# DRAFT
# FY 2027 Action Plan

For Public Comment
November 13, 2026

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# Executive Summary

## AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

### 1. Introduction

The Draft 2027 Action Plan identifies the City of Evanston's housing, community development, and economic needs and strategies to guide the use of entitlement funding from the U.S. Department of Housing and Urban Development (HUD) in alignment with the 2025-2029 Consolidated Plan. The City receives Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds. Evanston received Emergency Solutions Grant (ESG) funds in 2025 and 2026, but was not eligible to receive Emergency Solutions Grant (ESG) funds in FY2024. ESG funds are included in the Draft 2027 Action Plan for public comment.

The Action Plan is submitted to HUD for approval following its development according to the regulations in 24 CFR Part 91, which includes consultation with community stakeholders and input from the public. The City of Evanston engages and encourages residents and institutions to work together to make Evanston the most livable city. To this end, the City will continue to pursue strategies to address housing, economic, and social service needs of low- and moderate-income residents, the homeless, and special needs populations. Evanston has established tools and partnerships to address the ongoing effects of rising housing costs and stagnant wages that continue to stifle progress, particularly for low- and moderate-income residents in our city.

Since the pandemic, multiple City departments have conducted assessments that relied heavily on community engagement to develop plans that address areas for improvement. The 2025-2029 Consolidated Plan and 2027 Action Plan incorporate these local planning initiatives that focus on affordable housing, economic development, sustainability, enhancement of public facilities and parks, capital improvement projects, and targeted health initiatives in historically underserved areas of Evanston.

### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

**Affordable housing:** Evanston lacks the number and variety of affordable housing units to meet the needs of its low- and moderate-income residents. CDBG funding will focus on the rehabilitation of low-to-moderate income owner-occupied and rental housing to address code and life safety issues and

prevent displacement. Code enforcement remains an important tool to maintain decent and safe housing and address blight from vacant and poorly maintained properties. HOME funds will be used for the construction, acquisition, and/or rehabilitation of affordable housing.

**Homelessness:** HOME funding will support the Tenant-Based Rental Assistance (TBRA) program for families with children in Evanston schools. In combination with education, job training, and other support, TBRA provides stability, lifting two generations out of poverty. ESG funds will support homelessness prevention for income-eligible households facing imminent eviction and to provide Street Outreach and Emergency Shelter services to households experiencing homelessness.

**Creating livable communities:** Surveys show community members want improvements to neighborhood parks and better access to public transportation; they also identify the need for better stormwater management, drainage improvements, and measures to address flooding. The City will continue to use CDBG funding to improve infrastructure, including street lighting, sidewalks, and parks.

**Public Services:** CDBG funding will support public services that provide access to resources that address housing and homeless needs identified by community outreach. Local funds will be used for other public services, which could include, but are not limited to, case management services that provide benefits enrollment, senior care, early childhood care, and youth programs to expand access to education, workforce development, and support for households fleeing domestic violence.

## 3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City has historically met the CDBG requirement for timely expenditure of grant funds according to the regulations. This is achieved if funds available from the U.S. Treasury in the tenth month of the grant year are less than 1.5 times the current year CDBG grant amount. In 2026, due to the timing of receipt of grant awards and delays in public infrastructure projects, the City fell short of the requirement. However, the required balance was met during Q4 of 2026. The City has also complied with the Overall Benefit Certification, which requires that not less than seventy percent of CDBG expenditures benefit low-moderate income residents. Many of the activities undertaken with CDBG funds benefit primarily low to moderate-income households.

The CAPER lists the City's accomplishments in meeting the goals and priorities established in the Consolidated Plan. The City's 2026 CAPER may be viewed at: www.cityofevanston.org/hud.

## 4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The requirements set forth in Subpart B of 24 CFR Part 91 guide Evanston's citizen participation and stakeholder consultation process. Public participation, including hearings and public comment periods, is open to all and includes participation from low and moderate-income and other concerned residents. Evanston's annual plan budget is presented for public review in the third quarter of the year; residents are encouraged to provide input through a variety of channels, including multiple public meetings, by email, and online forms. Evanston's budget includes information about federal awards, including CDBG, ESG, and HOME funds. Stakeholders requesting and in receipt of federal and local awards discuss projects and program outcomes at public meetings of the Housing & Community Development Committee (HCDC) and the Social Services Committee (SSC). Additionally, HCDC holds additional public meetings to review the consolidated plan, action plans, and CAPERs before City Council review and approval; the City holds at least two public meetings for input on each plan/report.

The public comment period for the City's draft 2027 Action Plan is November 13 to December 15, 2026. The City of Evanston's Housing and Community Development Committee will hold a public hearing to hear comments on Tuesday December 15, 2026; the December meeting marks the close of the 30-day public comment period. People also have the opportunity to provide comments at the City Council meeting to review and approve the submission of the 2027 Action Plan to HUD. The draft Action Plan is available on the City's website and in print form at the City Clerk's desk, and public comment periods are held at Housing and Community Development Committee public meetings.

**5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

A summary of any and all public comments received will be included in the appendix of the Action Plan, titled "Public Comments Received and Response." It will include the comments received from the public comment period and comments sent to the Housing & Grants Division before submission to HUD.

**6. Summary of comments or views not accepted and the reasons for not accepting them**

All comments received have been considered in the development of the 2027 Action Plan; any comments not accepted are reported and include a reason for not accepting them in the final version of the plan. The City of Evanston is committed to transparency and accountability to all residents. A final summary of comments with a response will be included in the appendix and titled "Public comments Received and Response."

**7. Summary**

The City of Evanston's 2027 Action Plan identifies the housing and community development needs of predominantly low-to-moderate income areas and households in Evanston. The objective is to target available resources to meet the identified needs to revitalize neighborhoods and improve the quality of life for Evanston residents.

The 2027 Action Plan begins January 1, 2027, and identifies activities that address Evanston's most critical needs. The City develops its 2027 Action Plan based on estimated entitlement grant amounts, as the timing of the 2027 federal budget and appropriations is unknown. The 2027 Action Plan will be updated to include actual grant amounts. All available CDBG, HOME, and ESG funds have been allocated to Goals in the Plan for submission to City Council for approval and then to HUD. A substantial amendment to the Action Plan is defined in the Citizen Participation Plan (CPP) as:

- A change in funding among the Goals used in the development of a plan (AP-20) that is greater than 20% of the total allocated towards the Goal, except for Planning & Administration, which can only use the amount allowed by the grant.
- The deletion of a Goal included in a plan
- The addition of a Goal not currently included in a plan

Any changes to the Plans following receipt of the City's entitlement grant amounts that increase or decrease funding for a goal by less than 20% shall be considered "non-substantial" and may be approved by the Housing & Community Development Committee or Social Services Committee, as appropriate, based on the program affected. These changes would not trigger a second public comment period.

Any changes to the Action Plan that would be considered a substantial amendment would trigger a second 30-day comment period and public meeting for input following the process outlined in the 2024 CPP.

## PR-05 Lead & Responsible Agencies – 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

| Agency Role | Name | Department/Agency |
|---|---|---|
| | | |

| | | |
|---|---|---|
| CDBG Administrator | EVANSTON | Community Development |
| HOME Administrator | EVANSTON | Community Development |
| ESG Administrator | EVANSTON | Community Development |

**Table 1 – Responsible Agencies**

### Narrative (optional)

The City of Evanston's Community Development Department is the administrator for the Community Development Block Grant, HOME Investment Partnership, and, when received, the Emergency Solutions Grant programs.

### Consolidated Plan Public Contact Information

Sarah Flax
Community Development Director
909 Davis Street, Evanston, IL 60201
847-448-8684

## AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

### 1. Introduction

To develop the Consolidated Plan and subsequent Action Plans, the City of Evanston's Housing & Grants Division consulted with numerous City departments, including: Community Development, Public Works, Health & Human Services, Parks & Recreation, Utilities, and Economic Development. The following community partners were also consulted: Housing Authority of Cook County (HACC), Alliance to End Homelessness in Suburban Cook County (Alliance or CoC) as Evanston's Continuum of Care, local and regional nonprofit service providers, housing providers, local advocacy groups, and residents. American Community Survey (ACS) data remains fundamental to the plan. Data are from consulted organizations, the United States Census Bureau, and HUD. Finally, this plan incorporates needs assessments and plans from several City departments including: Parks & Green Spaces Community Survey and Report (Spring 2023), Climate Action and Resiliency Plan (CARP), the Long Range Sewer Improvement Program and Stormwater Master Plan (SWMP), Evanston Project for the Local Assessment of Needs (EPLAN), ADA Transition Plan (2022), Evanston Thrives Retail Action Plan, Putting Assets to Work (PAW) initiative, HUD's Pathways to Removing Obstacles (PRO) Housing grant action plan, the City's Comprehensive General Plan, adopted in January, 2026, and the Strategic Housing Plan (Housing4All), adopted May 11, 2026.

Through these ongoing outreach and engagement efforts, the following priorities were identified for the 2027 Action Plan: affordable housing activities, including shelter for people experiencing homelessness. Community service providers also report on barriers to receiving services, including long wait lists, lack of capacity to assume additional participants, and lack of financial resources, and ways to use federal and local funds to connect those in need to services. These collaborative initiatives and outreach efforts will continue to inform uses for local and federal funds.

### Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

Federal funds target low and moderate-income people, particularly those who live in public or supported housing, and are braided with other sources, including local and state funds. Funds are distributed to partners, including private and nonprofit partners.

Evanston used ARPA funds to create a Living Room drop-in facility for adults over the age of 18 who are in need of mental health assistance. This facility is located at St. Francis Hospital and is operated by Turning Point, a mental health service provider. Guests receive counseling in person, via phone, or virtually in a supportive environment and avoid emergency room visits or calling 911.

Evanston will continue to allocate approximately 15% of CDBG annually to support services particularly for individuals and families experiencing homelessness and housing insecurity and/or fleeing domestic

violence. HOME Funds will continue to support the Tenant Based Rental Assistance Program (TBRA) that provides case management to families with children under 18 years of age and a housing subsidy paid directly to the housing provider. This program prioritizes households that are unstably housed or doubled-up.

HUD awarded $1,300,074 of HOME-ARP funding to Evanston; $1,000,000 has been allocated for the acquisition, development, and/or rehabilitation of non-congregate shelters and $150,000 for tenant-based rental assistance.

Evanston has multiple congregate settings that serve low- and moderate-income residents including people with disabilities, seniors on fixed incomes, and people experiencing homelessness or unstably housed. The City's Ombudsman Program acts as a liaison between residents, hospitals, the City's two Specialized Mental Health Rehabilitation Facilities (SMHRFs), and the eight Skilled Nursing Facilities (SNFs) for persons returning from acute care health institutions. Evanston's Ombudsman also works with housing and supportive service providers through advocacy, emergency planning, and assistance with infectious disease monitoring.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The City works closely with the Alliance to End Homelessness in Suburban Cook County and local providers (Housing Connections, formerly known as Connections for the Homeless, Interfaith Action, the YWCA Evanston/North Shore, etc.) to confirm compliance with policies and procedures established by the Alliance as Evanston's CoC. To ensure agencies that historically received ESG funds from Evanston continue to receive support in the event the City is not awarded ESG funds, City staff works with Alliance staff to advocate for State ESG funding for agencies that rely on this support. Additionally, City staff and community partners continue to follow the policies and procedures established by the Alliance, including Coordinated Entry, to support Evanston residents working to find housing.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The City of Evanston recognizes that the demand is greater than available resources to provide essential services, emergency shelter, prevention, and re-housing that meet all needs. The City works closely with the Alliance to End Homelessness in Suburban Cook County and local providers (Housing Connections, formerly known as Connections for the Homeless, Interfaith Action, the YWCA Evanston/North Shore, etc.) to comply with policies and procedures established by the Alliance as Evanston's CoC. The City and

Alliance agree that individuals and households must be prioritized to ensure that the limited resources available are allocated in the most efficient and appropriate manner. The City of Evanston and the Alliance continue to work on policies and procedures to assess, prioritize and reassess individuals' and families' needs for all ESG-funded services, including essential services for those in emergency shelter, rapid re-housing, and homeless prevention activities. Through the Coordinated Entry process, seniors and veterans are prioritized populations until the Continuum has reached functional zero within those populations. The Coordinated Entry process also prioritizes households based on length of time spent homeless; this prioritization replaced use of the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT).

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

| | | |
|---|---|---|
| 1 | **Agency/Group/Organization** | Housing Authority of Cook County (HACC) |
| | **Agency/Group/Organization Type** | Housing<br>PHA<br>Regional organization |
| | **What section of the Plan was addressed by Consultation?** | Housing Need Assessment<br>Public Housing Needs |
| | **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | Ongoing consultation. Provided data for relevant Consolidated Plan and Action Plan sections. |
| 2 | **Agency/Group/Organization** | YWCA EVANSTON/NORTH SHORE |
| | **Agency/Group/Organization Type** | Housing<br>Services - Housing<br>Services-Victims of Domestic Violence<br>Services-Employment |
| | **What section of the Plan was addressed by Consultation?** | Housing Need Assessment<br>Homeless Needs - Families with children<br>Homelessness Strategy<br>Anti-poverty Strategy |
| | **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | Ongoing consultation, provided information for related Consolidated Plan/Action Plan sections. |
| 3 | **Agency/Group/Organization** | CONNECTIONS FOR THE HOMELESS, INC. |

| | | |
|---|---|---|
| | **Agency/Group/Organization Type** | Housing<br>Services - Housing<br>Services-homeless |
| | **What section of the Plan was addressed by Consultation?** | Housing Need Assessment<br>Homeless Needs - Chronically homeless<br>Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Homelessness Needs - Unaccompanied youth<br>Homelessness Strategy<br>Market Analysis |
| | **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | Ongoing consultation, provided information for related Consolidated Plan/Action Plan sections. |
| 4 | **Agency/Group/Organization** | Alliance to End Homelessness in Suburban Cook County |
| | **Agency/Group/Organization Type** | Housing<br>Services - Housing<br>Services-homeless |
| | **What section of the Plan was addressed by Consultation?** | Housing Need Assessment<br>Homeless Needs - Chronically homeless<br>Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Homelessness Needs - Unaccompanied youth<br>Homelessness Strategy |

| | | |
|---|---|---|
| | **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | Ongoing consultation, provided information for related Consolidated Plan/Action Plan sections. |
| 5 | **Agency/Group/Organization** | Interfaith Action of Evanston |
| | **Agency/Group/Organization Type** | Services-homeless |
| | **What section of the Plan was addressed by Consultation?** | Homeless Needs - Chronically homeless<br>Homelessness Needs - Veterans<br>Homelessness Strategy |
| | **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | Provided data for relevant Consolidated Plan sections. Attended planning meetings to develop needs assessment and other related Consolidated Plan sections. |
| 6 | **Agency/Group/Organization** | Community Partners for Affordable Housing |
| | **Agency/Group/Organization Type** | Housing<br>Services - Housing |
| | **What section of the Plan was addressed by Consultation?** | Housing Need Assessment<br>Market Analysis |
| | **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | Ongoing consultation, provided information for related Consolidated Plan/Action Plan sections. |
| 7 | **Agency/Group/Organization** | Family Focus |
| | **Agency/Group/Organization Type** | Services-Children<br>Services-Elderly Persons<br>Services-Education |

| | | |
|---|---|---|
| | **What section of the Plan was addressed by Consultation?** | Non-Homeless Special Needs<br>Anti-poverty Strategy |
| | **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | Ongoing consultation, provided information for related Consolidated Plan/Action Plan sections. |
| 8 | **Agency/Group/Organization** | Youth & Opportunity United |
| | **Agency/Group/Organization Type** | Services-Children<br>Services-Education |
| | **What section of the Plan was addressed by Consultation?** | Homelessness Needs - Unaccompanied youth<br>Non-Homeless Special Needs |
| | **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | Ongoing consultation, provided information for related Consolidated Plan/Action Plan sections. |
| 9 | **Agency/Group/Organization** | METROPOLITAN TENANTS ORGANIZATION |
| | **Agency/Group/Organization Type** | Housing<br>Services - Housing |
| | **What section of the Plan was addressed by Consultation?** | Housing Need Assessment<br>Public Housing Needs<br>Non-Homeless Special Needs<br>Market Analysis |
| | **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | Ongoing consultation, provided information for related Consolidated Plan/Action Plan sections. |
| 10 | **Agency/Group/Organization** | Infant Welfare Society of Evanston |

| | | |
|---|---|---|
| | **Agency/Group/Organization Type** | Services-Children<br>Services-Health |
| | **What section of the Plan was addressed by Consultation?** | Housing Need Assessment<br>Non-Homeless Special Needs<br>Anti-poverty Strategy |
| | **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | Ongoing consultation, provided information for related Consolidated Plan/Action Plan sections. |
| 11 | **Agency/Group/Organization** | James B. Moran Center for Youth Advocacy |
| | **Agency/Group/Organization Type** | Services-Children<br>Services-Persons with Disabilities<br>Services-Education<br>Services-Employment |
| | **What section of the Plan was addressed by Consultation?** | Non-Homeless Special Needs<br>Anti-poverty Strategy |
| | **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | Ongoing consultation, provided information for related Consolidated Plan/Action Plan sections. |
| 12 | **Agency/Group/Organization** | PEER Services |
| | **Agency/Group/Organization Type** | Services-Health<br>Health Agency |
| | **What section of the Plan was addressed by Consultation?** | Non-Homeless Special Needs |

| | | |
|---|---|---|
| | **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | Ongoing consultation, provided information for related Consolidated Plan/Action Plan sections. |
| 13 | **Agency/Group/Organization** | NORTH SHORE SENIOR CENTER |
| | **Agency/Group/Organization Type** | Services-Elderly Persons |
| | **What section of the Plan was addressed by Consultation?** | Non-Homeless Special Needs |
| | **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | Ongoing consultation, provided information for related Consolidated Plan/Action Plan sections. |
| 14 | **Agency/Group/Organization** | Impact Behavioral Health Partners |
| | **Agency/Group/Organization Type** | Services - Housing<br>Services-Persons with Disabilities<br>Services-Employment |
| | **What section of the Plan was addressed by Consultation?** | Housing Need Assessment |
| | **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | Ongoing consultation, provided information for related Consolidated Plan/Action Plan sections. |

### Identify any Agency Types not consulted and provide rationale for not consulting

Evanston did not knowingly exclude any agencies or community partners from participating in the Action Plan outreach process.

## Other local/regional/state/federal planning efforts considered when preparing the Plan

| Name of Plan | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan? |
|---|---|---|
| Continuum of Care | Alliance to End Homelessness in Suburban Cook County | The Continuum of Care provides the framework and services for many of the activities provided locally to bring assistance and housing to homeless individuals and families. |
| Climate Action and Resilience Plan (CARP) | City of Evanston | This plan focuses on providing access to City programs, services,activities, parks, and facilities for persons with disabling conditions by identifying barriers and providing strategies to remove them.This plan aligns with the Consolidated Plan by promoting the highest quality of life for all residents. |
| Capital Improvements Program (CIP) | City of Evanston | The CIP identifies infrastructure projects under the following categories: transportation, facilities, parks, water treatment, and street, water main, and sewer projects. Municipal public facilities and infrastructure projects identified in this Consolidated Plan align with the CIP. |
| Stormwater Master Plan (SWMP) and Stormwater Management Guide (Guide) | City of Evanston | SWMP launched in 2020 to develop a hydrologic and hydraulic model of the City's stormwater system to identify and define needed system improvements. The SWMP is foundational to the Guide which will provide the framework for developing a resilient stormwater management system. The City uses green technology to reduce the amount of stormwater entering the combined sewer system. The Guide succeeds the Long Range Sewer Improvement Program constructed between 1991 and 2008. |

**Table 3 – Other local / regional / federal planning efforts**

## Narrative (optional)

In addition to the various strategic plans referenced in the section above, the City considered other local/regional/state/federal planning efforts and will continue its efforts to coordinate further with local, regional, state, and federal partners to create opportunities to align and reduce duplication of efforts at the local level.

The City cooperates and coordinates various aspects of the Consolidated Plan and shares regional interests with the neighboring local governments of Chicago, Skokie, and other local communities. For this reason, the City of Evanston works cooperatively and in coordination with various public entities including the Metropolitan Water Reclamation District of Greater Chicago and the Chicago Metropolitan Agency for Planning (CMAP). Evanston also works with the Alliance to End Homelessness in Suburban Cook County, its Continuum of Care, in implementing its homeless and near-homeless programs and goals.

The City actively engages with the Housing Authority of Cook County (HACC), which manages public housing within Evanston and surrounding Cook County. The Community Development Department recognizes the importance of the quality and quantity of public housing units and Housing Choice Voucher holders in Evanston and cooperates with the HACC to implement any strategic goals put forth in the Consolidated Plan and Action Plan.

The City addresses broadband needs through partnerships with District 202 and the Evanston Public Library; both provide WiFi hotspots available to borrow, free of charge, for extended periods of time to student households and Evanston library cardholders. Broadband access was not identified as a high need by the Community Needs Assessment survey distributed as part of the Consolidated Plan process.

All community feedback received will be included in the Action Plan planning process. The City of Evanston is engaged in constant consultation with stakeholders through not only the Consolidated Planning process but all City planning initiatives that are incorporated into the Consolidated Plan. The City will continue to engage all available stakeholders in the planning and execution of projects and programs to better serve community members.

## AP-12 Participation – 91.105, 91.200(c)

### 1. Summary of citizen participation process/Efforts made to broaden citizen participation

**Summarize citizen participation process and how it impacted goal-setting**

In addition to the partners and plans identified above, the 2027 Action Plan also incorporates results, outcomes, and feedback received from recent surveys and community engagement efforts. In the third quarter of 2023, as part of the application process for HUD's PRO Housing initiative, stakeholder engagement was used to generate feedback about housing challenges. Over one hundred local and regional stakeholders, including organizations that uphold fair housing laws and affordable housing managers/owners, identified barriers to affordable housing development and offered solutions. While drafting the 2025-2029 Consolidated Plan, targeted community outreach was performed to assess the needs. Over the last couple of years, the City also launched a community-driven initiative to develop a new comprehensive general plan and zoning code. This process, entitled Envision Evanston 2045, solicited input about community needs and aspirations for the next 20 years. Further community engagement was performed as part of the development of the Housing4All 2026-2027 Work Plan.

**Citizen Participation Outreach**

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|---|---|---|---|---|---|---|
| 1 | Public Meeting | Non-targeted/broad community | Public meetings of the Housing & Community Development Committee to take place on November 17 and December 15, 2026. | Comments received will be attached to the plan. | All comments will be accepted. | http://www.cityofevanston.org/conplan |

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|---|---|---|---|---|---|---|
| 2 | Newspaper Ad | Non-targeted/broad community | Display ad in the November 12, 2026 issue of the Evanston Review, a newspaper of general circulation, that the draft 2027 Action Plan is available on the City's website November 13, 2026, and that the public comment period closed on Tuesday, December 15, 2026, at the public meeting of the Housing & Community Development Committee. The plan is also available in printed format at the City Clerk office beginning Friday, November 13 , 2026. | No specific comments can be linked to the newspaper ads. All comments received have been attached to the plan. | All comments will be accepted. | http://www.cityofevanston.org/conplan |

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|---|---|---|---|---|---|---|
| 3 | Internet Outreach | Non-targeted/broad community | News item on the City's homepage and in the e-newsletter story that the draft 2027 Action Plan is available on the City website beginning November 13, 2026. The Draft 2027 Action Plan will also be placed as a news item in the City's website and in the e-newsletter beginning November 17, 2026. | No specific comments can be linked to the internet outreach. All comments received will be attached to the plan. | All comments will be accepted. | http://www.cityofevanston.org/conplan |
| 4 | Outreach through Ward Councilmembers via Email | Low-moderate income households, 2nd, 5th, and 8th Ward residents. | Information about the draft 2027 Action Plan and public comment period provided in ward newsletters. | No specific comments can be linked to this outreach. All comments received have been attached to the plan. | All comments will be accepted. | http://www.cityofevanston.org/conplan |

**Table 4 – Citizen Participation Outreach**

# Expected Resources

## AP-15 Expected Resources – 91.220(c)(1,2)

### Introduction

The anticipated resources section of the strategic plan describes the City of Evanston's financial resources for the duration of the 2027 Action Plan. The financial resources listed are not all encompassing but serve to illustrate the City's ability to use federal and local funding to address the priority needs and goals put forth in this plan. The funds are anticipated to be utilized by various regional and local government entities as well as the service providers which serve Evanston. The City developed its draft 2027 Action Plan based on estimated entitlement grant amounts, as the timing of the 2027 federal budget and appropriations was unknown. Funding was allocated by goal by percentage of the estimated grants. The 2027 Action Plan will be updated to reflect actual grant amounts once available. All available CDBG, HOME, and ESG funds are allocated to Goals in the final Plans for submission to City Council for approval and then to HUD. 15% of HOME funds will be set aside as CHDO Reserves. For FY2027, that is $45,000.00 of CHDO Reserve set aside.

### Anticipated Resources

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan $ | Narrative Description |
|---|---|---|---|---|---|---|---|---|
| | | | Annual Allocation: $ | Program Income: $ | Prior Year Resources: $ | Total: $ | | |
| CDBG | public - federal | Acquisition<br>Admin and Planning<br>Economic Development<br>Housing<br>Public Improvements<br>Public Services | 1,690,000.00 | 115,000.00 | 0.00 | 1,805,000.00 | 2,750,000.00 | Expected Amount Available for Remainder of ConPlan estimated at an annual grant of $1,360,000 with $15,000 in program income annually. |
| HOME | public - federal | Acquisition<br>Homebuyer assistance<br>Homeowner rehab<br>Multifamily rental new construction<br>Multifamily rental rehab<br>New construction for ownership<br>TBRA | 275,000 | 25,000.00 | 0.00 | 300,000 | 600,000.00 | Expected Amount Available for Remainder of ConPlan estimated at an annual grant of $275,000 with $25,000 in program income annually. This will include 15% CDHO project set aside. ($45,000 for FY2027) |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan $ | Narrative Description |
|---|---|---|---|---|---|---|---|---|
| | | | Annual Allocation: $ | Program Income: $ | Prior Year Resources: $ | Total: $ | | |
| ESG | public - federal | Conversion and rehab for transitional housing<br>Financial Assistance<br>Overnight shelter<br>Rapid re-housing (rental assistance)<br>Rental Assistance<br>Services<br>Transitional housing | 150,0000 | 0.00 | 0.00 | 150,000.00 | 0.00 | Evanston received an ESG award for FY2026 and included one for FY2027. |

**Table 1 - Expected Resources – Priority Table**

## Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Federal funding will leverage private, state and local funds by enabling the City of Evanston to serve those with the greatest need at the highest capacity, particularly when it comes to affordable housing challenges. Additionally, federal funds may serve as gap financing for City programs or service providers applications that require additional funding in order to have their program, project, or service come to fruition. The grant funds provided by HUD will allow organizations and the City to meet the needs of the community's most vulnerable members. HOME matching funds come from the Affordable Housing Fund, LIHTC, State of IL Housing Trust Fund, and other sources including developers' contributions. As of 2025,

Evanston had $22,142,776 in available HOME matching funds from prior projects. The City of Evanston also finalized a Strategic Housing Plan and corresponding work plan which will identify additional opportunities and potential sources of funding to address housing needs in Evanston while leveraging all possible sources of funding. If Evanston receives an ESG award for the 2027 program year; ESG funds will be matched 1 to 1 by awarded providers.

### If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Evanston owns a number of properties that could address the needs identified in the plan. This includes vacant land, parking lots, and underutilized buildings. These publicly owned properties are being evaluated for potential redevelopment through the Putting Assets to Work initiative.

For example, the City recently purchased 1825-1831 Brown Avenue which presents an opportunity to develop permanently affordable ownership and rental housing. In addition, the City recently approved the purchase of up to 10 housing units nearing their affordability term with a mix of ARPA funds and HOME CHDO reserve funds. The units will be affordable rental units (up to 100% AMI) and placed in a land trust to guarantee continued affordability, located in census tract 8092.

Additionally, program design will take place in 2027 on multiple activities approved as part of the PRO housing plan including the redevelopment of city-owned properties. These activities will require City Council approval before implementation.

### Discussion

The City of Evanston joined the Government Finance Officers Association's second cohort of Putting Assets to Work (PAW) initiative in 2023. This selective and innovative program led to an asset map of all City real estate assets and a strategy to better utilize the City of Evanston's public facilities, help meet the City's Climate Action and Resilience Plan goals and evaluate the potential for adaptive reuse and new development of affordable housing. The City of Evanston will continue to pursue additional funding, complementing existing resources, to leverage city-owned property to address the needs identified in PAW.

As a precursor project to the larger PAW initiative, the 60-unit 100% affordable development less than 500 feet from the South Boulevard Purple Line Station and Pace Bus 213 stop has broken ground in 2025 and should start lease up and occupancy by the time of this plan. The previous property consisted of four townhomes owned and managed by the Housing Authority of Cook County, and an underutilized parking lot, owned by the City of Evanston. The unit mix is 30 one-bedrooms, 12 two-bedrooms, and 12 three-bedrooms, accommodating households of all sizes. 18 units will have project-based vouchers, 3 will serve households ≤30% AMI from the State Referral Network, 17 will serve households ≤60% AMI and 22 will serve households ≤80% AMI. Additionally, the One Howard Street Economic Recovery Plan outlines strategies to promote economic recovery and revitalization. Based on feasibility studies, this area is a prime location for housing, retail, and public facility investments that incorporate transit-oriented design and ground-floor activation to restore and celebrate a thriving community corridor between Evanston and Chicago.

In an effort to address downtown retail vacancies and support new entrepreneurs, the City implemented a retail incubator program in 2026 to help local makers and entrepreneurs expand and grow their businesses with City support. The City has leased a vacant storefront to turn into a shared marketplace for eleven selected micro-businesses. Eligible participants received CDBG funding to offset costs of rent, inventory, licensing fees, and equipment. Participants also have access to educational workshops on business topics and continued City support to assist with their goals of opening their own brick and mortar space. After this 3 month pilot cohort, the City is planning to hold additional cohorts in 2027.

The City continues to implement the Evanston Thrives Retail Action Plan and the One Howard Economic Recovery Plan. Projects are underway to create more vibrancy in Evanston's business districts, including new artistic lighting under a train viaduct, new public plaza spaces, public art, and wayfinding signage.

The City of Evanston will continue to pursue other available federal, state and private sources to leverage entitlement grant funding for the proposed community development initiatives in the Consolidated Plan. The City will also contribute a number of local tools and incentives, including updating the requirements for covered developments to provide affordable housing units or contribute to the City's Affordable Housing Fund. In addition, local funds will be allocated during the 5 year period to support the City's Consolidated Planning priorities.

# Annual Goals and Objectives

## AP-20 Annual Goals and Objectives

### Goals Summary Information

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|---|---|---|---|---|---|---|---|---|
| **1** | Affordable Housing | 2025 | 2029 | Affordable Housing | Entire Jurisdiction | Maintain and Improve Rental Housing<br>Access to Rental Housing<br>Maintain and Improve Owner Occupied Housing | CDBG: $821,275<br>HOME: $100,000 | Rental units rehabilitated: 1<br>Homeowner Housing Rehabilitated: 5<br>Buildings Demolished: 0 Buildings<br>Other: 3500 Other |
| **2** | Homelessness | 2025 | 2029 | Homeless | Entire Jurisdiction | Access to Rental Housing | HOME: $175,000<br>ESG: $150,000 | Tenant-based rental assistance / Rapid Rehousing: 8 Households Assisted<br>Homeless Person Overnight Shelter: 100 Persons Assisted<br>Homelessness Prevention: 15 Persons Assisted<br>Other: 75 Other |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|---|---|---|---|---|---|---|---|---|
| **3** | Creating Livable Communities | 2025 | 2029 | Non-Housing Community Development | Entire Jurisdiction | Public Infrastructure | CDBG: $397,100.00 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 60 Persons Assisted |
| **4** | Public Services | 2025 | 2029 | Homeless Non-Homeless Special Needs | Entire Jurisdiction | Public Services | CDBG: $252,700 | Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted<br>Homeless Person Overnight Shelter: 200 Persons Assisted<br>Overnight/Emergency Shelter/Transitional Housing Beds added: 50 Beds<br>Homelessness Prevention: 15 Persons Assisted |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|---|---|---|---|---|---|---|---|---|
| **5** | Planning and Administration | 2025 | 2029 | Planning and Administration of CDBG HOME and ESG | Entire Jurisdiction | Maintain and Improve Rental Housing<br>Access to Rental Housing<br>Maintain and Improve Owner Occupied Housing<br>Public Infrastructure<br>Public Services | CDBG: $333,9250<br>HOME: $25,000 | Other: 2 Other |

**Table 2 – Goals Summary**

## Goal Descriptions

| | | |
|---|---|---|
| **1** | **Goal Name** | Affordable Housing |
| | **Goal Description** | Maintain and Improve Rental Housing, Access to Rental Housing, Maintain and Improve Owner Occupied Housing |
| **2** | **Goal Name** | Homelessness |

| | | |
|---|---|---|
| | **Goal Description** | The City of Evanston aims to assist those at risk of experiencing homelessness through tenant based rental assistance. Additional services for people experiencing homelessness include but are not limited to street outreach, and support for homeless shelters. |
| **3** | **Goal Name** | Creating Livable Communities |
| | **Goal Description** | Creating livable communities through improvements to public facilities and infrastructure. Maintaining and improving the quality of Evanston's existing infrastructure and public facilities instrumental to ensuring that residents live in a safe, clean, and decent environment. |
| **4** | **Goal Name** | Public Services |
| | **Goal Description** | Improving access to public services for Evanston residents, particularly for low and moderate income segments of our population, is a key goal of the City. As seen through input from the community and consultation, there is a high need for housing related public services including support services for households experiencing homelessness or at risk of homelessness. |
| **5** | **Goal Name** | Planning and Administration |
| | **Goal Description** | Administration of CDBG, HOME. ESG admin ($11,250) is included in total project costs in a different goal. |

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

The City has identified the following projects to be implemented in 2027 to achieve the goals in the Consolidated Plan. The Tenant Based Rental Assistance (TBRA) project will address the needs of homeless families with children with direct rental and utilities assistance. Evanston will have a CHDO 15% project set-aside ($45,000). The Rental Housing project combines both HOME and CDBG activities, both which are for rental rehabilitation/acquisition.

**Projects**

| # | Project Name |
|---|---|
| 1 | Tenant Based Rental Assistance (TBRA) |
| 2 | Rental Housing |
| 3 | Homeowner Rehabilitation |
| 4 | Code Enforcement |
| 5 | Public Services |
| 6 | Public Facilities & Infrastructure |
| 7 | 2027 ESG |
| 8 | Administration |

**Table 3 - Project Information**

### Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Entitlement funds are used to develop viable communities by providing safe, affordable housing, and suitable living environments. Through consultation and residents participation, the City was able to define priority needs in the community. Following this, goals were set to address those needs taking funding restrictions into account. City staff created project priorities and allocation amounts which were reviewed by public bodies including the Housing & Community Development Committee, Social Services Committee and City Council.

The need for affordable housing continues to be a priority in Evanston. HOME, CDBG, ESG and matching funds will be used to address this need. Additionally, CDBG public services funds will be focusing primarily on services addressing housing and homelessness needs. A portion of CDBG funds is projected to be used to address infrastructure needs, such as sidewalks and park improvements in areas with a majority of low and moderate-income residents. We continue to explore opportunities for the acquisition and rehabilitation of new rental units using the 15% CHDO Reserves ($45,000.00).

## AP-38 Project Summary

### Project Summary Information

| | | |
|---|---|---|
| **1** | **Project Name** | Tenant Based Rental Assistance (TBRA) |
| | **Target Area** | Entire Jurisdiction |
| | **Goals Supported** | Homelessness |
| | **Needs Addressed** | Access to Rental Housing |
| | **Funding** | HOME: $175,000.00 |
| | **Description** | Direct rental and utilities assistance |
| | **Target Date** | 9/30/2028 |
| | **Estimate the number and type of families that will benefit from the proposed activities** | 8 households |
| | **Location Description** | Entire jurisdiction |
| | **Planned Activities** | Rent and utilities assistance for McKinney-Vento families with children under 18 to achieve housing stability and economic independence. |
| **2** | **Project Name** | Rental Housing |
| | **Target Area** | Entire Jurisdiction |
| | **Goals Supported** | Affordable Housing |
| | **Needs Addressed** | Access to Rental Housing<br>Maintain and Improve Rental Housing |
| | **Funding** | CDBG: $150,000.00<br>HOME: $100,00.00 |
| | **Description** | Rental housing acquisition and/or rehabilitation |
| | **Target Date** | 6/30/2028 |
| | **Estimate the number and type of families that will benefit from the proposed activities** | 1 household |
| | **Location Description** | To be determined |
| | **Planned Activities** | CDBG will be used for rehab of rental units for households with incomes at 80% AMI. HOME funding will be used for new construction, acquisition and/or rehabilitation of rental housing. |

| | | |
|---|---|---|
| **3** | **Project Name** | Homeowner Rehabilitation |
| | **Target Area** | Entire Jurisdiction |
| | **Goals Supported** | Affordable Housing |
| | **Needs Addressed** | Maintain and Improve Owner OccupiedHousing |
| | **Funding** | CDBG: $451,275.00 |
| | **Description** | Rehabilitation of owner-occupied homes throughout Evanston, owned by low- and moderate-income populations |
| | **Target Date** | 12/31/2028 |
| | **Estimate the number and type of families that will benefit from the proposed activities** | 5 households |
| | **Location Description** | To be determined based on applications received. |
| | **Planned Activities** | Substantial rehabilitation and emergency rehabilitation of income eligible, owner-occupied housing. |
| **4** | **Project Name** | Code Enforcement |
| | **Target Area** | CDBG TARGET AREA |
| | **Goals Supported** | Affordable Housing |
| | **Needs Addressed** | Maintain and Improve Rental Housing<br>Maintain and Improve Owner Occupied Housing |
| | **Funding** | CDBG: $220,000.00 |
| | **Description** | Code enforcement inspections |
| | **Target Date** | 12/31/2027 |
| | **Estimate the number and type of families that will benefit from the proposed activities** | Project benefits over 3,500 units/households living in the CDBG target area. |
| | **Location Description** | CDBG Target Area |
| | **Planned Activities** | Code enforcement inspections in the CDBG Target Area, including necessary building demolition/clearance as identified by code enforcement inspectors. |

| | | |
|---|---|---|
| **5** | **Project Name** | Public Services |
| | **Target Area** | Entire Jurisdiction |
| | **Goals Supported** | Public Services |
| | **Needs Addressed** | Public Services |
| | **Funding** | CDBG: $252,700.00 |
| | **Description** | CDBG funded public service activities support low and moderate income residents; |
| | **Target Date** | 12/31/2027 |
| | **Estimate the number and type of families that will benefit from the proposed activities** | 515 low- to moderate-income residents including individuals, couples and families supported through public services; it is estimated that 200 people served will be homeless or at-risk of homelessness and will receive shelter services. Funds also support emergency shelter programs providing approximately 50 beds. |
| | **Location Description** | |
| | **Planned Activities** | Services provided to 715 low- and moderate-income residents, primarily Housing and homeless related services. |
| **6** | **Project Name** | Public Facilities & Infrastructure |
| | **Target Area** | Entire Jurisdiction |
| | **Goals Supported** | Creating Livable Communities |
| | **Needs Addressed** | Public Infrastructure |
| | **Funding** | CDBG: $397,100.00 |
| | **Description** | sidewalk improvements or park improvements |
| | **Target Date** | 12/21/2028 |
| | **Estimate the number and type of families that will benefit from the proposed activities** | 60 low to moderate income households. Projects unlikely to complete before the end of 20278. Accomplishments will be recorded once complete. |
| | **Location Description** | CDBG Target area |
| | **Planned Activities** | sidewalk improvements or park improvements. |
| **7** | **Project Name** | 2027 ESG |

| | | |
|---|---|---|
| | **Target Area** | Entire Jurisdiction |
| | **Goals Supported** | Homelessness |
| | **Needs Addressed** | Access to Rental Housing |
| | **Funding** | ESG: $150,000 |
| | **Description** | Homeless prevention and supportive services, street outreach, operation and support for emergency overnight shelters, and administration. Admin is to be capped at 7.5%, and Street Outreach and/or Shelter activities are to be capped at 60% |
| | **Target Date** | 9/30/2028 |
| | **Estimate the number and type of families that will benefit from the proposed activities** | There will be approximately 190 beneficiaries of ESG-funded activities, a combination of single persons, couples, households with children and households fleeing domestic violence. |
| | **Location Description** | Entire jurisdiction |
| | **Planned Activities** | Direct rental assistance, supportive services, shelter operations, and street outreach. Project also includes administration of ESG programs. |
| **8** | **Project Name** | Administration |
| | **Target Area** | Entire Jurisdiction |
| | **Goals Supported** | Planning and Administration |
| | **Needs Addressed** | Maintain and Improve Rental Housing<br>Access to Rental Housing<br>Maintain and Improve Owner Occupied Housing<br>Public Infrastructure<br>Public Services |
| | **Funding** | CDBG: $333,925.00<br>HOME: $25,000.00 |
| | **Description** | Administration of CDBG and HOME |
| | **Target Date** | 12/31/2027 |
| | **Estimate the number and type of families that will benefit from the proposed activities** | N.A. |

| | | |
|---|---|---|
| | **Location Description** | Entire jurisdiction |
| | **Planned Activities** | The planned activities in this project are CDBG and HOME administration which involve planning and management of grant funded activities and compliance. |

## AP-50 Geographic Distribution – 91.220(f)

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

Funding for programs is available citywide, however, given the funds are directed to benefit income-eligible households, the funds usually benefit areas of low income and minority concentration as well. Evanston will continue to balance investments between areas with a higher concentration of low income residents and making new affordable housing opportunities available throughout the city while also preserving existing affordable housing.

The CDBG Target Area comprises a section of central and south Evanston between Green Bay Road and the Metropolitan Water Reclamation District canal to Dempster Street; East of McCormick Boulevard between Main Street and Oakton Street to Dodge Avenue; and between Howard and Oakton Streets to the Metra tracks. Its aggregated percentage of low to moderate income households is approximately 60%. The CDBG Target Area has been redefined to include specifically high need areas and census blocks with higher low to moderate income households.

CDBG is usually directed on an area basis to census tracts in the city where, based on the American Census Survey, the majority of residents qualify as low- and moderate-income, except for programs that qualify for funding based on services benefiting low- and moderate-income persons. HOME funds are spent throughout the city for the creation and rehabilitation of income-restricted units. HOME TBRA funds are used throughout the City to stabilize families that qualify as extremely low to moderate income and provide referrals to wrap-around services. Similarly, HOME-ARP funds are directed for a HOME-ARP TBRA program and for Non-Congregate Shelter to people in the qualifying populations citywide. While both TBRA programs are available city wide for income eligible households, they tend to concentrate in areas with a concentration of low to moderate income households.

ESG funds, when received, are allocated to benefit persons who are extremely low and low income across the entire jurisdiction; ESG funds can support street outreach, shelter operations, rapid re-housing, and homelessness prevention services. If Evanston is not eligible for ESG, City staff will work with the CoC to advocate for state ESG funds for ESG subrecipients, Housing Connections, formerly known as Connections for the Homeless and the YWCA.

Evanston will continue to work with the HACC and other affordable housing providers for opportunities to develop public housing programs and affordable units throughout the city.

### Geographic Distribution

| Target Area | Percentage of Funds |
|---|---|
| CDBG TARGET AREA | 28 |
| Entire Jurisdiction | 72 |

**Table 4 - Geographic Distribution**

### Rationale for the priorities for allocating investments geographically

Evanston locates funded projects in line with approved city policies and priorities with respect to CDBG and HOME funds. The City is committed to investment in neighborhoods where a majority of residents are at or less than 80% AMI. As an example, the One Howard Street Economic Recovery Plan proposes ideas to revitalize and reimagine urban design, public safety corridor improvements, and retail in south Evanston. Any projects developed as a result of this plan would have significant positive impacts on an identified CDBG Target Area that could carry over throughout Evanston. Funding for some programs is available citywide, however, given the funds are directed to benefit income-eligible households, the funds usually benefit areas of low income and minority concentration as well.

### Discussion

Future updates to the City's zoning code, in alignment with the recently approved Comprehensive General Plan, will be included in future action plans related to this consolidated plan.

# Affordable Housing

## AP-55 Affordable Housing – 91.220(g)

### Introduction

This section details how Evanston will meet the Consolidated Plan goal: Provide decent affordable housing, by specifying the number of homeless, non-homeless, and special needs populations to be provided affordable housing and the number of affordable housing units supported by program type in the 2027 program year. The City will fund programming to maintain and produce decent, safe and affordable housing options for extremely low-, low- and moderate-income households.

| One Year Goals for the Number of Households to be Supported | |
|---|---|
| Homeless | 8 |
| Non-Homeless | 21 |
| Special-Needs | 0 |
| Total | 29 |

**Table 6 - One Year Goals for Affordable Housing by Support Requirement**

| One Year Goals for the Number of Households Supported Through | |
|---|---|
| Rental Assistance | 23 |
| The Production of New Units | 0 |
| Rehab of Existing Units | 6 |
| Acquisition of Existing Units | 0 |
| Total | 29 |

**Table 7 - One Year Goals for Affordable Housing by Support Type**

### Discussion

The City runs housing programs, administers housing policies and funds housing initiatives that work to address housing needs and support vulnerable households. In 2027, CDBG funds will continue to support the Housing Rehab Program and Code Enforcement, both dedicated to preserving and restoring affordable housing. HOME funds will continue to support the Tenant Based Rental Assistance (TBRA) Program as well as the creation/acquisition and rehab of new affordable rental units. Additionally, ESG Prevention funds are expected to help 15 renter households remain in housing. The City will use the

housing quality standards defined by the National Standards for the Physical Inspection of Real Estate (NSPIRE) when inspecting TBRA units and housing rehabilitation projects subsidized by CDBG funds. NSPIRE is used to document property compliance through accurate assessment of the property's condition, streamlining inspection processes, and prioritizing the health and safety of residents.

City Council approved a Strategic Housing Plan that contains strategies, objectives, and approaches to achieving the City's housing goals. Evanston will also work with community partners providing affordable housing. This includes the construction of 33 HOME-assisted units in partnership with the Housing Opportunity Development Corporation. These one, two, and three bedroom units will be rented to households with an initial income at or below 80% of the Area Median Income ("AMI").

Naturally occurring affordable housing is increasingly challenging for households at or below 50% AMI. Units may still exist, but they cost more to own or rent. Evanston is working on policy initiatives to increase naturally occurring affordable housing.

## AP-60 Public Housing – 91.220(h)

### Introduction

The Housing Authority of Cook County (HACC) serves suburban Cook County, including Evanston. The HACC administers the Housing Choice Voucher program in Evanston and has two buildings for seniors and the disabled, scattered site units for families, and project-based Section 8 units in the community.

### Actions planned during the next year to address the needs to public housing

The HACC is undergoing various repositioning strategies to improve the quality of aging housing stock while leveraging public and private resources, easing administrative burdens, and preserving current affordable housing.

HACC anticipates receiving HUD approval to convert public housing assistance associated with Evanston scattered sites throughout HUD Rental Assistance Demonstration (RAD) to Project-Based Vouchers (PBV) following issuance of a Commitment to Enter into a Housing Assistance Payments Contract (CHAP). The proposed conversion will involve existing public housing units located at scattered-site properties in Evanston. HACC intends to rehabilitate the properties in conjunction with the RAD conversion to preserve the units as long-term affordable housing. Upon conversion to PBV assistance, HACC will adopt the applicable RAD resident rights, participation, waiting list, grievance, and tenant protection requirements in accordance with the RAD notice and other applicable HUD requirements.

Additionally, the HACC partnered with PIRHL and the City of Evanston to develop a mixed-income housing project that will create up to 60 units of affordable housing. The five-story building has three units designated for households at 30% AMI, 17 units for households at or below 60% AMI, 22 units for households at or below 80% AMI, and 18 units for project based voucher holders. The project should lease up in 2027.

### Actions to encourage public housing residents to become more involved in management and participate in homeownership

HACC no longer has an active Resident Advisory Board or a Resident Service Coordinator at either RAD PBRA properties, but residents at the Victor Walchirk building have taken the initiative to form their own resident council. This council is actively involved in performing various tasks and planning activities for their fellow residents. Monthly community gatherings include games like bingo to foster a sense of community and encourage socialization.

Additionally, the HACC has dedicated behavioral health care coordinators at Perlman and Walchirk who are available to assist residents in identifying behavioral changes that may affect independence. These

coordinators also link residents to valuable community resources including preventative health care, home health care, transportation services and more.

### If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The HACC is not designated as troubled.

### Discussion

The City will continue to actively engage and communicate with HACC to continue to address the needs of residents whose rents are subsidized by HACC are met and services are coordinated with other agencies for efficient and effective use of all community resources.

## AP-65 Homeless and Other Special Needs Activities – 91.220(i)

### Introduction

The following section discusses the homeless and special needs activities to be undertaken in Evanston during the second year of the 2025-2029 Consolidated Plan.

### 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

The City anticipates continued support for Housing Connections, formerly known as Connections for the Homeless, Interfaith Action, and the YWCA with local and federal funds as available. Connections manages the Outreach, Drop-In and Health Care program which provides basic needs including food, clothing, showers, access to a registered nurse, and case management services for people experiencing homelessness. Interfaith Action runs an emergency shelter PADS program - which expanded hours to be open 217 days a year, a soup kitchen and year-round Hospitality Center that offers job counselors and access to computers. When the Hilda's Place shelter project renovations complete, Interfaith Action will manage the year-round shelter program; this shelter will replace the rotating PADS Emergency Overnight Shelter Interfaith Action has managed in past years. The YWCA provides shelter and a myriad of services to families fleeing domestic violence. The City's Youth & Young Adult Outreach team works with youth, particularly those who are disengaged from other supports or experiencing homelessness to connect them to community resources and housing. The City also employs a Human Services Specialist dedicated to connecting low and moderate income residents to support services and General Assistance case managers that help residents reach self-sufficiency.
The Crisis Alternative Response Evanston (C.A.R.E) program is an innovative initiative aimed at providing a non-police response to certain low-risk service calls. This program operates independently from the Evanston Police Department and assists with complaints of vagrancy, people who seem to be experiencing episodes of mental illness, soliciting complaints, and panhandling. All members of the CARE team have Emergency Crisis Responder training that includes crisis intervention and mental health. CARE professionals are able to connect unhoused residents to support and shelter services.

Since launching in July 2024, CARE has responded to more than 4,500 calls for service and has expanded from four to six Crisis Responders. Priorities for 2027 include increasing capacity for eligible nonviolent behavioral health, wellness, and quality of life calls; strengthening proactive outreach and follow up services; expanding partnerships and referral pathways with community service providers; continuing specialized responder training and professional development; and using program data and evaluation to guide future improvements. CARE will continue emphasizing voluntary engagement, de-escalation, problem solving, and connection to community resources as alternatives to enforcement when

appropriate.

### Addressing the emergency shelter and transitional housing needs of homeless persons

Housing Connections, formerly known as Connections for the Homeless, is the recipient of CDBG-CV funds awarded to Cook County from the State of Illinois to renovate shelters at the Margarita Inn. Connections will also use HOME-ARP funds to support this renovation project. Construction began in 2026.

Connections is renovating Hilda's Place to provide a permanent fixed-site, year-round, non-congregate shelter with up to 30 beds using CDBG-CV funds awarded by the State of Illinois Department of Commerce and Economic Opportunity (DCEO) and an additional award of Congressional Appropriation funds facilitated by Rep. Jan Schakowsky's office. Interfaith Action will assume management responsibilities and this project would replace the PADS emergency overnight shelter that currently operates only during cold weather months.

The YWCA manages 66 emergency shelter beds and 22 transitional beds for families fleeing domestic violence. The City expects to continue to support shelter operations through local and federal funds.

City staff will also allocate ESG funds to provide eligible services to households experiencing homelessness or at risk of homelessness. ESG funds will support Homelessness Prevention, Emergency Shelter and Street Outreach services.

### 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

Any disruption of ESG funding for housing subsidies and case management support will significantly reduce the resources available to help house people and families experiencing homelessness and prevent households from becoming homeless again. With an award of ESG for the 2027 program year, funds will continue to support Emergency Shelter, Street Outreach and Homelessness Prevention services. The City also receives HOME funds and was awarded HOME-ARP funds; a portion of these grants supports the Tenant-Based Rental Assistance (TBRA) program managed by Connections. The HOME-ARP Allocation Plan was approved by Evanston's City Council on October 10, 2022, and in April 2024, City Council awarded $150,000 for TBRA and $1,000,000 for non-congregate shelter to Connections. In 2026, Connections utilized the HOME-APR non-congregate shelter funds to rehabilitate a shelter space containing 43 units (65-beds). Cook County is also supporting this project using funds from

the Urban Shelter Grant, a CDBG-CV funded program administered by the State.
The TBRA program provides security deposits, utilities payments and subsidized rent for up to 24 months. Participants also receive case management and wraparound services including job training and education. The program moves qualifying households from shelter into permanent housing.

City staff across departments will continue to offer support services and direct subsidies for basic needs including food, housing and utilities; the General Assistance and Emergency Assistance funds are used to prevent homelessness and help residents remain in the community.

**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.**

The McGaw YMCA provides housing for long-term residents with incomes between 30% and 80% AMI through SRO units. To address the complex needs of residents, residents also have the option to participate in on-site case management and receive connections to community support services to help develop financial independence and stability with the goal of moving into permanent housing. In 2026, the City awarded local funds to Family Promise, a homelessness prevention and rotational shelter program working with families experiencing homelessness or at risk of homelessness; this agency will be considered for funding renewal in FY2027. Family Promise provides up to 16 temporary shelter beds in partnership with 7 Evanston based congregations; families remain in shelter for one to three months. Family Promise also operates a Day Center that provides meals, access laundry services, access to computers and employment support services, after school care and tutoring for children, and case management. The Day Center also has a food and household supply pantry that distributes goods like paper towels, toilet paper, laundry and dish detergent, hand soap and disinfectant wipes, that are not subsidized by food stamps. Family Promise also refers participants to Housing Connections to help families identify more permanent shelter and housing options.

Historically, the City uses federal and local funds, including ESG, to support households experiencing homelessness or at risk of homelessness. ESG funds support Street Outreach, Emergency Shelter, and Homelessness Prevention services. The City will also continue to provide Emergency Assistance and General Assistance to income eligible households.

### Discussion

The City will continue to use Federal and local funds to support public services, specifically shelter programs that connect vulnerable people, including families fleeing domestic violence, to community

support and basic needs services. Additionally, the City's Ombudsman program will continue to act as a liaison between hospitals, individuals and congregate settings to ensure that people experiencing homelessness or who have physical and/or mental health care needs find placement and receive care.

## AP-75 Barriers to affordable housing – 91.220(j)

### Introduction:

Over the past several years, Evanston has implemented policies and programs to address the housing needs of low- and moderate-income residents by increasing the supply of and access to safe, decent, and affordable housing. While some have demonstrated success, others have uncovered additional barriers, or require additional resources to maximize impact. Through the PRO Housing initiative, Evanston has identified three significant barriers to affordable housing production and preservation, and devised strategies to mitigate or remove them. The first barrier is limited funding for housing preservation policies and the need for anti-displacement programs. The second barrier is the City's complex entitlement and permitting process which stifles development. There is also a lack of housing data to support strategic use of limited resources. The City is working to streamline housing entitlement and permitting processes, collect and analyze housing data and explore the development of potential opportunity sites.

### Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

In 2024, the City began work on a new Comprehensive General Plan. The Comprehensive General Plan was approved in early 2026. In 2026, the City of Evanston also adopted a strategic housing plan, Housing4All. The plan serves as the City's guiding framework for the next ten years, setting a clear vision for how Evanston will meet its housing needs. It identifies gaps and goals and develops objectives and strategies with a focus on implementation and accountability.

### Discussion:

The City's goals include the following: increase housing supply and housing choice; preserve current homes and prevent displacement; expand support for non-traditional housing models including community land trusts, shared housing, and limited-equity cooperatives; focus on healthy buildings and neighborhoods; expand revenue for housing initiatives; and build and leverage local capacity and partnerships, supported by the newly adopted Comprehensive General Plan and Strategic Housing Plan. These efforts also tie into the goals of the 2025-2029 Consolidated Plan and this Action Plan.

The City will continue several initiatives that support these goals and incentivise the creation of

affordable housing. New housing developments with 7 or more units are required to provide housing units for households at or below 60% AMI and/or contribute to the City's Affordable Housing Fund. The City currently provides incentives including: an expedited application review process, waived and deferred building permit fees, zoning bonuses, and reduced parking requirements. Community Partners for Affordable Housing (CPAH) manages the waitlist for eligible applicants. Increasing the number of and funding available for affordable units in Evanston by requiring more onsite affordable units takes advantage of HB-2621, the State of Illinois tax incentives for affordable housing.

The CDBG Housing Rehabilitation Program helps preserve affordable housing, particularly owner occupied homes, and stabilize neighborhoods by helping low and moderate income owner occupied households that lack the financial capacity to obtain conventional financing to rehabilitate their homes. The Rehab program prioritizes life safety and code violations that could result in declaring a home uninhabitable by addressing emergency needs such as failed furnaces, roofs, and hot water heaters, and by repairing failed sewer laterals and structural defects that may make a home unlivable. Other program goals include reducing household utility costs by incorporating energy and water saving features in the rehabilitation process and making accessibility improvements for residents with disabilities and older adults that enable them to live safely in their homes. CDBG Housing Rehab projects are funded with zero interest deferred loans that are repaid at the sale of the property because the households receiving assistance are unable to pay debt service. The program will be available for owner-occupied and rental properties with a majority of income-eligible tenants. The City partners with Community Partners for Affordable Housing (CPAH) for construction management to improve program efficiency and more effectively leverage outside funding to rehab low and moderate income housing. CPAH also administers the Illinois Housing Development Authority (IHDA) Home Repair and Accessibility Program (HRAP), which can be used in conjunction with the Owner-Occupied Rehabilitation Program.

The Affordable Housing Fund supports housing development and acquisition and rehab of housing for households with incomes at or below 100% AMI. The AHF provides soft funding to leverage Low Income Housing Tax Credits (LIHTC) for affordable productions, contributes to acquisition and rehabilitation projects, in conjunction with CDBG and HOME funds, and supports landlord-tenant services and management of the IHO waitlist. The City of Evanston will continue to work to identify suitable projects with the goal of increasing affordable housing supply in our community in alignment with the City Council Goals and adopted plans and policies.

## AP-85 Other Actions – 91.220(k)

### Introduction:

The following are actions to be undertaken by the City of Evanston to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead based paint hazards, reduce the number of property-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

Affordable housing is a primary need of low and moderate income residents, primarily renters. City programs including General Assistance and Emergency Assistance help program participants remain stable in the community. The City's ability to address priorities is impacted by funding. Services for households experiencing homelessness or at risk of homelessness continue to be a priority, and the City dedicates federal and local funds for rent assistance, shelter support, and street outreach services. All federal funds under the Public Services goal address shelter and emergency support for basic housing needs.

The City's Workforce Development Division provides training and job placement opportunities to participants 18 to 30 years old through the following initiatives: ASPIRE, EMERGE, LEP, and the Lead Service Line Replacement program. The ASPIRE program provides career track positions in healthcare through training, internships, certifications, tuition reimbursement and credential obtainment. EMERGE connects participants to careers in retirement and senior living, in partnership with local employers. The Local Employment Program (LEP) provides employment opportunities to qualified Evanston residents as laborers, apprentices and journeymen in trades including electrical, HVAC, carpentry, masonry, concrete, etc. for construction projects within the city and in partnership with local unions. The LEP also offers assistance in covering monetary dues for Local Evanston union tradespeople. The Lead Service Line Replacement program trains participants on the skills needed for lead service line replacement and street restoration; participants receive one to two years of on-the-job training in entry-level manual labor positions in municipal water distribution, paving, and sewer conveyance systems. All programs reduce barriers to employment by offering career counseling for participants who are unemployed, underemployed, have disabilities or are reentering citizens impacted by the carceral system.

The ARPA funded Living Room addresses the needs of community members suffering from mental health crises and as part of the City's Alternatives to 911 Initiative, Evanston partners with Turning Point and Ascension Saint Francis hospital to provide a non-clinical space for individuals to process crisis events. Additionally, the City will continue to employ the Crisis Alternative Response Evanston (C.A.R.E.) team to provide a non-police response to low-risk service calls like nuisance complaints, panhandling, lost or confused persons or people potentially experiencing a mental health crisis. CARES team members also provide street outreach services, well-being checks and connect residents to community provided

support services for mental health, health and basic needs.

### Actions planned to foster and maintain affordable housing

The City's locally funded Affordable Housing Fund is used to develop and rehab affordable housing for persons up to 100% of the area median income. This provides funding in addition to CDBG and HOME funds to develop and maintain affordable housing throughout Evanston. Expanding affordable housing options remains a City goal.

In 2024, the City purchased property on Brown Avenue. The City is exploring options that would include entering the parcel into a land trust for the purpose of developing permanently affordable ownership and rental housing. A preliminary assessment suggests that up to nine units could be developed. If the property is kept in the land trust the units will remain affordable in perpetuity.

The City continues to partner with the Metropolitan Tenants Organization (MTO) and Lawyers' Committee for Better Housing (LCBH) to strengthen landlord/tenant relations, particularly for low-income households with subsidies, and increase awareness of landlord-tenant rights and responsibilities. This contract was renewed for another 12 months in 2026 to continue services through 2027. MTO will be organizing webinars and a library office hours to educate and provide assistance to landlords and tenants as the updated Residential Landlord Tenant Ordinance gets implemented. Additionally, the partnership with LCBH provides low-income residents with legal assistance and representation in cases of evictions, retaliation, illegal lockouts, etc.

The City's CDBG funded Housing Rehabilitation Program provides income eligible owner-occupants and owners of residential structures occupied primarily by income eligible households, with financial assistance in the form of below market rate, at 0% interest rate loans to address safety, health, and accessibility needs. The property value is required be under the eligibility cap. To ensure funds are applied to projects most in need of assistance, the City uses a priority ranking based on health and safety risks and severity of structural damage to decide which projects to fund. Housing Rehab clients may be located anywhere in the City of Evanston, but are generally concentrated in the Community Development Block Grant (CDBG) Target Area. The scope of work for each project is determined on a case-by-case assessment of work needed to address life safety issues and code violations in order to preserve and prolong the useful life of the property. All assisted properties must be occupied by low and moderate income households, defined as having incomes ≤ 80% AMI. In 2027, the program will be expanded to include multifamily rental properties between 5 and 35 units with a majority of low to moderate income tenants.

### Actions planned to reduce lead-based paint hazards

The Evanston Health and Human Services Department serves as a delegate agency for the State of Illinois

lead program. The primary goal of the lead program is to protect the public's health and safety by identifying lead-bearing substances that may be the source of exposure to children, and to assure lead hazards are managed in place, mitigated, or abated through the administration and enforcement of the Lead Poisoning Prevention Act and the Lead Poisoning Prevention Code. Evanston HHS receives all test results of blood lead levels for children residing in Evanston. A Lead Risk Assessor contacts the parent or guardian for any child with a test result of 3.5 µg/dL or higher and schedules a time to conduct a lead risk assessment. This is a change; in past years, the test result triggering a Lead Risk Assessor follow up was 5 µg/dL or higher. If lead hazards are discovered in the home of a child with an EBL, elevated blood lead level, the property owner is required to mitigate the lead using a lead abatement contractor.

In addition to responding to cases of childhood lead poisoning the Evanston HHS also provides preventative lead risk assessments for Evanston residents as long as there is either a child age 6 or less or a pregnant woman is living at the property. This is a proactive service offered to the residents of Evanston to help them become aware of the possible lead hazards in their home along with preventing their child from becoming lead poisoned.

The Evanston Health & Human Services Department is partnering with the Cook County Department of Public Health to provide lead hazard removal at no cost to the resident or owner. This opportunity is made possible by a four year grant from the U.S. Department of Housing and Urban Development.

### Actions planned to reduce the number of poverty-level families

Multiple City departments manage programs designed to reduce the number of poverty-level families. The Health & Human Services Department manages the General Assistance and Emergency Assistance programs that support low income households not eligible for other subsidies either through ongoing support or a single award for households at risk of homelessness. Evanston's Workforce Development Division manages several programs aimed at target populations, including disconnected youth and unemployed or underemployed job seekers, that provide job training, internships and connections to employers in high growth or need industries to secure career track positions that pay a living wage.

Evanston uses a substantial portion of HOME funds to support the Tenant Based Rental Assistance (TBRA) Program which provides rental assistance to families with children under 18 years of age and a household income that qualifies as very low or low. Heads of households typically include single mothers, but the program has also supported households who have members with a documented disability or other special needs. The goal of the program is to provide housing support to stabilize Evanston families, providing an opportunity for the head of household to obtain career advancement credentials that can lead to increased job skills, employment security, and economic stability.

### Actions planned to develop institutional structure

In January 2026, City Council approved a new Comprehensive General Plan as part of the Envision Evanston 2045 initiative. The plan serves as a guide for future development and decision-making related

to land use, housing, transportation, economic development, infrastructure, parks, the environment, and more. In August 2026, CIty Council selected a consultant team to align the City's zoning code and map with the 2026 Comprehensive General Plan.

### Actions planned to enhance coordination between public and private housing and social service agencies

The City will continue to use up to 15% of CDBG and local funds to support public services - many of which serve public housing residents as well as low and moderate income individuals and families. Funded services include housing support and services for households experiencing homelessness or at risk of homelessness. The City will continue to employ an Ombudsman committed to coordinating services for residents of Evanston's Specialized Mental Health Rehabilitation Facilities and Skilled Nursing Facilities; these homes all accept Medicaid and are equipped to serve low and moderate income residents. The Ombudsman also coordinates services for residents of Evanston's 34 congregate settings for those with physical or mental disabilities.

### Discussion:

The largest obstacle to meeting the needs of vulnerable and low moderate income residents is lack of funding. Using federal and local funds, Evanston will continue to foster and maintain affordable housing, reduce lead based paint hazards, work to reduce the number of property-level individuals and families, and enhance coordination between public and private housing and social service agencies.

# Program Specific Requirements

## AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

**Introduction:**

### Community Development Block Grant Program (CDBG)
### Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

| | |
|---|---|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | 0 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0 |
| 3. The amount of surplus funds from urban renewal settlements | 0 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan | 0 |
| 5. The amount of income from float-funded activities | 0 |
| **Total Program Income:** | **0** |

### Other CDBG Requirements

| | |
|---|---|
| 1. The amount of urgent need activities | 0 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income.Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 70.00% |

## HOME Investment Partnership Program (HOME)
## Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

   Additional forms of investment in the construction of new affordable rental housing where HOME funds are invested usually includes Low Income Housing Tax Credits and City of Evanston Affordable Housing Funds. A 33 unit affordable housing project will be under construction in 2027. This project will use Low Income Housing Tax Credits, and City of Evanston Affordable Housing Funds.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

   The City does not plan to use HOME funds for homebuyer activities in 2026; HOME resources will be focused on rental housing needs, primarily of households whose incomes do not exceed 60% of the area median income.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

   As noted above, the City of Evanston does not plan to use HOME funds for owner occupied homeownership.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

   The City does not plan to allow for the use of HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

   This is not applicable.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services

received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

This is not applicable.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

   This is not applicable.

## Emergency Solutions Grant (ESG)
## Reference 91.220(l)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

   ESG Policies and Procedures are attached.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

   The City of Evanston is part of the Suburban Cook County Continuum of Care. The Alliance to End Homelessness in Suburban Cook County, lead agency for the Cook County CoC, has a common intake form and data entry standards for HMIS. The Alliance includes members of the Continuum of Care in a process to refine and improve its coordinated intake system. The process coordinates intake from multiple access points, including phone/internet, walk-ins at agencies, shelters and street outreach and uses a pre-screen to assign individual cases to:

- Diversion/Prevention with case management only
- Prevention funding and case management
- Referral to parallel systems such as Veterans and DV programs
- Short-term intervention combining case management and shelter for homeless
- Medium-term intervention combining case management with bridge housing (rapid re-housing), Safe Haven or transitional housing
- Long-term intervention combining case management with permanent supportive housing or rapid re-housing or transitional housing, as available.

   All cases qualified as needing short-, medium, or long-term interventions are prioritized using Length of Time Homeless (LOTH), which replaced the VI-SPDAT in 2023. This approach is viewed as more objective, transparent and equitable. The coordinated system - Entry Point - which connects people experiencing or at risk of homelessness to housing and services, aligns with HUD's Coordinated Entry

requirements, particularly in maintaining a standardized access process and prioritization framework.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

   City Staff develops recommendations for ESG allocations that are reviewed by the Social Services Committee (SSC). The recommendation of the SSC is reviewed and approved by the Evanston City Council. All recommendations are discussed at public meetings, whose agendas are published in advance, as required by the Open Meetings Act.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

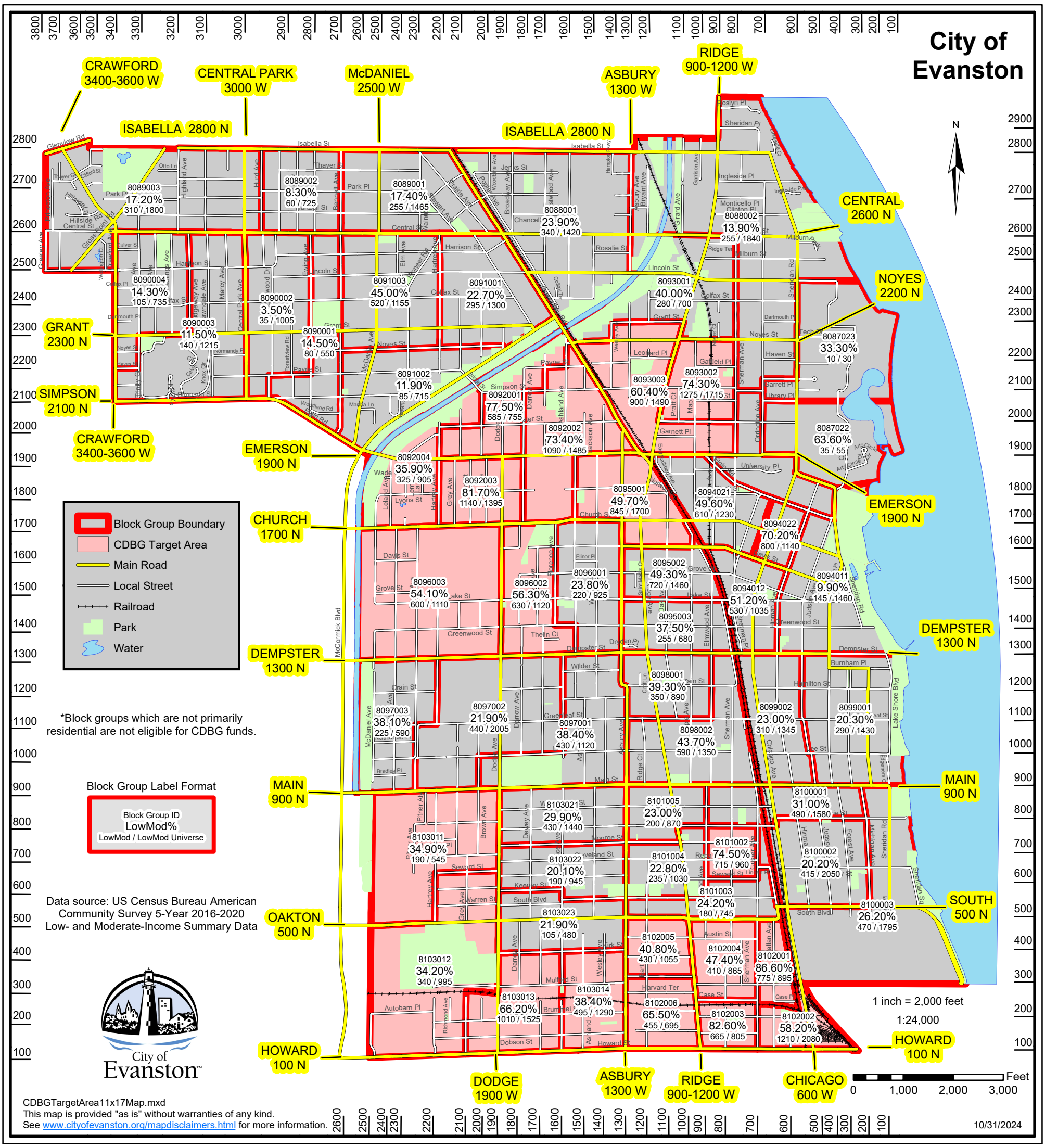
   The City of Evanston is part of the Alliance to End Homelessness in Suburban Cook County and the Suburban Cook County Continuum of Care. The Alliance has homeless or formerly homeless persons on its Board of Directors and in its working groups. Housing Connections, formerly known as Connections for the Homeless, an ESG subrecipient and member of the Alliance, also has people with lived experience on its board of directors and engaged in Joining Forces, its advocacy program.

*5.* Describe performance standards for evaluating ESG.

- Engagement rate: the percent of persons exiting shelter where the destination is known
- Percent of persons exiting shelter who used 30 shelter-nights or fewer
- Percent of persons exited to permanent housing

# Maps

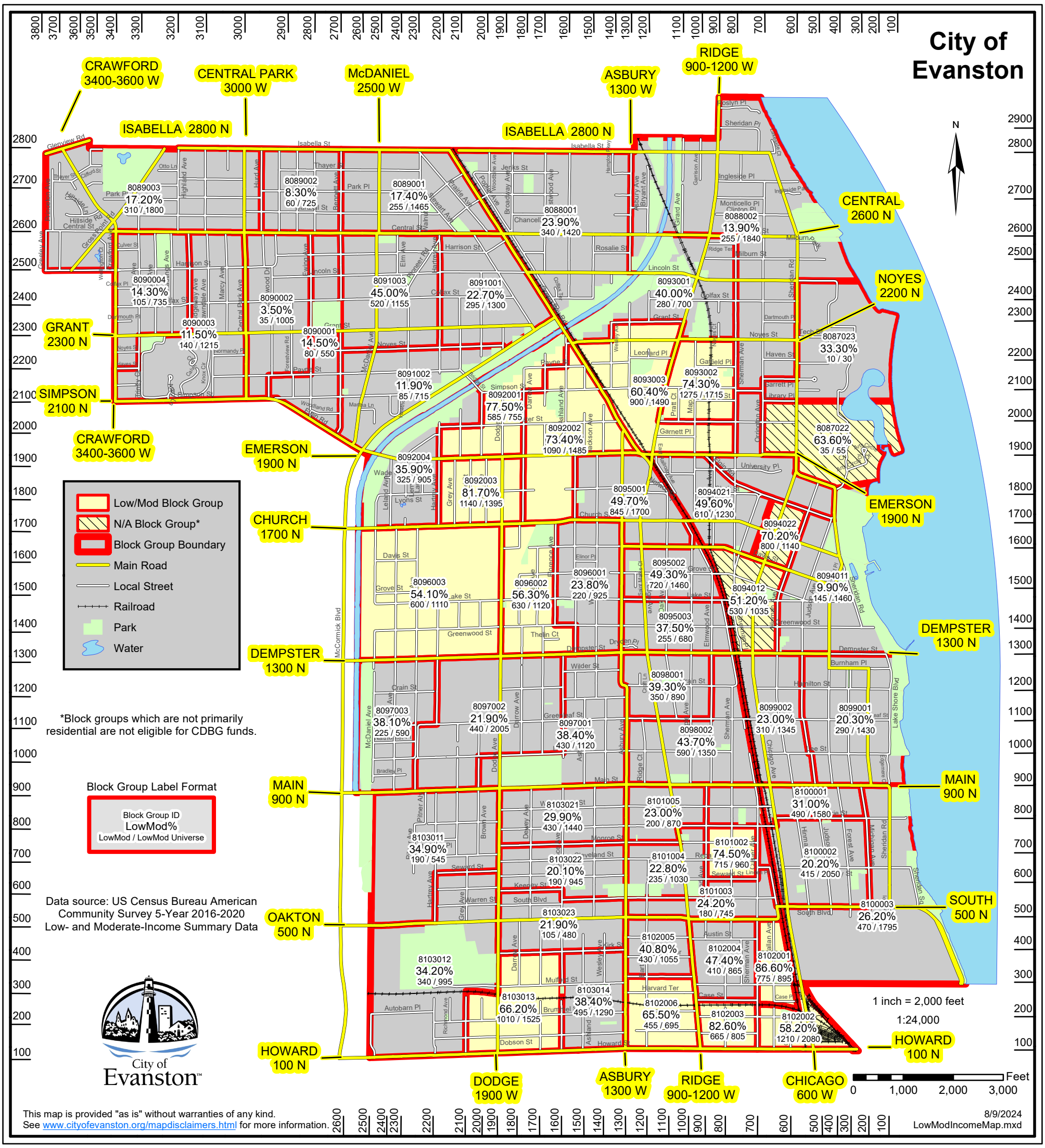
# CDBG Target Area




CDBGTargetArea11x17Map.mxd
This map is provided "as is" without warranties of any kind.
See www.cityofevanston.org/mapdisclaimers.html for more information.

10/31/2024

# Low/Moderate Income Census Block Groups




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See www.cityofevanston.org/mapdisclaimers.html for more information.

8/9/2024
LowModIncomeMap.mxd

# 2027 ESG Policies and Procedures

**City of Evanston**
**Emergency Solutions Grant Program (ESG)**
**Policies and Procedures Manual**

## I. Overview

Evanston receives ESG funds based on the needs of its residents and its goal is to provide housing and services in Evanston to the greatest extent possible in compliance with requirements established by the U. S. Department of Housing and Urban Development (HUD). At present, all shelters and essential services funded with ESG are located in Evanston. Prevention funds are limited to eligible households living in Evanston. In order to be eligible for Re-housing funding, an individual or household's last permanent address must be in Evanston or they are residing in a homeless shelter in Evanston. Due to the shortage of affordable housing in Evanston, particularly larger units, a household eligible for Re-housing may choose rental housing located outside of Evanston's boundaries if no appropriate rental housing is identified in Evanston. All households selected for Rapid Re-Housing subsidies are selected following the policies and procedures of the Coordinated Entry process established and carried out by the Alliance to End Homelessness in Suburban Cook County ("The Alliance"), Evanston's Continuum of Care. Evanston works with two primary service providers: Housing Connections (Connections), formerly known as Connections for the Homeless, and the YWCA Evanston-North Shore (YWCA). Clients must continue to meet with their case manager and fulfill requirements of their case plan for the period in which rental assistance is provided.

Below is a brief listing of eligible expenses by category. Additionally, Evanston continues to work with the Alliance and incorporates policies and procedures established in partnership with the Alliance. Included is the Coordinated Entry Protocol for Suburban Cook County.

**Homeless Management Information System (HMIS)**
Funds may be used for staff salaries and benefits for HMIS management, HMIS licenses and computer security assessments.

**Emergency Shelter Operational Costs**
Funds may be used for shelter maintenance, operation, rent, repairs, security, fuel, equipment, insurance, utilities, food, furnishings and costs of staff.

**Street Outreach**
Funds may be used for services relating to employment, health, drug abuse, and education and may include (but are not limited to):

1. Assistance in obtaining permanent housing
2. Medical and psychological counseling and supervision
3. Employment counseling, job placement and job training
4. Nutritional counseling
5. Substance abuse treatment and counseling

6. Assistance in obtaining other Federal, State and local benefits such as mental health benefits; employment counseling; medical assistance; Veteran's benefits; SSI/SSDI, TANF, General Assistance, LINK/SNAP; etc.
7. Other services such as childcare and transportation
8. Salaries of program staff to provide the above services

**Rapid Re-housing**
Funds may be used for Direct Tenant Based Rental and Utilities Assistance, Housing Relocation and Stabilization Services, and case management.

**Homeless Prevention**
Funds may be used for Direct Tenant Based Rental and Utilities Assistance, Housing Relocation and Stabilization Services, and case management.

## II. Eligibility Criteria for Prevention and Re-housing Funds

The City of Evanston's ESG program policies and procedures are based on 24 CFR 91 and Part 576. Evanston Households are reviewed and approved for the program by the Coordinated Entry process managed by the Alliance to End Homelessness in Suburban Cook County (the Alliance) and/or Housing Connections (CFTH) case management staff. CFTH is a member of the Alliance and is also the primary subrecipient of ESG funds.

To receive **Rapid Re-Housing assistance**:

A. Household must be homeless as defined under categories 1 or 4 of the homeless definition, §91.5
B. Head(s) of household whose last permanent residence prior to becoming homeless was an Evanston address at which they resided for six or more months (exception may be made to this requirement for households fleeing domestic violence), or who have a child (children) enrolled in Dist. 65 or Dist. 202, or other Evanston based childcare, or who are currently employed in Evanston
C. The household must have undergone at least an initial consultation and eligibility assessment with a case manager or other authorized representative who is responsible for determining eligibility and the type and level of assistance needed
D. Based on assessment at intake, household has likelihood of maintaining housing and becoming self-sustaining following the receipt of assistance estimated at 12 months, but could be for a shorter (3 – 6 month) period
E. Head(s) of household must agree to follow the case management plan developed working with the case manager and meet with the designated case manager at least once per month while receiving assistance. Recipients meeting the definitions and requirements of the Violence Against Women Act of 1994 (42 U.S.C. 13701 *et seq.*) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 *et seq.*) are exempt from this requirement.

To receive **Prevention assistance:**

A. Household must be at risk of becoming homeless under category 2 of the homeless definition.
B. Households must have an income below 30% of the Area Median Income (AMI) at initial assessment.
C. Head(s) of household must be an Evanston resident of six months or more, or who have a child (children) enrolled in Dist. 65 or Dist. 202, or other Evanston based childcare, or who are currently employed in Evanston.
D. The household must have undergone at least an initial consultation and eligibility assessment with a case manager or other authorized representative who is responsible for determining eligibility and the type and level of assistance needed.
E. Based on assessment at intake, household is likely to maintain housing and become self-sustaining following the receipt of short- or medium-term assistance.
F. Household income must be reassessed at 3-month intervals and remain under 30% of AMI to continue to receive Prevention assistance.
G. Head(s) of household must agree to follow the case management plan developed working with the case manager and must agree to meet with the designated case manager at least once per month while receiving assistance. Recipients meeting the definitions and requirements of the Violence Against Women Act of 1994 (42 U.S.C. 13701 *et seq.*) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 *et seq.*) are exempt from this requirement.

## III. Emergency Transfers Under the Violence Against Women Act

In accordance with the Violence Against Women Act (VAWA), ESG funded programs providing permanent housing (rapid re-housing) or transitional housing will allow households who experience domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from their current unit to another unit. The providing agency will follow the Continuum of Care protocol including a model emergency transfer plan provided by HUD; all receiving agencies are required to implement that plan as needed.

Any agency receiving ESG funds must demonstrate that an emergency transfer plan is in place and that the availability of said plan has been communicated with individuals and families in ESG funded housing interventions. If a participant is currently in ESG supported housing and experiences DV or sexual assault, the participant is eligible for an emergency transfer to another housing unit as soon as one becomes available or can be located. The participant can request an emergency transfer in writing or verbally to the housing program case manager or administrator. The housing program will provide reasonable accommodations to this policy for individuals with disabilities. The housing provider will also ensure that the request of an emergency transfer is kept confidential. The housing program will act as quickly as possible to move a household that is a victim of domestic violence, dating violence, sexual assault or stalking to another unit, subject to availability and safety of a unit. Survivors are encouraged to contact the 24-hour DV hotline and are connected with a local Victim Service Provider to assist with additional safety planning and appropriate resources.

## IV. Standards for Targeting and Providing Essential Services Related to Street Outreach

Street outreach takes place in locations in Evanston where homeless are known to be, such as soup kitchens, churches, hospitals, police departments, libraries and other locations. Case managers and outreach workers engage with eligible people to educate them about housing and supportive services options available. Referrals to services can also come from the Entry Point Call Center for the northern suburbs of Cook County. Callers are screened to assess needs and directed to available services in the area. This includes scheduling callers for intake into local housing programs.

Referral

Clients are given referrals to mainstream services based on needs; common referral and case management services provided below.

Available Essential Services

Case Management services:

1. Obtaining ID
2. Applying for benefits, GA, SSI, SSDI, veterans benefits, SNAP, Section 8 housing vouchers, VASH vouchers
3. Locating housing
4. Applying for housing assistance
5. Applying for Medicaid
6. Creating a service plan with goals and implementation steps and timeframes

Health Care services:

1. Physical
2. Vaccinations
3. Psycho-social assessment
4. Psychiatric evaluation and prescription of medication
5. Monitoring medication
6. Health education
7. Establishing a primary health care provider and physician.
8. Creating a coordinated care plan.

Employment services:

1. One-on-one counseling
2. Job clubs
3. Assistance with resumes
4. Job readiness training programs
5. Job referrals

Education services:

1. TABE (Test of Adult Basic Education) testing
2. Career counseling
3. Remedial education/GED
4. Assistance in applying for training programs or education programs

5. Tutoring
6. Tuition assistance

Discharge
Providers use a harm reduction and trauma-informed model for services. The philosophy of *harm reduction* promotes and supports the right of people who use substances and engage in other risky behaviors to be treated with dignity and respect, including their right to exercise self-determination related to use and their right to expect and receive collaboration in therapeutic relationships. *Trauma-Informed Systems* are those in which all components of a given service system have been reconsidered and evaluated in light of a basic understanding of the role that violence plays in the lives of people seeking mental health and addictions services.

## V. Emergency Shelter: Admission, Diversion, Referral, and Discharge Policies

The Alliance to End Homelessness in Suburban Cook County is the lead agency for the Cook County Continuum of care and sets policy for emergency shelter admission, diversion, referral, and discharge; local providers follow the policies and procedures outlined by the Alliance.

**Shelter Admission, Diversion, Referral and Discharge Policies:**

Admission

Open to any homeless individual over the age of 17.

- Must be able to function in a congregate setting
- Cannot be disruptive

Individuals seeking admittance go through an intake process that requires an interview with case managers. Case managers review the application and approved clients may move in the following day, or as scheduled based on availability.

Diversion & Referral

Clients who are turned away from the shelter are referred to the nearest shelter and provided with transit/bus fare to get there.

Discharge

Clients may be discharged for three reasons.

1. They have stayed the maximum number of nights.
2. They have completed their case plan, found housing, and moved out.
3. They can be discharged for cause, which includes:
    a. Violent behavior that is a danger to others or to themselves;
    b. Persistent no shows for their shelter bed without an acceptable explanation;
    c. Persistent violation of the curfew causing a disturbance in the shelter.

**Admission, Diversion, Referral and Discharge Policies for shelters supporting families fleeing domestic violence:**

Admission

Admissions are done over the 24-hour crisis hotline.

- Client must be a victim of domestic violence

Diversion & Referral

Clients who are turned away from the shelter because it is full are referred to the Entry Point Call Center (877-426-6515), and connected to Street Outreach programming for ongoing case management. Clients that call local hotlines or providers and are suicidal are referred to the Statewide 988 Suicide and Crisis Lifeline.

Discharge

Clients can be discharged for the following reasons.

1. Violence
2. Safety violations
3. Drug or alcohol use
4. Repeated failure to follow the rules

In all cases, clients are assisted in finding an alternative shelter and given bus, train or cab fare to travel.

## VI. Coordination

The City of Evanston continues to work with the Alliance, local agencies that serve the homeless and people at risk of homelessness, and other advocacy organizations to develop and maintain policies and procedures to coordinate provision of emergency shelter, street outreach, homeless prevention and rapid re-housing assistance, mainstream and other services. Housing Connections, the primary recipient of City of Evanston ESG funds, participates very closely with the Alliance on many levels. Connections is a member of the Alliance and participates in committees responsible for reviewing CoC performance and setting policies regarding use of federal funds. The City's Grants and Compliance Specialists is also responsible for reviewing CoC policies and procedures and attending update and performance meetings as able. Participation and partnership help to ensure clear communication of goals and priorities and decrease redundancies as they relate to ESG funding.

Coordination among ESG recipients is facilitated through the use of HMIS and the Coordinated Entry process managed by the Alliance and used to determine rapid rehousing recipients based on length of time homeless and client location preference. This is an important component to a more coordinated process for intake and will help determine prioritization for services. In compliance with HUD requirements, all funded programs participate in the coordinated entry process known as Entry Point. Entry Point is the Coordinated Entry System for Suburban Cook County Continuum of Care (CoC). The intake process has been standardized and a by-name vulnerability list for the region, which is maintained by the Alliance as the Entry Point Lead Agency, has been employed to prioritize the most vulnerable for the most intensive housing interventions. This process is used to match individuals to Permanent Supportive Housing and Rapid Re-Housing supports.

## VII. Prioritization

The City recognizes that the demand is greater than available resources to provide essential services, emergency shelter, prevention and re-housing that meet all needs. The City and Alliance also recognize that individuals and households must be prioritized to ensure that these limited resources available are allocated in the most efficient and appropriate manner. As stated above, Housing Connections, in partnership with the Alliance, is responsible for assessing, prioritizing and reassessing the needs of all individuals and households participating in ESG-funded services, including essential services for those in emergency shelter, rapid re-housing and homelessness prevention activities.

Assessment tools and protocols conform to the requirements established by HUD, the Alliance, ESG Subrecipients and City of Evanston. These tools and protocols create consistency in assessments and provide the basis for appropriate agency and service referrals. All ESG subrecipients use this system to help identify immediate needs of participants: emergency shelter, homelessness prevention resources, diversion and stabilization services. Individuals and families in need can undergo the pre-screen over the phone or in person.

Street outreach and emergency shelter are intended to be low-barrier, and the prioritization work focuses on getting people the right housing intervention as needed. Approximately half of seasonal shelter guests served in suburban Cook County stay 7 shelter nights or fewer, so the Alliance focuses on persons who spend longer in shelter when assessing them for a potential housing intervention.

The Alliance manages a central, by-name vulnerable list for the region, maintained within HMIS. Connections also uses HMIS; clients are prioritized by vulnerability factors, and subpopulations are ranked by factors including, but not limited to: length of time homeless, lack of access to family and/or community support, and number of previous homeless episodes. The City's Health and Human Services Department is responsible for administering General Assistance funds. There is a large overlap of populations served by both General Assistance and ESG, and staff will be working to ensure funds are spent in the most efficient manner.

*Essential services for clients in emergency shelter:* ESG funding may be used to provide essential services to individuals and families who are in an emergency shelter. This may include case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.

ESG subrecipients are responsible for assessing an individual or family's initial need for shelter and must reassess that need on an ongoing basis to ensure that only those with the greatest need receive ESG-funded emergency shelter assistance. Shelters that serve families must serve all eligible members; individuals may not be separated from other members of their household.

*Rapid Re-Housing:* Homeless households whose last permanent address was in Evanston, who resided there for a minimum of six months, and who demonstrate potential to retain permanent housing following a medium-term subsidy (approximately six months with the

option to extend the subsidy up to, but not to exceed, 24 months in a 36 month period) are eligible for ESG Rapid Re-housing.

Risk factors for Rapid Re-housing assistance include, but are not limited to:

- Individuals/Households who lack a fixed, regular, and adequate nighttime residence, meaning:
    - Primary nighttime residence is a public or private place not meant for human habitation; or
    - Living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal , state, and local government programs); or
    - Exiting an institution where (s)he has resided for 90 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
- Any individual or family who:
    - Is fleeing, or is attempting to flee, domestic violence;
    - Has no other residence; and
    - Lacks the resources or support networks to obtain other permanent housing

*Prevention:* Evanston households with incomes under 30% of area median that have potential of remaining stability housed following a medium-term subsidy will be targeted for Prevention. Risk factors for Prevention assistance include but are not limited to:

- Individual or family at imminent risk of losing their primary nighttime residence:
    - Residence will be lost within 21 days after the date of application for Prevention assistance;
    - No subsequent residence has been identified; and
    - The individual or family lacks the resources or support networks needed to obtain other permanent housing
- Unaccompanied youth under 25 years of age, or families with children and youth who do not otherwise qualify as homeless under this definition, but who:
    - Are defined as homeless under the other listed federal statutes;
    - Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
    - Have experienced persistent instability as measured by two moves or more in the preceding 60 days; and
    - Can be expected to continue in such status for an extended period of time due to special needs or barriers
- An individual or family who:
    - Has an annual income below 30% of median household income for the area based on HUD Part 5 definition; and
    - Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; and

- Meets one of the following conditions:
  - Has moved two or more times because of economic reasons during the 60 days immediately preceding the application for assistance; OR
  - Is living in the home of another because of economic hardship; OR
  - Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days of the date of application for assistance; OR
  - Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
  - Lives in an SRO or efficiency apartment unit in which more than 2 persons reside or in a larger housing unit in which more than one and a half persons per room reside; OR
  - Is exiting a publicly funded institution or system of care; OR
  - Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Consolidated Plan

- A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute
- An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

**VIII. Minimum Standards for Permanent Housing**

ESG subsidized housing must meet the minimum habitability standards under 24 CFR §576.403(c). This restriction applies to all activities under the Homelessness Prevention and Rapid Re-Housing components, including rental assistance and housing relocation and stabilizations services. In addition:

- If an eligible household needs homeless prevention assistance to remain in its existing unit, the assistance can only be provided if that unit meets the minimum standard.
- If an eligible household needs homeless prevention or rapid re-housing assistance to move to a new unit, the assistance can only be provided if the <u>new</u> unit meets the minimum standards. The unit the household is leaving does not need to be inspected.
- All units must be inspected prior to entering into a lease agreement and prior to occupancy.
- The housing must also comply with any other standards established by the City that exceed or add to these minimum standards.

The same standards apply regardless of the amount of ESG funds involved. For example, the unit must be inspected and confirmed that it meets the ESG minimum habitability standards, even if the only ESG assistance provided is for a security deposit or moving assistance. The Subrecipient is required to document compliance with ESG habitability standards in the program participant's file.

*Homelessness Prevention*
When ESG Rental Assistance and/or Housing Relocation and Stabilization Services are provided to help participants remain in or move into permanent housing, the ESG minimum habitability standards apply to either the current unit (if the program participant is staying in place) or to a new unit (if the program participant is moving). Even if only a minimal amount of Housing Relocation and Stabilization Services assistance – such as utility arrears/payments (Financial Assistance) or housing stability case management (Services) – is provided under the Homelessness Prevention component, the habitability standards apply to the unit and must be documented in the program participant's file.

If the program participants need Homeless Prevention assistance to stay in the current housing, the housing must be inspected and found to meet the minimum habitability standards before the subrecipient incurs ESG costs for any of the following:

- Providing any service to the program participant;
- Entering into a rental assistance agreement with the owner; or
- Making any payment on behalf of the program participant (e.g., rental or utility arrears, rental or utility payments, etc.)

*Rapid Re-Housing*
When ESG Rental Assistance and/or Housing Relocation and Stabilization Services are provided under the Rapid Re-housing component to help a program participant move into a new permanent housing unit, the habitability standards apply to the unit into which they are moving and must be documented in the program participant's file. If Rapid Re-housing services are being provided before a unit has been identified, no habitability inspection is required until there is a unit to be inspected. If assistance with arrears for a prior unit is needed as part of the rapid re-housing assistance, no habitability inspection is required for the old unit on which the arrears are owed, so long as the program participant will be rapidly re-housed in a different unit.

If the program participant needs Homeless Prevention or Rapid Re-housing assistance to obtain housing, the unit into which the program participant is moving must be inspected before the program participant signs the lease and before the subrecipient provides any ESG rental assistance or housing relocation and stabilization services specific to the unit into which the program participant will be moving. One exception to this is the rental application fee. If a program participant applies for several units, only the unit into which they ultimately decide to move must be inspected.

## IX. Inspections

Inspections of any unit supported with leasing or rental assistance funds are required to ensure that the unit is compliant with ESG Minimum Habitability Standards for Emergency Shelters and Permanent Housing as detailed in 24 CFR 576.403 and meets ESG program requirements for habitability, lead based paint, and rent reasonableness, before any assistance can be provided on behalf of a program participant. When the unit is located in Evanston, Subrecipient must

request and coordinate inspections with the City's Property Standards Department. Moderate deficiencies must be corrected within thirty (30) days and low deficiencies must be corrected within sixty (60) days.

During a nationally declared disaster or locally declared disaster as defined by local health officials (such as COVID-19), City inspectors will have the ability and authority to perform virtual inspections in order to facilitate housing families and individuals in units that meet housing suitability requirements, provided that physical inspections occur within three months after it is declared by local health officials that special measures to mitigate damage caused by the disaster are no longer required.

## X. Rent and Utilities Subsidy

Each household's case will be reviewed by a case manager to assess its capacity to pay a portion of rent and utilities. A household's contribution to rent and/or utilities generally should not exceed 50% of the gross household income using the HUD Part 5 definition. Subsidies may be deep or shallow based on the unique circumstances of each recipient; the amount of subsidy will be reassessed each month. ESG funds may be used for rent and utilities arrearages on a one time basis, security and utility deposits, first and last month's rent and rent and utility subsidies as allowed. The City does not consider any funds for security deposits that are refunded as Program Income and does not expect the Subrecipient to return any such funds. ESG can also be used to pay late fees provided the charge complies with the City's Residential Landlord and Tenant Ordinance (RLTO).

## XI. Length of Assistance

Evanston's ESG program can provide subsidies for up to 24 months including, but not to exceed 6 months of rent arrears. Typically, subsidies to individual households do not exceed 3 months. Case managers meet with clients monthly and practice progressive engagement, wherein households are engaged in case management services and given a basic level of financial support. Monthly monitoring and periodic budget assessments determine if and when the basic level of assistance should be changed or increased. The percentage of subsidy paid is meant to decrease throughout the year as households move toward stability and are able to assume responsibility for paying full rent at the end of 12 months. Extending the potential timeframe for households beyond twelve months, with clients required to maintain compliance with their case plan in order to qualify for direct assistance, can help clients overcome the following challenges:

1. Households have not been able to maintain their housing independently following six months of assistance
2. Households remain rent burdened and are not able to achieve financial stability in Evanston's high rent market
3. Landlords are unwilling to write leases for clients based on their history of housing and financial instability.

All households will be re-evaluated at the end of the twelve month period if a subsidy is still required to maintain housing and extension of funding may be approved by the Program Review

Committee based on need and the availability of funding. No client will receive more than 24 months of assistance in a three-year period.

## XII. Type, Amount, and Duration of Housing Stabilization and/or Relocation Services

Housing relocation and/or relocation services provided to the participant will include basic case management. Housing search, placement, legal services, mediation, and credit repair may be a component to case management or referred out to other service providers.

## XIII. Client Application Process

A household may enter the ESG program through several avenues, including:

1. Referral from City or other sources including those outlined by the Alliance's Coordinated Entry Protocol
2. By contacting subrecipient(s) directly

After an initial intake screening has been conducted to determine program fit, a potential client will be referred to a case manager who will conduct a full intake application (including initial budget review). Once all information is gathered from the applicant the case manager will present the eligible case to the appropriate Review Committee. The Review Committee meets as needed to review and approve applicants for assistance through ESG. Once an applicant is approved for assistance, case managers will develop a case management plan for each client household. This plan may include referrals to other agencies for needed services (e.g., legal, financial literacy, etc.).

## XIV. Eligibility Documentation and Recordkeeping

Subrecipients must establish written intake procedures that include a requirement for written documentation verifying eligibility for program services in accordance with the following preferred order of documentation:

**Third-party Verification –** source documents provided by an outside source.
Third party documentation is the preferable form of verification and includes but is not exclusive to a written statement or document from employer, landlord, public benefit worker, or agency service provider. Written verification sent directly to program staff or via the applicant is preferred.

**Intake/Case Manager Worker Observation –** documented by ESG staff.
Staff documentation may include oral statements made by a social worker, case manager, or other appropriate official at an institution, shelter, or other facility and documented by the program intake worker/case manager. When the Intake Worker is unable to obtain a written or oral statement from a shelter, institution or facility staff, the Intake Worker must document, in writing, their efforts to obtain eligibility documentation and must place their documentation in the client's file.

**Applicant Self-certification –** applicant signed document certifying eligibility.

Self-certification requires a written and signed document by the individual or head of household seeking assistance attesting to the eligibility facts for which they are certifying. A third party may be designated by an applicant to sign documents on their behalf when they are unable to do so. If needed, the subrecipient must provide access to language interpretation services and assistive devices necessary for applicants to understand the documents they are certifying.

Self-certification documentation is only used when documented staff efforts verify that third-party or worker observation documentation is not available. However, lack of third-party documentation must not prevent an individual or household from being immediately admitted to emergency shelter, receiving street outreach services or immediately accessing domestic violence/victim service shelter and assistance.

Documentation of all client/applicant information must be available in client/applicant files or if kept electronically, available upon request. Documentation of all efforts to obtain higher preference of verification (3rd party and Intake Worker Observation) when lower forms of preference are used, must be in writing and kept in the client/applicant file.

## XV. Subrecipient Funding Agreements

A written agreement must be entered into between the City and each entity receiving ESG funds. The written agreement forms the basis for the contractual obligation between the parties to fund and implement eligible activities. The agreement will denote the responsibilities attributed to each party, outline the scope of services to be performed, and methods of accountability. Subrecipient desk monitoring will take place at least quarterly and will include review of voucher information submitted for the duration of the grant. Site visits will be conducted periodically based on a risk analysis. Execution of the agreement binds the subrecipient for a specified period of time and may be revised only upon written authorization from the City.

## XVI. Fiscal Policies & Procedures

Subrecipients of ESG funds must ensure that they are in compliance with all applicable fiscal and administrative requirements issued by the City of Evanston and the federal government. When a subrecipient's financial policies and procedures are less restrictive, as part of the agreement, the agency agrees to adhere to the following:

- 2 CFR Part 200 Uniform Administrative Requirements, cost principles, and audit requirements for Federal Awards
- 24 CFR Part 576 – Emergency Solutions Grants Program

### A. Board of Director Responsibilities

Upon execution of the agreement between the City and the subrecipient, the subrecipient shall:

1. Immediately report all changes in its articles of incorporation, bylaws, or tax-exempt status to the City.
2. Ensure no member of the Board of Directors is a paid employee, agent, or subcontractor.

3. Continue to include representation on the Board of Directors, the broadest possible cross-section of the community, including those with expertise and interest in the provided services, representatives from community organizations interested in the services, and, ideally, past users of the service or similar services.
4. Keep minutes of all regular and special meetings of the Board of Directors, have a regular meeting at least once a year, and upon request.

**B. Administrative Oversight**

Subrecipient Administrative/Program Staff responsibilities include:

- Ensure that all expenditures involving the use of federal funds are eligible under the federal and local requirements of the grant
- Approval of purchase orders and contracts to be reimbursed through HUD grant funds are coded properly
- Ensure compliance with all HUD regulations and City Grant Agreement
- Implementation of an internal control system

Subrecipient Financial Officer Responsibilities include:

The finance officer, accountant, or responsible agency representative is responsible for maintaining a computer accounting/bookkeeping system. The agency representative's responsibilities include, but are not limited to:

- Control of accounting documents for processing by the subrecipient
- Preparation of financial reports based on accounting records
- Preparation of all records/reports submitted to the City as required prior to release of funds and subject to review by the agency's Director
- Execution and oversight of all financial procedures designed to avoid or eliminate waste, fraud, or abuse of grant funds.

Internal Controls

Agencies receiving ESG funding shall have:

- Written Policies and Procedures that define staff qualifications and duties, lines of authority, separation of functions, and access to assets and sensitive documents.
- Written Accounting Procedures, including procedures for approving and recording transactions and regular reconciliation of records to check for completeness and accuracy.

A good internal control system should include several basic features, regardless of the organization's size. These include:

- An organization plan that safeguards resources by segregating duties;
- A system of authorization and recording procedures that provides effective accounting control over assets, liabilities, revenues, and expenses;
- An established system of procedures followed by each organizational component in performing its duties and functions;
- Personnel capable of performing their responsibilities; and

- An effective system of internal reviews.

The internal control requirements provide for the separation of duties and the secure storage of accounting records in limited access areas. In maintaining these accounting records a subrecipient should also ensure that:

- Journal Entries are properly approved and explained/supported
- Posting and trial balances are performed on a regular basis; and,
- Fidelity bond coverage is obtained for responsible officials of the organization.

**IX. Recordkeeping**

To ensure eligibility of costs, subrecipient files shall include copies of:

- Funding approval by City Council
- Agreement with the City
- Procurement and Bid information
- Contracts with vendors
- Up to date budget (including copies of budget change requests)
- Expenditure and payment information including supporting documentation
- Characteristics and location of clients served
- Program status and quarterly progress reports
- Audits and financial information
- Monitoring reports
- Other relevant correspondence

Record Retention Policy

All ESG files must be maintained for a minimum of five years after the City's grant year closes out with HUD (which may be several years after an individual subrecipient's grant closeout). The City of Evanston will regularly alert subrecipients when a grant year has been closed out, but they should expect to retain records at least ten (10) years from execution of their subrecipient agreement.

Access to Records

HUD, City of Evanston staff, the Inspector General of The United States or any of their duly authorized representatives have the right to access subrecipient agency program records. All ESG grantees are required to provide citizens with reasonable access to records regarding the current funded programs and past, consistent with applicable State and local laws regarding privacy and confidentiality.

Information may be provided using aggregate statistics. All clients may be lumped into categories, but no personally identifiable information (PII) may be released. For example, a report may state: 150 clients served this quarter, 60 White, 60 Black/African-American, 15 Native American, 15 Asian. Of those clients, 25 were female head of household, 100 were very low income, and 50 were moderate income.

Accounting Records

Financial record keeping is one of the primary areas subject to reviews and one which, if inadequate, can lead to findings and the possible recapture of funds. Accounting systems shall provide reliable, complete, and up to date information about sources and uses of funds.

These are the financial information and records that must be maintained by the agency:

- A computer accounting system that records the source of income and categorizes expenses for grant activity
- Written accounting procedures, chart of accounts, written internal controls, administrative controls, accounting journals and ledgers;
- Payment requests and source documentation (bills, receipts, copies or canceled checks, etc.);
- Comparison of actual checks written with budgeted amounts for each grant;
- Written procedures for determining what is reasonable and allowable under OMB circulars for costs and activities;
- Procurement files (bids, contracts, etc.) and real property inventory;
- Bank account and payroll records; and
- Financial statements, correspondence and audit files.

Records pertaining to ESG activities shall be kept separately. A separate fund should be kept for all grant income and expenses.

<u>Maintenance of Records</u>

Subrecipients are required to have accounting records that adequately identify the source and application of ESG funds provided to them. To meet this requirement, a subrecipient's accounting system should include the following elements:

- *Chart of Accounts* – This is a list of names and the numbering system for the individual accounts that contains the basic information about particular classification of financial transactions for the organization. Any ESG award must have a unique number identifying it as a source of income. Line Item Expenditures and Line Item Funding Items must be associated with income and expense items identified in the Agency's Chart of Accounts as provided in the application for funding.
- *Cash Receipts Journal* – This journal documents (in chronological order) when funds were received, in what amounts, and from what sources. Each entry in the journal states the name of the individual accounts to be debited and credited, the dollar amount of each debit and credit, the date of the transaction, and any other necessary explanation of the transaction.
- *Cash Disbursement Journal* – This journal documents the expenditures of the organization in chronological order.
- *Payroll Journal* – This journal documents the organization's expenses on salaries and benefits, and distinguishes different categories for regulatory purposes.
- *General Ledger* – After a transaction is entered into a journal, that information also should be transferred to the proper accounts in the general ledger. The process of transferring transaction information from a journal to a ledger is known as "posting".

The entries in the journal and ledger should be cross-indexed to permit the tracing of any recorded transaction.

- *Payroll Records* – The largest component of direct cost associated with most awards received by nonprofit organizations is labor. Personnel activity reports or equivalent documentation must meet certain standards. Reports must reflect a determination of the actual activity of each employee, the number of hours spent working on the program and the number of hours spent working with Evanston residents. Time and activity tracking is required of all employees whose salaries are paid in full or in part with ESG funds; funds may only be used to reimburse eligible activities which benefit primarily low and moderate income persons.

Source Documentation

All accounting records must be supported by source documentation. This is necessary to show that the costs charged against ESG funds were incurred during the effective period of the subrecipient's agreement with the City, were actually paid out, were expended on allowable items, and had been approved by the responsible officials in the subrecipient organization. The source documentation must explain the basis of the costs incurred, as well as show the actual dates and amount of expenditures. Source documents should be included with all voucher requests.

Source documents, such as invoices or time cards, should provide all details of each transaction or activity. Additionally source documents must be readily accessible during monitoring visits. A variety of source documents and records are needed to properly account for grant transactions. These documents include, but are not limited to the following:

- Invoices – originals should be marked paid and dated
- Timesheets – signed by the employee and immediate supervisor
- Service Contracts – all grant funded service contracts must be a written agreement between the subrecipient and the firm/individual.

## XVII. Agency Compensation

Agencies providing ESG eligible services may request reimbursement once funds are spent. Funds may be requested as frequently as once a month, but in no case less than once a quarter. A draw down request form must be submitted along with a match report and source documents for all expenses, including time and activity tracking for staff costs. No funds will be disbursed until all required reports and substantiating documentation are submitted.

## XVIII. Reporting/Data Collection

**Performance Standards**: The following are preliminary performance standards established by the Suburban Cook County Continuum of Care to measure the goals of reducing and eliminating homelessness.

- Engagement rate: the percent of persons exiting shelter where the destination is known
- Percent of persons exiting shelter who used 30 shelter-nights or fewer
- Percent exited to permanent housing, for each component type (shelter, HP, RRH)
- Follow up on housing status at 6 month following the end of assistance

Reporting requirements for ESG have not been finalized. Once requirements are established, the City of Evanston will work with Subrecipients to establish compliance.

**Case Management Requirements**

Case managers:

- Conduct an initial intake
- Complete full application with client
- Collect and store verification documents
- Maintain confidentiality as described in the subrecipient agreement for a period of four (4) years following the termination of said agreement.
- Participate in the Review Committee, as appropriate
- Assess client needs and coordinate/facilitate the case management service plan
- Follow up with each client to gauge compliance with case management service plan
- Keep case notes for each household served
- Input client level data into HMIS. It is recommended that information be input into HMIS immediately following client contact or service provision.
- Meet with the client(s)at least once a month
- Conduct a home visit at least once during the period of time in which a household is receiving direct assistance
- Work with households that choose to re-engage in case management if the household is still in need of assistance.

All participants should, in addition to the initial case management budget session, receive budgeting help as part of case management or be referred to an approved budget counseling program, such as Money Management International (workshop or telephone consult) or the YWCA Evanston/North Shore (workshop).

Although assistance may be approved for up to six months, case managers may recommend early termination of assistance if it is determined that a household requires less assistance. Assistance must be terminated for any Prevention client whose income equals or exceeds 30% of AMI at their three month evaluation. Either lack of compliance with their case management plan or if information provided in the initial application was false constitutes grounds for immediate termination of assistance.

## XIX. Property and Property Owner Requirements

Before Evanston-based properties can be approved for subsidy, case managers must verify that the property owner is registered under the City's Rental Registration program and in compliance with City of Evanston Ordinance 141-O-18. Additionally:

- The property must be located within the City boundaries of Evanston.
- The property must have a current rental housing letter of compliance or must pass an inspection of habitability standards as performed by a City of Evanston inspector.
- Dwelling units must conform to current zoning and rental housing regulations.

Annual registration of all rental units is required; the owner should ensure registration is current prior to inspection. The owner is additionally responsible for maintaining the premises in substantial compliance with applicable codes of the City and shall promptly make any and all repairs necessary to fulfill this obligation.

Ineligible properties include: vacation rental properties, properties located outside City of Evanston boundaries, and shared housing units.

**XX. Lead-Based Paint Requirements**

Federal lead-based paint requirements apply any time federal funds are used for housing assistance and the living space or unity was built prior to 1978, except housing for the elderly or persons with disabilities (unless any child who is less than 6 years of age resides or is expected to reside in such housing, then the requirements do apply) or any 0-bedroom dwelling. The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M and R apply to all shelters assisted with ESG funding and all housing occupied by program participants.

The following subparts of HUD's implementing regulations at 24 CFR part 35 include:
Subpart A – Lead disclosure rule
Subpart B – General requirements
Subpart H – Project-based assistance
Subpart J – Rehabilitation
Subpart K – Acquisition, leasing, support services, or operation
Subpart M – Tenant-based rental assistance
Subpart R – Methods and standards for hazard evaluation and reduction

Subrecipient must provide the lead hazard information pamphlet to any resident who will be residing in a unit built before 1978. The tenant must receive the pamphlet before moving into the unit. If subrecipient can document that the tenant received the pamphlet previously, subrecipient is not required to provide it again.

For units older than 1978 which will house one or more children under the age of 6, landlord and tenant must complete a Lead-Based Paint Disclosure form (see OHCS website for sample form). The form describes any known current or previous lead-based paint hazards, and documents tenant's receipt of records and the lead hazard information pamphlet. Additionally, a visual lead-based paint assessment must be completed by a person trained in this inspection process. The inspection may be completed in conjunction with the habitability inspection if the inspector is qualified. At Intake, it should be noted on the Application Form if there will be any child in the household younger than 6 years. This information should be provided to the habitability inspector prior to their examination of the proposed rental unit.

If a notification is received from a public health department or other medical health care provider that a child of less than 6 years of age living in a unit funded by ESG rental assistance,

has an elevated blood lead level, an environmental investigation of the dwelling unity and common areas servicing the dwelling unit in which the child lived, regardless of whether the child is still living in the dwelling. For more information, see 24 CFR 35.730 and 35.1225.

Essential service activities, such as counseling, case management, street outreach, referrals to employment, etc., are exempt and excluded from the lead-based paint inspection requirements.

**ADDENDUM 1. POLICY REQUIREMENTS**

If applicable:

1. The Recipient shall not use grant funds to promote "gender ideology," as defined in Executive Order (E.O.) 14168, Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government.

2. The Recipient agrees that its compliance in all respects with all applicable Federal anti-discrimination laws is material to the U.S. Government's payment decisions for purposes of section 3729(b)(4) of title 31, United States Code.

3. The Recipient certifies that it does not operate any programs that violate any applicable Federal anti-discrimination laws, including Title VI of the Civil Rights Act of 1964.

4. The Recipient shall not use any grant funds to fund or promote elective abortions, as required by E.O. 14182, Enforcing the Hyde Amendment.

5. This Grant shall not be governed by Executive Orders revoked by E.O. 14154, including E.O. 14008, or any requirements implementing Executive Orders that have been revoked.

6. The Recipient must administer its grant in accordance with all applicable immigration restrictions and requirements, including the eligibility and verification requirements that apply under title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, as amended (8 U.S.C. 1601-1646) (PRWORA) and any applicable requirements that HUD, the Attorney General, or the U.S. Citizenship and Immigration Services may establish from time to time to comply with PRWORA, Executive Order 14218, or other Executive Orders or immigration laws.

7. No state or unit of general local government that receives funding under this grant may use that funding in a manner that by design or effect facilitates the subsidization or promotion of illegal immigration or shields illegal aliens from deportation, including by maintaining policies or practices that materially impede enforcement of federal immigration statutes and regulations.

8. The Recipient must use SAVE, or an equivalent verification system approved by the Federal government, to prevent any Federal public benefit from being provided to an ineligible alien who entered the United States illegally or is otherwise unlawfully present in the United States.

9. Faith-based organizations may be Subrecipients for funds on the same basis as any other organization. Recipients may not, in the selection of Subrecipients, discriminate against an organization based on the organization's religious character, affiliation, or exercise.

10. Awards to Subrecipients made under, relating to or arising out of the Federal Award will not be used to engage in illegal racial discrimination, including racial preferences.

11. Awards to Subrecipients made under, relating to, or arising out of the Federal Award will not be distributed in a way that violates or otherwise is used to interfere with constitutional protections guaranteed for speech and religious beliefs and the free exercise of religion.

12. Awards made under, relating to, or arising out of the Federal Award will not be used to fund any project, service provider, or organization that operates illegal drug injection sites or "safe consumption sites" in violation of 21 U.S.C. § 856, knowingly permits the use or distribution of illicit drugs on property under their control in violation of 21 U.S.C. 856(a)(2), or knowingly distributes drug paraphernalia in violation of 21 USC 863. This is not a requirement that program participants must be sober in order to receive assistance, participate in treatment in order to receive assistance, or be evicted or exited from assistance for a first-time violation of a drug-related program policy or lease requirement.

13. All agreements or contracts made under, relating to, or arising out of the Federal Award must contain the same terms and conditions as those in the grant agreement issued by HUD. Any conflicting terms and conditions must be approved by HUD.

14. Recipient shall comply with all applicable workforce management requirements, regulations and statutes, including, without limitation, Title VII of the Civil Rights Act of 1964, 8 U.S.C. § 1324a, the Copeland "Anti-Kickback" Act, and the Drug-Free Workplace Act of 1988, as they may apply.