access and address these needs by following Coordinated Entry practices.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

ESG Prevention funds will be used as described above to help low-income households achieve housing stability. The Village will fund Housing Forward's ESG Rapid Re-housing

activity. Oak Park is also focusing on prevention programs, often referring persons in need to the Homelessness Prevention Call Line, as mentioned above. We must once again repeat that Housing Forward will address these needs by following Coordinated Entry practices.

Additionally, the Oak Park Homelessness Coalition links a variety of agencies – including health care, mental health, and youth institutions and facilities – to provide a more coordinated system of care to ultimately end and prevent homelessness in the community. The Village is much involved in the Oak Park Homelessness Coalition.

All agencies receiving ESG funds are required to connect households to mainstream benefits as available and appropriate for their needs. In addition, the Community Mental Health Board strengthens the systems of care and provides prevention, early intervention, treatment and quality of life services to the most vulnerable residents. One of the responsibilities of the Community Mental Health Board is to maintain and expand the coordination of community resources and look for gaps in services and ways to improve efficiency.

Source of Funds

The Village of Oak Park expects to receive \$135,000 in Emergency Solutions Grant (ESG) program funds for PY 2017, with \$10,125 of that amount going to Village ESG Administration.

The proposed Subrecipient allocations for PY 2017 ESG funds are:

PY 2017 ESG Agency	Proposed Activity	Proposed Amount
Alliance to End Homelessness	HMIS	\$10,000
Housing Forward	Emergency Shelter	\$24,000
Housing Forward	Homeless Prevention	\$31,000
Housing Forward	Rapid Re-Housing	\$41,500
Housing Forward	Street Outreach	\$18,375
Total ESG Recommendations		\$124,875

Discharge Coordination Policies

The following discharge policies, as written by the Continuum of Care, reflect the planned activities to implement a cohesive, community-wide Discharge Coordination Policy by the Alliance to End Homelessness in Suburban Cook County, which includes the Village of Oak Park.

Continuum of Care Discharge Planning: Foster Care

The Illinois Department of Children and Family Services (DCFS) provides housing to youth who are wards of the state through many programs until the youth's 21st birthday. Programs include traditional foster care placement, Independent Living Programs, Transitional Living Programs and other residential programs. Most young people exiting foster care transition to stable housing on their own. Youth who age out of care but later decide they want to return prior to age 21 can do so by contacting DCFS. Wards can enroll in the Youth in College program prior to their 21st birthday and continue to receive a payment while they are enrolled in a college or employment training program until their 23rd birthday. Youth who choose to exit foster care prior to age 21 (and those adopted after age 16) can be assisted

by DCFS' Youth Housing Assistance Program (YHAP) shortly before and after they exit care. YHAP provides housing advocacy and cash assistance to young people ages 18-21.

Continuum of Care Discharge Planning: Health Care

The Illinois Department of Public Health (IDPH) operates under eight State administrative rules that govern the facilities it licenses or regulates, including hospitals, assisted living, skilled nursing, intermediate care, sheltered care, veteran homes, and community living facilities. All eight administrative rules include discharge procedures. Alliance members participate in Illinois' Coordinated Care Entity (CCE) projects that involve hospitals, housing, and service providers as vital partners. Designed to streamline and improve care for high users of health care, hospitals will notify the CCE of patients during emergency room visits, thereby reducing admissions and releasing individuals to their care coordination team. Emergency shelters have strong relationships with their local hospitals and connect clients to services immediately to avoid serious complications that may arise and require hospitalization. Many have registered nurses who visit weekly to offer these services.

Continuum of Care Discharge Planning: Mental Health

The Illinois Department of Human Services Division of Mental Health (DMH) has a long-standing policy that persons are not to be discharged into homelessness, if possible. In extended care facilities, stable housing and benefits are reliably in place before discharge. In acute treatment facilities, where the length of stay is 12 days or less and where 30% of persons admitted were homeless at entry, the facility staff relies on their relationships with local homeless-serving organizations to create linkages to other resources. Alliance members work with community hospital social work staff to inform them of resources for avoiding homelessness for persons discharged from psychiatric departments. DMH has an initiative to prevent persons in crisis with a serious mental health problem from being discharged or sent to a nursing home if housing resources are not available. Specialized Mental Health Rehabilitation Facilities (SMHRF) Comparable Service Program pays for crisis stabilization as an alternative to psychiatric hospitalization. It will pay for housing and services while securing other benefits in order to transition to other community housing and services.

The Illinois Department of Human Services Division of Mental Health (DMH) has set this policy. It applies to state-run hospitals—both acute and extended treatment facilities—and to other state-funded treatment programs.

While community hospitals mainly served private pay and Medicaid patients, the expansion of Medicaid is expected to increase low- and moderate-income persons' access to these private resources, offering new partners in the effort to prevent the discharge of persons into homelessness. The state merged the Division of Alcohol and Substance Abuse (DASA) and DMH, and DASA was awarded a SAMHSA grant that led to the creation of an Interagency Council on Homelessness. DMH co-chairs the council.

Continuum of Care Discharge Planning: Corrections

The Alliance works with Illinois Department of Corrections (IDOC) programming called TRAC (Trained Reformed And Capable) to ensure successful re-entry. TRAC begins at intake and extends throughout incarceration, working to obtain appropriate housing before release. Offenders at risk of homelessness or who have special needs are assigned Parole Reentry Group caseworkers to work on discharge plans in the 90 days prior to release. Post release,

parolees are evaluated for vulnerability. IDOC refers the chronic cases to the Alliance network for community linkages. Cook County Jail has received Second Chance Grants designed to reduce the risk of re-incarceration and homelessness among juvenile offenders.

The Sheriff's Re-Entry Council develops community partnerships through homeless resource fairs and cooperative projects like Datalink, which integrates mental health service data in order to reconnect detainees to their previous service provider. The Sheriff had entered into cooperative agreements with a coordinated health care entity, Be Well Health, to house persons in IMD facilities as an alternative to jail for persons with serious mental illnesses who are homeless.

The Alliance partners with IDOC, Veteran Affairs, Social Security Administration, Illinois's Division of Mental Health, Illinois Department of Juvenile Justice, Illinois HealthCare and Family Services, and the Illinois Department of Human Services to assist in identifying community resources and housing prior to prison release. IDOC stakeholders conduct onsite prison screenings to determine eligibility for community housing and support services. CountyCare and Together4Health are just two of several newer health care delivery mechanisms brought about by Affordable Care Act implementation. These will target the needs of various subpopulations exiting jail or prison with healthcare difficulties and who tend to frequently become homeless. These initiatives include members of the Continuum of Care, criminal justice departments, local government, and emergency health care providers as partners.

In PY 2017, the Village of Oak Park will continue to work with the Alliance to ensure that these policies are followed.

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AP-85 Other Actions - 91.420, 91.220(k)

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 identified needs in the Consolidated Plan and this draft Action Plan. These include the following:

- 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 under 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.
- 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.
- Intensifying the impact of limited available funding sources due to the still-sluggish economy. The Village, along with most communities, has even fewer resources available to address economic-recovery issues as municipalities themselves face revenue reductions.

To address these obstacles, the Village has initiated 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 amount of grant management undertaken by subrecipients and providing clear and measureable outcomes to ensure resources are being utilized in the most effective way possible.

The Village is also identifying new and innovative ways to increase the affordable housing stock by coordinating with Village agencies to identify areas of opportunity that might be feasible with the Village being a member of the Cook County HOME Consortium.

To address the need for a more vibrant economy, the Village is determined to make economic development a main priority by implementing a Section 108 business loan fund that was approved by HUD during the 2016 program year.

Actions planned to foster and maintain affordable housing

Oak Park has been investing its CDBG funds in housing rehabilitation for multiple years, but now more than ever an emphasis is being placed on determining ways to foster affordable housing in alternative ways. By joining the Cook County HOME Consortium, the Village hopes

to identify creative ways to increase the affordable housing stock in the community. The following are other actions that will be taken.

Addressing the Needs of Public Housing

While the Village will not be providing any financial assistance to the Oak Park Housing Authority in program year 2017, the Village will continue to work cooperatively with the Authority to promote its facilities, programs and policies.

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 nonprofit 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. These include some of the following initiatives:

- 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 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.
- The Village administers a 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 newer grant from Cook County, which is called the *Lead Poisoning Prevention Program Grant*.
- Though not funded by CDBG, the Village of Oak Park will 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.

Funds Expected to be Available

The Village of Oak Park estimates that it will apply \$269,000 in PY 2017 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 also begin the 2017 program year with an estimated initial fund amount of \$167,596.91 of repaid CDBG loans in its revolving loan fund, which will be utilized for homeowner rehabilitation loans.

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 State of Illinois has designated Oak Park as a community where children through 6 years of age are considered to be at high risk for lead exposure. This designation is based on the fact that a significant percentage of Oak Park housing units were built prior to 1978. Given the prevalence of older housing stock in Oak Park and the corresponding high risk for lead exposure for children under the age of six, the Village has committed to strong efforts in lead awareness, prevention, education and abatement. 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 Illinois Lead Poisoning Prevention Code.

Because of the age of the Village's housing stock, the Village of Oak Park is defined through the State of Illinois to be a high-risk area for lead. Because of this determination 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 to 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 *Stellar*. The Health Department's Nursing Division is responsible for reviewing incoming sample results using the *Stellar* data management system. Nursing staff must 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.

Nursing Case Management – Case management of children begins at 10 µg/dl on all children younger than 84 months of age. Children with a lead level at or above 10 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 under the age of 3 with a confirmed lead blood lead level of 10 µg/dl or above.
- A child over 3 to 6 years with a confirmed blood lead level of 20 µg/dl or above.
- A child over 3 to 6 years with three confirmed successive blood lead levels of 15-19 µg/dl.

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, the jobs will be bid, the 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 year in an effort to reduce the number of poverty-level families and increase self-sufficiency. Several activities funded through the CDBG and ESG programs work towards this goal. Additionally, the Village hosts a youth employment program in the summer months that provides job training and skill 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, shelter and other social services, the Village of Oak Park administers programs that aim to mitigate poverty and the problems associated with it. The Village can directly impact some of poverty's primary causal factors – poor-quality housing, expensive housing, lack of education, unemployment, low income and ill health – 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 multiple aspects of the programs run by the Village or its subrecipients, when working in concert, have the ability to reduce the number of households with incomes below the poverty level. Specific components of the Village's poverty-reduction strategy now follow.

Housing

A lack of affordable housing places housing cost burdens on low- to moderate-income persons, limiting their ability to pay for other goods and services, such as quality education or needed prescriptions. Based on the Village's Consolidated Plan outreach, and following the housing priorities listed in the Cook County Consolidated Plan, 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 affordable 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 units to renters under affordable rent limits for 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 much 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 Oak Park Department of Public Health identifies community problems and potential epidemics, develops health policies, enforces local ordinances and links residents to a wide range of direct services. Programs include a Family Case Management program, community nursing and a childhood lead program 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. One specific program is the healthy nutrition incentive program, which 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 and ESG 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 an agency that prevents, eliminates or ameliorates 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 homeless persons. Other CDBG-funded agencies also provide services that make a huge impact.

The Village supports other important services by allocating 96 percent of its PY 2017 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 include the Village's efforts to increase the number of minority- and women-owned businesses doing business with the Village and its encouragement of major partner agencies (the Oak Park Regional Housing Center, the Oak Park Economic Development Corporation and the Oak Park Residence Corporation) to increase the number of MBE/WBE contracts awarded. The Village's Business Services Division – along with the Village-funded Oak Park Economic Development Corporation – works on business retention and economic development expansion throughout the Village. 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 now has a Section 108 loan fund for small to midsize businesses in the amount of \$3 million. These funds will be loaned by the Village to support start-ups, promote businesses expansion and improvement, create and/or retain jobs, assist low/moderate-income persons, and deliver positive economic benefits for the Village and its residents.

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. 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 throughout the year, offering referrals for funding and training opportunities where appropriate. Staff also attends relevant 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 makes a great effort to work with the network of public agencies and local nonprofit 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 nonprofit 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 Community Development Citizens' Advisory Committee (CDCAC) regarding the allocation of CDBG and ESG funds. Staff and elected officials consider community needs and public opinion to determine prioritization.

Non-profit CDBG subrecipients are monitored based on a risk analysis, and previous performance is reported by 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, including 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 draft Action Plan. The Village of Oak Park holds liaison membership on the Board of Directors of the Oak Park-River Forest Chamber of Commerce, Visit Oak Park, the Downtown Oak Park Special Service Area, the Business Association Council and other individual business districts.

Coordination among agencies in the development and implementation of housing and community development programs and services is critical in efforts to maximizing 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 purpose of helping persons experiencing homelessness and those at risk. Also, the Intergovernmental Committee of the Board meets bimonthly and includes the Village, Oak Park Township, Oak Park Housing Authority, the Park District of Oak Park and local school districts. This group shares information, facilities, and future plans to assure coordination in service provision among independent governmental entities. Additionally, 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 services to be provided and the related costs. The Village's extensive project performance review process also enhances coordination.
- *Regional and state level:* The Village participates in the Alliance to End Homelessness in Suburban Cook County (Continuum of Care lead agency), the Chicago Metropolitan Agency for Planning and the Metropolitan Planning Council. The Village also collaborates with neighboring municipalities in several efforts. In conjunction with the Oak Park-River Forest Community Foundation, the Village also periodically convenes 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 Association of Redevelopment and Housing Officials, the National Community Development Association and the National League of Cities. The Village leadership is also a member of several municipal organizations that support local government, including the US Conference of Mayors.

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

Through the consultation process, better coordination and collaboration was identified as a key priority for the Village and its partners. To address this need, the Village has been facilitating the meeting of community funders, as discussed above, as well as integrating this in the public service application process. Beginning with the PY 2015 (the prior program year's) application, public service applicants had to include in their written narrative a discussion of how they are coordinating with other agencies in the community, and if they do not currently have these connections, they were asked to describe their detailed process and timeline for implementing a collaborative process. This not only will improve collaboration for awarded agencies, it will also allow 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 regularly attends Continuum of Care Prevention 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.

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

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 established a comprehensive set of standards and procedures to evaluate its own performance in meeting the goals and objectives outlined in the draft Action Plan, as well as ensuring the adequate performance of subrecipients each program year.

Administrative Monitoring

The Village monitors the administration of Action Plan program activity in four ways:

Annual CAPER

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. One key part of the CAPER is the Integrated Disbursement and Information System (IDIS) Reports section. 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. Oak Park's IDIS reports in the annual CAPER show in great detail how the Village's CDBG and ESG funds were spent to meet its stated goals and objectives.

Program Budget Format

Beginning in fiscal year 2000, the Village of Oak Park changed its budgeting system from a line-item (traditional fund) budget to a program (functional) budget. Because of this change, fund items such as housing rehabilitation and infrastructure improvements appear in the CDBG section of the budget. This format makes it easier for the Village to monitor its grants activities. The Village has also begun accounting for all grants in separate funds, which

improves reporting and enhances the long-term tracking of grant activity.

Moreover, the program budget is presented in a format that provides a detailed operational budget, so that the Village can review expenditures by a particular function or service. By doing so, outputs of a particular program (e.g. number of units rehabilitated, lineal feet of street paved) may be compared to resources required (e.g. cost of materials and labor) to help assist the public or Village staff in understanding the elements of a particular program and in determining its effectiveness. Again, this format simplifies the Village's efforts in self-monitoring its grants activities while also improving the accuracy of the self-assessment. In addition, the Village follows a performance measurement system (called MAP) and the Village of Oak Park grants unit is part of this system, using timeliness of spending as an outcome, and reporting on annual federal grants accomplishments.

Interdepartmental Reporting

Village of Oak Park grants unit staff administering the federal grants received by the Village report program accomplishments to Village Management, and when needed, inform or respond to the needs of Village of Oak Park Board of Trustees. Identifying progress and accomplishments informs the Village management on how the Village is meeting the goals and objectives that were listed in each Action Plan.

Subrecipient Monitoring

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

The Village's monitoring standards and procedures include the following functions:

- **Performance Evaluation Review:** Includes National Objective compliance, contract or agreement objectives, Statement of Work, budget, accomplishments, corrective actions/deadlines (if necessary), technical assistance and identification of high-risk subrecipients, if any.
- **Record-Keeping System:** Filing system, security procedures, location and accessibility, documentation, environmental review (performed by Village staff), and

environmental review documentation (Village staff retain these items).

- **Financial Management Systems:** CDBG staff persons ensure that subrecipients have systems for internal control, accurate accounting records, eligible and reasonable costs, proper drawdown procedures, proper auditing reports and budget control. Reports are generated that identify project status and any unused funds.
- **Encouragement of Timeliness of Expenditures:** As noted above, the Village of Oak Park has strongly emphasized the importance of timeliness of expenditures to subrecipients, and this effort consistently results in the Village meeting or exceeding the HUD-required grants spending ratio. The Village will continue to meet with those subrecipients that fail to spend in a timely manner and will continue to increase the efficiency of the drawdown procedure to ensure continuing compliance with the timeliness of expenditures.
- **Non-Discrimination and Actions to Further Fair Housing:** Equal Employment Opportunity, Section 3 (if applicable), fair housing compliance, requirements for disabled persons, and Women and Minority Business Enterprises. Village staff attend all available fair housing trainings in the area.
- **Procurement and Bonding:** Procurement procedures, construction specifications, competitive bids, prevention of the use of debarred, suspended or ineligible contractors, small purchases, conflict of interest, and bonding requirements.
- **Labor Standards Monitoring:** Prevailing wages, notices, documentation, payroll review, contractor eligibility, field inspections and interviews.
- **Relocation and Anti-Displacement:** Practiced where applicable.

In addition, depending on the type of activity conducted by the subrecipient, other items are reviewed at the time of the monitoring visit that more specifically examine that activity. Per HUD guidance, the Village uses a risk-analysis approach to subrecipient monitoring.

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 IDIS. With the annual report, if the target goal is not met by a subrecipient, they are required to provide a detailed reason, and 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.