



Draft Action Plan



2019 Program Year

October 1, 2019 - September 30, 2020

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

Village of Oak Park, IL
Draft PY 2019 Action Plan

Table of Contents

1. Executive Summary	3
2. Expected Resources	5
3. Annual Goals and Objectives	6
4. Proposed Activities	9
5. Geographic Distribution	10
6. Homeless Assistance Activities	13
7. Other Actions	15
8. Program Specific Requirements	23

1. Executive Summary

Purpose of the Draft 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 5 Action Plan as required under 24 CFR 91.220. The draft Action Plan for PY 2019 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, 2019 to September 30, 2020.

Lead Agency

The lead agency for the draft 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 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 total Village of Oak Park CDBG allocation for PY 2019 is **\$1,633,190**. Because this allocation was lower than the PY 2018 CDBG allocation, to avoid some cuts, the Village will be adding \$34,330 in prior year, returned funds for a total PY 2019 CDBG amount of **\$1,667,520**.

Proposed administration set-asides include \$90,438 for the Oak Park Regional Housing Center, \$11,000 for Housing Forward/Oak Park Homelessness Coalition and \$225,200 for the Village of Oak Park. In addition, \$13,000 is set-aside, in the Public Services category, for the Village of Oak Park Health Department.

The proposed PY 2019 funding amount for non-profit CDBG subrecipients is as follows: \$231,978 (\$244,978 minus \$13,000 set aside for VOP Health Department) for Public Services and \$40,000 for Public Facilities and Improvements.

The remainder of the expected CDBG funding is proposed to be allocated as follows: \$275,904 for Housing; \$705,000 for Infrastructure; and \$75,000 for Code Enforcement.

The Single Family Housing Rehabilitation program will also begin the 2019 program year with an initial fund amount of \$119,682.73 of repaid CDBG loans, in its revolving fund, which will be utilized for homeowner rehabilitation loans.

The ESG amount for PY 2019 is **\$143,061**. After the Village ESG Administration amount of \$10,729 is subtracted from the total, the PY 2019 ESG funding amount for ESG subrecipients is \$132,332.

The Village continues to market a Section 108 loan program for businesses, in the amount of \$3 million. For PY 2019, the Village will 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 draft 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 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 some 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 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

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 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. A complete description of that process is available in the Consolidated Plan document.

The development of the Village of Oak Park draft PY 2019 Action Plan began on January 2, 2019 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 Department grants mailing list were sent a notice. Due to extreme weather conditions on January 31, 2019, the day of the application/grants programs workshop, Village Hall was closed during the scheduled time of the workshop, causing the workshop to be rescheduled for February 7, 2019. An updated ad was published February 6, 2019 in the *Wednesday Journal* newspaper. The email list of interested persons from agencies received a reschedule notice on January 30, 2019.

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 20, 2019, when a Notice of these meetings was published in the *Wednesday Journal* newspaper. **Seven public CDCAC meetings were held in March and April, 2019.**

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 2019 CDBG entitlement allocation and for most of the ESG funds. All of these recommendations are expected to be accepted, and are now included in this draft Action Plan.

On June 3, 2019, the Village Board voted on releasing the draft PY 2019 Annual Action Plan for a 30-day public comment period to begin June 20, 2019. The Notice of Document Availability for the draft PY 2019 Action Plan is expected to be published in the *Wednesday Journal* on June 19, 2019 and to be advertised on the Village website, with the 30-day comment period running from June 20, 2019 to 5 p.m. on July 19, 2019. After being released, the draft PY 2019 Action Plan will be made available at the following locations:

- Both Oak Park Public Library branches;
- Village of Oak Park Grants Office, 123 Madison Street, Oak Park, Room 214; 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 2019 is **\$1,633,190**. The Village will be adding \$34,330 in prior year, returned funds for a total PY 2019 CDBG amount of **\$1,667,520**. 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 and ESG 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 providers 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 ESG amount for PY 2019 is **\$143,061**. After the Village ESG Administration amount of \$10,729 is subtracted from the total, the PY 2019 ESG funding amount for ESG subrecipients is **\$132,332**. Matched dollar for dollar, ESG funds increase the investment made in the community.

The Village also has a Section 108 loan fund for businesses, in the amount of \$3 million.

3. Annual Goals and Objectives

PY 2019 Priorities, Objectives and Outcomes

During the 2019 Action Plan program year (October 1, 2019 - September 30, 2020), 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. The following is a breakdown by grant category.

Housing: According to the National Alliance to End Homelessness, when housing accounts for 50% or more of a household's resources, any unexpected financial crisis could jeopardize housing stability and lead to an increased risk of homelessness. Housing is a high priority for Oak Park.

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 Consolidated Plan determined three primary priorities within housing. Those three priorities are as follows: 1.) Affordable housing; 2.) Aging in place; and 3.) Repair assistance for both renter-and owner-occupied units.

Public Infrastructure: Infrastructure improvements will be made within CDBG Target Areas for improving streets and alleys. 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 rating during the Consolidated Plan process. The top four Public Services priorities that emerged during the planning process include the following: 1.) Domestic violence programs; 2.) Mental health programs; 3.) Programs for persons with disabilities; and 4.) 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. It should be noted that

this category is capped at 15% of the Village's annual entitlement allocation, thereby limiting the amount of funds available to subrecipients.

Economic Development: Through the HUD Section 108 Loan Guarantee Program, the Village continues to market 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/moderate-income persons, and deliver positive economic benefits for the Village and its residents.

For borrowers, the Village offers a very competitive interest rate, lower than conventional financing. The Village will charge 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 permanent, low and moderate-income, full-time equivalent job for at least every \$35,000 invested. To date, the Village has received two applications but neither one was approved.

Code Enforcement: 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.

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 support these needs.

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 interviews with both the Alliance to End Homelessness in Suburban Cook County and Housing Forward, as well as through other Consolidated Plan meetings, the Village determined that the most effective way to focus ESG allocations is to focus on affordable housing. This focus will be done primarily through permanent supportive housing, transitional housing, emergency shelter, homelessness prevention, street outreach and rapid re-housing. 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 is prioritized.

Public Facilities Improvements: 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.

Consolidated 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-occupied 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. Accessibility improvements are 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. The Oak Park Section 108 Loan Program is a business loan fund focused on the expansion of businesses.
8	Goal Name	Administration
	Goal Description	Administration of the CDBG and ESG Programs by Village staff, homelessness assistance administration and planning, and fair housing administration.

4. Proposed CDBG Activities for PY 2019 - Funding

PY 2019 CDBG Agency	Proposed Activity	Grant Amount
ADMINISTRATION	(Capped at 20% of total award)	
Village of Oak Park (VOP)	VOP CDBG Administration	\$225,200
Oak Park Regional Housing Center	Fair Housing Administration	\$90,438
Housing Forward/OP Homeless Coalition	Homelessness Assistance Planning & Admin	\$11,000
Total Admin		\$326,638
PUBLIC SERVICES	(Capped at 15% of total award)	
Community Support Services	Respite and Case Management	\$6,500
Day Nursery	Healthy Beginnings for Children	\$7,500
Hephzibah Children's Association	At-Risk Services & Support	\$16,000
Housing Forward	Emergency Shelter	\$13,000
Housing Forward	Employment Readiness	\$10,000
NAMI-Metro Suburban	Drop In Center	\$11,000
New Moms, Inc.	Family Support	\$18,500
Oak Park Regional Housing Center	Fair Housing Outreach	\$73,000
Oak Park-River Forest Food Pantry	Direct Hunger Relief	\$16,631
Oak Pk-River Forest Infant Welfare Society	Dental Care for Children and Youth	\$22,000
Sarah's Inn	Domestic Violence Services	\$11,000
Thrive Counseling Center	Psychiatric Services for Medicaid Clients	\$12,000
Way Back Inn	Child Care at Grateful House	\$2,847
West Cook YMCA	Resident Program Services	\$12,000
VOP Health Department (set aside)	Healthy Nutrition Incentives at Farmers Market	\$13,000
Total Public Services		\$244,978
PUBLIC FACILITIES & IMPROVEMENTS		
Oak Leyden	Public Facilities and Improvements	\$15,600
UCP-Seguín Services	Public Facilities and Improvements	\$24,400
Total Facility Improvements		\$40,000
HOUSING		
VOP Housing Programs	Lead Reduction, SRP, and SFR & SRP delivery	\$275,904
Total Housing		\$275,904
INFRASTRUCTURE		
VOP Public Works Engineering Division	ADA Sidewalks, Alleys & ADA Ramps & Sidewalks	\$705,000
Total Infrastructure		\$705,000
CODE ENFORCEMENT		
VOP Property Maintenance, Neigh. Svcs.	CDBG Code Enforcement	\$75,000
Total Code Enforcement		\$75,000
GRAND TOTAL		\$1,667,520

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, administration and public services, based on consultation. CDBG Public Service and Public Facilities Improvements funds are allocated through the Community Development Citizen Advisory Committee for subrecipients.

Proposed ESG Activities for PY 2019 - Funding

Proposed PY 2019 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 2019 ESG Agency	Proposed Activity	Grant Amount
ESG ADMINISTRATION	(Capped at 7.5% of total award)	
Village of Oak Park (VOP)	VOP ESG Administration	\$10,729
Total ESG Administration		\$10,729
ESG SUBRECIPIENTS		
Alliance to End Homelessness	Homeless Management & Information System	\$10,144
Housing Forward	Emergency Shelter	\$32,500
Housing Forward	Homelessness Prevention	\$26,688
Housing Forward	Rapid Re-Housing	\$42,000
Housing Forward	Street Outreach	\$21,000
Total ESG Subrecipients		\$132,332
GRAND TOTAL		\$143,061

With regard to both the CDBG and ESG tables listed above, the Village has identified these activities proposed to be implemented in PY 2019 to achieve the priorities, strategies and goals listed in the Consolidated Plan.

ESG funds are allocated through the Community Development Citizen Advisory Committee for subrecipients.

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 three Oak Park sites. One UCP Seguin group home 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.

Oak Leyden is an agency with a proposed Public Facilities Improvements project. The proposed Oak Leyden Facility Improvement CILA group home is in census tract 8125, an area of racial concentration.

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.

One proposed UCP Seguin Facility Improvement activity is in an area of racial concentration that is also a LMI area. One UCP Seguin group home is in census tract 8121, block group 1.

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6. Homeless Assistance Activities

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. The Village regularly attends Continuum of Care Prevention Committee and West Suburban Council on Homelessness meetings.

This participation also includes attending meetings on the implementation of the Suburban Cook County Coordinated Entry (CE) system. CE is a community-wide system that standardizes and expedites the process by which people experiencing homelessness or who are at imminent risk of homelessness access shelter, housing, and homeless resources.

CE is helping suburban Cook County municipalities and assistance providers better target the limited resources that are provided by the homeless assistance system, to people who are experiencing homelessness. By standardizing the intake process across the region, by sharing information in real-time, and by adopting uniform prioritization policies, homeless service agencies will be able to refer people to the right program based on their preferences and level of need.

The Village was an important part in the creation of CE, being a member of the committee that chose the CE provider. Both of the Village of Oak Park PY 2019 ESG subrecipients will enthusiastically and substantially follow CE practices, and both have Written Standards for serving clients and providing services.

Source of Funds

The Emergency Solutions Grant (ESG) amount for PY 2019 is **\$143,061**. After the Village ESG Administration amount of \$10,729 is subtracted from the total, the PY 2019 ESG funding amount for ESG subrecipients is **\$132,332**. Matched dollar for dollar, ESG funds increase the investment made in the community.

The proposed subrecipient allocations for PY 2019 ESG funds are:

PY 2019 ESG Agency	Proposed Activity	Proposed Amount
Alliance to End Homelessness	HMIS	\$10,144
Housing Forward	Emergency Shelter	\$32,500
Housing Forward	Homeless Prevention	\$26,688
Housing Forward	Rapid Re-Housing	\$42,000
Housing Forward	Street Outreach	\$21,000
Total ESG for Subrecipients		\$132,332

Reaching Out to Homeless Persons

Housing Forward's homeless outreach program is the largest provider of services to Oak Park's homeless population, including the unsheltered homeless. PY 2019 ESG (and CDBG) subrecipient Housing Forward will address a wide range of needs, including shelter, homelessness prevention, rapid re-housing and street outreach. 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 is to move persons to transitional and permanent supportive housing.

Housing Forward will reach out to homeless persons, including unsheltered persons, chronically homeless individuals and families, families with children, veterans, and unaccompanied youth. Housing Forward will assess each client's individual needs by following significantly planned and well-thought-out Coordinated Entry practices. (CDBG funds are also proposed to be used to assist persons experiencing homelessness; see the table on page 9).

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 higher rents as compared to neighboring municipalities, some Housing Forward ESG Rapid Re-housing funds may be used to house persons outside of Oak Park. However, all such clients will originate in Oak Park shelters.

Emergency Shelter and Transitional Housing

From mid-September through mid-May, Housing Forward's CDBG- and ESG-funded Emergency Shelter Program serves many individuals and families at nine rotating sites. Six of those sites 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 which are in Oak Park. The program 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.

Transition to Permanent Housing and Independent Living

ESG activities have the goal of preventing individuals and families who were recently homeless from becoming homeless again. Housing Forward ESG-supported activities will provide case management and supportive services, and will 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 and to determine program outcomes. Housing Forward will improve access and address these needs by following Coordinated Entry practices.

Homeless Prevention and Rapid Re-Housing

ESG Prevention funds will be used by Housing Forward to help low-income households achieve housing stability and Housing Forward's ESG Rapid Re-housing activity will quickly move homeless persons into housing. Housing Forward will enhance these services by following Coordinated Entry practices.

All agencies receiving ESG funds are required to connect households to mainstream benefits, as available and appropriate for their needs. In addition, the Oak Park 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.

Additionally, the Oak Park Homelessness Coalition links a variety of agencies, including those offering health care, mental health, senior services and youth services, to provide a more coordinated system of care, with the goal of ultimately ending and preventing homelessness in the community. Through Housing Forward, the Village is supporting the Oak Park Homelessness Coalition in PY 2019 with an \$11,000 homelessness assistance planning and administration grant.

Street Outreach

ESG Street Outreach funds will be used by Housing Forward to reach non-service seeking individuals and families who are residing in a place not meant for human habitation (e.g., parks and cars) in the Oak Park area. The goal of the activity is to help link these individuals to more traditional basic needs and case management services, with the ultimate goal of securing permanent housing for each client.

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 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. It should also be noted that the Village's PY 2019 CDBG allocation is \$52,814 less than the PY 2018 allocation.
- 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.

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 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 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.

Available Funds

The Village of Oak Park will apply **\$275,904** in PY 2019 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 2019 program year with an initial fund amount of \$119,682.73 of repaid CDBG loans in its revolving 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 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 2019, 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 and ESG programs will work towards this goal. Additionally, 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, 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. One specific program is 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 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 Housing Forward, which 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 persons experiencing homelessness.

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 2019 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 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 via the Community Development Citizens Advisory Committee (CDCAC) regarding the allocation of CDBG and ESG 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 draft Action Plan.

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 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.

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 over four 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 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 draft 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 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.

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.