



HOUSING & COMMUNITY DEVELOPMENT ACT COMMITTEE

Tuesday, November 21, 2017

7:00 pm

Lorraine H. Morton Civic Center, 2100 Ridge Avenue
Room 2402

AGENDA

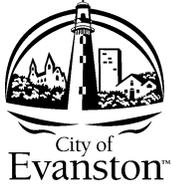
- I. CALL TO ORDER/DECLARATION OF QUORUM**
- II. APPROVAL OF MEETING MINUTES FOR OCTOBER 17, 2017**
- III. PUBLIC INPUT ON THE DRAFT 2018 ACTION PLAN**
- IV. DISCUSSION AND VOTE TO RECOMMEND APPROVAL OF THE DRAFT 2018 ACTION PLAN TO CITY COUNCIL FOLLOWING RECEIPT OF 2018 ENTITLEMENT GRANT AMOUNTS**
- V. DISCUSSION OF THE 2018 COMMUNITY DEVELOPMENT BLOCK GRANT ALLOCATION PROCESS**
- VI. DISCUSSION OF PUBLIC OUTREACH AND ENGAGEMENT PROCESS FOR THE CITY'S CONSOLIDATED PLAN, ACTION PLANS, AND CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORTS**
- VII. PUBLIC COMMENT**
- VIII. STAFF REPORTS**
- IX. ADJOURNMENT**

The next meeting of the Housing & Community Development Act Committee
is scheduled for
Tuesday, December 19 in Room 2402.

Order of agenda items is subject to change

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La ciudad de Evanston está obligada a hacer accesibles todas las reuniones públicas a las personas minusválidas o las quines no hablan inglés. Si usted necesita ayuda, favor de ponerse en contacto con la Oficina de Administración del Centro a 847/866-2916 (voz) o 847/448-8052 (TDD).



Memorandum

To: Housing & Community Development Act Committee

From: Sarah Flax, Housing and Grants Administrator

Subject: November 21, 2017 HCDA Meeting Cover Memo

Date: November 21, 2017

Attached please find:

- The meeting agenda
- Item 1: Draft minutes of the October 17, 2017 meeting for approval
- Item 2: Draft 2018 Action Plan
- Item 3: Memorandum Discussion of Public Outreach and Engagement Process for the City's Consolidated Plan, Action Plans, and Consolidated Annual Performance and Evaluation Reports
- Attachments to Item 3: Email from E. Chocoi; Citizen Participation Plan; Memorandum Incorporating 24 CFR Part 5 Affirmatively Furthering Fair Housing

We look forward to seeing you on November 21st.



MEETING MINUTES

HOUSING & COMMUNITY DEVELOPMENT ACT COMMITTEE

Tuesday, October 17, 2017

7:00 P.M.

Lorraine H. Morton Civic Center, 2100 Ridge Avenue, Room 2402

Members present: Ald. Rainey, Ald. Wilson, Ald. Wynne, Glen Mackey, Michael Miro, Jeannie Sanke

Members Absent: Ald. Braithwaite, Ald. Rue Simmons, Carol Goddard, Shawn Jones

Presiding Member: Ald. Rainey, Committee Chair

Staff: S. Flax

Call to Order / Declaration of Quorum

Chair Rainey declared a quorum of the Housing and Community Development Act Committee and called the meeting to order at 7:14 pm.

Approval of Meeting Minutes for September 26, 2017

Ald. Wynne moved approval of the minutes as presented, Ald. Wilson seconded the motion; the minutes were approved unanimously.

Approval of Regional Fair Housing Assessment Plan

Alderman Rainey noted that the City is required by HUD to conduct an Assessment of Fair Housing by 2020 and explained that the City received information about the regional Assessment of Fair Housing (AFH) Plan about a week prior, with a deadline for City Council approval of November 1, 2017 in order to participate. Benefits to the City include reduced cost of \$13,000 versus \$25,000 or more to do a standalone AFH, and a more effective analysis because housing is a regional issue. This is a major undertaking that will be completed and submitted to HUD in January 2020. Other participants include Cook County, Housing Authority of Cook County, Chicago, Chicago Housing Authority, and numerous other municipalities and Public Housing Authorities in Cook County that receive funding from HUD. Ald. Wilson moved approval of Resolution 82-R-17 to Accept Planning Staff Assistance Services Delivered by the Chicago Metropolitan Agency for Planning (CMAP) for the 2020-2024 Assessment of Fair Housing (AFH) and to recommend its approval to City Council on October 23, 2017; Glenn Mackey seconded the motion. Discussion included the possibility that if Cook County did not agree to participate as the lead entity by November 1, the regional AFH would not move forward. Whether the project would be considered a subrecipient agreement or a contract also needed to be finalized. Staff explained that if the regional AFH did not move forward, the City would explore a joint AFH with Skokie.

Discussion about the relationship of fair housing to affordable housing followed. Staff explained that the lack of affordable housing can become a fair housing issue if there is disparate impact on any of the protected classes in the Fair Housing Act. Ald. Rainey asked staff to explain the impact of the timing of the AFH submission on the City's 2020-2024 Consolidated Plan. Staff explained that the City's Consolidated Plan earliest submission date is November 15, 2019, but would likely be later because HUD will not review plans based on estimated grant amounts. In

the last three years, the earliest release of grant amounts was mid-February and the latest was mid-June. If the City's Consolidated Plan were submitted before the AFH, then the City would have to amend its Consolidated Plan to address any additional actions recommended in the AFH that were not in the ConPlan within 12 months of HUD acceptance of the AFH. Staff does not expect this would result in a substantial amendment because conclusions and actions for the AFH will be finalized substantially before its submission to HUD. As there was no further discussion, Ald Rainey called for a vote on Ald Wilson's motion; the motion was approved unanimously.

Public Comment

Priscilla Giles asked how the HCDA meeting was publicized and noted that the general public, and particularly low/moderate income residents, were unlikely to be aware of the meeting or to understand what is being discussed at it. She noted that in the past, flyers had been distributed as a means of publicizing HCDA meetings and questioned how many people would go online and find the information.

Ald. Rainey thanked her for her input and reiterated that the City is required by HUD to conduct an AFH and the committee action to approve participation in the proposed regional AFH to gain cost efficiencies and a more effective analysis than a separate AFH was driven by the November 1 commitment deadline. There would be significant outreach to residents to participate in focus groups and other activities involved in the development of the AFH. The meeting was on the City calendar and the HCDA webpage, where the packet with full details about the AFH was also posted.

Glenn Mackey suggested that aldermen could announce HCDA meetings and topics at ward meetings and in ward newsletters and emails to reach their constituents. Ald. Rainey noted that the City is required to run newspaper ads for certain meetings by HUD. The Evanston RoundTable is used because it reaches more Evanston residents than other newspapers. Staff noted in addition to the newspaper ad, the City uses its e-newsletter, Facebook and Twitter to reach residents; staff will also work with the Community Engagement division to provide information to aldermen about the November 21 meeting.

Staff report

Staff noted that a resident had contacted the City via email and suggested that a meeting be held to explain the draft Action Plan prior to the November 21 meeting at which public comment was requested. Following discussion it was agreed that a meeting would not be added prior to the standing November 21 meeting but a discussion of how to improve public outreach and engagement would be an agenda item at that meeting.

Michael Miro requested that the committee take time to reflect on the 2018 allocations and discuss the CDBG allocation process prior to the 2019 grant application process. It was agreed that this item would also be on the November 21 agenda.

Adjournment

There being no further business before the committee, Ald. Wilson moved to adjourn, Ald. Wynn seconded the motion and it was approved unanimously; the meeting was adjourned at 7:55 PM.

Respectfully submitted,

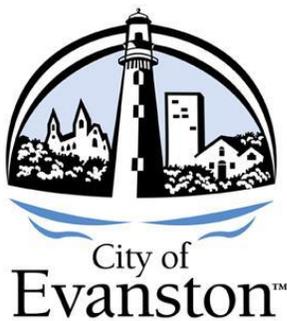
Sarah K. Flax
Housing and Grants Administrator

City of Evanston

2018 Action Plan

For Public Comment

October 20, 2017 – DRAFT PLAN
Updated November 15, 2017



Executive Summary

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

1. Introduction

Evanston's 2018 Action Plan implements the fourth year of the City's 2015-2019 Consolidated Plan using CDBG, HOME and ESG funds. Three federal statutory goals to improve living conditions for primarily low- and moderate-income residents are addressed:

- Provide decent housing
- Provide a suitable living environment
- Expand economic opportunities

This draft 2018 Action Plan has been developed using estimated amounts (\$1.5 million for CDBG, \$260,000 for HOME and \$140,000 for ESG) as the timing of the 2018 federal budget and appropriations are unknown. The City develops its draft Action Plan based on estimated grant amounts and follows its Citizen Participation Plan for the 30-day public comment period prior to the start of the City's fiscal year on January 1, 2018 to fulfill the requirements to be able to charge pre-award costs to our federal grants. The plan will be updated to include 2018 actual grant amounts following their release.

The Citizen Participation Plan defines a substantial amendment to the Action Plan as:

- A change in funding among the Goals used in the development of the plan (AP-20) that is greater than 20% of the total allocated towards the Goal
- The deletion of a Goal included in the plan
- The addition of a Goal not currently included in a plan

Following receipt of the 2018 CDBG grant amount, staff will develop recommendations for the Housing and Community Development Act Committee's consideration to either increase or decrease funding allocated by that committee at its meeting on September 26, 2017 to specific activities. If the actual grant amount is larger than estimated, funding would not be increased for all activities on a pro rata basis. Instead, factors affecting the award of additional funding would include, but not be limited to, whether an activity was awarded less than its full request or if declines in funding from other sources, including the State of Illinois, would affect viability. It is not anticipated that new activities would be funded. If the actual CDBG grant amount is less than the estimate, reductions to activity funding would be considered on a case-by-case basis rather than on a pro rata basis, taking into account the same factors.

HOME and ESG funding is not allocated to specific activities until the City receives its grant amounts, so changes in those grant amounts would not constitute a substantial amendment to the draft Action Plan

unless the amounts were to be so substantial that funding for any goal were increased or decreased by more than 20%.

In the event that any adjustment to the draft Action Plan based on the actual entitlement grant amounts were to trigger a substantial amendment, a second 30-day public comment period would be conducted to seek input and comment on the proposed changes. The amended Action Plan would be approved by the Housing and Community Development Act Committee and submitted to City Council for approval prior to its submission to HUD. Any public comments received during either of the comment periods would be summarized in the Action Plan, including any comments or views that are not accepted and the reasons for which they are not accepted.

Any changes to the Action Plan based on receipt of the City's entitlement grant amounts for 2018 that change funding for a goal by less than 20% shall be considered "non-substantial." Non-substantial amendments to CDBG, HOME, or ESG will be approved by the Housing & Community Development Act Committee, Planning & Development Committee or Human Services Committee, as appropriate, based on the program affected. These changes would not trigger a second public comment period.

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: Housing continues to be the City's highest priority. However, maintaining and increasing the supply of affordable rental units through acquisition, rehab or new construction is increasingly difficult due to reductions in funding and increases in the cost of real property, and increasing construction costs to prevent displacement of low- and moderate-income households by addressing code and life safety violations. Code enforcement in the CDBG Target Area remains an important tool to maintain decent, safe housing and address blight from vacant and poorly maintained properties and neighborhoods.

Homelessness: The City plans to continue to use HOME funding for its Tenant-Based Rental Assistance (TBRA) program for families with children under the age of 18. In combination with education, job training and other supports, TBRA enables parents to develop self-sufficiency skills to support themselves and their families, lifting two generations out of poverty. ESG funds will continue to be used to identify individuals and households who are homeless or at high risk of homelessness through street outreach, and to provide emergency housing, homeless prevention and rapid re-housing services.

Creating livable communities: The City will continue to use CDBG funding to improve public infrastructure and facilities to revitalize neighborhoods and improve service delivery. In 2018, this

includes funds for street and alley improvements in primarily low- and moderate-income neighborhoods, as well as rehabilitation of a community facility in the City's NRSA. In addition, several Public Facilities projects funded in 2017 are expected to be completed in 2018.

Economic Development: In addition to CDBG, the City uses resources from its Economic Development Fund and Tax Increment Financing to expand economic development opportunities to small businesses. CDBG grants and loans to for-profit businesses will continue to be evaluated throughout the year by the City's Economic Development Committee in order to maximize effectiveness of use of all resources to support economic development in the City; recommendations from the Economic Development Committee are then submitted to City Council for approval.

Public Services: Maintaining and expanding the availability of, and increasing access to, needed services are key goals of the City. Services include, but are not limited to, mental health, dependent care and youth programs, and job training. Drastic reductions in State of Illinois funding, particularly for child care, the homeless, the disabled, mental health and substance abuse programs has reduced vital services and expanded unmet needs; continued lack of state funds threatens the stability of numerous agencies. As a result, an unprecedented number of agencies applied to the City of Evanston for 2018 grants. The City reduced local funding allocated by the Mental Health Board for social services by 4% due to reductions in City general fund revenues, mirroring the reductions being made to the City's overall 2018 budget.

3. Evaluation of past performance

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

Evanston uses funding to address housing and community development needs and leverage outside resources to achieve goals and objectives in the Consolidated Plan. In 2017, the City allocated HOME and local Affordable Housing Funds (AHF) for the acquisition and rehab of two affordable rental units by Community Partners for Affordable Housing (CPAH). The rehab is expected to be complete in 2018. One of the two units is funded with HOME and AHF dollars and will be available for households with incomes at or below 60% AMI. The other unit is funded with AHF dollars and will be rented to a household at or below 80% AMI. A CDBG Housing Rehab project for a 13-unit affordable housing rental building is expected to be completed by year end 2017.

The City's CDBG Housing Rehabilitation program continued to help income eligible homeowners maintain decent, sanitary housing using below market rate loans. Program priorities are to address code violations and immediate life safety issues that could result in a property being determined uninhabitable, as well as to address aging mechanical systems to insure a functional lifespan of ten years.

The late release of 2017 entitlement funds has resulted in limited implementation of CDBG-funded capital activities; carryover of Public Facilities projects to 2018 is anticipated. The Youth & Opportunity United (YOU) Headquarters project funded in prior years was completed in 2017. This building is 12,000 square feet and serves as both a Youth Center for YOU programming and as office space for YOU's administrative staff. The building has two clinical counseling rooms, a multi-purpose and performance room, and a demonstration kitchen that will support youth in learning cooking, health, and nutrition. YOU works with primarily low and moderate income youth. Other Public Facilities projects that will be completed or substantially completed in 2017 include: resurfacing the parking lot for Over the Rainbow, an organization that serves the disabled, a street resurfacing project on Dewey Avenue in census block group 8092.01 in the City's NRSA, an alley paving project in census block 8102.03, and improvements to Brummel Park in that same census block group; the outdated play structure was removed and will be replaced, and new trash receptacles and benches will also be installed.

Ongoing challenges include identifying applicant projects that are clearly defined and shovel ready. Evanston continues to try to fund larger, more complicated projects, not deferred maintenance projects. CDBG funds allocated in 2016 to tuck point the Weissbourd-Homes family Focus Center were withdrawn and are being reallocated in the 2018 CDBG Action Plan due to the potential sale of that property. Family Focus continues to provide services in that location for the foreseeable future and also to rent space to a number of other non-profits that serve primarily low/moderate income residents in the NRSA; Family Focus is working with the Illinois Facilities Fund on the building disposition and remains committed to providing services in Evanston if the building is sold.

Economic Development staff continues to work to fill vacant storefronts in privately-owned and City-owned properties on Howard Street in the ongoing revitalization of that important corridor. CDBG funding in the form of loans to two, for-profit businesses; Good To Go Jamaican Cuisine and Cafe Coralie are part of the financing to open new restaurants there; both openings are anticipated by early 2018. Additionally, the City funded Sunshine Enterprises for a second year to provide technical assistance to entrepreneurs and micro enterprises in the City's NRSA.

The City continued to use CDBG and local funds to support a wide range of social services for low- and moderate-income residents. Evanston agencies face increasing challenges to meet the increasing demand for services and maintain organizational stability due to cuts in State of Illinois funding and delayed payments on reduced State contracts. Additionally, the City continued to fund Connections for the Homeless and the YWCA Evanston-North Shore with ESG to address the needs of individuals and families who are homeless or at high risk of homelessness. Following federal priorities, ESG funds were prioritized for rapid re-housing, however the increasing rents in Evanston makes it difficult for ESG recipients to locate affordable units and necessitates longer subsidies to enable households to gain self-sufficiency and avoid evictions. ESG also supports street outreach and emergency shelter. In 2018, CDBG funding will again be allocated for emergency overnight shelter to address the increasing number of

unsheltered homeless on winter nights. Connections for the Homeless and other providers continue to expand private fundraising efforts to maintain street outreach and day services.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

A draft of the Consolidated Plan and/or Action Plan is posted on the City's website and printed copies are available at the Lorraine H. Morton Civic Center during the required 30-day comment period. Public input on the plan is sought by the Housing & Community Development Act Committee at a public meeting and in written form during the 30-day comment period; that committee recommends approval of the plans to City Council following the public comment period and consideration of any comments received. City Council meetings, at which action to adopt or approve the plans is decided, also offers opportunity for public comment. Any comments received during the public comment period, including at the public meeting after which the public comment period closes, are summarized and attached to the Consolidated Plan and/or Action Plan prior to its submission to HUD, with an explanation of any comments or views that are not accepted and the reasons for which they are not accepted.

Consolidated Plans and Action Plans must be submitted to HUD by November 15 of the preceding year, unless directed otherwise by HUD. Action Plans will be based on estimated grant amounts as required in order to hold the public comment period prior to the start of the City's fiscal year on January 1.

The City of Evanston invites public participation at all stages of the Consolidated Planning process. The City is committed to making reasonable and timely access to the needs assessment, strategy development and budget recommendation process for all members of the community, particularly low- and moderate-income persons.

5. Summary of public comments

Public Comments will be included following the close of the public comment period on Tuesday, November 21, 2017.

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

Any public City of Evanston Citizen Participation Plan comments received during the comment period or at the public meeting will be summarized and included in the 2018 Action Plan prior to its submission to HUD.

Any comments or views that are not accepted and the reasons for which they are not accepted will also be included after the close of the public comment period on Tuesday, November 21, 2017.

7. Summary

R-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.

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 Housing and Grants division, part of the Community Development Department, is the administrator for the Community Development Block Grant, HOME, and Emergency Solutions Grant programs.

Consolidated Plan Public Contact Information

Sarah Flax
Housing and Grants Administrator
2100 Ridge Avenue
Evanston, IL 60201
sflax@cityofevanston.org
847.448.8684

P-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The City of Evanston’s Community Development Department consulted with numerous City departments (Public Works, Health, Parks and Recreation, Utilities, Economic Development), as well as the Housing Authority of Cook County, Alliance to End Homelessness in Suburban Cook County Continuum of Care, local and regional nonprofit service providers, housing providers, and community residents to develop the 2018 Action Plan. Data are from consulted organizations, the United States Census Bureau and HUD.

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(I))

The City of Evanston’s Community Development Department regularly coordinates with public and assisted housing providers along with private and governmental health, mental health, and service agencies. Notifications of recent updates and developments are sent to an interested parties email list, including nonprofit service providers, governmental agencies, community residents, and representatives from various City departments.

The Community Development Department regularly attends meetings and other events involving the community and various stakeholders. Staff is aware of any major impacts, such as State of Illinois funding reductions, which affect vulnerable residents. Engaging with nonprofit service providers on a regular basis fosters an environment where the City works in tandem with the community to achieve better outcomes.

The City of Evanston’s Health and Human Services Department implemented a community health improvement plan (EPLAN) based on goals identified through a nationally recognized Mobilizing for Actions through Planning and Partnerships (MAPP) model. These goals were defined and agreed upon in partnership with residents, private and governmental health, mental health and social service agencies in the beginning of 2016 and will continue to define the City’s health priorities for the next four years.

The City continued the combined application process for 2018 CDBG Public Services and City's Mental Health Board funding to allocate funds to the highest priority needs of the community and encourage collaboration among community partners. Additionally, reporting and monitoring practices are unified for agencies receiving both local and federal funds to ensure clear programmatic and financial record keeping, compliance and transparency.

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 of Evanston works with the Alliance to End Homelessness in Suburban Cook County (Alliance), the lead agency for the Suburban Cook County Continuum of Care, to address the needs of homeless persons and persons at risk of homelessness in Evanston. Evanston's Housing and Grants Administrator serves on the board of directors, as well as the Finance and Governance Committees of the Alliance. Staff members of Evanston agencies that are Alliance members, including Connections for the Homeless and Impact Behavioral Health Partners (formerly Housing Options for the Mentally Ill), participate on the board of directors, HMIS, Coordinated Entry, Prevention and other standing committees. The City of Evanston works closely with service providers, including the YWCA Evanston-Northshore and Connections for the Homeless, in order to address the needs of chronically homeless individuals and families, families with children, veterans, and unaccompanied youth.

Connections for the Homeless and City of Evanston staff participated in the 2017 Point in Time count; Connections and other agencies serving the homeless will continue to use the Vulnerability Index (VI-SPDAT) to ensure that chronically homeless individuals and families are part of the Alliance ranking based on vulnerability, so that they have access to permanent supportive housing, rapid re-housing and other interventions. City staff is participating in the Coordinated Entry System process with the Alliance and members of the Continuum. Goals for 2018 include the continued use of the Housing Match and By Name Referrals list managed by the Alliance and developed to prioritize families for housing assistance and to more successfully provide short term stability case management and shelter diversion services. In 2018 the Alliance will continue with branding and marketing efforts. Additionally, the Alliance will begin matching households eligible for Prevention and Rapid Re-Housing using HMIS and evaluate the collective impact approach to assisting those in most need.

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 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. Use of HMIS is critical to this process. It is unclear whether InfoNet, the system used by organizations supporting households affected by domestic violence, will be able to integrate with IDIS to report 2018 outcomes.

The City of Evanston continues to work with the Alliance and agencies that serve the homeless and people at risk of homelessness, as well as other advocacy organizations. Connections for the Homeless, the primary recipient of City of Evanston ESG funds, works closely with the Alliance on many levels. Connections staff participate on the HMIS Committee meeting and the monthly prevention meetings. The City's Housing and Grants Administrator is currently on the Governance and Finance Committees of the Alliance. Participation across the Board and committees help to ensure clear communication of goals and priorities and decrease redundancies as they relate to ESG funding. Funds may be used for staff salaries and benefits for HMIS management, HMIS licenses and computer security assessments.

As discussed previously, the City prioritizes rapid re-housing. One of the goals of Coordinated Entry is to explore using rapid re-housing funds as bridge funding for individuals/ households approved for permanent supportive housing or on the waitlist for housing choice vouchers. Due to high rent costs in Evanston, people housed with rapid re-housing require a longer subsidy than other parts of the Continuum to become self-sufficient.

While the Alliance works to finalize the priorities, the City of Evanston will continue to prioritize households that demonstrate the potential to become self-sufficient in a 3 to 6 month time frame. Due to the nature and amount of ESG funds, this population is best served by this type of funding. There is a significant overlap in the populations served by General Assistance (GA) and ESG, GA staff has access to HMIS in order to identify people receiving services through the Continuum and eliminate duplication of services. The City's Human Services Specialist, hired in 2016, continues to further coordinate housing, health, mental health, and other social services for low- and moderate-income residents and at-risk residents.

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
	Agency/Group/Organization Type	Housing PHA Services - Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment 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?	Attended planning meetings to develop needs assessment and provided data for relevant sections of the 2018 Action Plan.
2	Agency/Group/Organization	MCGAW YMCA
	Agency/Group/Organization Type	Housing Services - Housing
	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?	Attended planning meetings to develop needs assessment and other related 2018 Action Plan sections.
3	Agency/Group/Organization	YWCA EVANSTON/NORTH SHORE
	Agency/Group/Organization Type	Housing Services - Housing Services-Victims of Domestic Violence Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

		Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended planning meetings to develop needs assessment and other related 2018 Action Plan sections.
4	Agency/Group/Organization	MEALS AT HOME
	Agency/Group/Organization Type	Services-Elderly Persons
	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?	Attended planning meetings to develop needs assessment and other related 2018 Action Plan sections.
5	Agency/Group/Organization	James B. Moran Center for Youth Advocacy
	Agency/Group/Organization Type	Services-Children
	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?	Attended planning meetings to develop needs assessment and other related 2018 Action Plan sections.
6	Agency/Group/Organization	FAMILY FOCUS
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended planning meetings to develop needs assessment and other related 2018 Action Plan sections.
7	Agency/Group/Organization	CONNECTIONS FOR THE HOMELESS
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended planning meetings to develop needs assessment and other related 2018 Action Plan sections.
8	Agency/Group/Organization	ILLINOIS HOUSING DEVELOPMENT AUTHORITY
	Agency/Group/Organization Type	Housing Services - Housing Other government - State

	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?	Consulted to provide data/input for relevant 2018 Action Plan sections.
9	Agency/Group/Organization	EVANSTON
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy

		Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Various City departments attended planning meetings to develop needs assessment and provided data for relevant 2018 Action Plan sections. Departments included Community Development, Public Works, Parks, Health, and Economic Development.
10	Agency/Group/Organization	Chicago Metropolitan Agency for Planning (CMAP)
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted to provide data/input for relevant 2018 Action Plan sections.

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

All major agencies providing a full range of services in and around the City of Evanston were consulted or contacted to request comments/input.

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.

2016 Annual Comprehensive Housing Plan	Illinois Housing Development Authority	The City of Evanston works with IHDA to ensure continued access to affordable housing for Evanston's low and moderate income residents.
Red and Purple Line Modernization	Chicago Transit Authority	Furthering access to employment opportunities is integral to community development and fostering greater economic growth. The modernization of the Red and Purple Line trains will serve to provide greater accessibility for those with disabilities and the elderly.
Go To 2040	Chicago Metropolitan Agency for Planning	CMAP's Go to 2040 Plan strives for regional growth in the Chicago area. Evanston is an important component of the Chicago metropolitan region; coordinated growth and development with the region will improve the quality of live for Evanston's residents.
2000 Evanston Comprehensive General Plan	City of Evanston	The current Evanston Comprehensive General Plan was adopted in 2000. It establishes long range planning goals and objectives in functional areas of General Land Use, Public Facilities, Circulation, and Community Environment. An update to the plan is due shortly to address the changed economic landscape.
Evanston Plan 2030	City of Evanston	The update to the 2000 Evanston Comprehensive General Plan establishes long range planning goals and objectives in the functional areas of General Land Use, Public Facilities, Circulation, and Community Environment.
STAR Community Rating System	STAR Communities	Framework for sustainability goals, objectives and evaluation measures that define best practices to improve community conditions. Goals center on improving the following: built environment, climate & energy, economy & jobs, education, arts & community, equity & empowerment, health & safety, and natural systems.
West Evanston Master Plan 2007	City of Evanston	The West Evanston Master Plan is the capstone for the neighborhood planning initiatives in West Evanston since 2000. The plan clearly communicates the neighborhood and City's vision of the context and form for future infill projects so that it and its residents become fully integrated with the existing community. West Evanston encompasses an area of the City

		where low- and moderate-income community members reside.
West Side Neighborhood Planning - 2005	City of Evanston	This report documents the community consultation and planning process guided by the Neighborhood Committee of the Evanston Plan Commission. The final report identifies community concerns and issues in the West Side neighborhood, examines the opportunities presented by redevelopment projects and presents action recommendations.
EPLAN 2016-2021 Community Health Assessment	City of Evanston	The City's EPLAN began with a five-year strategic planning process to improve the effectiveness and efficiency of the public health system in Evanston. Interventions to improve the health of residents were identified in partnership with public health officials, community leaders, residents, and service providers based on the following four assessments: community themes and strengths, forces of change, local public health system and community health status. The EPLAN provides a strategic five-year health improvement plan.
Evanston Climate Action Plan	City of Evanston	The Evanston Climate Action Plan is organized into nine focus areas and outlines more than 200 strategies for reducing Evanston's greenhouse gas emissions. The nine focus areas are: Transportation & Land Use, Energy Efficiency & Buildings, Renewable Energy Resources, Waste Reduction & Recycling, Forestry, Prairie & Carbon Offsets, Food Production & Distribution, Policy & Research, Education & Engagement and Communications & Public Relations.
Plan for Affordable Housing	City of Evanston	Evanston's Plan for Affordable Housing looks at how to effectively and efficiently meet Evanston residents need for housing that is affordable. In addition, the plan looks at the best ways to use federal and local funds to increase affordable housing opportunities in Evanston.
Analysis of Impediments to Fair Housing Choice	City of Evanston	The City contracted with the independent consultants, Mullin and Lonergan, in 2013 to produce the Analysis of Impediments to Fair Housing Choice Report. The report discusses the nature of Evanston's barriers to fair housing choice and provides recommendations to lift

		these barriers.
Cook County Consolidated Plan 2015-2019	Cook County	The City of Evanston is a jurisdiction within Cook County and is impacted by the goals and priorities put forth in the Consolidated Plan of Cook County. Public housing, homelessness, and affordable housing are some of the fields where Evanston and Cook County work in coordination to address.
HACC 5 Year PHA Plan and Annual Plan	Housing Authority of Cook County	The City of Evanston works with the Housing Authority of Cook County to ensure that their public housing goals are in coordination with those of Evanston in this Consolidated Plan. The HACC owns and operates public housing units in Evanston as well as the Housing Choice Voucher Program.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City of Evanston works cooperatively and in coordination with various public entities. The City cooperates and coordinates various aspects of the Consolidated Plan and shared regional interests with the neighboring local governments of Chicago, Wilmette, Skokie, and other North Shore communities. Evanston works with the Alliance to End Homelessness in Suburban Cook County, its Continuum of Care, to implement its homeless and prevention programs.

The City also actively engages with the Housing Authority of Cook County (HACC) the Public Housing Authority for Evanston and Cook County. The Community Development Department is aware of the quality and quantity of public housing within Evanston and cooperates with the HACC to implement any strategic goals put forth in the Consolidated Plan. In addition, attention is paid to Cook County's Consolidated Plan in order to ensure an understanding of the focus areas and community development efforts of the entire county. Evanston coordinates with the Illinois Housing Development Authority to ensure its housing strategies and goals are reflected in the Consolidated Plan governing Evanston.

The City of Evanston's Health and Human Services Department was consulted for the 2018 Action Plan to provide information on services available within the community through partners or other organizations targeted to HIV/AIDS, youth, families, elderly, homeless, special needs, veterans, and all other populations. Additionally, Evanston is in the process of renewing its STAR Communities Rating; STAR communities Rating System is the nation's leading framework and certification program for local sustainability. STAR, or Sustainability Tools for Assessing & Rating Communities, measures progress across social, economic and environmental performance areas. STAR has seven areas of focus: built environment; climate and energy; economy and jobs; education, arts and community; equity and empowerment; health and safety; and natural systems. These areas align with the goals set in the City's 2015-2019 Consolidated Plan. The City currently has a four-star rating and is working to raise that to a five-star, the highest level, in 2018.

P-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

Many local non-profit organizations and City departments were consulted during the 2015-2019 Consolidated planning process, and in the development of the 2018 Action Plan.

The City of Evanston invites public comment on the draft 2018 Action Plan in a 30-day period from October 23 to November 21, 2017 following its Citizen Participation Plan. The public comment period was advertised via a display ad in the Evanston RoundTable, a newspaper of general circulation, notice on the homepage of the City's website, articles in the City's e-newsletter that reaches over 30,000

emails, and on Twitter and Facebook. People could provide feedback via email to cdbg@cityofevanston.org, respond on Twitter and Facebook, submit written comments on paper to staff, or provide input in person at the Housing and Community Development Act Committee Meeting on November 21, 2017 at 7pm.

The comments will be summarized and provided in the final 2018 Action 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	Housing and Community Development Act Committee meeting November 21, 2017 at 7pm in room 2402 of the Morton Civic Center to hear public comment on the 2018 Action Plan.			https://www.cityofevanston.org/government/agendas-minutes/special-council-committees/housing-community-development-act-committee
2	Newspaper Ad	Minorities Non-targeted/broad community	Display ad in the October 5, 2017 issue of the Evanston RoundTable, a newspaper of general circulation, that the draft 2018			http://www.cityofevanston.org/2018actionplan

			<p>Action Plan would be available on the City's website and in printed format at the Civic Center beginning October 23, 2017 for the 30-day public comment period. The ad also highlighted the meeting of the Housing and Community Development Act Committee on November 21, 2017, at which input from the public was being sought. The Evanston RoundTable is used because it</p>			
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			is distributed free to all residential addresses in Evanston and reaches all segments of Evanston residents more effectively than any other newspaper.			
3	Internet Outreach	Non-targeted/broad community	News item on the City's homepage and in an e-newsletter story that the 2018 Action Plan draft was available on the City website and also in printed format beginning October 23, 2017.			http://www.cityofevanston.org/2018actionplan

4	Internet Outreach	Non-targeted/broad community people who are active on social media				
5	Bulletin board postings at community centers and the Public Library	Minorities senior citizens				http://www.cityofevanston.org/2018actionplan
6	Outreach through ward aldermen at ward meetings and via email	Minorities Wards 5, 2, 8 and 9 have significant Black/African-American and Hispanic populations				http://www.cityofevanston.org/2018actionplan

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 2018 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.

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 Admin and Planning Economic Development Housing Public Improvements	1,500,000	76,319	680,000	2,256,319	1,500,000	\$680,000 of prior year resources comprises \$100,150 unspent from completed activities that is reallocated as part of this Action Plan; \$589,850 is carryover funding allocated to activities in prior years that are underway or will be undertaken in 2018. This includes

		Public Services						the revolving loan fund.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	260,000	22,695	509,028	833,543	260,000	Prior year resources include \$169,439 in unallocated funds from 2017, plus \$292,915 allocated to TBRA activities and \$46,673 allocated to development activities not yet drawn.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental	140,000	0	133,500	284,334	140,000	\$133,500 in prior year carryover funds due to late release of 2017 grant.

		assistance) Rental Assistance Services Transitional housing						
Competitive McKinney- Vento Homeless Assistance Act	public - federal	Conversion and rehab for transitional housing Overnight shelter Transitional housing	1,100,000	0	0	1,100,000	1,000,000	Funding through the Continuum of Care for Evanston based projects and programs.
Other	public - local	Acquisition Homebuyer assistance Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership Overnight	750,000	0	0	750,000	1,000,000	Programs funded include: Landlord- Tenant services, HMIS support, and the Handyman Program for small scale repairs for seniors. Funds may be used for a wide range of housing development programs and projects.

		shelter Public Services Rental Assistance TBRA Transitional housing						
Other	public - local	Public Services	700,000	0	0	700,000	700,000	Local funding to be spent on mental health and other social services

Table 5 - 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. Additionally, federal funds will 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 money provided by HUD will allow organizations and the City to address the needs of the community's most vulnerable members.

Evanston's ESG funds will be matched on a one-to-one basis with Mental Health Board funds from the City's general fund, state funds and other resources, including in-kind contributions, depending on the agencies funded. HOME matching funds may be from the Affordable Housing Fund and sources such as the Federal Home Loan Bank, LIHTC, and/or developers' contributions, as well as with state and local funding such as the United Way and MHB for Tenant Based Rental Assistance.

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 some properties and land in west and south Evanston that may be used to address the needs identified in this plan. Vacant properties on Howard Street are being developed as restaurants to continue the revitalization of the Howard Street retail/commercial corridor. In addition, a theater is being developed as the new home of Theo Ubique, designed by Carol Ross Barney Architects, to build on the success of several dining establishments assisted by the City and bring cultural and entertainment amenities to the neighborhood. The City is working to determine the disposition of two lots located in census tract 8092 that were acquired through the City's NSP2 program that will be redeveloped for housing and other community development needs. In addition, the City has applied for ten tax-delinquent vacant parcels, the majority of which are part of the abandoned Mayfair Railroad right of way, in west Evanston through the Cook County No Cash Bid program that are within the West Evanston Master Plan area. If acquired, these parcels would provide opportunity for redevelopment as housing, green space and other needs.

Discussion

The City of Evanston will continue to pursue additional funding opportunities to complement existing resources.

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	2015	2019	Affordable Housing	Entire Jurisdiction	Access to Rental Housing Maintain and Improve Rental Housing Homeownership	CDBG: \$845,021 HOME: \$296,673	Rental units rehabilitated: 7 Household Housing Unit Homeowner Housing Rehabilitated: 8 Household Housing Unit Buildings Demolished: 1 Buildings Housing Code Enforcement/Foreclosed Property Care: 2000 Household Housing Unit
2	Homelessness	2015	2019	Homeless	Entire Jurisdiction	Access to Rental Housing Public Services	CDBG: \$15,000 HOME: \$392,915 ESG: \$263,009	Tenant-based rental assistance / Rapid Rehousing: 22 Households Assisted Homeless Person Overnight Shelter: 380 Persons Assisted Homelessness Prevention: 5 Persons Assisted Other: 50 Other

3	Creating Livable Communities	2015	2019	Non-Housing Community Development	Entire Jurisdiction	Public Infrastructure Public Facilities	CDBG: \$897,043	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10,000 Persons Assisted
4	Economic Development	2015	2019	Non-Housing Community Development	CDBG TARGET AREA Entire Jurisdiction Evanston NRSA - Proposed	Economic Development	CDBG: \$77,957	Businesses assisted: 11 Businesses Assisted
5	Public Services	2015	2019	Non-Homeless Special Needs Non-Housing Community Development	Entire Jurisdiction	Public Services	CDBG: \$221,448	Public service activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted
6	Planning and Administration	2015	2019	Planning and Administration			CDBG: \$300,000 HOME: \$26,000 ESG: \$10,500	

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	The City of Evanston aims to increase, maintain, and improve affordable housing. The advanced age of Evanston's housing supply necessitates the need for rehabbing of existing housing. Sustaining safe, decent, and affordable housing will allow low and moderate income residents the opportunity to remain in the community.
2	Goal Name	Homelessness
	Goal Description	The City of Evanston aims to support services to prevent homelessness and to assist those currently experiencing homelessness. These services include but are not limited to street outreach, rapid re-housing, and tenant based rental assistance. During 2018, emphasis will continue to be placed on the housing first model (providing permanent housing as opposed to 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 infrastructure and public facilities is instrumental to ensuring a safe, clean, and livable environment, and a high quality of life for all residents.
4	Goal Name	Economic Development
	Goal Description	Economic development will promote the vitality of Evanston's economy in depressed areas of the City. Fostering growth in these areas will in turn provide greater opportunities for the City's low and moderate income residents. Economic development activities may include but are not limited to workforce development/job training, and technical and financial assistance to businesses.
5	Goal Name	Public Services
	Goal Description	Improving access to quality public services for residents is a key goal of the City. Community participation and consultation indicated there is a high need for these services. Public services include but are not limited to mental health, senior services,

		youth services, and services to address homelessness.
6	Goal Name	Planning and Administration
	Goal Description	Administration of CDBG, ESG, and HOME.

Projects

AP-35 Projects – 91.220(d)

Introduction

Projects

#	Project Name
1	ESG
2	Tenant Based Rental Assistance (TBRA)
3	Rental Housing
4	Homeowner Rehabilitation
5	Code Enforcement
6	Public Services
7	Economic Development
8	Public Facilities and Infrastructure
9	Administration

Table 7 - Project Information

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

Allocation priorities were determined to be housing, infrastructure and homelessness, based on consultation and public participation. Obstacles to addressing these underserved needs continue to be the high cost of housing and the diminishing resources allocated to our jurisdiction, as well as reduced local revenues from building permits, sales tax and other sources.

AP-38 Project Summary

Project Summary Information

1	Project Name	ESG
	Target Area	Entire Jurisdiction

	Goals Supported	Homelessness Public Services Planning and Administration
	Needs Addressed	Access to Rental Housing Public Services
	Funding	ESG: \$273,509
	Description	Homeless prevention, rapid re-housing, street outreach, and overnight shelter. Administration of ESG program.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Street outreach is anticipated to serve 50 homeless individuals; overnight shelter is anticipated to serve 320 persons/families who are generally without income to 30% AMI; prevention is expected to serve 5 households up to 30% AMI; rapid rehousing is expected to serve 7 households that are literally homeless.
	Location Description	Street outreach is conducted at places where homeless individuals are known to gather, including the public libraries, 24-hour fast food restaurants, and in parks, under bridges and on the beaches in warmer months, as well as at Connections for the Homeless and the YWCA Evanston-North Shore facilities. Interfaith Action Emergency Overnight Shelter is not reflected here as it is CDBG-funded.
	Planned Activities	Direct rental assistance, supportive services, shelter operations, and street outreach. ESG Administration is also shown in this project and is not reflected in the Administration Project.
2	Project Name	Tenant Based Rental Assistance (TBRA)
	Target Area	Entire Jurisdiction
	Goals Supported	Homelessness
	Needs Addressed	Access to Rental Housing
	Funding	HOME: \$392,915
	Description	Direct rental and utility assistance.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated that 15 households with children under the age of 18 will receive rent and utility assistance for up to 24 months. Most households will have incomes at or below 30% AMI at intake.

	Location Description	Households will choose rental units throughout the city based on factors such as what schools their children attend and where adults work.
	Planned Activities	Direct rental and utility assistance will be provided with HOME funds. In addition, case management, education and job training, and other needed services will be provided with other resources to enable these households to gain economic self-sufficiency and maintain housing stability following graduation from the program.
3	Project Name	Rental Housing
	Target Area	Entire Jurisdiction Evanston NRSA - Proposed
	Goals Supported	Affordable Housing
	Needs Addressed	Maintain and Improve Rental Housing
	Funding	CDBG: \$40,000 HOME: \$296,673
	Description	Rental housing development or rehabilitation.
	Target Date	12/31/2018
	Estimate the number and type of families that will benefit from the proposed activities	Two rental units are expected to be rehabbed with CDBG in 2018 and will be occupied by households whose incomes do not exceed 80% AMI. It is expected that HOME funds will be committed to 4 rental acquisition/rehab projects in 2018. Additionally, the rehab of one HOME rental unit will be completed and rented in 2018.
	Location Description	Some units are likely to be located in the NRSA where most housing is relatively affordable. Units outside the NRSA will be prioritized for HOME funding in order to achieve economically integrated neighborhoods and affirmatively further fair housing.
	Planned Activities	Rehabilitation of several rental units throughout the city.
4	Project Name	Homeowner Rehabilitation
	Target Area	CDBG TARGET AREA Evanston NRSA - Proposed
	Goals Supported	Affordable Housing
	Needs Addressed	Maintain and Improve Owner Occupied Housing
	Funding	CDBG: \$441,122
	Description	Rehabilitation of owner-occupied homes throughout Evanston, owned by

		low and moderate income households.
	Target Date	12/31/2018
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that eight units of owner-occupied housing will be rehabbed using CDBG through the City's Housing Rehab program. Household incomes may not exceed 80% of AMI.
	Location Description	It is anticipated that most units will be in the City's CDBG Target area and/or NRSA, based on where most income eligible owner occupied housing is located.
	Planned Activities	Homeowner Rehabilitation Program, including direct rehabilitation loans and program administration.
5	Project Name	Code Enforcement
	Target Area	CDBG TARGET AREA
	Goals Supported	Affordable Housing
	Needs Addressed	Maintain and Improve Rental Housing Maintain and Improve Owner Occupied Housing
	Funding	CDBG: \$363,899
	Description	Code enforcement inspections in the CDBG Target Area, including necessary building demolition/clearance or rehabilitation as identified by code enforcement inspectors.
	Target Date	12/31/2018
	Estimate the number and type of families that will benefit from the proposed activities	CDBG Code Enforcement will directly benefit the residents of the 2,000 units that are anticipated will be inspected. In addition, all residents of the CDBG Target Area in which code inspections are undertaken, which is primarily low/moderate income.
	Location Description	CDBG Code Enforcement is undertaken in the CDBG Target Area. See map.
	Planned Activities	Code enforcement inspections in the CDBG Target Area, including necessary building demolition/clearance or rehabilitation as identified by code enforcement inspectors.
6	Project Name	Public Services
	Target Area	CDBG TARGET AREA Entire Jurisdiction
	Goals Supported	Public Services

	Needs Addressed	Public Services
	Funding	CDBG: \$236,448
	Description	Public services to low- and moderate- income residents throughout the City of Evanston, particularly for youth programs, senior services, legal services, graffiti removal, housing services and domestic violence services.
	Target Date	12/31/2018
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated that 7,500 individuals with family incomes that do not exceed 80% AMI will be served by a broad range of social services.
	Location Description	Persons served will be from all parts of Evanston, with a concentration in the CDBG Target Area.
	Planned Activities	The following activities are the public services allocated CDBG grants in 2018: Target Area Graffiti Removal, Summer Youth Employment Program, Certificate of Rehab Program, Future Focus Youth Program, home delivered meals, legal & social services for youth, Grandparents Raising Grandchildren, Art and Action, , college readiness for teens, services for PSH residents,, and domestic violence case management & services. In addition, the emergency overnight shelter is included here.
7	Project Name	Economic Development
	Target Area	CDBG TARGET AREA Evanston NRSA - Proposed
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$77,957
	Description	Economic development activities aimed at assisting businesses and creating new businesses.
	Target Date	12/31/2018
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated that 10 entrepreneurs starting a business or micro-enterprises seeking to expand their business will be served in 2018 and one new or existing business will receive direct financial assistance in the form of a loan.
	Location Description	Sunshine Enterprises technical assistance to entrepreneurs and micro enterprises is located in the NRSA. In addition, businesses in west

		Evanston and on Howard Street will be evaluated for assistance.
	Planned Activities	The City of Evanston uses CDBG entitlement and CDBG funded economic development loan funds to provide technical assistance to micro enterprises and entrepreneurs through subrecipient agreements, and may be used for grants or loans to eligible businesses.
8	Project Name	Public Facilities and Infrastructure
	Target Area	CDBG TARGET AREA Entire Jurisdiction Evanston NRSA - Proposed
	Goals Supported	Creating Livable Communities
	Needs Addressed	Public Infrastructure Public Facilities
	Funding	CDBG: \$897,043
	Description	Improvements made to public facilities and infrastructure.
	Target Date	12/31/2018
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated approximately 10,000 persons will benefit from the activity, primarily low- and moderate- income persons.
	Location Description	The activities will take place throughout the City, but in areas that are low- and moderate- income areas (the designated service area will qualify at or above 45.13% LMI). It is anticipated many of the improvements will take place in the CDBG Target Area and/or the proposed NRSA.
	Planned Activities	Activities funded in 2018 are: Street Resurfacing, Alley Paving and Renovations to Mason Park field house. Activities funded in prior years that will carry over in 2018 include improvements to: Children's Home and Aid Rice Center, Baby Toddler Nursery, Reba Early Learning Center, McGaw YMCA Men's Residence, and Alley Special Assessment Assistance.
9	Project Name	Administration
	Target Area	Entire Jurisdiction
	Goals Supported	Planning and Administration
	Needs Addressed	Access to Rental Housing Maintain and Improve Rental Housing Maintain and Improve Owner Occupied Housing

	Economic Development Public Infrastructure Public Facilities Public Services Homeownership
Funding	CDBG: \$300,000 HOME: \$26,000
Description	Administration of CDBG and HOME.
Target Date	12/31/2018
Estimate the number and type of families that will benefit from the proposed activities	
Location Description	
Planned Activities	Administration and financial management of CDBG and HOME grants. ESG Administration is in the ESG Project.

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

It is estimated that over 90% of all CDBG, and 100% of HOME and ESG funding, will be allocated to benefit persons who are low- and moderate- income. Some activities, such as public services and homeowner rehabilitation, are provided throughout our jurisdiction, while Code Enforcement and Graffiti Removal are limited to the CDBG Target Area (local target area). Public Infrastructure improvements are concentrated in the Neighborhood Revitalization Strategy Area (NRSA). Additionally, it is expected that a significant amount of housing and economic development funds will be spent in the NRSA and CDBG Target Area, which are on the west and south sides of Evanston and have a concentration of low- and moderate income and minority residents.

Geographic Distribution

Target Area	Percentage of Funds
CDBG TARGET AREA	40
Entire Jurisdiction	20
Evanston NRSA - Proposed	40

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The nature of the project or activity is a primary factor in where it will take place. For example, public services are offered at multiple sites throughout the community in order to serve low- and moderate-income persons throughout the community and be accessible to all who qualify for services. Area benefit activities such as public infrastructure improvements must qualify as low- and moderate- income areas; most, but not all eligible census block groups are within the CDBG Target Area and/or NRSA. It is likely housing and area-benefit activities will have significant investments made in those areas, which are also the areas with the highest needs.

Discussion

See Geographic Priorities section of the Consolidated Plan (SP-10) for more information regarding the CDBG Target Area and NRSA, their boundaries and types of activities that will take place within the areas.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	22
Non-Homeless	15
Special-Needs	0
Total	37

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	27
The Production of New Units	0
Rehab of Existing Units	15

Acquisition of Existing Units	2
Total	44

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

There are a number of housing activities that will be continued in 2018 for homeless, non-homeless and special-needs residents in need of safe and affordable housing. Housing rehabilitation and rental subsidies through tenant-based rental assistance, rapid re-housing and prevention programs will impact the largest number of persons or households and serve two very different, yet vital housing needs for low- and moderate-income residents of Evanston. New construction and acquisition continues to be an important need, but difficult to accomplish due to funding limitations. It is more effective to aggregate HOME funds into a larger sum of money for housing development, instead of allocating all of the funding each year. The City aggregated enough funding to be able to commit HOME funds for acquisition and rehab of affordable housing units in 2017. This project will be completed in IDIS in 2018.

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, as well as seven project-based Section 8 units in Emerson Square.

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

The HACC is applying for 4% tax credits to rehab its 45 units of scattered site housing in Evanston and has contacted the City about gap funding. Staff is communicating with Cook County about the total gap financing needed of \$1,075,000. The estimated contribution by the City if the percent of funding is the same as with the Senior Redevelopment Project is about \$50,000. The source of funding could be CDBG, HOME, or the City’s local AHF. It is not efficient or cost effective for the HACC to do a few units at a time due to lack of funding sources for small scale projects.

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

The HACC has a Resident Advisory Board (RAB) established at one of its sites in Evanston, the Walchirk building. The RAB’s functions include, but are not limited to: assisting residents with access to computers, offering in-house services such as change for laundry, copies, and postage. RAB activities are

somewhat limited during the rehab of Walchirk and Perlman buildings and are also affected by reduced occupancy.

HACC's Resident Service Coordinators work closely with other agencies, including the City's Levy Center, to help its residents access services and participate in activities throughout the community. Additional services are always being considered and added when possible.

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 ensure that the needs of residents assisted by that agency 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 homeless and special needs activities that will be undertaken in Evanston in 2018 (the fourth year of the 2015-2019 Consolidated Plan) are a continuation of those undertaken in 2017. However, the scope of some activities has been affected by funding cuts from the State of Illinois. Descriptions of changes are included below.

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

Connections for the Homeless continues to be the primary provider of outreach services to Evanston's homeless population, including the unsheltered homeless. Connections' street outreach team works with the Evanston police department, hospitals, the public library and other places where homeless individuals are known to congregate, and uses the VI-SPDAT to prioritize chronically homeless persons for housing through the Suburban Cook County Continuum of Care. Cuts in funding by the State of Illinois in 2015 necessitated the elimination of laundry and showers that were available to homeless persons seeking those services. Connections raised private funds to provide these services on a limited basis in 2016 and 2017 and is working with Interfaith Action and other providers to provide continued services in 2018. Connections' case managers develop individualized case plans for each client; assist

them to obtain housing and access services that may include employment counseling/placement, health services, substance abuse counseling and education. Resources are focused on clients who were committed to coming off the street and working towards becoming stable, rather than those who accessed drop-in services only for basic needs on an intermittent basis.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City uses ESG funds for operating support of Hilda's Place, Connections for the Homeless' 20-bed congregate shelter, and the YWCA Evanston-North Shore's 34-bed domestic violence shelter. CDBG funds are also used to fund the YWCA's domestic violence services. Both shelters provide housing for up to 90 days for their clients. Hilda's Place provides housing for approximately 120 single adults annually and the YWCA houses approximately 250 women and children who are victims of domestic violence. These same levels of services are projected for 2018.

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

The City will focus its ESG resources on re-housing as its primary strategy to reduce the amount of time that individuals and families experience homelessness. The City expects that 7 households will be served with rapid re-housing in 2018. Barriers to using ESG for re-housing include the high rental rates in Evanston and the length of time it typically takes a family or household to become self-sufficient, which make it difficult to implement a "low barrier" re-housing strategy. Households are evaluated for their likely capacity to maintain market rate housing after a medium-term subsidy to avoid evictions following the subsidy. Outreach to landlords is being undertaken in 2018 and establishing a landlord mitigation fund using Affordable Housing Funds is under evaluation to incentivize landlords to accept assisted households as tenants.

In 2017, the City renewed funding for the HOME-funded Tenant Based Rental Assistance program for households with children under the age of 18, especially those with children enrolled in Evanston schools, that are homeless or unstably housed, including doubled-up/couch surfing. The City enrolled an additional ten households in 2017, thereby continuing to facilitate access for homeless individuals and families to affordable housing units. In addition to rent subsidies, TBRA households receive case management and other needed services, including education and job training, as part of their individualized self-sufficiency plans, from the program administrator, Connections for the Homeless. Households that completed their second year in the TBRA program but were not yet able to support themselves were evaluated for a renewal contract.

ESG funds will be used to prevent individuals and families who were recently homeless from becoming homeless again. ESG-supported programs are required to provide case management and supportive services, and to connect clients with mainstream resources to increase their likelihood of achieving long-term housing stability. ESG-funded clients will receive follow-up contact to determine their housing status 6 and 18 months after termination of assistance as required and provide additional supports as needed to prevent households from becoming homeless again, as well as determine program outcomes. The City expects to serve 10 households with ESG prevention funds in 2018.

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

ESG Prevention funds will be used as described above to help households with incomes below 30% of area median income avoid becoming homeless, and re-housing funds will be used to help low-income households achieve housing stability in 2018.

Evanston has two large facilities, Albany Care and Greenwood Care, with a total of 562 beds whose residents are being evaluated for the capacity to live in community-based settings according to the terms of the Williams Consent Decree. City staff works with mental health agencies and the State of Illinois to identify potential housing options for eligible clients who choose to live in Evanston. The Alliance to End Homelessness in Suburban Cook County has a working group that is developing discharge policies and procedures for the region. In addition, Connections for the Homeless and the police department work to help transition people being released from publicly funded institutions and hospitals.

All agencies receiving ESG funds are required to connect households to mainstream benefits as available and appropriate for their needs. In addition, the City's Mental Health Board evaluates the effectiveness of collaborations/referrals of agencies applying for funds as a criterion for funding. MHB and CDBG Public Services applications for 2018 funding were combined to streamline the application process for agencies applying for both sources of funds and to provide information to the Housing and Community Development Act Committee and Mental Health Board to better assess total funding levels being considered for programs and identify gaps in services.

The Evanston Cradle to Career initiative is a collective impact effort to mobilize our community assets to make a lasting difference in the lives of our community's children, youth and families. Its vision is that by the age of 23, all Evanston young adults will be leading productive lives, building on the resources, education, and support that they and their families have had to help them grow into resilient, educated,

healthy, self-sufficient, and socially responsible adults. Member organizations include School Districts 202 and 65, the City of Evanston, the United Way, Youth & Opportunity United and more than 20 other service providers.

Discussion

The City of Evanston will continue to collaborate with the Alliance to End Homelessness in Suburban Cook County Continuum of Care in order to address the needs of homeless individuals and families in Evanston.

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

Introduction:

The City of Evanston continues to address the barriers to affordable housing in Evanston identified in the Analysis of Impediments to Fair Housing Choice as described in the discussion section below. The AI may be found at <http://www.cityofevanston.org/assets/EvanstonAI4414.pdf>

The City planned to be a participant in the regional Assessment of Fair Housing (AFH) for which Cook County was to be the lead agency and Chicago Metropolitan Agency for Planning (CMAP) would have provided staff support. The City was notified on November 15 that the regional AFH effort was not moving forward. As a result, the City will undertake its AFH in 2018 independently, or in collaboration with a limited number of partners if that proves to be feasible, for submission to HUD by early April 2019, in compliance with requirements.

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

The City of Evanston amended its Inclusionary Housing Ordinance (IHO) in late 2015 with an effective date of January 1, 2016. To date, two rental projects have been approved that are subject to the IHO. A 44-unit rental building will have four on-site affordable units, 2 each at 50% and 60% AMI; a 242-unit rental development will pay a fee-in-lieu of on-site units of \$2.4 million to the City's Affordable Housing Fund. Three more planned developments comprising over 750 rental units are in varying stages of review at this time. Due to rising land and construction costs that have pushed the per unit cost of new development over \$300,000 in transit oriented areas, it is much more cost effective for developers to pay the fee-in-lieu of on-site units. The City is evaluating revisions to the IHO to better incentivize on-site affordable units, including raising the fee-in-lieu, because the current \$75,000 - \$100,000 per unit will not fund construction of a comparable number of affordable units, particularly in the City's transit-oriented areas. In addition, the City is evaluating a range of strategies to address the need for rental and

ownership housing affordable to households up to 120% of AMI and to integrate affordable housing more equitably throughout our City, including:

- New sources to fund affordable housing needs such as impact fees on development not covered by the IHO, increase in the demolition tax or the real estate transfer stamp
- Rental of accessory dwelling units (ADUs) to non-family member HHs if rented to income eligible HHs at affordable rates
- Construction of ADUs for rental in single-family residential districts where currently not allowed
- Zoning changes to allow development of modest sized single-family homes on smaller lots that currently allowed and/or a special use that enables the development of multiple small-scale homes on existing City lots
- Contributions of City-owned land for affordable housing development
- First-time homebuyer programs working with local banks that are members of the Federal Home Loan Bank
- Use of land trust to reduce cost of home ownership and maintain long-term affordability
- Expansion of affordable housing preservation programs, particularly targeting owner-occupied two-flats that comprise a substantial part of Evanston's naturally occurring affordable rental and affordable home ownership
- More effective partnerships with other funders and developers

Discussion:

The primary barrier to affordable housing is the continuing mismatch between incomes and housing costs in Evanston. The City's inflation-adjusted median household income dropped 10.2% between 2000 and 2011, outpacing 2.4% and 3.7% reductions in median housing value and gross rent, respectively. Evanston lost 70.7% of its units renting for less than \$700 between 2000 and 2011, while the number of units renting for more than \$1,000 increased by two-thirds. Minimum-wage, single income households and those depending on Social Security Income (SSI) payments cannot afford an apartment renting at the fair market rate in Cook County. Additionally, property taxes continue to represent an affordability concern for residents, particularly those with fixed incomes.

High property costs, particularly in predominantly single family neighborhoods with larger lot sizes and transit oriented corridors, have resulted in the concentration of affordable housing in west and south Evanston neighborhoods rather than being dispersed evenly. The stigma associated with affordable housing can be a barrier to siting affordable housing in areas of the City where currently none exist.

Another barrier to affordable housing within Evanston is the shortage of decent, affordable and accessible housing for persons with disabilities. The supply of affordable housing accessible to persons with physical disabilities is due in large part to the age of housing stock, most of which was built before the Americans with Disabilities Act was passed. Much of the City's older homes are difficult to retrofit for accessibility because they are multi-story units with stairs. This is true of smaller two-to-four flats as well as larger three- or four-story walk-ups built in the 1930s and 1940s. Some facilities designed to

accommodate people with mobility disabilities exist in Evanston, including the two buildings HACC updated per its Section 504 Transition Plan. However, stakeholders and HACC waiting list data suggest that the unmet need for affordable accessible housing will continue to be significant.

The City's occupancy standards for rental housing that limits the number of unrelated persons residing in a single housing unit can be an additional barrier to affordable housing, particularly for non-traditional households.

The City of Evanston wants to ensure that it is the most livable city for all of its residents. In order to most effectively address the housing needs of its low-, moderate-, and middle-income residents, and maintain its economic and racial diversity, priority for income restricted rental and ownership units funded by CDBG, HOME or local funds will be given to eligible households that live in Evanston or have a household member that works in Evanston wherever possible and in compliance with fair housing. The City is developing a centralized wait list for income restricted units developed through the Inclusionary Housing Ordinance to facilitate access to affordable housing for its residents. Properties with income restricted units not developed through the IHO may choose to get referrals from this centralized wait list to expand its effectiveness. Rental assistance programs funded with HOME, ESG and local funds will be used in Evanston to the greatest extent feasible to minimize displacement of lower income residents.

AP-85 Other Actions – 91.220(k)

Introduction:

The following are actions that will 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 poverty-level families, develop institutional structure, and enhance coordination between public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

Through consultation, three needs were identified as underserved:

- Youth programming and services
- Education and employment related services for young adults
- Energy efficiency improvements.

In addition to the social services funded by the City to address youth programming needs, the Cradle to Careers collective impact initiative is working to develop a community-wide method of assessing unmet needs and progress to address them so that all Evanston youth get the education and other supports they need to be independent, self-sufficient members of society by age 23. This is focused heavily on youth services, with an additional focus on job training and skills for young adults transitioning into

independence.

The City's cross departmental taskforce that identifies gaps in services for all at-risk populations in the City continues to meet on a quarterly basis. Topics include addressing individual residents with complex needs, as well as situations like hoarding that affect multiple City staff and departments. One of the initiatives from that group is how to use the City's 311 service to more effectively direct callers to resources, whether at the City or in the community. A new centralized database for case management and referrals will be implemented in 2017 to more effectively coordinate client services from multiple departments.

Community Development continues to work with the City's Sustainability division to help businesses and residents to capitalize on existing incentives and rebate programs offered by ComEd, Nicor and others to make environmentally- and economically-friendly improvements to their properties. Where possible, these will be incorporated into the CDBG Housing Rehab Program.

Actions planned to foster and maintain affordable housing

Evanston has supported alternative housing options, such as home sharing, for some time, and continues to research new and alternative ways, including rental of accessory dwelling units, to expand affordable housing. The City also works with Open Communities, the HUD fair housing agency for 16 suburbs north of Chicago (Evanston included), to strengthen landlord/tenant relations, particularly for low-income households with subsidies, and increase awareness of fair housing rights and responsibilities.

The City of Evanston has a locally funded Affordable Housing Fund, which is used for the development and rehab of affordable housing for persons up to 120% of the area median income. This provides funding in addition to CDBG and HOME funds to develop and maintain much-needed affordable housing throughout Evanston. In the fourth quarter of 2017, City Council will discuss and identify strategies for increasing affordable housing in Evanston to guide the development of a comprehensive affordable housing plan. Implementation of new policies and strategies is expected to begin in 2018.

Actions planned to reduce lead-based paint hazards

The City of Evanston's grant from Cook County's Lead Poisoning Prevention Program abates lead-based paint hazards in dwellings occupied by families with young children. The City receives up to \$100,000 per year to continue lead-based paint hazard prevention. The funding is used for stand-alone projects that mitigate lead hazards and layered with CDBG loan funds in Housing Rehab projects for eligible households.

The City is a delegate agency for the State of Illinois and enforces its Lead Act and codes. City staff receives lead test information for children residing in Evanston, investigates all cases when elevated lead

levels are found and takes appropriate action. Children with Elevated Blood Lead (EBL) levels above 5 mg/dl (micrograms/deciliter) receive case management services to educate the families about potential sources and lead safe practices. Any child with an EBL between 6 and 9 is contacted by the Health Department and an assessment of the home is performed if requested by a physician. The Health Department contacts the parent or guardian of any child testing at a level of 10 mg/dl or greater and performs a lead assessment of the property. Lead assessments are performed by the City's Licensed Lead Assessors in the Health Department. In addition, families concerned about lead that have children under 6 years of age may have their home tested.

Health Department staff responds to complaints from residents about demolition and rehab projects to determine if lead is present and ensure safe practices. Staff also file affidavits when windows are being replaced in buildings constructed before 1978 to ensure proper lead procedures and disposal of contaminated materials.

Additionally, all housing activities with federal funding must meet or exceed lead-based paint requirements. All housing rehabilitation projects have a lead assessment and require a lead clearance if lead-based paint hazards are identified.

Actions planned to reduce the number of poverty-level families

There are a variety of actions the City undertakes throughout the year in an effort to reduce the number of poverty-level families and increase self-sufficiency. The programs funded through CDBG and / or HOME that work towards this goal are the tenant-based rental assistance (TBRA) program, Certificate of Rehab program and a variety of other job training and education programs aimed at youth and young adults. Additionally, the City's investment in the Cradle to Career program demonstrates its commitment to ensuring that Evanston residents are prepared for the workforce.

Additionally, the City's Economic Development Department works diligently to grow the City's economy, specifically by working to redevelop vacant or underperforming commercial corridors. Developing a variety of businesses in Evanston is critical to providing living-wage jobs for a diverse population with multiple job skills and experiences. Economic Development is accomplished by utilizing many different funding sources including, but not limited to, the CDBG Economic Development Fund, tax-increment financing (TIF) and other local funds.

Actions planned to develop institutional structure

City staff works throughout the year to develop and coordinate capacity to address needs, both within the City and throughout our partner agencies. Staff provides technical assistance on federal grant management requirements, including the new Omni circular, Davis-Bacon, financial management and other grant management procedures. Staff maintains contact with partner agencies throughout the

year, offering referrals for funding and training opportunities where appropriate.

The City combined the application process for CDBG Public Services and Mental Health Board funds for 2017 using ZoomGrants, an online grants application and management system, to improve efficiency and effectiveness for both the City and agencies receiving funding. Additionally, investments are made in technology that assists departments within the City to more effectively and efficiently manage grant programs. One example is CDM, which is the City's management software program for all housing-related projects that require project and/or loan management and ongoing compliance. Staff also attends relevant training and conferences on all aspects of grant and project management.

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

The City is heavily invested in collaborations throughout the community, as evidenced by Cradle to Career, the Task Force for At-risk populations and other initiatives. The City has successfully paired with multiple health-service providers, including Erie Family Health Center, a federally qualified health center that provides bi-lingual medical, dental and mental health services to the community, regardless of the person's ability to pay. This has been a critical partnership that has increased access to quality, affordable healthcare for low- and moderate-income residents.

Additionally, the City's General Assistance program is being evaluated to see where opportunities exist to coordinate better between the City, public agencies and social service providers to better address the needs of underserved residents. These efforts are critical to furthering Consolidated Plan and City Council goals to make Evanston the most livable city for everyone who lives or works here.

Program Specific Requirements

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

Introduction:

Housing and Grants staff is responsible for ensuring compliance with all program specific requirements, as well as for program monitoring and reporting. In addition, staff ensures that federal cross-cutting requirements, including the Omni Circular, Davis-Bacon and Related Acts, Uniform Relocation Act, and Section 3, are met.

**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. | 90.00% |

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:

The City has not approved use any other form of investment beyond those listed in Section 92.205 for 2016. However, its local Affordable Housing Fund revenues may be approved to address affordable housing needs for households with incomes between 80% and 120% of the area median. Although these households' incomes exceed the eligibility level for HOME and CDBG funding, they may be housing cost burdened, paying more than 30% of gross income for housing, because Evanston is a high cost housing market in the Chicago metro area.

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 2018; HOME resources will be focused on rental housing needs, primarily of households whose incomes do not exceed 60% of the area median income.

If homebuyer activities were to be undertaken, the City would use recapture provisions to maintain long-term affordability for ownership projects with direct homebuyer subsidies in the form of down payment or closing cost assistance, or purchase price reductions (soft second mortgages) used to maintain compliance. The length of the affordability period would be based on the amount of HOME subsidy and forgiven on a pro-rata basis as long as the property remains the owner's primary residence. The balance is due only if the property is sold or ceases to be the buyer's primary residence before the end of the affordability period, subject to net proceeds.

The City's recapture terms are based on the minimum HOME requirements. Subsidies of \$14,999 per unit or less are subject to recapture for five years, subsidies between \$15,000 and \$39,999 are subject to recapture for ten years and subsidies over \$40,000 are subject to recapture for 15 years.

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:

If homebuyer activities were undertaken, the City would record a Junior Mortgage and Land Use Regulatory Agreement (LURA) deed restriction that acts as the Affordable Housing Restriction to ensure that the HOME funds are subject to recapture if the unit does not remain the principal residence of the purchaser for the length of the affordability period. Buyers would also sign an Agreement with the City describing the HOME subsidy. The City considers requests to subordinate its junior mortgage in a refinance of the first mortgage as long as the borrower does not receive any cash back as part of the refinancing and the new loan amount does not exceed the original first mortgage

with allowances for generally accepted financing costs. The City will not subordinate to a negative amortization loan or any loan it deems to be predatory.

Loan principal would be forgiven:

- At the rate of 1/60th per month for a 5 year term
 - At the rate of 1/120th per month for a 10 year term
 - At the rate of 1/180th per month for a 15 year term
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:

HOME funds may be used to refinance existing debt secured on multi-family rehab projects, excluding projects whose debt is made or insured by any federal program. The City may consider using HOME funds to refinance existing debt in specific situations using the following guidelines:

- To ensure that rehabilitation is the primary eligible activity, HOME funds may be used only to refinance the rehabilitation portion of a loan and up to 40% of acquisition financing.
- The property must be inspected to ensure disinvestment has not occurred.
- The Project pro forma will be reviewed to ensure that the long-term needs of the project can be met and that serving the targeted population is feasible.
- It must be stated whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
- Whether the length of the affordability will extend beyond the minimum 15 years will be determined and specified before HOME funds are invested.
- The project must be located in Evanston.
- HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

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

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

Please see attached ESG Policies and Procedures. Also included is the Coordinated Entry Protocol for Suburban Cook County from the Alliance to End Homelessness in Suburban Cook County. As part of the Alliance, the City of Evanston and all ESG subrecipients work to incorporate the protocols outlined by both documents.

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 developed a common intake form and data entry standards for HMIS.

The Alliance to end Homelessness in Suburban Cook County has initiated a process that includes members of the Continuum of Care 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 would use the VI-SPDAT and be ranked for housing based on vulnerability.

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 Housing and Homelessness Commission (HHC). Staff then takes the HHC recommendations to the Human Services Committee or Planning and Development Committee of City Council. The recommendation of that committee 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.

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
- Follow up contact to determine housing status 6 months after termination of assistance

Housing Trust Fund (HTF)
Reference 24 CFR 91.220(I)(5)

1. Distribution of Funds

Not applicable. The City of Evanston does not receive Housing Trust Funds directly.

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

I. Overview

The Emergency Shelter Grant program provides funding for a broad range of activities that addresses the needs of people who are homeless or at risk of homelessness. ESG was one of 20 programs established by the Stewart B. McKinney Vento Homeless Act of 1987 (P.L. 100-77), the Nation's first comprehensive response to homelessness. The City of Evanston has received ESG funds since 1989.

In 2009, Congress approved the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act to better coordinate resources and address the growing problem of homelessness. The implementation of HEARTH includes changing the Emergency Shelter Grant to the Emergency Solutions Grant to include eligible activities based on the ARRA-funded Homelessness Prevention and Rapid Re-housing Program (HPRP).

The Emergency Solutions Grant Interim Rule regulations which took effect in 2012 direct entitlement communities to use funding for primarily re-housing and homeless prevention activities, following the “housing first” strategy of the HEARTH Act. The name change from the Emergency Shelter to the Emergency *Solutions* Grant highlights the focus on permanent housing rather than short-term shelters. Re-housing for people who are homeless is strongly prioritized. HUD adopted 24 CFR 91 and 24 CFR 578 establishing the definition of “chronically homeless” to be used by all recipients, subrecipients and the Continuum of Care Program participants beginning January 15, 2016. This rule focuses on households and individuals with the longest histories of homelessness and who may also have the highest need. The new rule also establishes procedures for documenting homelessness and maintaining records. Under the current ESG regulations, funds may be used for the Homeless Management and Information System (HMIS), use of which is now required for all ESG-funded services by all service providers (excluding domestic violence shelters) to ensure consistency of data points and reduce duplication of services among providers.

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. 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. 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 to End Homelessness in Suburban Cook County. The City 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 child care 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 its HPRP policies and procedures, modified to include the new HUD definition of Chronically Homeless as outlined in 24 CFR 91. Households will be reviewed and approved for the program by the ESG Program Review Committee.

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 must be a U.S. citizen or legal resident 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)
- 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 short- or medium-term assistance, estimated at 3 – 6 months
- E. Head(s) of household must agree to follow the case management plan developed working with the case manager
- F. Head(s) of household must agree to meet with the designated case manager at least once a month while receiving assistance, including at least one home visit
- G. Head(s) of household must agree to follow-up contact at specified intervals following receipt of assistance. The City is working with the Alliance and ESG subrecipients to determine the most effective timing of follow-up contacts.

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 a U.S. citizen or legal resident and an Evanston resident of six months or more.
- 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 has likelihood of maintaining housing and becoming self-sustaining following the receipt of 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
- H. Head(s) of household must agree to meet with the designated case manager at least once a month while receiving assistance, including at least one home visit
- I. Head(s) of household must agree to follow-up contact at specified intervals following receipt of assistance. The City is working with the Alliance and ESG subrecipients to determine the most effective timing of follow-up contacts.

III. 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 engage with eligible people to educate them about housing and supportive services options available. Referrals to services can also come from the Homeless Hotline 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: IDHS Prevention funds and City of Evanston ESG
5. Applying for Medicaid
6. Creating an individual 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.

IV. Emergency Shelter: Admission, Diversion, Referral, and Discharge Policies

There are two overnight shelters located in Evanston: Hilda's Place, Connections for the Homeless' 20-bed transitional shelter, and the YWCA Evanston-North Shore's 34-bed domestic violence shelter. Both are supported by the City with ESG and Mental Health Board funds. Both programs ensure equal access to individuals in accordance with their gender identity. Each provides shelter for up to 90 days. Hilda's Place serves an estimated 120 single adults and the YWCA provides shelter for an estimated 250 women and children who are victims of domestic violence each year.

Hilda's Place 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 90 nights at Hilda's Place.
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.

YWCA Evanston-North Shore Domestic Violence Shelter Admission, Diversion, Referral and Discharge Policies:

Admission

Admissions are done over the 24-hour crisis hot line.

- 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 Illinois Help Line (877-863-6338). Clients that call the YWCA hotline and are suicidal are referred to the nearest hospital for assessment before intake can proceed. Male children over the age of 12 cannot stay at the shelter. If a family with a male child 12 or older would like to stay together, the household will be referred to Greenhouse or Family Rescue, which accepts families with male children up to 17 years.

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.

V. Coordination

The City of Evanston continues to work with the Alliance to End Homelessness in Suburban Cook County ("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 and housing providers. 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 its north council, known as AHAND. Connections staff participates in the HMIS Committee meeting, the monthly Prevention Committee and the SubCook Zero: 2017 Team, which each meets monthly. The City's Grants and Compliance Specialists is a member of the Coordinated Entry Committee. Participation across the Board and committees 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 Universal Intake and Eligibility Form developed by the Alliance. This is an important component to a more coordinated process for intake and will help determine targeting and prioritization for services.

In the Alliance's Draft Strategic Plan Action Steps 2014-2017, the goal to launch the use of a standardized assessment tool in suburban Cook County is clearly stated. The Alliance recently completed a six-month planning process for a full launch of Coordinated Entry within suburban Cook County. The Alliance and its member agencies have adopted the use of the VI-SPDAT (Vulnerability Index-Service Prioritization Decision Assistance Tool) as an evidence-based tool for determining acuity and matching homeless people to the interventions that fit their needs. The Alliance HMIS staff is reviewing the VI-SPDAT functionality that Bowman has built into its ServicePoint HMIS product. Hines VA Hospital incorporated the VI-SPDAT tool into its HUD-VASH voucher prioritization in late 2013, allowing the Alliance to learn more about their experience with the tool. The Homeless Management Information System functionality includes the VI-SPDAT for prioritization of homeless individuals for permanent supportive housing since November 2014. The Coordinated Entry protocols call for the adoption of the Family VI-SPDAT and Transition Age Youth (TAY) VI-SPDAT later in 2016.

VI. 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, the City of Evanston and the Alliance continue to refine policies and procedures to assess, prioritize and reassess 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, in use by all agencies receiving ESG, CoC and other homeless program funding within the Continuum, conform to the requirements established by the Alliance, ESG recipients and City of Evanston staff. These tools and protocols create consistency in assessment and provide the basis for appropriate agency referrals and for targeting and prioritization by program. All ESG subrecipients use this system to help identify immediate needs of participants: emergency shelter, homelessness prevention resources, diversion and stabilization services, or referral to specialized services to determine the individual or family need for emergency shelter or other ESG-funded assistance. 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, not on deciding who gets access to shelter or outreach services. Approximately half of seasonal shelter guests served in suburban Cook County stay 7 shelter nights or fewer, so the Alliance will focus 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 uses HMIS; clients are prioritized by vulnerability factors, and subpopulations are

ranked by different 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 Housing Authority of Cook County (HACC) committed to creating up to 75 FLOW vouchers in 2014 and 25 more in each of the following three years, for people who are ready to move up from permanent supportive housing into a unit paid for with a Housing Choice Voucher. Residents in permanent supportive housing are assessed for their readiness to move into a less intensive environment, thus freeing up that PSH unit for other people who are experiencing homelessness and currently vulnerable.

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. City staff gained access to HMIS in early 2016 and hired a dedicated Human Services Specialist to further coordinate and track services.

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, child care, 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 re-assess 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 families and may not refuse services based on the age of children or the size of the family.

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 of up to six months are eligible for ESG 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 14 days of 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.

VII. 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.

VIII. Length of Assistance

Initially, Evanston's ESG program was to focus assistance on households that demonstrate likely capacity to maintain stable housing following short-term (up to three month) support. The guideline for length of assistance per household has been extended from up to three months to up to six months, and generally estimated at up to \$10,000 for families with children and up to \$6,000 for single adults or couples. This change was made based on in-market experience in 2014 due to the following factors:

1. Households have not been able to maintain their housing independently following three months of assistance
2. Landlords are unwilling to write leases for clients based on their history of housing and financial instability. Extending the potential timeframe for households from three months to six months (with the potential to go up to twelve months) with clients required to maintain compliance with their case plan in order to qualify for direct assistance, will help overcome this.

All households will be re-evaluated at the end of the three month period 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.

IX. 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.

X. 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 Program Review Committee. The Review Committee will meet monthly or as needed to review and approve applicants for assistance through ESG or for referral to other programs or sources. 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.).

XI. 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.

XII. 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 will be expected to:

- 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 ESG Program 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
- Conduct a follow up with each client household 6 months after their exit from the ESG program to determine if the client retains their housing and other measures of stability.

All clients 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.

Evanston Neighborhood Revitalization Strategy Area

City of Evanston



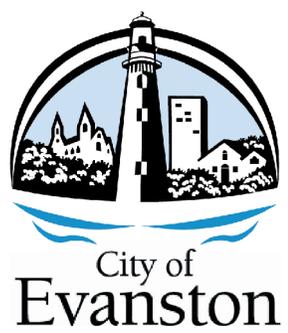
Block Group Labelling

Block Group ID
LOWMOD %
LOWMOD / LOWMODUNIV

Map Legend

- Railroad
- Census Block Group
- Park
- Possible West Evanston NRSA
- Main Road
- Local Street
- Water

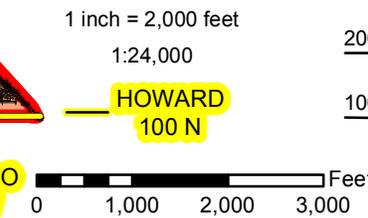
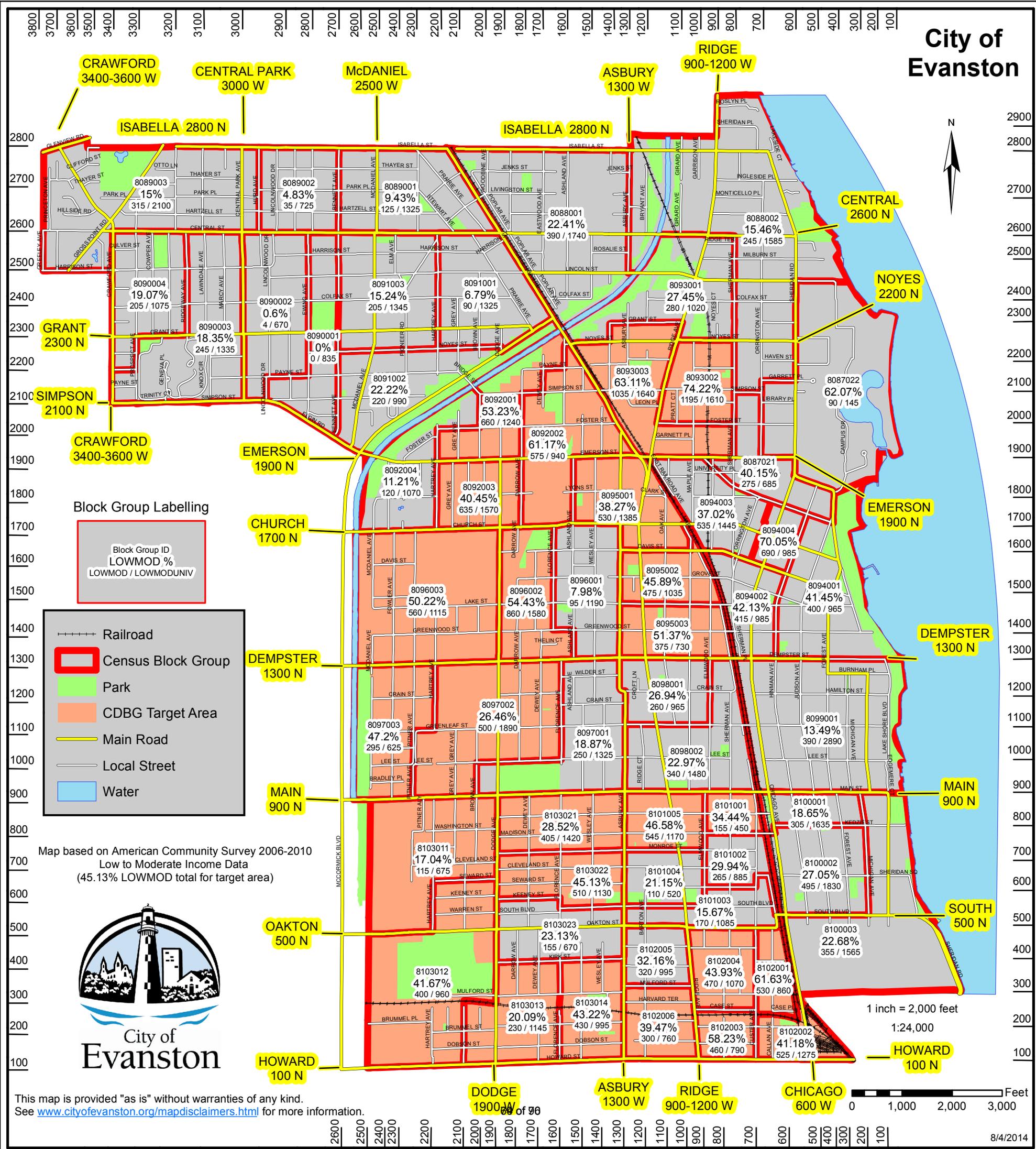
Map based on American Community Survey 2006-2010 Low to Moderate Income Data



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

CDBG Target Area

City of Evanston



**CITY OF EVANSTON
UNEXPENDED CDBG FUNDS FROM PRIOR YEARS
FOR REALLOCATION IN FY 2018**

Program Year	Project	Amount
2014	PEER Services Window Replacement	\$ 1,000.00
2015	Weissbourd-Holmes Center Gym Floor Replacement	\$ 9,169.00
2011	2011 WEST Signage	\$ 4,280.00
2016	CDBG Administration	\$ 5,701.42
2016	Weissbourd-Holmes Center Tuckpointing	\$ 80,000.00
	Total	\$ 100,150.42



Memorandum

To: Members of the Housing and Community Development Act Committee

From: Sarah Flax, Housing and Grants Administrator
Jessica Wingader, Grants and Compliance Specialist

Subject: Discussion of Public Outreach and Engagement Process for the City's Consolidated Plan, Action Plans, and Consolidated Annual Performance and Evaluation Reports

Date: November 21, 2017

Summary:

At the October 17 meeting, the HCDA Committee agreed to review the methods used to engage the public and solicit input on the draft Action Plan based on suggested changes received from a resident (attached). The Public Outreach section of the Citizen Participation Plan, as well as a summary of public input received during prior public comment periods for the 2015-2019 Consolidated Plan process are provided below; the Citizen Participation Plan, which is part of the approved 2015-2019 Consolidation Plan, is attached. Changes to the Citizen Participation Plan could trigger a substantial amendment to the City's Consolidated Plan. The City is required to review its Citizen Participation Plan based on the requirements of the new Assessment of Fair Housing (AFH) and make any amendments required. The HUD Notice regarding this requirement is attached. Staff recommends that any additional changes to the Citizen Participation Plan be done simultaneously. The City was notified on November 15 that the planned regional Cook county AFH is not moving forward. Staff is evaluating the impact of this and will bring a recommendation to the committee on how to proceed in early 2018. The due date for the City's AFH if completed independently of any collaboration with other entitlement communities is April 6, 2019.

Background:

Public Outreach (from Citizen Participation Plan)

The City uses multiple communications channels to inform residents about the Consolidated Planning process and engage them in its development, approval and assessment. The following outreach efforts may be taken as appropriate to provide citizen access to the Consolidated Planning process. Failure to use any one of these shall not be considered a violation of this Plan.

- *Notices of all public comment periods and public hearings are published in a paper of general circulation, on the homepage of the City website, on the City's social media accounts (Facebook, Twitter, etc.), and via the City's e-newsletter that goes to over 35,000 emails prior to the opening of the public comment*

period. The notice includes the dates of the comment period; the date, time and location of the public hearing.

- *Notices of public meetings are sent to the media for all public meetings in accordance with the Illinois Open Meetings Act and posted on bulletin boards in the Lorraine H. Morton Civic Center. Meeting agendas, packets and minutes are posted online for public review at www.cityofevanston.org.*
- *Email notification is sent to community organizations and individuals who request to receive information about meeting dates, agendas, funding application and allocation schedules, and other information.*

Following this process the public comment period for the draft 2018 Action Plan was publicized through a ¼ display ad in the Evanston RoundTable, which is the most effective publication for reaching Evanston's low/moderate income residents because it is distributed to 15,000 homes with an additional 3,000 papers bulk-dropped to more than 50 convenient locations throughout the community. The public comment period was also featured in two e-news bulletins sent to 48,000 subscribers, posted on Facebook and Twitter, and emailed to the CDBG Interested Parties list of over 150 direct contacts.

Summary of Public Comment

To date, there has been no comment received for the draft 2018 Action Plan. Erv Choccol emailed suggestions to improve the process; see attached.

The following input was received about the draft 2017 Action Plan:

- Email from Mary Brugliera suggesting that the City invite Habitat for Humanity to work on affordable housing in Evanston. A group was active in Evanston some 20 years ago and NU students are involved in projects outside of Evanston.
- Twitter message from Tony Nguyenn asking for more bike lanes.
- Email from Kristin Lems about the need for a walk button at Emerson St and Dodge Ave.
- Two emails from Chris Haller offering a free trial of CiviComent.
- At the November 15 meeting of the Housing and Community Development Act Committee, Sue Loellbach, with Connections for the Homeless, read a prepared statement in support of the draft 2017 Action Plan that thanked the City for developing the plan, noted the need for more housing affordable to households at 30 and 50% of the area median income, ect.

The following input was received about the draft 2016 CAPER:

The City received input from one person, Judy Malik, via two emails on March 16 and 17, 2017. Ms. Malik alleges that African-Americans are not receiving assistance to enable them to continue to live in Evanston while immigrants and refugees are being welcomed.

No input was received about the draft 2016 Action Plan.

The following input was received about the draft 2015-2019 Consolidated Plan and 2015 Action Plan:

Comments from Evanston community resident Husayn Allmart expressed concern over housing affordability and thanking City staff for their efforts in ensuring that Evanston remains an ideal community for all of its residents. Upon reviewing the Draft Consolidated Plan, Paul Selden, Executive Director of Connections for the Homeless, provided comments and feedback on the various needs assessments concerning housing and homelessness. Additionally, local homeless population data was provided. The edits, comments, and data were considered and incorporated into the plan.

Attachments:

- Email from E. Chocoi
- Citizen Participation Plan
- HUD Notice Regarding Citizen Participation Plan Requirements for Assessment of Fair Housing

Sarah Flax <sflax@cityofevanston.org>

Re: Notice in Evanston Round Table of 10/5/17 For the 2018 Action Plan

1 message

Erv Chocol <echocoltwc@aol.com>

Tue, Oct 10, 2017 at 2:28 PM

To: sflax@cityofevanston.orgCc: shagerty@cityofevanston.org, cfleming@cityofevanston.org, wbobkiewicz@cityofevanston.org,jleonard@cityofevanston.org

Thank you again for all the details Sarah.

My suggestion to have a public presentation was to have it well in advance of the deadline. This will give people time to review, discuss and ask questions,

Erv Chocol

-----Original Message-----

From: Sarah Flax <sflax@cityofevanston.org>To: Erv Chocol <echocoltwc@aol.com>Cc: Steve Hagerty <shagerty@cityofevanston.org>; Cicely Fleming <cfleming@cityofevanston.org>; Wally Bobkiewicz <wbobkiewicz@cityofevanston.org>; Johanna Leonard <jleonard@cityofevanston.org>

Sent: Mon, Oct 9, 2017 6:09 pm

Subject: Re: Notice in Evanston Round Table of 10/5/17 For the 2018 Action Plan

We will not be using CoUrbanize for the 2018 Action Plan but the City will be updating its Citizen Participation Plan in early 2018 to comply with new HUD requirements relating to providing information on fair housing choice and access to opportunity for our low and moderate income residents, the primary beneficiaries of our HUD funding and from whom we are most interested in getting input. I would like to include improvements to public engagement in the City's Consolidated Plan process, including annual Action Plans and Consolidated Annual Performance and Evaluation Reports, at the same time to get better public participation and strengthen outcomes overall. Over the last 4-6 years, comments have been submitted almost exclusively in written form via email and most recently via Twitter. We hear this from our peers in other communities, too. Many people are not able to make it to the meetings, but they are required by the regulations, same as placing notices in newspapers. I will also discuss your suggestion to have a presentation about the 2018 Action Plan at the November 21 meeting with the committee chair.

Generally, questions about the Action Plan or anything relating to our HUD funding may be submitted to cdbg@cityofevanston.org or via the City's 311 system. But please feel free to call or email me directly - I welcome your questions and input. Thanks again for your interest!

Best regards,

Sarah

Sarah K. Flax

Housing and Grants Administrator

Community Development

Morton Civic Center

City of Evanston

[2100 Ridge Ave. | Evanston, IL 60201](http://2100RidgeAve.com) | [847-448-8684](tel:847-448-8684)

sflax@cityofevanston.org | cityofevanston.org

On Mon, Oct 9, 2017 at 1:09 PM, Erv Chocol <echocoltwc@aol.com> wrote:

Thank you for your detailed explanation Sarah.

A public presentation would be worthwhile. Much more can be learned at a public presentation where questions can be asked. It is also preferred by many people who may not fully understand the Action Plan in writing. Is this being considered?

When people have questions, where do they go for answers?

Will the CoUrbanize facility also be used to publicize the Action Plan?

Regards,

Erv Chocol

-----Original Message-----

From: Sarah Flax <sflax@cityofevanston.org>

To: Erv Chocol <echocoltwc@aol.com>

Cc: Steve Hagerty <shagerty@cityofevanston.org>; Cicely Fleming <cfleming@cityofevanston.org>; Wally Bobkiewicz <wbobkiewicz@cityofevanston.org>; Johanna Leonard <jleonard@cityofevanston.org>

Sent: Mon, Oct 9, 2017 11:55 am

Subject: Re: Notice in Evanston Round Table of 10/5/17 For the 2018 Action Plan

Mr. Chocol,

Thank you for your interest in the 2018 Action Plan and the public comment period. The timing of the meeting for public comment is held at the close of the comment period so that the Housing and Community Development Act Committee may consider all comments made during the 30-day period before they vote to recommend approval of the Action Plan to City Council. There is no presentation of the draft Action Plan at the meeting; its purpose is for the committee to consider any input from the public. Staff includes all input received to date in the meeting packet, which is posted at least 48 hours before the meeting, and distributes any additional comments received between the packet posting and the start of the meeting to the committee. All public comment is summarized in the Action Plan that is submitted to HUD and text of any input provided in writing is appended, as required by HUD. As Mayor Hagerty noted in a separate email to you, the City is following HUD protocol and its Citizen Participation Plan that was developed according to HUD regulations and approved as part of the HUD 2015-2019 Consolidated Plan.

The City is required by HUD to publicize the 30-day comment period in a newspaper of general circulation. The announcement in the October 5 issue of the RoundTable notes that the comment period opens on October 23 and closes at the public meeting on November 21. It includes how to find the Plan on the City's website at www.cityofevanston.org/2018actionplan starting October 23 and that printed copies will be available to view in room 3304 of the Civic Center. The time of the meeting, 7PM, and the location, Morton Civic Center with full address, including room number, are also shown. There is also information in Spanish at the bottom of the notice about how persons with disabilities or limited English proficiency may get assistance. We also use the City's e-newsletter and social media to inform people that we are seeking input on the Action Plan and how to provide it.

We are always open to improvement to the Citizen Participation Plan for our HUD grants. I'd be happy to meet or discuss by phone at your convenience.

Best regards,

Sarah

Sarah K. Flax

Housing and Grants Administrator

Community Development

Morton Civic Center

City of Evanston

2100 Ridge Ave. | Evanston, IL 60201 | 847-448-8684

sflax@cityofevanston.org | cityofevanston.org

On Sat, Oct 7, 2017 at 6:55 PM, 'Erv Chocol' via cdbg <cdbg@cityofevanston.org> wrote:

The meeting notice for Nov. 21 does not say where it is or the time of day.

Also the comment period closes on the day of the meeting. Please provide more time between these two occurrences so that Evanston citizens have enough time to review, discuss and ask questions that will later come to mind for the 2018 Action Plan. At least 30 days would be appropriate. Some people will think that this committee is forcing this plan.

The notice also indicates that copies can be obtained at the Civic Center and online before the 21st. But much more can be learned at a public presentation where questions can be asked. It is also preferred by many people who may not fully understand the Action Plan in writing.

Also suggest that the CoUrbanize facility is used for the Action Plan.

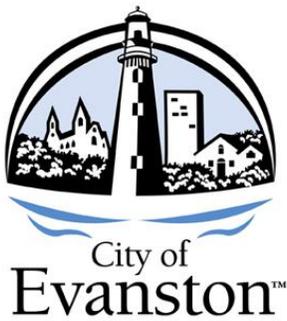
Respectfully,

Erv Chocol
1020 Cleveland, Evanston

City of Evanston

Citizen Participation Plan

Adopted by the Evanston City Council
November 10, 2014



Citizen Participation Plan: City of Evanston

Introduction and Purpose

As a recipient of Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Solutions Grant (ESG) entitlement funds from the U.S. Department of Housing and Urban Development (HUD), the City of Evanston is required to develop a Consolidated Plan and annual Action Plans to guide its use of those funds, and Consolidated Annual Performance and Evaluation Reports (CAPER) to report accomplishments against the goals of those plans. The City is also responsible for engaging the public in all phases of the development of its Consolidated Planning process. In addition to consulting with public and private agencies to define community needs and resources available to address them, the City encourages participation from all residents, particularly low- and moderate-income residents, non-English speaking residents, persons with disabilities, and other segments that receive services funded by its entitlement grants, to expand their participation in the Consolidated Planning process.

The City of Evanston's Citizen Participation Plan (CPP) outlines the policies and procedures the City has developed to encourage Evanston residents and stakeholders to participate in the development of the City's 2015-2019 Consolidated Plan, its annual Action Plans and Consolidated Annual Performance and Evaluation Reports (CAPER), as well as any substantial amendments to the Consolidated Plan or Action Plans. The CPP is designed in accordance with Section 104 (a) of the Housing and Community Development Act of 1974, codified at 42 U.S.C. Section 5304 (a) and 24 CFR Part 91.105.

The City's Community Development Department is the lead agency with responsibility for the Consolidated Planning process, including implementation of its Citizen Participation Plan.

Development of the Consolidated Plan and Action Plans

Community Development staff employs online surveys and public meetings to get input on the housing, community and economic development needs and priorities from its residents for the development of the Consolidated Plan. Surveys, focus groups and individual conferences are used to get input from housing providers, non-profit services providers, public agencies and elected and appointed officials. The City's Housing & Community Development Act Committee holds one or more meetings to solicit input regarding needs in the community and to hear public comment on the priorities and activities proposed in the plans.

A draft of the Consolidated Plan and/or Action Plan is posted on the City's website and printed copies are made available at the Lorraine H. Morton Civic Center during the required 30-day comment period. Public input on the plan is sought by the Housing & Community Development Act Committee at a public meeting and in written form during the 30-day comment period, and recommends approval of the plans to City Council. City Council meetings at which action to adopt or approve the plans is taken also offer opportunity for public comment. Any public

comments received during the comment period or at the public meetings is summarized and attached to the Consolidated Plan and/or Action Plan prior to its submission to HUD, including any comments or views that are not accepted and the reasons for which they are not accepted. Consolidated Plans and Action Plans must be submitted to HUD by November 15 of the preceding year, unless directed otherwise by HUD. Action Plans will be based on estimated grant amounts as required in order to make the November 15 submission deadline.

Process for Citizen Participation

The City of Evanston invites public participation at all stages of the Consolidated Planning process. The City is committed to making reasonable and timely access to the needs assessment, strategy development and budget recommendation process for all members of the community, particularly low- and moderate-income persons.

Substantial Amendments to the Consolidated Plan or Action Plans

HUD requires entitlement communities to specify the criteria that trigger an amendment to the Consolidated Plan or Action Plan and describe the public process for amending those plans. The City of Evanston defines a substantial amendment to the Consolidated Plan or Action Plan as:

- A change in funding among the Goals used in the development of the plan (SP-45 for Consolidated Plan, AP-20 for Annual Action Plans), that is greater than 20% of the total allocated towards the Goal
- The deletion of a Goal included in a plan
- The addition of a Goal not currently included in a plan

Any substantial amendment to the Consolidated Plan would be proposed to the Housing & Community Development Act Committee for review and a public hearing would be conducted. Additionally, the public will be provided a minimum of 30 days to review and make comment on the proposed change. If approved by that committee, the substantial amendment would be submitted to City Council for approval.

Substantial amendments to Action Plans would be proposed to the Housing & Community Development Act Committee if pertaining to CDBG, or the Planning & Development or Human Services Committee if pertaining to HOME or ESG. A public hearing would be conducted during the required 30-day comment period to allow the public to review and make comment on the proposed change. If approved at the committee level, the substantial amendment would be submitted to City Council for approval.

Any substantial amendment approved by City Council will be submitted to HUD as it occurs during the year or at the end of the program year. Any public comments received during the comment period or at the public hearing will be considered, summarized and attached to the substantial amendment prior to its submission to HUD, including any comments or views that are not accepted and the reasons for which they are not accepted.

All other amendments shall be considered "non-substantial." This includes amendments to either the Consolidated Plan or Action Plan that are required when plans are based on estimated funding and are modified based on actual grant amounts.

Non-substantial amendments to CDBG, HOME or ESG may be approved by the Housing & Community Development Act Committee, Planning & Development Committee or Human Services Committee, as appropriate, based on the program affected and shall not trigger a public comment period or re-submission to HUD for approval.

Consolidated Annual Performance and Evaluation Report

The Consolidated Annual Performance and Evaluation Report (CAPER) identifies the expenditures and performance results for each Annual Action Plan activity in a completed program year and any outstanding activities from prior program years. Corresponding to the City's fiscal year of January 1-December 31, CAPERs are submitted to HUD by March 31 which is within 90 days of the City's CDBG, HOME and ESG program year. Prior to its submission to HUD, the draft CAPER will be posted on the City's website for the required 15-day public comment period and The Housing & Community Development Act Committee will hold a public hearing to receive input from the public. Input will also be accepted in written form. The Housing & Community Development Act Committee will recommend acceptance of the CAPER to City Council. The City Council meeting at which action to approve the CAPER is taken also offers opportunity for public comment. Any public comments received during the comment period or at the public hearing will be considered, summarized and attached to the CAPER when submitted to HUD.

Public Meetings

Opportunities for citizen input on housing, economic development and public services needs and policies are provided throughout the year through public comment scheduled at regular public meetings of the Housing & Community Development Act Committee, Housing & Homelessness Commission, Economic Development Committee, Planning & Development Committee and Human Services Committee, as well as at City Council meetings.

To provide equal access for persons with disabilities, most meetings are held at the Lorraine H. Morton Civic Center or other locations that are accessible to persons with mobility impairments including the Main Public Library, Levy Center and Fleetwood-Jourdain Community Center. Translators will be provided at meetings if requested 48 hours in advance of the meeting.

Meetings of the City Council and standing committees of the Council are broadcast on Evanston cable channel and streamed live on the internet. Notices of public meetings and comment periods include contact information for anyone needing assistance because of a disability or language difference. If an individual is unable to attend a public hearing and wishes to comment on the subject matter of the hearing, written comments may be submitted to the Community Development Department via email, USPS or in person.

Funding recommendations for CDBG, HOME and ESG are presented and discussed at meetings of the committees that oversee each grant program. The Housing & Community Development

Act Committee conducts an annual application process CDBG to develop funding recommendations for programs/projects that the City anticipates undertaking in the upcoming fiscal year. City staff holds one or more pre-application meetings to provide technical assistance to applicants, particularly new applicants, and schedules individual meetings as needed. Applications are submitted via an online grants application program, ZoomGrants, and are available for public review on the City's website and at one or more committee meetings where applicants present their proposals and answer questions from committee members. The Housing & Community Development Act Committee holds a public meeting at which members develop CDBG funding recommendations for the upcoming year. Application review and funding meetings are televised on the City of Evanston cable TV channel. Applications for Economic Development projects are programs are accepted throughout the year and reviewed and underwritten by staff, then reviewed by the Economic Development Committee.

HOME and ESG funding recommendations at the activity/sub regional level are made during public meetings of the Housing & Homeless Commission following the procedures described above. Recommendations from the Housing & Homelessness Commission go the either Planning & Development or Human Services Committees for approval and are recommended to City Council.

Public Outreach

The City uses multiple communications channels to inform residents about the Consolidated Planning process and engage them in its development, approval and assessment. The following outreach efforts may be taken as appropriate to provide citizen access to the Consolidated Planning process. Failure to use any one of these shall not be considered a violation of this Plan.

- Notices of all public comment periods and public hearings are published in a paper of general circulation, on the homepage of the City website, on the City's social media accounts (Facebook, Twitter, etc.), and via the City's enewsletter that goes to over 35,000 emails prior to the opening of the public comment period. The notice includes the dates of the comment period; the date, time and location of the public hearing.
- Notices of public meetings are sent to the media for all public meetings in accordance with the Illinois Open Meetings Act and posted on bulletin boards in the Lorraine H. Morton Civic Center. Meeting agendas, packets and minutes are posted online for public review at www.cityofevanston.org.
- Email notification is sent to community organizations and individuals who request to receive information about meeting dates, agendas, funding application and allocation schedules, and other information.

Access to Information

The City of Evanston Consolidated Plan, including this CPP, Annual Action Plans, any Substantial Amendments to those plans, and Consolidated Annual Performance and Evaluation Reports are available on line at www.cityofevanston.org. The City website may be translated into 150 different languages using Google Translate. In addition, the Consolidated Plan, Action Plans and CAPERs are available in print format for public review during regular working hours at:

Community Development Department
Lorraine H. Morton Civic Center
2100 Ridge Ave, 3rd Floor
Evanston, IL 60201
847-448-4311

This information shall be provided in a format accessible to persons with disabilities, upon adequate notice. Requests for additional information may be made to the Community Development Department at the address and phone listed above. A response shall be provided within 15 working days of receipt of the request, where practicable. If printed copies are requested, photocopier charges and miscellaneous charges for other related services and materials will be assessed in accordance with the City's Freedom Of Information Act policy.

Comments/Complaints

Any complaints relating to the Consolidated Plan, Action Plan or CAPER received in writing will receive a written response within 15 working days. The following points are used as guidance in responding to complaints:

- Stated needs and objectives are inconsistent with available and reliable data
- Stated projects are inappropriate for meeting needs and approved objectives
- Consolidated Plan does not comply with regulations for the Community Development Block Grant, HOME Investment Partnerships or Emergency Shelter grants programs.

Displacement

The City of Evanston will make every effort to minimize the displacement of persons as a direct result of the implementation of projects funded by its HUD entitlement grant programs. If displacement does occur, the City will follow all applicable federal regulations to alleviate the impact of such permanent and involuntary relocations.

Section 108 Loan Guarantee

The City of Evanston intends to apply for a Section 108 Loan Guarantee, authorized under HUD regulation 24 CFR Part 570, Subpart M, in the form of a Pooled Fund. If received, the Section 108 Program will be subject to all provisions set forth within this Citizen Participation Plan. Applications for Section 108 loan guarantee assistance may be included as part of the process for obtaining CDBG or HOME Entitlement funds, or may be undertaken separately anytime during the program year. The required public hearing to inform citizens of uses of funds will be carried out by the City's Economic Development Division or Community Development Department staff.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

OFFICE OF THE ASSISTANT SECRETARY FOR
COMMUNITY PLANNING AND DEVELOPMENT

MAR 14 2016

MEMORANDUM FOR: All CPD Formula Program Grantees
All CPD Field Office Directors

FROM: Harriet Tregoning, Principal Deputy Assistant Secretary
for Community Planning and Development, D

SUBJECT: Incorporating 24 CFR Part 5 Affirmatively Furthering Fair Housing
into 24 CFR 91.10 Consolidated Program Year, 24 CFR 91.105
Citizen participation plan for local governments and 24 CFR 91.115
Citizen participation plan for States

The U.S. Department of Housing and Urban Development (HUD) recently published a Final Rule at 24 CFR Part 5 regarding a grantee's obligation to Affirmatively Further Fair Housing (AFFH). The new rule sets forth a meaningful and transparent process to identify and understand local and regional fair housing issues and to set goals for improving fair housing choice and access to opportunity. HUD is providing its consolidated plan grantees and public housing authorities with an Assessment Tool and a rich set of data within a mapping tool to support the development of the Assessment of Fair Housing (AFH), which is replacing the Analysis of Impediments to Fair Housing Choice (AI). The assessment of information on the current state of neighborhood demographics and assets within an open planning process can affect the nature of the conversations, and ultimately, community decisions. The AFH Tool, informed by the community participation process, will guide grantees through the identification of fair housing issues and related contributing factors, and result in prioritizing and setting of goals for its upcoming planning period.

Under the new rule, the citizen participation plan requirements at 24 CFR 91.105 for local governments and 24 CFR 91.115 for states have been revised to accommodate the new AFH, the analysis undertaken pursuant to § 5.154 requiring consultation and community participation in the analysis of fair housing data, an assessment of fair housing issues and contributing factors, and an identification of fair housing priorities and goals.

Section 107 of the Cranston-Gonzalez National Affordable Housing Act and its implementing regulations at 24 CFR Part 91 require jurisdictions to implement a citizen participation process as a prelude to the allocation and expenditure of formula funds for HUD's Community Planning and Development programs. These requirements are also contained in section 104(a)(2) of the Housing and Community Development Act of 1974 for CDBG grantees. A grantee's citizen participation plan and proposed allocation of funds to eligible activities are components of its consolidated plan required pursuant to 24 CFR 91. The specific statutory requirement is implemented through 24 CFR 91.105 and 24 CFR 91.115, which describe the standards for local government and state citizen participation plans applicable to the formula grant programs.

Under the new AFFH rule, a grantee's citizen participation plan will need to be amended prior to the initiation of the AFH process to comply with the new provisions at § 91.105 for local governments and § 91.115 for states. This memorandum outlines the revisions and additions to the consolidated plan process, the consultation process and the citizen participation plan requirements for both local government and states so they may incorporate the AFH into their citizen participation plan.

24 CFR 91.10 – Consolidated program year and collaborating on an AFH submission

The AFFH rule at 24 CFR 5.152 and 5.156 encourages program participants to collaborate in undertaking a joint Assessment of Fair Housing (AFH) or a regional AFH. A joint AFH refers to two or more program participants conducting and submitting a single AFH. Joint participants may include local jurisdictions, states, Insular Areas, or PHAs. A regional AFH is a type of joint AFH in which at least two of the participants are consolidated plan program participants, conducting and submitting a single AFH. Collaborating program participants must, through a written agreement, designate one participant as the lead entity to oversee the joint or regional AFH on behalf of all collaborating program participants. Program participants that intend to collaborate must notify the appropriate FHEO Regional Director and provide a copy of their collaboration agreement. The new rule requests all collaborating program participants be on the same program year and consolidated plan submission cycle before submission of the joint AFH or regional AFH.

For the purposes of the AFFH Rule, HUD considers a consortium that acts as a single unit of general local government for the purposes of the HOME program to also be a single program participant for the purposes of completing an AFH. As such, a HOME consortium must submit a single AFH that covers the jurisdictions that make up the consortium. HUD does not consider such a submission to be a "joint" or "regional" submission. As such, HOME consortia are not subject to the requirements to notify HUD of the intent to submit jointly or to complete a separate written agreement. Consolidated Planning regulations require HOME consortium members to be on the same cycle for the 3-5 year consolidated plan (and to submit a single consolidated plan), so the AFH due date would be the same for the entire consortium.

Under 24 CFR 91.10, a jurisdiction may either shorten or lengthen its program year to align its program year with its collaborating partners. To change the beginning date of the following program year, the jurisdiction must notify their HUD field office in writing at least two months before the date the program year would have usually ended if it had not lengthened or at least two months before the end of a proposed shortened program year.

HUD recognizes that for the purpose of submitting a joint or regional AFH, some grantees may need to extend their consolidated plan beyond the normal three to five year time period in order to align their program with the other collaborating participants' consolidated plan cycles. Under 24 CFR 91.20, a jurisdiction may request an extension in writing to the field office of its intent to prepare a joint or regional AFH. The field office, at its discretion, will review and consider an extension of no more than two years for the specific purpose of aligning consolidated plan cycles for a joint or regional AFH. Jurisdictions requiring more than two years to become aligned with their designated AFH lead's program year start date should instead submit a new consolidated plan with a time period that would align the jurisdiction to its collaborating partners. Jurisdictions should

be aware that even when an extension is granted they must still continue to submit an annual action plan and required certifications.

The new rule does provide that if the alignment of a program year is not practicable, then the submission deadline for a joint AFH or regional AFH must be based on the designated lead entity's program year start date for its CPD formula grant programs. Within twelve months after the date of AFH acceptance, each collaborating program participant that has a program year start date earlier than the designated lead entity must make appropriate amendments to its consolidated plan to incorporate strategies and proposed actions consistent with the fair housing goals, issues, and other elements identified in the joint AFH or regional AFH.

24 CFR 91.100 and 24 CFR 91.110 - Consultation

The AFFH Final Rule revised the consultation process at 24 CFR 91.100(a)(1) and (5) and (c) and paragraph 91.100(e) was added to reflect the following additional consultation requirements for local governments. For states, the equivalent provision at 24 CFR 91.110(a) was also revised. Details of these additions and revisions are discussed in this section.

Under § 91.100(a)(1), a jurisdiction shall consult with other public and private agencies that provide assisted housing, health services, and social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. A jurisdiction shall also consult with community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws when preparing both the AFH and the consolidated plan. The jurisdiction's consultation process, under § 91.100(a)(5), should include consultation with regional government agencies in addition to adjacent units of general local government and local government agencies. This includes local government agencies with metropolitan-wide planning and transportation responsibilities, particularly for problems and solutions that go beyond a single jurisdiction.

States, under § 91.110(a), must comply with the same requirements as local governments with the addition of also consulting with state-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws during preparation of the AFH and consolidated plan.

Public housing agencies (PHAs):

Under § 91.100(c)(1), the jurisdiction shall consult with public housing authorities (PHAs) operating in the jurisdiction. This consultation will continue to consider public housing needs, planned programs and activities under the consolidated plan. It will also now require consultation with PHAs operating in the jurisdiction on the AFH, on strategies for affirmatively furthering fair housing, and on proposed actions to affirmatively further fair housing in the consolidated plan. The intent is that this consultation will help provide a better basis for the certification by the authorized officials that the PHA Plan is consistent with the consolidated plan and the local government's description of its strategy for affirmatively furthering fair housing. The consultation process continues to require the jurisdiction to address the needs of public housing and, where necessary, the manner in which it will provide financial or other assistance to a troubled PHA to improve the

PHA's operations and remove the designation of troubled. The regulation, under § 91.100(c)(1), requires the jurisdiction to now obtain PHA input on addressing fair housing issues in the public housing and Housing Choice Voucher programs.

States must comply with the same requirements as local governments. Section 91.110(a)(1) is revised to address state-specific consultation requirements with respect to public housing or Housing Choice Voucher programs. The state shall consult with any housing agency administering public housing or the section 8 program on a statewide basis as well as all PHAs that certify consistency with the state's consolidated plan. A state's consultation with these entities may consider public housing needs, planned programs and activities, the AFH, strategies for affirmatively furthering fair housing, and proposed actions to affirmatively further fair housing. The state's consultation also helps ensure that activities with regard to affirmatively furthering fair housing, local drug elimination, neighborhood improvement programs, and resident programs and services, funded under a PHA's program are fully coordinated with those funded under a program covered by the consolidated plan to achieve comprehensive community development goals and affirmatively further fair housing.

Under § 91.100(c)(2) for local governments and § 91.110(a)(1) for states, the consultation process should work to ensure that activities with regard to affirmatively furthering fair housing are fully coordinated to achieve comprehensive community development goals and affirmatively further fair housing. If a PHA is required to implement remedies under a Voluntary Compliance Agreement, the grantee should now work with or consult with the PHAs, as appropriate, to identify actions the grantee may take, if any, to assist the PHA in implementing the required remedies.

Affirmatively Furthering Fair Housing:

Section 91.100(e)(1)-(3) for local governments and § 91.110(a)(2) for states are new additions to Part 91 and specifically address the consultation process with regard to affirmatively furthering fair housing organizations. The local jurisdiction shall consult with community-based and regionally-based organizations, and the state shall consult with state-based and regionally-based organizations. These organizations should represent protected class members, and organizations that enforce fair housing laws, such as state or local fair housing enforcement agencies, including participants in the:

- Fair Housing Assistance Program (FHAP);
- Fair housing organizations;
- Nonprofit organizations that receive funding under the Fair Housing Initiative Program (FHIP); and
- Other public and private fair housing service agencies, to the extent that such entities operate within the grantee's area.

This consultation will help provide a better basis for the grantee's AFH, its certification to affirmatively further fair housing, and other portions of the consolidated plan concerning affirmatively furthering fair housing.

- For local jurisdictions, this consultation must occur with any organizations that have relevant knowledge or data to inform the AFH.
- For states, this consultation should occur with organizations that have the capacity to engage with data informing the AFH.

The organizations involved in the consultations should be sufficiently independent and representative to provide meaningful feedback to a jurisdiction on the AFH, the consolidated plan, and their implementation. At a minimum, the grantee will consult with the above referenced organizations in the development of both the AFH and the consolidated plan. Consultation on the consolidated plan shall specifically seek input into how the goals identified in an accepted AFH inform the priorities and objectives of the consolidated plan.

24 CFR 91.105 and 91.115 - Citizen Participation Plan

The AFFH Rule has revised the citizen participation process at 24 CFR 91.105(a)(1) and (a)(2)(i) through (iii). Paragraph 91.105(a)(4) is added and paragraphs § 91.105(b), (c), (e)(1), (f) through (j) and (l) are revised to reflect additional citizen participation plan requirements for local governments. For states, 24 CFR 91.115 is revised at § 91.115(a)(1) and (2). Paragraph § 91.115(a)(4) is added and paragraphs § 91.115(b), (c), (f), (g), and (h) are revised to reflect additional citizen participation plan requirements. In addition to these new provisions, the regulation now replaces “citizens” with “residents” at § 91.105(b), development of the AFH and the consolidated plan. Details of these additions and revisions are discussed in this section.

Encouragement of citizen participation:

In addition to existing citizen participation plan requirements, under § 91.105(a)(2)(i) through (iii) for local governments and § 91.115(a)(2)(i) through (iii) for states, the plan must also encourage citizens to participate in the development of the AFH and any revisions to the AFH in the same manner one would encourage citizen participation in the consolidated plan, any substantial amendments to the plan and the performance report. This process shall include persons living in areas designated by the local jurisdiction as a revitalization area, areas designated by either a local jurisdiction or a state as a slum and blighted area and areas where CDBG funds are proposed to be used.

The citizen participation plan shall encourage the participation of local and regional institutions for jurisdictions and statewide and regional institutions for states. The plan shall also encourage the participation of Continuums of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations, in the process of developing and implementing the AFH and the consolidated plan.

States, under § 91.115(a)(2)(iii), should explore alternative public involvement techniques, such as focus groups and use of the internet. These techniques should encourage a shared vision of change for the community and the review of program performance.

For local jurisdictions, the citizen participation plan, under § 91.105(a)(2)(iii), shall also encourage, in conjunction with public housing agency consultations, participation of residents of

public and assisted housing developments, including any resident advisory boards, resident councils, and resident management corporations, in the process of developing and implementing the AFH and the consolidated plan, along with other low-income residents of targeted revitalization areas in which the developments are located. The jurisdictions shall make an effort to provide information to the PHA about the AFH, AFFH strategy, and consolidated plan activities related to the jurisdiction's developments and surrounding communities so that the PHA can make this information available at the annual public hearing(s) required for the PHA Plan.

Assistance provided to non-English speaking residents of the community, previously addressed under § 91.105(e), is now located at § 91.105(a)(4) for local governments and § 91.115(a)(4) for states. The citizen participation plan shall describe the grantee's procedures for assessing its language needs and identify any need for translation of notices and other vital documents. At a minimum, the citizen participation plan shall require that the grantee take reasonable steps to provide language assistance to ensure meaningful access to participation by non-English-speaking and limited English proficiency residents of the community.

Development of the AFH and the consolidated plan:

Under § 91.105(b) for local governments and § 91.115(b) for states, the citizen participation plan must include the following minimum requirements for the development of both the AFH and the consolidated plan.

- The citizen participation plan must require that the grantee make available to the public, residents, public agencies, and other interested parties any HUD-provided data and other supplemental information the grantee plans to incorporate into its AFH at the start of the public participation process (or as soon as feasible after).
- The grantee may make the HUD-provided data available to the public by cross-referencing to the data on HUD's website.
- The citizen participation plan must require the grantee to publish the proposed AFH and the proposed consolidated plan in a manner that affords its residents, units of general local government, public agencies, and other interested parties a reasonable opportunity to examine its content and to submit comments.
- The citizen participation plan must set forth how the grantee will make public the proposed AFH and the proposed consolidated plan and give reasonable opportunity to examine each document's content.
- The requirement for publishing may be met by publishing a summary of each document in one or more newspapers of general circulation, and by making copies of each document available on the Internet, on the grantee's official government web site, as well as at libraries, government offices, and public places.
- The summary must describe the content and purpose of the AFH or the consolidated plan, as applicable, and must include a list of locations where copies of the entire proposed document may be examined.
- In addition, a reasonable number of free copies of the plan or the AFH, as applicable, must be provided to residents and groups that request a copy of the plan or the AFH.
- The citizen participation plan must provide for at least one public hearing during both the development of the AFH and development of the consolidated plan and must provide a

period, not less than 30 calendar days, to receive comments from residents of the community on the consolidated plan or the AFH. The required public hearing must occur before the proposed consolidated plan is published for comment.

- The citizen participation plan shall require the grantee to consider the comments or views of residents, whether received in writing or orally at the public hearings, in preparing in the final AFH or the final consolidated plan. A summary of any comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the final AFH or the final consolidated plan.

States must comply with the same requirements as local governments; new language at § 91.115(b)(2) also addresses the need for states to ensure that the AFH, the consolidated plan and the PHA plan are informed by meaningful community participation by employing communications means designed to reach the broadest audience.

Consolidated plan amendments and AFH revisions:

Under § 91.105(c)(1) for jurisdictions and § 91.115(c)(1) for states, the criteria for amendments to the consolidated plan remain the same; the rule adds a section on criteria for revisions to the AFH. Grantees must specify the criteria they will use for determining when revisions to the AFH will be required. At a minimum, the specified criteria must address the situations described in 24 CFR 5.164, which include a material change in circumstances in the jurisdiction that affects the information on which the AFH is based, to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances. Under § 91.105(c)(2) and § 91.115(c)(2), the citizen participation plan must provide community residents (and units of general local government for states) with reasonable notice and an opportunity to comment on substantial amendments to the consolidated plan and revisions to the AFH. The citizen participation plan must state how reasonable notice will be provided and the opportunity to comment will be given. The period of notification remains the same, not less than 30 calendar days, and now covers any revision to the AFH before the revised AFH is submitted to HUD for review. The grantee must still consider any comments or views of residents (and units of general local government for states) received in writing or orally at public hearings in regard to a substantial amendment to the consolidated plan or significant revision to the AFH, as applicable. A summary of these comments or views and a summary of any comments or views not accepted and the reasons why, shall be attached to the substantial amendment to the consolidated plan or the revision to the AFH.

Public hearings:

In addition to obtaining residents' views through the required public hearing addressing housing and community development needs, development of proposed activities, and review of program performance, § 91.105(e) for local governments and § 91.115(b)(3) for states, require that the grantee must also address the proposed strategies and actions for affirmatively furthering fair housing consistent with the AFH. At least one of the public hearings must be held before the proposed consolidated plan is published for comment. Under § 91.105(1)(iii) for local governments and § 91.115(b)(3) for states, the citizen participation plan must provide that at least one public hearing is held before the proposed AFH is published for comment, in order to obtain the views of

the community on AFH-related data and affirmatively furthering fair housing in the grantee's housing and community development programs.

Meetings:

Under § 91.105(f) for jurisdictions and § 91.115(b)(3)(ii) for states, the citizen participation plan must provide residents of the community with reasonable and timely access to local meetings, consistent with accessibility and reasonable accommodation requirements, in accordance with section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR part 8 as well as the Americans with Disabilities Act and implementing regulations at 28 CFR part 35 and 36, as applicable.

Availability to the public:

Under § 91.105(g) for local governments and § 91.115(f) for states, the citizen participation plan must state how documents will be available to the public. In addition to the consolidated plan and any substantial amendments thereto, the HUD-accepted AFH and any subsequent revisions must be made available to the public. This includes making materials available in a form accessible to persons with disabilities or limited English proficiency upon request.

Access to records:

Under § 91.105(h) for local governments and § 91.115(g) for states, the citizen participation plan must state how the grantee will provide residents of the community, public agencies, and other interested parties with reasonable and timely access to information and records relating to the grantee's AFH, consolidated plan, and use of assistance under the programs covered by this part during the preceding 5 years.

Technical Assistance:

Under § 91.105(i), the citizen participation plan for local governments must provide for technical assistance to groups representative of persons of low-and-moderate income that request such assistance to comment on the AFH, or in developing proposals for funding assistance under any of the programs covered by the consolidated plan, with the level and type of assistance determined by the jurisdiction. The assistance need not include the provision of funds to the groups.

Complaints:

Under § 91.105(j) for local governments and § 91.115(h) for states, the citizen participation plan shall describe the grantee's appropriate and practicable procedures to handle complaints from its residents related to the consolidated plan, consolidated plan amendments, the AFH, any revisions to the AFH, and the performance report. At a minimum, the citizen participation plan shall require that the grantee must provide a timely, substantive written response to every written resident complaint, within an established period of time (normally within 15 working days, where practicable).

Jurisdiction responsibility:

The new AFFH rule adds an AFH reference at § 91.105(l) to ensure that citizen participation requirements do not restrict the responsibility or authority of the local governments for the development and execution of its consolidated plan or AFH.

The revised standards for local government and state citizen participation plans are applicable to formula grant programs administered by the Office of Community Planning and Development (CPD). It is important that both local governments and states incorporate the new provisions described in this memorandum into their consultation and citizen participation process in order to remain in compliance with regulatory requirements.

Grantees with questions concerning this Notice should direct their inquiries to their local HUD Field Office Community Planning and Development Division. Field Offices should direct their questions to the Office of Block Grant Assistance at (202) 708-1577 for the Entitlement CDBG program or (202) 708-1322 for the State CDBG program.